Inspection Report	
Inspection ID/Docket number	5812
Inspector Name & Submit Date	Scott Rukke, 10/2/2014
Chief Eng Name & Review Date	Joe Subsits. 10/7/2014

Operator Information			
Name of Operator:	Avista Utilities	**OP ID #:**	31232
Name of Unit(s):	Headquarters		
Records Location:	Spokane, WA		
Date(s) of Last (unit) Inspection:	N/A	**Inspection Date(s):**	September 17 - 18, 2014

Inspection Summary:

Avista has no transmission facilities with HCA's in WA State. They are not required to have an IM program. They are required to do some additional measures per 192.935. We reviewed these requirements.

This Integrity Management inspection consisted of a records review and a field inspection component. Avista has only one pipeline that it categorizes as transmission. They use only 20% SMYS as the criteria. The Kettle Falls Transmission line consists primarily of 60.505 miles of 8-inch, 0.188 w.t., X-42, 12.09 miles of 6-inch, 0.156 w.t., and 0.135 miles of 4-inch. Approximately 2 miles are located within a class 3 location.

There are no HCA's on this transmission line. Avista has a policy of eliminating HCA's through the replacement of pipe within an HCA with heavier wall and lowering the percentage of SMYS to below 20%. Basically a search and destroy method. We have expressed concern in the past with this method as it doesn't consider the other definitions of transmission within the CFR. It is our belief that although a small segment may be replaced with heavier wall pipe the line is still transmission due to its purpose and the SMYS of the remaining pipe. See previous inspection notes under Docket PG-060260 as an area of concern.

There was one violation noted on this inspection. It was not directly related to their IM plan but to a repair made to a transmission facility outside an HCA. The elevated frequency of leak surveys required under 192.935 found a leak on a seam on their Kettle Falls transmission line in a class 3 location that required a replacement of a 98' segment of line. The line was not constructed to accommodate an internal inspection device. A violation was written for 192.150(a).

No other issues were noted.

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Co. Official: **Phone No.:** **Fax No.:** **Emergency Phone No.:**	Don Kopczynski, VP Energy delivery 509-495-4877	**Phone No.:** **Fax No.:** **Emergency Phone No.:**	

Persons Interviewed	Title	Phone No.
Randy Bareither	Pipeline Safety Engineer	509-495-8716
Linda Burger	Gas Integrity Mgmt Specialist	509-495-4423
Jody Morehouse	Mgr Pipeline Integrity & Compliance	509-495-2760
Dylan Karaus	Integrity Mgmt Analyst	509-495-4668

Assessment and Repair - Confirmatory Direct Assessment

4. CDA Plan (detail) *Is an adequate Confirmatory Direct Assessment Plan in place?* (AR.CDA.CDAPLAN.P) (detail)

192.931 (192.931(a); 192.931(b); 192.931(c); 192.931(d))	Sat+	Sat	Concern	Unsat	NA X	NC
Notes Avista does not use CDA						

5. External Corrosion Plan (detail) *From the review of the results of selected integrity assessments, was the external corrosion plan properly implemented?* (AR.CDA.CDAEXTCORR.R) (detail)

192.931(b)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes Avista does not use CDA						

6. Internal Corrosion Plan (detail) *From the review of the results of selected integrity assessments, was the internal corrosion plan properly implemented?* (AR.CDA.CDAINTCORR.R) (detail)

192.931(c)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes: Avista does not use CDA						

7. Remediation of Indications (detail) *From the review of the results of selected integrity assessments, was the need to accelerate the next assessment evaluated?* (AR.CDA.CDAINDICATION.R) (detail)

192.931(d)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes: Avista does not use CDA						

Assessment and Repair - External Corrosion Direct Assessment (ECDA)

3. ECDA Plan (detail) *Is an adequate ECDA plan and process in place for conducting ECDA?* (AR.EC.ECDAPLAN.P) (detail)

192.925(a) (192.925(b))	Sat+	Sat X	Concern	Unsat	NA	NC
Notes: **Section 4.4.1**						

4. ECDA Pre-Assessment (detail) *From the review of the results of selected integrity assessments, does the ECDA pre-assessment process comply with NACE SP0502-2008 Section 3 and §192.925(b)(1)? (AR.EC.ECDAPREASSESS.R) (detail)*

192.925(b)(1) (NACE SP-0502-2008, Section 3.2)	Sat+	Sat X	Concern	Unsat	NA	NC
Notes: **Section 4.4.1**						

5. Integration of ECDA Results with other Information (detail) *Is the process for integrating ECDA results with other information adequate? (AR.EC.ECDAINTEGRATION.P) (detail)*

192.917(b) (B31.8S Section 4.5)	Sat+	Sat X	Concern	Unsat	NA	NC
Notes: **Section 4.4.1**						

6. Integration of ECDA Results with other Information (detail) *From a review of records, did the operator integrate other data/information when evaluating data/results? (AR.EC.ECDAINTEGRATION.R) (detail)*

192.917(b) (B31.8S Section 4.5)	Sat+	Sat X	Concern	Unsat	NA	NC
Notes: **Section 4.4.1**						

7. ECDA Region Identification (detail) *From the review of the results of selected integrity assessments, did the operator identify ECDA Regions? (AR.EC.ECDAREGION.R) (detail)*

192.925(b)(1) (NACE SP 0502 2008)	Sat+	Sat X	Concern	Unsat	NA	NC
Notes: **Section 4.4.1**						

8. ECDA Indirect Examination (detail) *From the review of the results of selected integrity assessments, does the ECDA indirect inspection process comply with NACE SP0502-2008 Section 4 and ASME B31.8S-2004, Section 6.4? (AR.EC.ECDAINDIRECT.R) (detail)*

192.925(b)(2) (NACE SP0502-2008, Section 4)	Sat+	Sat X	Concern	Unsat	NA	NC
Notes **Section 4.4.1**						

9. ECDA Direct Examination (detail) *From the review of the results of selected integrity assessments, were excavations and data collection performed in accordance with NACE SP0502-2008, Sections 5 and 6.4.2 and ASME B31.8S, Section 6.4? (AR.EC.ECDADIRECT.R) (detail)*

192.925(b)(3) (NACE SP-0502-2008 Sections 5 and 6.4.2)	Sat+	Sat X	Concern	Unsat	NA	NC
Notes **Section 4.4.1**						

10. Quality of ECDA Data Analysis (detail) *From the review of the results of integrity assessments, was analysis of the ECDA data and other information adequate to identify external corrosion threats to the pipeline? (AR.EC.ECDAANALYSIS.R) (detail)*

	Sat+	Sat X	Concern	Unsat	NA	NC
192.925(b)(4) (192.933(b); B31.8S Section 6.4)						

Notes
Section 4.4.1

12. ECDA Post-Assessment (detail) *From the review of the results of selected integrity assessments, were requirements met for post assessment? (AR.EC.ECDAPOSTASSESS.R) (detail)*

	Sat+	Sat X	Concern	Unsat	NA	NC
192.925(b)(4) (NACE SP-0502-2002 Section 6.2)						

Notes
Section 4.4.1

Assessment and Repair - Internal Corrosion Direct Assessment

3. ICDA Plan (detail) *Is an adequate ICDA plan and process in place for conducting ICDA? (AR.IC.ICDAPLAN.P) (detail)*

	Sat+	Sat	Concern	Unsat	NA X	NC
192.927(c) (192.927(a); 192.927(b); ASME B31.8S, Section 6.4 and Appendix B2)						

Notes:
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

4. Pre-Assessment (detail) *From the review of the results of selected integrity assessments, were the requirements met for an ICDA pre-assessment? (AR.IC.ICDAPREASSESS.R) (detail)*

	Sat+	Sat	Concern	Unsat	NA X	NC
192.927(c)(1) (B31.8S Appendix A2)						

Notes:
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

5. Integration of ICDA Results with other Information (detail) *Is the process for integrating ICDA results with other information adequate? (AR.IC.ICDAINTEGRATION.P) (detail)*

	Sat+	Sat	Concern	Unsat	NA X	NC
192.917(b) (B31.8S Section 4.5)						

Notes:
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

6. Integration of ICDA Results with Other Information (detail) *From a review of records, were other data/information integrated when evaluating data/results? (AR.IC.ICDAINTEGRATION.R) (detail)*

	Sat+	Sat	Concern	Unsat	NA X	NC
192.917(b) (B31.8S Section 4.5)						

Notes:
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

7. ICDA Region Identification (detail) *From the review of the results of selected integrity assessments, were ICDA Regions adequately identified?* (AR.IC.ICDAREGION.R) (detail)

192.927(c)(2) (192.927(c)(5))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:.
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

8. Identification of Locations for Excavation and Direct Examination (detail) *From the review of the results of selected integrity assessments, were sites identified where internal corrosion may be present?* (AR.IC.ICDADIRECT.R) (detail)

192.927(c)(3) (192.927(c)(5))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

10. Post-Assessment Evaluation and Monitoring (detail) *From the review of the results of selected integrity assessments, did the operator assess the effectiveness of the ICDA process?* (AR.IC.ICDAPOSTASSESS.R) (detail)

192.927(c)(4)(i) (192.927(c)(4)(ii))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

11. Quality of ICDA Data Analysis (detail) *From the review of the results of integrity assessments, was analysis of the ICDA data and other information adequate to identify internal corrosion threats to the pipeline?* (AR.IC.ICDAANALYSIS.R) (detail)

192.927 (192.933(b); B31.8S Section 6.4, Appendix A2 and Appendix B2)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No ICDA data collected to date. ICDA is considered as a mitigation option in the Internal Corrosion Algorithm within the Inspection History Multiplication Factor.

Assessment and Repair - Repair Criteria

1. Definition of Discovery (detail) *Does the integrity assessment process properly define discovery and the required time frame?* (AR.RC.DISCOVERY.P) (detail)

192.933(b)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Section 6.2

2. Inclusion of All IM Repair Criteria (detail) *Do the operator's Integrity Management Plan and/or maintenance processes include all of the §192.933 repair criteria?* (AR.RC.IMPRC.P) (detail)

192.911(e) (192.933(c); 192.933(d))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
Section 6.2

3. Categorization of Defects (detail) *From the review of the results of integrity assessments, were all defects properly categorized or discovered?* (AR.RC.DEFECTCAT.R) (detail)

192.933(d) (192.933(b); 192.933(c))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes Section 6.2

4. Pressure Reductions Taken in Response to Remediation of Conditions (detail) *From the review of the results of integrity assessments, was an acceptable pressure reduction promptly taken for each Immediate Repair condition or when a repair schedule could not be met?* (AR.RC.PRESSREDUCE.R) (detail)

192.933(a)	Sat+	Sat X	Concern	Unsat	NA X	NC

Notes: None required Section 6.2

5. Prioritized Schedule (detail) *From the review of the results of integrity assessments, did the operator develop a prioritized schedule?* (AR.RC.SCHEDULE.R) (detail)

192.933(c) (ASME B31.8S, Section 7)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes None required

6. Adequacy of Remediation (detail) *From the review of the results of integrity assessments, is the remediation specified in the prioritized schedule adequate to ensure the integrity of the pipeline until the next scheduled reassessment?* (AR.RC.METHOD.R) (detail)

192.933(a)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes: None required

7. Repair Criteria in Covered Segments (detail) *Does the repair process cover all of the elements for making repairs in covered segments?* (AR.RC.CRITERIA.P) (detail)

192.933(c)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes Section 6.2

8. Timely Remediation (detail) *From the review of the results of integrity assessments, were defects in segments that could affect an HCA remediated or dispositioned (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?* (AR.RC.SCHEDULEIMPL.R) (detail)

192.933(d) (ASME B31.8S Section 7)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes None required. No HCA's

Assessment and Repair - Stress Corrosion Cracking

2. SCCDA Plan (detail) *Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?* (AR.SCC.SCCDAPLAN.P) (detail)

192.929(b) (B31.8S Appendix A3)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes: SCC is not an issue in WA State. Only one of the five criteria for scc is present.

3. Collect and Evaluate Data (detail) *From the review of the results of selected integrity assessments, were data collected and evaluated?* (AR.SCC.SCCDADATA.R) (detail)

192.929(b)(1) (B31.8S Appendix A3.2)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No SCC

4. Assessment Method (High pH SCC) (detail) *From the review of the results of selected integrity assessments, did the operator perform an assessment using one of the methods specified in B31.8S Appendix A3?* (AR.SCC.SCCDAMETHOD.R) (detail)

192.929(b)(2) (B31.8S Appendix A3)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes

5. Assessing for Near Neutral SCC (detail) *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?* (AR.SCC.SCCDANEARNEUTRAL.R) (detail)

192.929(b)(2)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No SCC

6. Reassessment Interval (detail) *From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?* (AR.SCC.SCCDAREASSESSINTRVL.R) (detail)

192.939(a)(3)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
None required

Integrity Management - Baseline Assessments

1. IM Baseline Assessments - Methods (detail) *Does the process include requirements for specifying an assessment method(s) for each covered segment that is best suited for identifying anomalies associated with specific threats identified for the segment?* (IM.BA.BAMETHODS.P) (detail)

192.919(b) (192.921(a); 192.921(c); 192.921(h))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

2. IM Baseline Assessments - Methods (detail) *Was an assessment method(s) specified for each covered segment that is best suited for identifying anomalies associated with specific threats identified for the segment?* (IM.BA.BAMETHODS.R) (detail)

192.919(b) (192.921(a); 192.921(c); 192.921(h))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

3. IM Baseline Assessments - Prioritized Schedule (detail) *Does the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?* (IM.BA.BASCHEDULE.P) (detail)

192.917(c), (192.919(c); 192.921(b))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

4. IM Baseline Assessments - Prioritized Schedule (detail) *Does the BAP contain a schedule for completing the assessment activities for all covered segments that appropriately considered the applicable risk factors in the prioritization of the schedule as required by the process?* (IM.BA.BASCHEDULE.R) (detail)

192.917(c) (192.919(c); 192.921)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

5. IM Baseline Assessments - Prior Assessments (detail) *Does the process require that prior assessment methods meet the requirements of §192.921(a) and associated remedial actions to have been carried out to address conditions listed in §192.933?* (IM.BA.BAPRIOR.P) (detail)

192.921(e)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

6. IM Baseline Assessments - Prior Assessments (detail) *From a review of selected records, have prior assessment methods met the requirements of §192.921(a) and associated remedial actions to have been carried out to address conditions listed in §192.933?* (IM.BA.BAPRIOR.R) (detail)

192.921(e)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

7. IM Baseline Assessments - New HCAs/Newly Installed Pipe (detail) *Does the process include requirements for updating the baseline assessment plan for new HCAs and newly installed pipe?* (IM.BA.BANEW.P) (detail)

192.905(c) (192.921(f); 192.921(g))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No covered segments

8. IM Baseline Assessments - New HCAs/Newly Installed Pipe (detail) *Has the BAP been adequately updated for new HCAs and newly installed pipe?* (IM.BA.BANEW.R) (detail)

192.905(c), (192.921(f); 192.921(g))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes: No newly installed pipe

9. IM Baseline Assessments - Environmental & Safety Risks (detail) *Does the process include requirements for conducting integrity assessments (baseline and reassessment) in a manner that minimizes environmental and safety risks?* (IM.BA.BAENVIRON.P) (detail)

192.911(m) (192.911(o); 192.919(e); ASME B31.8S-2004, Section 11)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

10. IM Baseline Assessments - Environmental & Safety Risks (detail) *From a review of selected records, have integrity assessments (baseline and reassessment) been conducted in a manner that minimizes environmental and safety risks?* (IM.BA.BAENVIRON.R) (detail)

192.911(m) (192.11(o); 192.919(e); ASME B31.8S-2004, Section 11)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

Integrity Management - Continual Evaluation and Assessment

1. Periodic Evaluations (detail) *Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?* (IM.CA.PERIODICEVAL.P) (detail)

192.937(b) (192.917(a); 192.917(b); 192.917(c); 192.917(d); 192.917(e))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

2. Periodic Evaluations (detail) *Have periodic evaluations of pipeline integrity been performed based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?* (IM.CA.PERIODICEVAL.R) (detail)

192.937(b) (192.917(a); 192.917(b); 192.917(c); 192.917(d); 192.917(e))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

3. IM Continual Assessments - Methods (detail) *Is the approach for establishing reassessment method(s) consistent with the requirements in §192.937(c)?* (IM.CA.REASSESSMETHOD.P) (detail)

192.937(c) (192.931)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No covered segments

4. IM Continual Assessments - Methods (detail) *Has the approach for establishing the reassessment method been performed in a manner consistent with the requirements in §192.937(c) and as required?* (IM.CA.REASSESSMETHOD.R) (detail)

192.937(c) (192.931)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

5. Low Stress Reassessments (detail) *Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating at below 30% SMYS.* (IM.CA.LOWSTRESSREASSESS.P) (detail)

192.941(a) (192.941(b); 192.941(c))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No covered segments

6. Low Stress Reassessments (detail) *Is the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion adequate and being performed as required?* (IM.CA.LOWSTRESSREASSESS.R) (detail)

192.941(a) (192.941(b); 192.941(c))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes: Not used.

7. Reassessment Intervals (detail) *Is the process for establishing the reassessment intervals consistent with §192.939 and ASME B31.8S-2004?* (IM.CA.REASSESSINTERVAL.P) (detail)

192.937(a) (192.939(a); 192.939(b); 192.913(c); ASME B31.8S-2004, Section 5, Table 3)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No covered segments

8. Reassessment Intervals (detail) *Have reassessment intervals been established in a manner consistent with §192.939 and ASME B31.8S-2004 as required?* (IM.CA.REASSESSINTERVAL.R) (detail)

192.937(a) (192.939(a); 192.939(b); 192.913(c); ASME B31.8S-2004, Section 5, Table 3)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No covered segments

9. Waiver from Reassessment Interval in Limited Situations (detail) *Does the process include requirements for reassessment interval waivers?* (IM.CA.REASSESSWAIVER.P) (detail)

192.943(a) (192.943(b))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
Not required.

10. Waiver from Reassessment Interval in Limited Situations (detail) *Have reassessment interval waivers been adequately implemented, if applicable?* (IM.CA.REASSESSWAIVER.R) (detail)

192.943(a) (192.943(b))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
Not required.

11. Deviation from Reassessment Requirements based on Exceptional Performance (detail)
Does the process include requirements for deviations from reassessment requirements based on exceptional performance? (IM.CA.REASSESSEXCPERF.P) (detail)

192.913(a) (192.913(b); 192.913(c); ASME B31.8S-2004)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No deviation.

12. Deviation from Reassessment Requirements based on Exceptional Performance (detail)
Have deviations from reassessment requirements based on exceptional performance been adequately handled, if applicable? (IM.CA.REASSESSEXCPERF.R) (detail)

192.913(a) (192.913(b); 192.913(c); ASME B31.8S-2004)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
No deviation

Integrity Management - High Consequence Areas

1. IM High Consequence Areas - HCA Identification (detail) *Does the process include the methods defined in §192.903 High Consequence Area (1) and/or §192.903 High Consequence Area (2) to be applied to each pipeline for the identification of high consequence areas?* (IM.HC.HCAID.P) (detail)

192.905(a)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
Section 2.0

2. IM High Consequence Areas - HCA Identification (detail) *Was the identification of pipeline segments in high consequence areas completed by December 17, 2004 in accordance with process requirements?* (IM.HC.HCAID.R) (detail)

192.905(a) (192.907(a); 192.911(a))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Section 2.0

3. IM High Consequence Areas - Potential Impact Radius (detail) *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of §192.903?* (IM.HC.HCAPIR.P) (detail)

192.903 (192.905(a))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Section 2.0

4. IM High Consequence Areas - Potential Impact Radius (detail) *Do records indicate use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of §192.903?* (IM.HC.HCAPIR.R) (detail)

192.903 (192.905(a))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Section 2.0

5. IM High Consequence Areas - Identified Sites (detail) *Does the process for identification of identified sites include the sources listed in §192.905(b) for those buildings or outside areas meeting the criteria specified by §192.903 and require the source(s) of information selected to be documented?* (IM.HC.HCASITES.P) (detail)

192.903 (192.905(b))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Section 2.0

6. IM High Consequence Areas - Identified Sites (detail) *Do records indicate identification of identified sites being performed as required?* (IM.HC.HCASITES.R) (detail)

192.903 (192.905(b))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Section 2.0

7. IM High Consequence Areas - Identification Method 1 (Class Locations) (detail) *Is the integrity management process adequate for application of §192.903 High Consequence Area definition (1) for identification of HCAs?* (IM.HC.HCAMETHOD1.P) (detail)

192.903(1)(i) (192.903(1)(ii); 192.903(1)(iii); 192.903(1)(iv))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
Not used

8. IM High Consequence Areas - Identification Method 1 (Class Locations) (detail) *Do records indicate adequate application of the §192.903 High Consequence Area definition (1) for the identification of HCAs?* (IM.HC.HCAMETHOD1.R) (detail)

192.903 (1)(i) (192.903(1)(ii); 192.903(1)(iii); 192.903(1)(iv))	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
Not used

9. IM High Consequence Areas - Identification Method 2 (Potential Impact Radius) (detail) *Is the integrity management process adequate for application of §192.903 High Consequence Area definition (2) for identification of HCAs? (IM.HC.HCAMETHOD2.P) (detail)*

192.903(2)(i) (192.903(2)(ii))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
Section 2.0

10. IM High Consequence Areas - Identification Method 2 (Potential Impact Radius) (detail) *Do records indicate adequate application of §192.903 High Consequence Area definition (2) for identification of HCAs? (IM.HC.HCAMETHOD2.R) (detail)*

192.903(2)(i) (192.903(2)(ii))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
Section 2

11. IM High Consequence Areas - Newly Identified HCAs (detail) *Does the process include a requirement for evaluation of new information that may show that a pipeline segment impacts a high consequence area? (IM.HC.HCANEW.P) (detail)*

192.905(c)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
None identified

12. IM High Consequence Areas - Newly Identified HCAs (detail) *Are evaluations of new information that may show that a pipeline segment impacts a high consequence area being performed as required? (IM.HC.HCANEW.R) (detail)*

192.905(c)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes
None identified

Integrity Management - Preventive and Mitigative Measures

1. P&M Measures - General Requirements (detail) *Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area? (IM.PM.PMMGENERAL.P) (detail)*

192.935(a)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:

2. P&M Measures - General Requirements (detail) *Have additional measures been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA? (IM.PM.PMMGENERAL.R) (detail)*

192.935(a)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:

3. P&M Measures - Third Party Damage (detail) *Does the preventive and mitigative process include requirements that threats due to third party damage be addressed? (Note: A subset of these enhancements are required for pipelines operating below 30% SMYS - See IM.PM.PMMTPDSMYS.P)* (IM.PM.PMMTPD.P) (detail)

192.917(e)(1) (192.935(b)(1); 192.935(e))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:

4. P&M Measures - Third Party Damage (detail) *Has P&MM been implemented regarding threats due to third party damage as required by the process?* (IM.PM.PMMTPD.R) (detail)

192.917(e)(1) (192.935(b)(1); 192.935(e))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:

5. P&M Measures - Third Party Damage (Special Cases) (detail) *Does the process include requirements for preventive and mitigative requirements for pipelines operating below 30% SMYS?* (IM.PM.PMMTPDSMYS.P) (detail)

192.935(d) (192.935(e); 192 Table E.II.1)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
100% standby

6. P&M Measures - Third Party Damage (Special Cases) (detail) *Are preventive and mitigative requirements for pipelines operating below 30% SMYS being performed as required?* (IM.PM.PMMTPDSMYS.R) (detail)

192.935(d) (192.935(e); 192 Table E.II.1)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:

7. P&M Measures - Outside Force Damage (detail) *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?* (IM.PM.PMMOF.P) (detail)

192.935(b)(2)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
No known outside force threats. No HCA's

8. P&M Measures - Outside Force Damage (detail) *Are significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) being adequately addressed?* (IM.PM.PMMOF.R) (detail)

192.935(b)(2)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No known outside force threats. No HCA's

9. P&M Measures - Corrosion (detail) *Does the process adequately account for taking required actions to address significant corrosion threats?* (IM.PM.PMMCORR.P) (detail)

192.917(e)(5)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No known significant corrosion threats. No HCA's

10. P&M Measures - Corrosion (detail) *Are required actions being taken to address significant corrosion threats as required?* (IM.PM.PMMCORR.R) (detail)

192.917(e)(5)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
No known significant corrosion threats. No HCA's

11. P&M Measures - Automatic Shut-Off Valves or Remote Control Valves (detail) *Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?* (IM.PM.PMMASORCV.P) (detail)

192.935(c)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
None required. No HCA's

12. P&M Measures - Automatic Shut-Off Valves or Remote Control Valves (detail) *Has an adequate determination been made to determine if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?* (IM.PM.PMMASORCV.R) (detail)

192.935(c)	Sat+	Sat	Concern	Unsat	NA X	NC

Notes:
None required. No HCA's

Integrity Management - Quality Assurance

1. Quality Assurance (detail) *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?* (IM.QA.QARM.P) (detail)

192.911(l)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
In the program but no HCA's

2. Quality Assurance (detail) *Do records indicate the quality assurance processes for risk management applications meet the requirements of ASME B31.8S-2004, Section 12 and are the processes being performed as required?* (IM.QA.QARM.R) (detail)

192.911(l)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
In the program but no HCA's

3. Personnel Qualification and Training Requirements (detail) *Does the process include requirements to assure personnel involved in the integrity management program are qualified for their assigned responsibilities?* (IM.QA.IMPERSONNEL.P) (detail)

192.911(l) (192.915; ASME B31.8S-2004, Section 12(b)(4))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
Personnel were qualified to do the required 2X leak surveys. No HCA's

4. Personnel Qualification and Training Requirements (detail) *Are personnel involved in the integrity management program qualified for their assigned responsibilities?* (IM.QA.IMPERSONNEL.R) (detail)

192.911(l) (192.915(a); 192.915(b); 192.915(c); ASME B31.8S-2004, Section 12(b)(4))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Personnel were qualified to do the required 2X leak surveys. No HCA's

5. Invoking Non-Mandatory Statements in Standards (detail) *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE RP0502-2002) be addressed by an appropriate approach?* (IM.QA.IMNONMANDT.P) (detail)

192.7(a)	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Yes

6. Management of Change (detail) *Are the processes for management of changes to the IMP and management of change of associated procedures and processes adequate?* (IM.QA.IMMOC.P) (detail)

192.909(a) (192.909(b); 192.911(k))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
Yes

7. Management of Change (detail) *Are changes to the IMP and management of changes to IMP-related processes being performed as required?* (IM.QA.IMMOC.R) (detail)

192.909(a) (192.909(b); 192.911(k))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes
Yes

8. Performance Measures (detail) *Does the process include requirements for measuring and reporting integrity management program effectiveness?* (IM.QA.IMPERFMEAS.P) (detail)

192.945(a) (192.913(b); 192.951; ASME B31.8S-2004 Section 12(b)(5))	Sat+	Sat X	Concern	Unsat	NA	NC

Notes:
Yes

9. Performance Measures (detail) *Has the IMP effectiveness been adequately measured and reported, as applicable, to PHMSA?* (IM.QA.IMPERFMEAS.R) (detail)

192.945(a) (192.913(b); 192.951; ASME B31.8S-2004 Section 12(b)(5))	Sat+	Sat X	Concern	Unsat	NA	NC
Notes: No HCA's						

10. Record Keeping (detail) *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?* (IM.QA.RECORDS.P) (detail)

192.947(a) (192.947(b); 192.947(c); 192.947(d); 192.947(e); 192.947(f); 192.947(g); 192.947(h); 192.947(i); 192.911(n); ASME B31.8S-2004 Sections 12.1, 12.2(b)(1))	Sat+	Sat X	Concern	Unsat	NA	NC
Notes Yes						

11. Record Keeping (detail) *Are required records being maintained for the useful life of the pipeline?* (IM.QA.RECORDS.R) (detail)

192.947(a) (192.947(b); 192.947(c); 192.947(d); 192.947(e); 192.947(f); 192.947(g); 192.947(h); 192.947(i); ASME B31.8S-2004 Sections 12.1, 12.2(b)(1))	Sat+	Sat X	Concern	Unsat	NA	NC
Notes: Yes. Repairs after a leak were reviewed.						

Integrity Management - Risk Analysis

1. Threat Identification (detail) *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?* (IM.RA.THREATID.P) (detail)

192.917(a) (192.917(e); 192.913(b)(1); ASME B31.8S-2004, Section 2.2 and Section 5.10)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes: No covered segments						

2. Threat Identification (detail) *Do records indicate that all potential threats to each covered pipeline segment have been identified and evaluated?* (IM.RA.THREATID.R) (detail)

192.917(a) (192.917(e); 192.913(b)(1); ASME B31.8S-2004, Section 2.2 and Section 5.10)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

3. Data Gathering (detail) *Does the process include requirements to gather existing data and information on the entire pipeline that could be relevant to covered segments?* (IM.RA.RADATA.P) (detail)

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

4. Data Gathering (detail) *Is existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered? (IM.RA.RADATA.R) (detail)*

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

5. Data Integration (detail) *Does the process include requirements to integrate existing data and information on the entire pipeline that could be relevant to covered segments? (IM.RA.RAINTEGRATE.P) (detail)*

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

6. Data Integration (detail) *Is existing data and information on the entire pipeline that could be relevant to covered segments being adequately integrated? (IM.RA.RAINTEGRATE.R) (detail)*

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

7. Risk Analysis - Methodology (detail) *Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment? (IM.RA.RAMETHOD.P) (detail)*

192.917(c) (192.917(d); ASME B31.8S-2004, Section 5.3, Section 5.4, Section 5.5, Section 5.12)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

8. Risk Analysis - Determination of Risk (detail) *Does the process include requirements that factors that could affect the likelihood of a release, and factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment? (IM.RA.RAFACTORS.P) (detail)*

192.917(c) (ASME B31.8S-2004, Section 3.1, Section 3.3, Section 5.2, Section 5.3, and Section 5.7)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

9. Risk Analysis - Determination of Risk (detail) *Is risk analysis data combined in an appropriate manner to produce a risk value for each pipeline segment? (IM.RA.RAFACTORS.R) (detail)*

192.917(c) (ASME B31.8S-2004, Section 3.1, Section 3.3, Section 5.2, Section 5.3, and Section 5.7)	Sat+	Sat	Concern	Unsat	NA X	NC
Notes No covered segments						

10. Risk Analysis - Validation and Updates (detail) *Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?* (IM.RA.RAMOC.P) (detail)

192.917(c) (ASME B31.8S-2004, Section 5.4, 5.7, 5.11, 5.12)	Sat+	Sat	Concern	Unsat	NA X	NC
					X	

Notes
No covered segments

11. Risk Analysis - Validation and Updates (detail) *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?* (IM.RA.RAMOC.R) (detail)

192.917(c) (ASME B31.8S-2004, Section 5.4, 5.7, 5.11, 5.12)	Sat+	Sat	Concern	Unsat	NA X	NC
					X	

Notes
No covered segments