

Results and Notes Review

AR.RCHCA: Repair Criteria (HCA)

Question ID, References [AR.RCHCA.DISCOVERY.P](#) , 195.452(f)(4) (195.452(h)(2))

Question Text *Does the integrity assessment process properly define discovery and the required time frame for anomalies in a pipeline segment that can affect an HCA?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)

Notes

Question ID, References [AR.RCHCA.DISCOVERY.R](#) , 195.452(h)(2)

Question Text *From the review of the results of selected ILI and remediation projects, did discovery of all anomalies occur promptly, but no later than 180 days of completion of the assessment?*

Result **Sat**

Assets Covered Unit 31049

Result Notes MFL ILI tool run was completed Aug 19, 2009 by Baker Hughes with the following anomaly dig results:
(2) immediate, (2) 60-day, and (1) 180-day.

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Manual Sec 7.2

Question ID, References [AR.RCHCA.IMPRC.P](#) , 195.452(f)(4) (195.452(h)(4))

Question Text *Does process have criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?*

Result **Sat**

Assets Covered Unit 31049

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Manual Sec. 7.4.2, 7.4.3, 7.4.4, and 7.4.5.

AR.RCOM: Repair Criteria (O and M)

Question ID, References [AR.RCOM.REMEDIATIONOM.O](#) , 195.422(a) (195.422(b); 195.401(b)(1)195.402(a); 195.402(c)(14); 195.569; 195.579(c))

Question Text *Do the performance and documentation of remediation meet procedural requirements for non-IM repairs?*

Result **Sat**

Assets Covered Unit 31049

Result Notes McChord Pipeline procedure were revised (REV-13) 10-20-2014 to be evaluated for SCC pursuant to their IMP manual Section 8.2.

Theexposed pipe will be evaluated circumferentially and longitudinally for theSCC. The operator does not believe SCC is a potentialthreat because it was not identified in the 2004 UT ILI.

Temporary Inspector (none)

Notes

AR.RCHCA: Repair Criteria (HCA)

Question ID, References [AR.RCHCA.IMPRC.R](#) , 195.452(l)(1)(ii) (195.452(f)(4))

Question Text *Do records demonstrate that prompt action is taken to address all anomalous conditions discovered through the integrity assessment or information analysis?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RCHCA.IMPRC.O](#) , 195.452(h)(4)

Question Text *From an observation of a repair, was it remediated in accordance with its categorized repair schedule?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RCHCA.IMREPAIR.P](#) , 195.452(f)(4) (195.452(h)(1))

Question Text *Does the process require that repairs be performed in a manner to ensure the integrity of the pipeline until the next scheduled assessment?*

Result **Sat**

Assets Covered Unit 31049

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Manual Sec 7.6

Question ID, References [AR.RCHCA.PRESSREDUCE.R](#) , 195.452(l)(1)(ii) (95.404(a); 195.404 (b); 195.452(h)(1)(ii); 195.452(h)(4)(i); 195.55(a))

Question Text *From the review of the results of ILI and remediation projects, was an acceptable pressure reduction promptly taken for each Immediate Repair condition or when a repair schedule could not be met?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RCHCA.DEFECTCAT.R](#) , 195.452(l)(1)(ii) (195.452(h)(4))

Question Text *From the review of the results of integrity assessments and remediation projects, were there any defects that were not properly categorized?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RCHCA.PRESSREDUCE.P](#) , 195.452(f)(4) (195.428; 195.452(h)(1)(i); 195.452(h)(1)(ii))

Question Text *Does the process for pressure reduction meet the code requirements?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Sec 7.4.1

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Manual Sec 7.4.1

Question ID, References [AR.RCHCA.IMSCHEDULE.R](#) , 195.452(l)(1)(ii) (195.452.(h)(3))

Question Text *Do records demonstrate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(3)?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RCHCA.SCHEDULEIMPL.R](#) , 195.452(l)(1)(ii) (195.452(h)(4))

Question Text *From the review of the results of selected ILI and remediation projects, were defects in segments that could affect an HCA remediated or dispositioned within the applicable mandatory time limits of 195.452(h)(4)?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

AR.EC: External Corrosion Direct Assessment (ECDA)

Question ID, References [AR.EC.ECDAPLAN.P](#) , 195.588(b)(1) (195.588(b)(2); 195.588(b)(3); 195.588(b)(4); 195.588(b)(5))

Question Text *Has an ECDA plan and processes been prepared for conducting ECDA?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.EC.ECDAPREASSESS.R](#) , 195.589(c) (195.588(b)(2))

Question Text *Do records indicate that the ECDA pre-assessment process complies with NACE SP0502 Section 3 and 195.588?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.EC.ECDAINDIRECT.R](#) , 195.589(c) (195.588(b)(3))

Question Text *Do records indicate that the ECDA indirect examination process complies with NACE SP0502 Section 4 and 195.588?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.EC.ECDAINDIRECT.O](#) , 195.588(c) (195.452(j)(5)(iii))

Question Text *Was the indirect examination performed in accordance with the operator's procedures and 195.588(b)(3)?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.EC.ECDADIRECT.R](#) , 195.589(c) (195.588(b)(4))

Question Text *Do records indicate that excavations and data collection were performed in accordance with NACE SP0502, Sections 5 and 6.4.2?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.EC.ECDADIRECT.O](#) , 195.588(b)(4) (195.452(j)(5)(iii))

Question Text *Was the direct examination performed in accordance with requirements?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.EC.ECDAPOSTASSESS.R](#) , 195.589(c) (195.588(b)(5); 195.452(j)(3); 195.452(j)(4))

Question Text *Do records indicate that requirements were met for post assessment?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.EC.ECDAPLANMOC.R](#) , 195.588(c) (195.588(b)(4)(iii))

Question Text *Do records indicate that the operator established and implemented criteria and internal notification procedures for any changes in the ECDA Plan?*

AR.IL: In-Line Inspection (Smart Pigs)**Question ID, References** [AR.IL.ILIREVIEWQUAL.P](#) , 195.452(f)(8) (195.452(g))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate ILI assessment results and information analysis?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.6.2

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Sec. 6.2

Question ID, References [AR.IL.ILIREVIEWQUAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(8); 195.452(g))

Question Text *Does the process demonstrate that personnel who review and evaluate ILI assessment results and information analysis are qualified?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.IL.ILIIMPLPERQUAL.P](#) , 195.505(b)

Question Text *Does the process identify the qualification requirements for personnel who perform ILI covered tasks?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.6.3

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Sec.6.3

Question ID, References [AR.IL.ILIIMPLPERQUAL.R](#) , 195.505(b)

Question Text *Do records demonstrate that personnel who perform ILI covered tasks are qualified?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)

Notes

Question ID, References [AR.IL.ILISPECS.P](#) , 195.452(f)(4) (195.452(h))

Question Text *Do processes assure complete and adequate vendor ILI specifications?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)

Notes

Question ID, References [AR.IL.METHOD.P](#) , 195.452(f)(5) (195.452(j)(5))

Question Text *Do processes specify the assessment methods that are appropriate for the pipeline specific integrity threats?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.5.3.2

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Sec.5.3.2

Question ID, References [AR.IL.METHOD.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(j)(5))

Question Text *Are the assessment methods shown in the baseline and/or continual assessment plan appropriate for the pipeline specific integrity threats?*

Result **Sat**

Assets Covered Unit 31049

Result Notes In 2009 a MFL tool was used and in 2004 a UT tool was used. Data from 2004 was used to analysis 2009 data.

Temporary Inspector (none)
Notes

Question ID, References [AR.IL.ASSESSCHEDULE.P](#) , 195.452(f)(2) (195.452(c); 195.452(d); 195.452(e))

Question Text *Does the continual assessment plan include a prioritized schedule in accordance with §195.452 (d) that is based on the risk factors required by §195.452(e)?*

Result **Sat**

Assets Covered Unit 31049

Result Notes In 2005 Kiefner & Associates evaluated the longitudinal seam weld and the life of the pipe. (pre-'70 ERW pipe)

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) In 2005 Kiefner & Associates evaluated the longitudinal seam weld and the life of the pipe. (pre-'70 ERW pipe)

Question ID, References [AR.IL.ASSESSCHEDULE.R](#) , 195,452(l)(1)(ii) (195.452(b)(5); 195.452(c); 195.452(d); 195.452(f)(2); 195.452(f)(5))

Question Text *Does a review of records indicate that continual assessments are implemented as specified in the plan?*

Result **Sat**

Assets Covered Unit 31049

Result Notes Five year interval is used at McChord Pipeline.

Temporary Inspector (none)
Notes

Question ID, References [AR.IL.ILIVALIDATE.P](#) , 195.452(f)(4) (195.452(b)(6))

Question Text *Does the process provide for validating ILI results?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Sec.6.5

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Sec.6.5

Question ID, References [AR.IL.ILIVALIDATE.R](#) , 195.452(l)(1)(ii) (195.452(b)(6))

Question Text *Does a review of records for validating ILI assessment results demonstrate that the process was implemented appropriately?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.IL.ILIINTEGRATION.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Is the process for integrating ILI results with other information adequate?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Sec.6.1

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Sec.6.1

Question ID, References [AR.IL.ILIINTEGRATION.R](#) , 195.452(l)(1)(ii) (195.452(g))

Question Text *Did the operator integrate other data/information when evaluating tool data/results in the records reviewed?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)

Notes

Question ID, References [AR.IL.ILIACCEPCRITERIA.P](#) , 195.452(f)(4) (195.452(j)(5)(i))

Question Text *Were survey acceptance criteria defined to ensure a successful ILI tool run?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)

Notes

Question ID, References [AR.IL.ILIACCEPCRITERIA.R](#) , 195.452(l)(1)(ii) (195.452(c)(1)(i)(A))

Question Text *Do records demonstrate that the selected ILI tool run met the defined ILI tool run acceptance criteria?*

Result **Sat**

Assets Covered Unit 31049

Result Notes McChord's records have been revised to include ILI tool acceptance criteria for evaluating vendor's data including physical damage to the sensors, lost sensor channels during data collection, distance

inaccuracy, velocity over runs or under runs, etc.

Temporary Inspector (none)
Notes

Question ID, References [AR.IL.ILIANALYSIS.R](#) , 195.452(l)(1)(ii) (195.452(h)(1); 195.452(g))

Question Text *Do records demonstrate that the ILI data and other information were adequate to identify anomalies requiring remediation?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.IL.ILIDELAY.R](#) , 195.452(l)(1)(ii) (195.452(j)(1))

Question Text *Do records demonstrate that the performance of integrity assessments had been delayed such that a schedule or required timeframes was exceeded?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.IL.ILISTANDARD.P](#) , 195.452(b)(6)

Question Text *Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing ILI integrity assessments?*

Result **Sat**

Assets Covered Unit 31049

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP manual makes reference to API Recommended Practice 1104.

Question ID, References [AR.IL.ILISTANDARD.R](#) , 195.452(l)(1)(ii) (195.452(b)(6))

Question Text *Do records demonstrate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing ILI integrity assessments?*

Result **Sat**

Assets Covered Unit 31049

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Sec. 5.3.3

Question ID, References [AR.IL.IIIMPLEMENT.O](#) , 195.452(b)(5)

Question Text *Have the ILI procedures been followed?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

AR.OT: Other Technology

Question ID, References [AR.OT.OTPLAN.P](#) , 195.452(f)(5) (195.452(c)(1)(i)(D); 195.452(j)(5)(iv); 195.452(h)(4))

Question Text *If "Other Technologies" are used, has a process been developed?*

Result **Sat**

Assets Covered Unit 31049

Result Notes Other technology processes are discussed in company's IMP Manual Section 5.3.3

Temporary Inspector (none)
Notes

Question ID, References [AR.OT.OTPLAN.R](#) , 195.452(l)(1)(ii) (195.452(j)(5)(iv); 195.452(f)(5))

Question Text *From the review of selected integrity assessments results, do records show the assessments were performed in accordance with procedures and vendor recommendations?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.OT.OTPLAN.O](#) , 195.452(j)(5)(iv)

Question Text *Has the process for the use of "Other Technology" been followed?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.OT.OTDEFECTCAT.R](#) , 195.452(l)(1)(ii) (195.452(f)(4); 195.452(h)(2))

Question Text *From the review of the results of selected integrity assessments, were defects identified and categorized within 180 days or other applicable timeframe?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.OT.ASSESSMENTREVIEW.P](#) , 195.452(f)(8) (195.452(j)(5))Question Text *Does the process specify qualification requirements for personnel who review the results of an integrity assessment and information analysis using Other Technology?***Result NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection)

Question ID, References [AR.OT.ASSESSMENTREVIEW.R](#) , 195.452(l)(1)(ii) (195.452(f)(8))Question Text *From the review of the results of selected integrity assessments, were personnel who review the results of an integrity assessment and information analysis using Other Technology qualified?***Result NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

AR.PTI: Integrity Assessment Via Pressure Test**Question ID, References** [AR.PTI.PRESSTESTCORR.P](#) , 195.452(f)(3) (195.452(g)(3))

Question Text *Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.PTI.PRESSTESTCORR.R](#) , 195.589(c) (195.452(f)(3); 195.452(g)(3))

Question Text *From the review of corrosion control records, was the corrosion control program proven to be effective when pressure testing was the integrity assessment method used?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.PTI.PRESSTESTRESULT.R](#) , 195.452(l)(1)(ii) (195.452(f)(2); 195.452(c))

Question Text *From the review of the results of pressure tests, do the test records validate the pressure test?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.PTI.PRESSTESTRESULT.O](#) , 195.452(j)(5)(ii) (195.452(c)(1)(i)(b))

Question Text *Was the pressure test conducted in accordance with procedures?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

AR.RC: Repair Criteria

Question ID, References [AR.RC.INTEGRATION.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the process require the evaluation of all available information about the integrity of the entire pipeline and the consequences of failure when evaluating the integrity of each pipeline segment that can affect an HCA?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RC.INTEGRATION.R](#) , 195.452(l)(1)(ii) (195.452(g))

Question Text *From the review of the results of ILI and remediation projects, were all available information considered about the integrity of the entire pipeline and consequences of failure when evaluating the integrity of each pipeline segment that can affect an HCA?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RC.REMEDIATION.O](#) , 195.452(h) (195.402(a); 195.402(c)(14); 195.422(a); 195.569; 195.589(c))

Question Text *Are anomaly remediation and documentation of remediation adequate?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

AR.RMP: Repair Methods and Practices

Question ID, References [AR.RMP.SAFETY.O](#) , 195.422(a) (195.402(c)(14))

Question Text *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.RMP.METHOD.P](#) , 195.402(c)(3) (195.452(h)(1); 195.585)

Question Text *Does the process identify permissible repair methods for each type of defect?*

Result Sat

Assets Covered Unit 31049

Result Notes IMP Sec.7.6
Cut-out Maintenance Manual Sec E-9
Other Repairs Maintenance Manual G-2

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Sec.7.6
Cut-out Maintenance Manual Sec E-9
Other Repairs Maintenance Manual G-2

Question ID, References [AR.RMP.METHOD.R](#) , 195.404(c)(1) (195.422(a); 195.422(b); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RMP.REPAIRQUAL.R](#) , 195.505(b) (195.507(a); 195.505(c); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [AR.RMP.PIPECONDITION.R](#) , 195.404(c)(1) (195.404(c)(2))

Question Text *From the review of the results of integrity assessment and remediation projects and/or field observation, do repair records document all information needed to understand the conditions of the pipe and its environment and provide the information needed to support the Integrity Management risk model?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)

Notes

Question ID, References [AR.RMP.REPLACESTD.R](#) , 195.422(b)

Question Text *From the review of the results of integrity assessment and remediation projects and/or field observation, were components that were replaced constructed to the same or higher standards as the original component?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.RMP.WELDERQUAL.R](#) , 195.214(a) (195.214(b); 195.222(a); 195.222(b); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [AR.RMP.WELDQUAL.R](#) , 195.226(a) (195.226(b); 195.226(c); 195.230(a); 195.230(b); 195.230(c); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were weld defects repaired in accordance with §195.226 or §195.230?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.RMP.WELDINSPECT.R](#) , 195.228(a) (195.228(b); 195.234(a); 195.234(b); 195.234(c); 195.234(d); 195.234(e); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were welds inspected and examined in accordance with 195.228 or 195.234?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.RMP.CRACKREMIEDIATION.P](#) , 195.452(f)(3) (195.452(g))

Question Text *If cracks, SCC, or crack like features to be a threat on pipeline segments, have criteria been developed for remedial actions to address integrity issues raised by the assessment method?*

Result **Sat**

Assets Covered Unit 31049

Result Notes Maintenance Manual G-2

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) Maintenance Manual G-2

Question ID, References [AR.RMP.CRACKREMEDATION.R](#) , 195.452(l)(1)(ii) (195.452(f)(3))

Question Text *If the IM risk assessment and integrity assessments found cracks, SCC, or crack like features cracking to be a threat on pipeline segments, have remedial actions been taken to address integrity issues when assessment criteria have been exceeded?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [AR.RMP.CRACKNDE.P](#) , 195.452(f)(4)

Question Text *Does the process require that when a pipeline segment that meets the conditions for cracks, SCC, or crack like features is exposed an NDE method must be employed to evaluate for cracking?*

Result Sat

Assets Covered Unit 31049

Result Notes Maintenance Manual G-2
IMP Manual Sec. 7.6

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) Maintenance Manual G-2
IMP Manual Sec. 7.6

Question ID, References [AR.RMP.CRACKNDE.R](#) , 195.452(l)(1)(ii) (195.452(f)(4); 195.404(c))

Question Text *Do records indicate that when a pipeline segment that meets the conditions for cracks, SCC, or crack like features were exposed an NDE method was employed to evaluate for cracking?*

Result **Sat**

Assets Covered Unit 31049

Result Notes McChord Pipeline procedure were revised (REV-13) 10-20-2014 to be evaluated for SCC pursuant to their IMP manual Section 8.2.

Temporary Inspector (none)
Notes

Question ID, References [AR.RMP.CRACKNDE.O](#) , 195.452(h)(1)

Question Text *From an observation at an excavation site with suspected cracks, SCC, or crack like features, did the operator's personnel perform an NDE of the segment?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

IM.CA: Continual Evaluation and Assessment

Question ID, References [IM.CA.PERIODICEVAL.P](#) , 195.452(f)(5) (195.452(e); 195.452(j)(1); 195.452(j)(2); 195.452(g))

Question Text *Does the process include adequate provisions for performing periodic evaluations of pipeline integrity?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec. 8.1 Assessment Interval
IMP Manual Sec. 8.2 Risk Factors

The following notes are not part of the inspection record and will not be retained after the inspection is locked.

Al Jones (IM Inspection) IMP Manual Sec. 8.1 Assessment Interval
IMP Manual Sec. 8.2 Risk Factors

Question ID, References [IM.CA.PERIODICEVAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(e); 195.452(j)(1); 195.452(j)(2); 195.452(g))

Question Text *Do records indicate that periodic evaluations of pipeline integrity are performed on a technically justified frequency?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.CA.ASSESSINTERVAL.P](#) , 195.452(f)(5) (195.452(e); 195.452(g))

Question Text *Did the operator's plan identify all of the risk factors that reflect the conditions on the pipeline segment to establish an assessment schedule?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.9.0

Temporary Inspector (none)
Notes

Question ID, References [IM.CA.ASSESSINTERVAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(e); 195.452(j)(1); 195.452(j)(3))

Question Text *Are assessment intervals consistent with the risks identified for the pipeline and the results of previous assessments?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.CA.ASSESSMETHOD.P](#) , 195.452(f)(5) (195.452(j)(5); 195.452(g))

Question Text *Does process specify the assessment methods that are appropriate for the pipeline specific integrity threats?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.8.1

Temporary Inspector (none)
Notes

Question ID, References [IM.CA.ASSESSMETHOD.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(j)(5))

Question Text *Are assessment methods shown in the assessment plan appropriate for the pipeline specific integrity threats?*

Result **Concern**

Assets Covered Unit 31049

Summary (none)

Result Notes Pipeline is susceptible to SCC. The 2009 MFL tool had a 50% probability of accuracy for longitudinal cracks like features. McChord's records does not indicate the entire exposed pipe section is evaluated circumferential and longitudinally for the threat of crack like features or SCC
In 2009 about eleven linear feet of pipe was replaced at 72nd St and Waller Rd in Tacoma. The inside wall condition was visually examined and no corrosion was found.

Temporary Inspector (none)
Notes

Question ID, References [IM.CA.ASSESSNOTIFY.P](#) , 195.452(f)(5) (195.452(j)(4); 195.452(m))

Question Text *Does the process include adequate methodology for submitting variance notifications to PHMSA for assessment intervals longer than the 5-year maximum assessment interval and unavailable technology?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.5.2
IMP Manual Sec. 13.0 Notification Table 1.0

Temporary Inspector (none)
Notes

Question ID, References [IM.CA.ASSESSNOTIFY.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(m); 195.452(j)(4))

Question Text *Have variance notifications been submitted to PHMSA for assessment intervals longer than the 5-year maximum assessment interval and unavailable technology?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

IM.HC: High Consequence Areas

Question ID, References [IM.HC.HCALLOCATION.P](#) , 195.452(f)(1) (195.452(a); 195.452(d)(3))

Question Text *Does the process that requires identification of HCA-affecting segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.5.1 using DeLorme Mapping

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCALLOCATION.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a); 195.452(b)(2); 195.452(d)(3))

Question Text *Do records show that locations and boundaries of HCA-affecting segments are correctly identified and maintained up-to-date?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCALLOCATION.O](#) , 195.452(b)(5) (195.452(a); 195.452(b)(2); 195.453(f)(1))

Question Text *Are locations and boundaries of segments that can affect HCAs correctly identified and maintained up-to-date?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCAIDENT.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Is the process adequate to determine all locations where pipeline systems "could affect" a high consequence area, including pipelines that are located in HCAs?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Appendix A

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCAIDENT.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))

Question Text *Do records indicate that all locations where a pipeline system is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate and convincing technical justification is provided?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCARELEASE.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include technically adequate methods to determine the locations/scenarios and volume of potential commodity releases?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Appendix A

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCARELEASE.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))

Question Text *Do records indicate that identified release locations and spill volumes are appropriate, technically adequate, and determined consistent with the documented process?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCAOVERLAND.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include a technically adequate analysis of overland flow of liquids to determine the extent of commodity spread and its effects on HCAs?*

Result **Concern**

Assets Covered Unit 31049

Summary (none)

Result Notes McChord's procedure for overland flow of liquids is contained in Appendix - A for commodity spread and its effects on HCAs. Manholes for waste water locations need to be identified and mapped in proximity to the pipeline.

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCAOVERLAND.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do records indicate the overland spread analysis (if applicable) is technically adequate and consistent with program requirements?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCAH2OTRANSP.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include a technically adequate analysis approach for water transport of liquids to determine the extent of commodity spread and its effects on HCAs?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Appendix - A

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCAH2OTRANSP.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do records indicate that water transport analysis (if applicable) is technically adequate and consistent with its program requirements?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCAAIRDISP.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include a technically adequate analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [IM.HC.HCAAIRDISP.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do records indicate that the analysis of air dispersion of vapors (if applicable) is technically adequate and consistent with its program requirements?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)

Notes

Question ID, References [IM.HC.HCAINDIRECT.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process identify all locations of segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Appendix - A

Temporary Inspector (none)

Notes

Question ID, References [IM.HC.HCAINDIRECT.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do the records indicate that endpoints of segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCABOUNDING.R](#) , 195.452(f)(1) (195.452(b)(4))

Question Text *Does the HCA analysis bound historical releases/accidents?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCACAT3.P](#) , 195.452(f)(1) (195.452(b)(2))

Question Text *Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [IM.HC.HCACAT3.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(b)(2))

Question Text *Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

IM.PM: Preventive and Mitigative Measures

Question ID, References [IM.PM.PMMGENERAL.P](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2))

Question Text *Do the processes to identify additional preventive and mitigative actions include consideration of risk and cover a spectrum of alternatives? (Note: Leak detection and EFRDs are covered in more detail in subsequent questions within this sub-module.)*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sec.9.2 Leak Detection
IMP Manual Sec. 9.3 EFRD

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.PMMGENERAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))

Question Text *Is there documentation of preventive and mitigative actions that have been considered and implemented?*

Result Concern

Assets Covered Unit 31049

Summary (none)

Result Notes McChord Pipeline's records do not provide documentation for mitigation of AC current from ground faults. Company has not surveyed pipeline for ground fault threats. Company does add inhibitors to refined product to mitigate internal corrosion, provides increased line patrols along ROW, provides all line locate marks from 811 calls, and conducts close interval survey every fifth year.

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.PMMIMPLEMENT.O](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2); 195.452(i)(3); 195.452(i)(4))

Question Text *Have preventive and mitigative actions been implemented as described in the records?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.PMMRISK.P](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2))

Question Text *Does the process evaluate the effects of potential actions on reducing the likelihood and consequences of pipeline releases?*

Result Sat

Assets Covered Unit 31049

Result Notes IMP Manual Sec.9.1 includes Third Party Damage as highest priority.

Temporary Inspector (none)

Notes

Question ID, References [IM.PM.PMMRISK.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))

Question Text *Do records demonstrate evaluation of the effects of potential actions on reducing the likelihood and consequences of pipeline releases?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)

Notes

Question ID, References [IM.PM.PMMBASIS.P](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2))

Question Text *Does the process provide adequate basis for deciding which candidate preventive and mitigative actions are implemented?*

Result **Sat**

Assets Covered Unit 31049

Result Notes Refinery includes the following in IMP program:
Process Safety Management,
Management of Change, and
Incident & Hazardous Root Cause Analysis.

Temporary Inspector (none)

Notes

Question ID, References [IM.PM.PMMBASIS.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))

Question Text *Do records indicate that the P&MM decision making process has been applied as specified?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.IMLEAKDETEVAL.P](#) , 195.452(f)(6) (195.452(i)(3))

Question Text *Does the process for evaluating leak detection capability consider all of the 195.452(i)(3) required factors and other relevant factors?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Section 9.2

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.IMLEAKDETEVAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(3))

Question Text *Do records indicate that all required and other relevant leak detection evaluation factors have been adequately evaluated?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.IMLEAKDETHCA.R](#) , 195.452(l)(1)(ii) (195.452(i)(3))

Question Text *What leak detection measures are taken to prevent and mitigate the consequences of a pipeline failure on an HCA?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.IMLEAKDETHCA.O](#) , 195.452(i)(3)

Question Text *Have leak detection measures taken to prevent and mitigate the consequences of a pipeline failure in an HCA been implemented?*

Result Sat

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.PMMEFRD.P](#) , 195.452(f)(6) (195.452(i)(4))

Question Text *Do processes for evaluating the need for additional EFRDs consider all of the 195.452(i)(4) required factors and other relevant factors?*

Result Sat

Assets Covered Unit 31049

Result Notes IMP Manual Sec.9.2 Leak Detection
IMP Manual Sec. 9.3 EFRD

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.PMMEFRD.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(4))

Question Text *Do records indicate that all required and other relevant EFRD evaluation factors were adequately evaluated and any actions taken as appropriate?*

Result Sat

Assets Covered Unit 31049

Result Notes U.S. Oil has (1) Check valve (EFRD) and (3) manually operated valves. An in-house study by George Hills was done in 2004 to evaluate additional EFRD's. The recommendation was no additional EFRD would provide added protection at HCA's

Temporary Inspector (none)
Notes

Question ID, References [IM.PM.PMMEFRD.O](#) , 195.452(i)(4)

Question Text *Have identified EFRD projects been implemented as planned?*

Result NA

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

IM.QA: Quality Assurance

Question ID, References [IM.QA.IMPERFEFFECTIVE.P](#) , 195.452(f)(7) (195.452(k))

Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*

Result Sat

Assets Covered Unit 31049

Result Notes IMP Manual Section 10.

Temporary Inspector (none)
Notes

Question ID, References [IM.QA.IMPERFEFFECTIVE.R](#) , 195.452(l)(1)(ii) (195.452(f)(7); 195.452(k))

Question Text *Do records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.QA.IMPERFMETRIC.P](#) , 195.452(f)(7) (195.452(k))

Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Section 10.1.

Temporary Inspector (none)
Notes

Question ID, References [IM.QA.IMPERFMETRIC.R](#) , 195.452(l)(1)(ii) (195.452(f)(7); 195.452(k))

Question Text *Do records indicate that performance metrics are providing meaningful insight into integrity management program performance?*

Result **Sat**

Assets Covered Unit 31049

Result Notes Reviewed 2013 annual CP survey and verify (14) casings were checked.

Temporary Inspector (none)
Notes

Question ID, References [IM.QA.RECORDS.P](#) , 195.452(l) (195.404(c)(1); 195.452(c)(2))

Question Text *Is the process adequate to assure that the records required for integrity management program applications are maintained?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Sections 7.7 and 11.

Temporary Inspector (none)
Notes

Question ID, References [IM.QA.RECORDS.R](#) , 195.452(l)(1)(ii) (195.452(c)(2))

Question Text *From a review of records, has the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

IM.RA: Risk Analysis

Question ID, References [IM.RA.RAMETHOD.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Do processes for evaluating risk to HCAs require consideration of all relevant threat categories and risk factors when evaluating pipeline segments?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Section 6.1

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RAINTEGRATE.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Do processes for evaluating risk to HCAs include the appropriate risk factors and other information?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Appendix B-6 Segment Risk Analysis Matrix.

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.SCCRISK.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the IM risk assessment process give adequate criteria for evaluating and determining if stress corrosion cracking is a threat on the pipeline(s)?*

Result **Sat**

Assets Covered Unit 31049

Result Notes McChord's procedure was revised (REV-3) to include exposed pipe evaluation circumferentially and longitudinally for the SCC.

Records for anomaly evaluation, such as a dent, indicate the edges of the dent are evaluated for SCC and not the entire exposed pipe section.

UTC received the revision 10-20-2014.

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.SCCRISK.R](#) , 195.452(l)(1)(ii) (195.452(f)(3))

Question Text *Has an IM risk assessment been performed addressing the threat of stress corrosion cracking on their pipeline segments that could affect an HCA?*

Result **Concern**

Assets Covered Unit 31049

Summary (none)

Result Notes McChord Pipeline records for five anomaly evaluation did not verify for SCC outside the dent area. Visual inspection was made around the exposed pipe with coating removed, but not checked for SCC beyond the dent area.

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RADATA.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Are processes for data and information input into the risk analysis process adequate and appropriate?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RADATA.R](#) , 195.452(l)(1)(ii) (195.452(f)(3); 195.452(g))

Question Text *Are adequate data and information input into the risk analysis process?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RADATA.O](#) , 195.452(f)(3) (195.452(g))

Question Text *Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RASEGMENT.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the risk analysis process adequately represent and consider the variation in risk factors along the line such that segment-specific risk results and insights are obtained?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Appendix - A.

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RARERESULTS.R](#) , 195.452(l)(1)(ii) (195.452(f)(3); 195.452(g))

Question Text *Are results of the process to evaluate risk useful for drawing conclusions and insights for decision making?*

Result **Sat**

Assets Covered Unit 31049

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RAFACILITY.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the process include technically adequate approaches to identify and evaluate the risks of facilities that can affect HCAs?*

Result **Sat**

Assets Covered Unit 31049

Result Notes IMP Manual Section 6.1. The ROW is checked daily during the work week.

Temporary Inspector (none)
Notes

Question ID, References [IM.RA.RAFACILITY.R](#) , 195.452(l)(1)(ii) (195.452(f)(3); 195.452(g))

Question Text *Has the analysis of risk of facilities been performed as required?*

Result **Concern**

Assets Covered Unit 31049

Summary (none)

Result Notes McChord Pipeline records are not comprehensive in evaluating for risk of AC ground fault current and SCC threats.

Temporary Inspector (none)
Notes

RPT.NR: Notices and Reporting

Question ID, References [RPT.NR.NOTIFICATIONS.R](#) , 195.452(l)(1)(ii) (195.452(m))

Question Text *Has notification been made if Other Technology is used, technology is unavailable, the 5 year reassessment interval cannot be met, remediation schedule cannot be met and pressure cannot be reduced, or a pressure reduction exceeds 365 days?*

Result **NA**

Assets Covered Unit 31049

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Temporary Inspector (none)
Notes

RPT.RR: Regulatory Reporting (Traditional)

Question ID, References [RPT.RR.ANNUALREPORTIMINSPECT.R](#) , 195.49

Question Text *Is Annual Report Part F Data complete and accurate?*

Result **Sat**

Assets Covered Unit 31049

Result Notes Complete and accurate with no ILI inspections in 2013.

Temporary Inspector (none)
Notes

Question ID, References [RPT.RR.ANNUALREPORTIMASSESS.R](#) , 195.49

Question Text *Is Annual Report Part G data complete and accurate?*

Result **Sat**

Assets Covered Unit 31049

Result Notes Complete and accurate with no ILI inspections in 2013.

Temporary Inspector (none)
Notes

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