

**Utilities and Transportation Commission**  
**Standard Inspection Report for Intrastate Gas Distribution Systems**  
**Records Review and Field Inspection**

S – Satisfactory    U – Unsatisfactory    N/A – Not Applicable    N/C – Not Checked  
**If an item is marked U, N/A, or N/C, an explanation must be included in this report.**

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/Docket Number	6177		
Inspector Name & Submit Date	Dave Cullom and Derek Norwood 8/11/15		
Chief Eng Name & Review/Date	Joe Subsits 9/2/2015		
Operator Information			
Name of Operator:	Puget Sound Energy	OP ID #:	22189
Name of Unit(s):	King County West		
Records Location:	Bellevue, WA.		
Date(s) of Last (unit) Inspection:	5/6/2013	Inspection Date(s):	7/14/2015 – 7/30/2015

**Inspection Summary:**

A standard inspection was conducted of PSE's West King County distribution system. Records were reviewed at the Bellevue and Georgetown offices. The field visit included an inspection of pressure regulating stations, cathodic protection facilities, bridges, slide areas, odorant test sites, and isolated steel services.

Our inspection indicates four probable violation(s). We also noted one area of concern.

**PROBABLE VIOLATIONS**

1. **49 CFR §192.481 Atmospheric corrosion control: Monitoring.**

*(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:*

*At least once every 3 calendar years, but with intervals not exceeding 39 months*

**Finding(s):**

The pipeline inside the bridge at 145th and I-5 in Seattle is contained in a joint utility vault, running the length of the bridge and is exposed to the atmosphere, but no records were available at the time of inspection indicating that an atmospheric corrosion evaluation was being conducted.

2. **WAC 480-93-180 Plans and Procedures**

*(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

2500.0500 section 3.8 of PSE's Gas Operating Standards (GOS) states:

*"If it is believed that there are inaccuracies with gas plat or operation maps, a Natural Gas Map Revision Request Form (Form 3666) should be submitted to the Maps, Records and Technology Department for research and updates."*

**Finding(s):**

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**Inspection Summary:**

Several leak survey maps did not show services that PSE had original map records for, but the services were not on the maps that were used during the leak survey to locate the services that were scheduled to be evaluated.

The leak survey contractor had updated several maps with changes to reflect the existence of the service(s), but the maps used for the inspection in the following years did not have the updates incorporated.

Plat map #182073 for years 2014 and 2015 had revisions for 1 gas service.  
Plat map #202074 for years 2013 and 2014 had revisions for 1 gas service.  
Plat map #190071 for years 2013 and 2014 had revisions for 3 gas services.

PSE's service provider did not follow established procedures to update the maps used to conduct the leak surveys in a timely manner to ensure the scope of the survey was adequate. Form 3666 was used by the service provider, but the changes were not submitted to the appropriate for research and updates.

3.        **WAC 480-93-188 Gas leak surveys**

*(2) Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.*

**Finding(s):**

Flame Ionization (FI) equipment used for leak surveys did not have accuracy check records at least monthly, not exceeding 45 days between testing, and at least 12 times per year for 2014. These FI equipment numbers were #1016 and #10644.

4.        **WAC 480-93-188 Gas leak surveys**

*(5) Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:*

- (a) Description of the system and area surveyed (including maps and leak survey logs);*
- (b) Survey results;*
- (c) Survey method;*
- (d) Name of the person who performed the survey;*
- (e) Survey dates; and*
- (f) Instrument tracking or identification number.*

**Finding(s):**

PSE leak surveyed after a ground fault event at 17071 12th Ave NW in Shoreline 1/3/15, but was unable to provide leak survey record documentation. The only record available was a GPS coordinate log from the special leak survey.

**AREA OF CONCERN**

1.        **WAC 480-93-110 Corrosion Control**

*(2) Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all*

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**Inspection Summary:**

*efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)*

**Finding(s):**

During the field portion of the inspection we obtained a low reading of -510mV (on) at Belmont and Bellevue Pl. in Seattle, WA. If uncorrected within 90 days, this condition could lead to a probable violation.

<b>HQ Address:</b> PO Box 97034 M/S: EST-07W Bellevue, WA 98009-9734		<b>System/Unit Name &amp; Address:</b> PO Box 97034 M/S: EST-07W Bellevue, WA 98009-9734	
<b>Co. Official:</b>	Booga K. Gilbertson, Sr. VP Operations	<b>Phone No.:</b>	No unit phone number
<b>Phone No.:</b>	425-462-3843	<b>Fax No.:</b>	425-462-3770
<b>Fax No.:</b>	425-462-3770	<b>Emergency Phone No.:</b>	800-552-7171
<b>Emergency Phone No.:</b>	800-552-7171		
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>	
Pang Xiong	Engineering Specialist	206-716-2729	
Shari Silva-Compton	Public Awareness Program Manager	425-456-2270	
Charlie Gadzik	Customer Safety Communications Manager	425-456-2727	
Brett Conrad	Senior Project Manager	425-456-2914	
Darryl Hong	Sr. Regulatory Compliance Analyst	425-462-3911	
Stephanie Silva	Compliance Program Manager, Compliance Program	425-462-3923	
Signe Lippert	Supervisor Maintenance Programs	(206)716-2630	
Alan Mulkey	Consulting Engineer, GSI	(425)462-3889	
Debbie Larson	Supervisor CC North	(206)255-8166	
Gary Swanson	Maintenance Programs Coord.	(206)716-2632	

**WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.**

(check one below and enter appropriate date)

<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	<b>Date:</b>	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	<b>Date:</b>	11/2010
<input checked="" type="checkbox"/>	OQ Program Review (PHMSA Form 14)	<b>Date:</b>	2/4/2013

**GAS SYSTEM OPERATIONS**

<b>Gas Supplier</b>	Williams
<b>Services:</b>	Residential 250000    Commercial 7102    Industrial 2637    Other

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GAS SYSTEM OPERATIONS					
Number of reportable safety related conditions last year		0	Number of deferred leaks in system	1900	
Number of <u>non-reportable</u> safety related conditions last year		0	Number of third party hits last year		844 per 2014 annual report (aggregated)
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)		2,400 ft	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)		1839
Operating Pressure(s):		MAOP (Within last year)		Actual Operating Pressure (At time of Inspection)	
Feeder:	North Seattle Supply Greenwood Supply South Seattle Supply Midway	250 MAOP 250 MAOP 250 MAOP 250 MAOP		We did not visit the supply regulator stations during this audit. Please see the field data collection form for as found operating pressures for the pressure regulating stations we visited.	
Town:					
Other:					
Does the operator have any transmission pipelines?		Yes, These will be addressed in another inspection later this year.			
Compressor stations? Use Attachment 1.		No compressors			

Pipe Specifications:			
Year Installed (Range)	1956-2015	Pipe Diameters (Range)	.5 – 20 inch
Material Type	STW, HDPE, MDPE, Aldyl HD	Line Pipe Specification Used	API5L and D2513
Mileage	1852	SMYS %	<29%

Operator Qualification Field Validation	
<b>Important:</b> Per OPS, the OQ Field Inspection Protocol Form (Rev 4, May 2007) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at <a href="http://primis.phmsa.dot.gov/oqdb/home.oq">http://primis.phmsa.dot.gov/oqdb/home.oq</a> <b>Date Completed/Uploaded</b> 8/6/15	

Integrity Management Field Validation	
<b>Important:</b> Per PHMSA, IMP Field Verification Form (Rev 6/18/2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <a href="http://primis.phmsa.dot.gov/gasimp/home.gim">http://primis.phmsa.dot.gov/gasimp/home.gim</a> <b>Date Completed/Uploaded:</b> ***N/A - This is not a transmission audit***	

PART 199 Drug and Alcohol Testing Regulations and Procedures				S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection.			X			

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	<b>For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002</b> Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to <a href="mailto:opsgis@rspa.dot.gov">opsgis@rspa.dot.gov</a> stating that fact.</u> Include operator contact information with all updates. <b>No transmission lines are evaluated during a distribution audit</b>			X	
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	X			

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<b>3.</b>	191.5	Immediate Notice of certain incidents to <b>NRC (800) 424-8802</b> , or electronically at <a href="http://www.nrc.uscg.mil/nrchp.html">http://www.nrc.uscg.mil/nrchp.html</a> , and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident.	X			
<b>4.</b>	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> at unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	X			
<b>5.</b>	191.15(a)	30-day follow-up written reports to PHMSA ( <b>Form F7100.2</b> ) Submittal must be electronically to <a href="http://pipelineonlinereporting.phmsa.dot.gov">http://pipelineonlinereporting.phmsa.dot.gov</a>	X			
<b>6.</b>	191.15(c)	Supplemental report (to 30-day follow-up)	X			
<b>7.</b>	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2011 for the year 2010).	X			
<b>8.</b>	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a>	X			
<b>9.</b>	191.23	Filing the <b>Safety Related Condition Report (SRCR)</b>	X			
<b>10.</b>	191.25  49 U.S.C. 60139, Subsection (b)(2)	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery.  <b>Note:</b> Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA <b>on or before the fifth day</b> following the date on which the exceedance occurs.  The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <ul style="list-style-type: none"> <li>• The name and principal address of the operator date of the report, name, job title, and business telephone number of the person submitting the report.</li> <li>• The name, job title, and business telephone number of the person who determined the condition exists.</li> <li>• The date the condition was discovered and the date the condition was first determined to exist.</li> <li>• The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored.</li> <li>• The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action.</li> </ul>	X			
<b>11.</b>	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential <b>Safety Related Conditions</b>	X			
<b>12.</b>	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections <b>***Notes – No offshore pipelines***</b>			X	
<b>13.</b>	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports <b>***Notes – No CNWs or offshore facilities***</b>			X	
<b>14.</b>	480-93-200(1)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours)</b> for events which results in;				
<b>15.</b>	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization;	X			
<b>16.</b>	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars;	X			
<b>17.</b>	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	X			
<b>18.</b>	480-93-200(1)(d)	The unintentional ignition of gas;	X			
<b>19.</b>	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	X			
<b>20.</b>	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;	X			

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<b>21.</b>	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection;	X			
<b>22.</b>	480-93-200(2)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146</b> (Within <b>24 hours</b> ) for;				
<b>23.</b>	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;	X			
<b>24.</b>	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service;	X			
<b>25.</b>	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or	X			
<b>26.</b>	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	X			
<b>27.</b>	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
<b>28.</b>	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	X			
<b>29.</b>	480-93-200(4)(b)	The extent of injuries and damage;	X			
<b>30.</b>	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;	X			
<b>31.</b>	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;	X			
<b>32.</b>	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
<b>33.</b>	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site;	X			
<b>34.</b>	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
<b>35.</b>	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
<b>36.</b>	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			
<b>37.</b>	480-93-200(4)(j)	Line type;	X			
<b>38.</b>	480-93-200(4)(k)	City and county of incident; and	X			
<b>39.</b>	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
<b>40.</b>	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	X			
<b>41.</b>	480-93-200(6)	Written report within 5 days of receiving the <b>failure analysis</b> of any incident or hazardous condition due to <b>construction defects or material failure</b>	X			
<b>42.</b>	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form)				
<b>43.</b>	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n)	X			
<b>44.</b>	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed?	X			
<b>45.</b>	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? <b>Note:</b> Records maintained for two years and made available to the commission upon request.	X			
<b>46.</b>	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?				
<b>47.</b>	480-93-200(8)(a)	<ul style="list-style-type: none"> <li>• Notification requirements for excavators under RCW 19.122.050(1)</li> </ul>	X			
<b>48.</b>	480-93-200(8)(b)	<ul style="list-style-type: none"> <li>• A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and</li> </ul>	X			
<b>49.</b>	480-93-200(8)(c)	<ul style="list-style-type: none"> <li>• Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.</li> </ul>	X			

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50.	480-93-200(9)	<b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b> <ul style="list-style-type: none"> <li>An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a))</li> <li>A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b)</li> </ul>	X			
51.	480-93-200(10)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> for the proceeding calendar year				
52.	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
53.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.	X			
54.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

**Comments:**

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
57.	192.16	<b>Customer notification</b> - Customers notified, within <b>90 days</b> , of their responsibility for those service lines not maintained by the operator	X			
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
59.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate?	X			

**Comments:**

CONSTRUCTION RECORDS			S	U	N/A	N/C
60.	480-93-013	OQ records for personnel performing New Construction covered tasks	X			
61.	192.225	Test Results to Qualify Welding Procedures	X			
62.	192.227	Welder Qualification	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified <b>2/Yr (7.5Months)</b>	X			
64.	480-93-080(2)	Plastic pipe joiners re-qualified <b>1/Yr (15 Months)</b>	X			

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65.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	X			
66.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners <b>1/Yr (12Months)</b>	X			
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992	X			
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains	X			
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	X			
70.	192.241(a)	Visual Weld Inspector Training/Experience <b>****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X
71.	192.243(b)(2)	Nondestructive Technician Qualification <b>****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X
72.	192.243(c)	NDT procedures <b>****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X
73.	192.243(f)	Total Number of Girth Welds <b>****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X
74.	192.243(f)	Number of Welds Inspected by NDT <b>****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X
75.	192.243(f)	Number of Welds Rejected <b>****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X
76.	192.243(f)	Disposition of each Weld Rejected <b>****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X
77.	.273/.283	Qualified Joining Procedures Including Test Results	X			
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
80.	192.327	Amount, location, cover of each size of pipe installed	X			
81.	480-93-160(1)	Report filed <b>45 days</b> prior to construction or replacement of transmission pipelines <b>≥ 100</b> feet in length <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
82.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
84.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
85.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
88.	480-93-160(2)(f)	Proposed corrosion control program to be followed including specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
89.	480-93-160(2)(g)	Welding specifications; and <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X

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<b>CONSTRUCTION RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>91.</b>	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress $\geq$ 20% SMYS? ****Notes – <b>Transmission inspection components will be reviewed during a late 2015 audit.</b> ****				X
<b>92.</b>	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) *****Notes – <b>Looked 109069638 in detail</b> *****	X			
<b>93.</b>	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? ****Notes – <b>None encountered during this inspection. Review GOS</b> ****			X	
<b>94.</b>	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) *****Notes <b>Checked during crew inspections throughout the year. All were OK. Pressure testing equipment for some random construction jobs were also checked</b> ***	X			
<b>95.</b>	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig ****Notes – <b>No in-service moving or lowering of lines</b> *****			X	
<b>96.</b>	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines $\leq$ 60 psig ****Notes – <b>No in-service moving or lowering of lines</b> *****			X	

<b>Comments:</b>
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<b>OPERATIONS and MAINTENANCE RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>97.</b>	192.517(a)	Pressure Testing (operates at or above 100 psig) – <b>useful life of pipeline</b>	X			
<b>98.</b>	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – <b>5 years</b>	X			
<b>99.</b>	192.605(a)	Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> ) <b>Note:</b> Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09	X			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
<b>100.</b>		<p>Availability of construction records, maps, operating history to operating personnel</p> <p><b>***Notes –</b> 2500.0500 section 3.8 of PSE’s Gas Operating Standards (GOS) states:  “If it is believed that there are inaccuracies with gas plat or operation maps, a Natural Gas Map Revision Request Form (Form 3666) should be submitted to the Maps, Records and Technology Department for research and updates.”</p> <p><b>Finding(s):</b></p> <p>Several leak survey maps did not show services that PSE had original map records for, but the services were not on the maps that were used during the leak survey to locate the services that were scheduled to be evaluated.</p> <p>The leak survey contractor had updated several maps with changes to reflect the existence of the service(s), but the maps used for the inspection in the following years did not have the updates incorporated.</p> <p>Plat map #182073 for years 2014 and 2015 had revisions for a gas service. Plat map #202074 for years 2013 and 2014 had revisions for a gas service. Plat map #190071 for years 2013 and 2014 had revisions for 3 gas services.</p> <p>PSE’s service provider did not follow established procedures to update the maps used to conduct the leak surveys in a timely manner to ensure the scope of the survey was adequate. Form 3666 was used by the service provider, but the changes were not submitted to the appropriate for research and updates.***</p>				
	192.605(b)(3)			X		
101.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity?	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures. <b>****Note - Site Inspections are performed. I confirmed several of these internal audits during the course of performing DTC inspections this year.****</b>	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures	X			
104.	192.609	Class Location Study (If applicable) <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
105.	192.611	Confirmation or revision of MAOP <b>****Notes – Transmission inspection components will be reviewed during a late 2015 audit.****</b>				X
106.		<b>Damage Prevention (Operator Internal Performance Measures)</b>				
107.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) <b>***Notes – There are field audits and “ride-alongs” with observations) The contractor tracks damages assigned to a certain technician.USIC****</b>	X			
108.	192.614	Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? <b>***Notes – If the contractor continually performs substandard work, they will not renew the contract. A contract change has recently occurred****</b>	X			
109.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? <b>****Notes – This is in the contractors plan.****</b>	X			
110.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? <b>****Notes – They showed us testing results.****</b>	X			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
111.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	X			
112.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. <b>****Notes – The on time scorecard demonstrates these metrics.****</b>	X			
113.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? <b>****Notes – PSE approves USIC’s test and in the 2013 UTC OQ audit went through this in detail.****</b>	X			
114.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys? <b>****Notes – I observed during some DTC audits (i.e. 8300 E Marginal Way) where follow-up activities have occurred. No blasting issues noted during this inspection cycle per operator records.****</b>	X			

**Comments:**

115.		<b>Emergency Response Plans</b>	S	U	N/A	N/C
116.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response. <b>*****Notes – We looked at 2014 response times during the audit.****</b>	X			
117.	192.615(b)(1)	Location Specific Emergency Plan	X			
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training <b>*****Notes – They do a mock broken and blowing gas drill every two years. ****</b>	X			
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. <b>****Notes – For example, PSE reviews dispatch times in the 1284 form.****</b>	X			
120.	192.615(c)	Liaison Program with Public Officials	X			
121.	192.616	<b>Public Awareness Program</b>				
122.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:	X			
123.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.				
124.		<b>API RP 1162 Baseline* Recommended Message Deliveries</b>				

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125.		<b>Stakeholder Audience (LDC's)</b>	<b>Baseline Message Frequency (starting from effective date of Plan)</b>				
		Residence Along Local Distribution System	Annual <b>(***Notes – They use bill stuffers, social, media, events)</b>				
		LDC Customers	Twice annually				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		<b>Stakeholder Audience (Transmission line operators)</b>	<b>Baseline Message Frequency (starting from effective date of Plan)</b>				
		Residence Along Local Distribution System	2 years				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years (Mayor,				
		Excavator and Contractors	Annual				
		<b>**Notes - For Transmission pipelines within 1000ft they use an outside vendor use county records***</b>	They are members of PAPA and take advantage of those.  They added activities around the tunnel drilling				
		126.					
127.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.	X				
128.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than <b>June 20, 2010</b> . .616(h) <b>***Notes - End of 2013 this was reviewed***</b>	X				
129.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. <b>***Notes – PSE is not a master meter operator***</b>			X		
130.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 <b>Note:</b> Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10)	X				

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131.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)	X			
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements <b>***Notes - All readings for the time period reviewed met the criteria****</b>			X	
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
136.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? <b>1/yr(15 months)</b>	X			
137.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b>	X			
138.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on	X			
139.	480-93-155(1)	Up-rating of system MAOP to <b>&gt;60 psig?</b> Procedures and specifications submitted <b>45 days</b> prior? <b>***Notes – No uprates or proximity requests were conducted for this unit during this inspection time period.</b>			X	
140.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	X			
141.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company’s own facilities, and; <b>****Notes – PSE calls these customer reports and has a process to identify the source and/or ensure that the odor is not from regulated facilities.****</b>	X			
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? <b>****Notes – PSE calls these customer reports as well. They do not notify by mail because they will not leave an unsafe condition without taking action. ****</b>	X			
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within <b>30 days</b> of a leak repair? <b>****Notes – They will return if there is residual gas after aspirating****</b>	X			
144.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? <b>**Notes - None were discovered being downgraded and upgraded during the records review. **</b>	X			
145.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X			
146.	480-93-188(1)	Gas leak surveys <b>****Notes – See scanned attachments for selections. The original selection list that we used to make sub-selections from is in .SHP GIS format.****</b>	X			

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147.	480-93-188(2)	<p>Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)</p> <p>FI# 15758 used 6/13/13    Infrasource    Calibrated 6/6/13    Checked OK</p> <p>FI#824    Checked OK</p> <p><b>SNA Units</b></p> <p><b>FI# 1016</b></p> <table border="1"> <thead> <tr> <th>CAL DATE</th> <th>SERIAL #</th> <th>MODEL AS FOUND</th> <th>CAL PASS/FAIL</th> </tr> </thead> <tbody> <tr><td>1/2/2014</td><td>1016</td><td>A600</td><td>Pass</td></tr> <tr><td>1/31/2014</td><td>1016</td><td>A600</td><td>Pass</td></tr> <tr><td>3/3/2014</td><td>1016</td><td>A600</td><td>Pass</td></tr> <tr><td>4/29/2014</td><td>1016</td><td>A600</td><td>Pass</td></tr> <tr><td>6/30/2014</td><td>1016</td><td>A600</td><td>Pass</td></tr> <tr><td>8/4/2014</td><td>1016</td><td>A600</td><td>Pass</td></tr> <tr><td>9/2/2014</td><td>1016</td><td>A600</td><td>Pass</td></tr> </tbody> </table> <p>FI# 1069 used 9/5/14    Calibrated 9/2/14</p> <p><b>FI# 10644 8/5/14    Calibrated 9/2/14</b></p> <p><b>Per PSE, equipment number 10644 had the accuracy check on the following dates:</b></p> <p><b>04/30/2014, 06/02/2014, 07/07/2014 and 08/04/2014.</b></p> <p><b>***Notes - Flame Ionization (FI) equipment used for leak surveys had no records of being placed out of service and did not have accuracy checks at least monthly, not exceeding 45 days between testing, and at least 12 times per year for 2014. These FI equipment numbers were #1016 and #10644.***</b></p>	CAL DATE	SERIAL #	MODEL AS FOUND	CAL PASS/FAIL	1/2/2014	1016	A600	Pass	1/31/2014	1016	A600	Pass	3/3/2014	1016	A600	Pass	4/29/2014	1016	A600	Pass	6/30/2014	1016	A600	Pass	8/4/2014	1016	A600	Pass	9/2/2014	1016	A600	Pass				X
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148.	480-93-188(3)	Leak survey frequency (Refer to Table Below) ****Looked at several HRLs 6459 California SW and others from year to year on the leak survey maps.****	X																																			
		<table border="1"> <tr> <td>Business Districts (implement by 6/02/07)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>High Occupancy Structures</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Pipelines Operating ≥ 250 psig</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Other Mains: CI, WI, copper, unprotected steel</td> <td>2/yr (7.5 months)</td> </tr> </table>	Business Districts (implement by 6/02/07)	1/yr (15 months)	High Occupancy Structures	1/yr (15 months)	Pipelines Operating ≥ 250 psig	1/yr (15 months)	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)																												
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149.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs ****Notes – None known by the operator that needed to be conducted****			X																																	
150.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred. ***Notes – This may also include 188(4)d for the “Bertha” tunneling project****	X																																			
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected ****Notes – None known. They do a slide patrol as part of their bridges and slides, but this falls under patrolling.****			X																																	
152.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions. ****Notes – We looked at several inside and outside leak surveys for the “Bertha” tunnel project.***	X																																			

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153.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. ****Notes – These are shown on the leak work orders. No issues found****	X															
154.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f) ****Notes – PSE leak surveyed after a ground fault event at 17071 12th Ave NW in Shoreline 1/3/15, but was able to provide leak survey record documentation other than some GPS coordinates. The additional items required under 480-93-188(5) are: (a) Description of the system and area surveyed (including maps and leak survey logs); (b) Survey results; (c) Survey method; (d) Name of the person who performed the survey; (e) Survey dates; and (f) Instrument tracking or identification number		X														
155.	480-93-188(6)	Leak program - Self Audits ****Notes – The last one was performed Jan 4 <sup>th</sup> , 2013****	X															
156.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 ****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***				X												
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
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157.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 ****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***				X												
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed																
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3	2/yr	7½ months																
4	4/yr	4½ months																
158.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1) ***Notes – This is part of bridge and slides***	X															
159.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	X															
160.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1)	X															
161.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> <li>Outside Business District (5 years)</li> <li>Cathodically unprotected distribution lines (3 years)</li> </ul>	X															
162.	192.603(b)	Tests for Reinstating Service Lines 192.725	X															
163.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 ***Notes – No abandoned underwater lines in system***			X													
164.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739	X															
165.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743	X															
166.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***			X													
167.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747	X															
168.	480-93-100(3)	Service valve maintenance (1 per yr/15 months)	X															
169.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 ****Notes - No large vaults****			X													
170.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751	X															

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171.	192.603(b)	Welding – Procedure 192.225(b)	X			
172.	192.603(b)	Welding – Welder Qualification 192.227/.229 ****Notes – Job# 887030622 The job was from leak work order N0113691, the date was 06/13/2013 per the operator's records. There was a leak on a 6" HP main and a pumpkin had to be welded around the leak as a final repair. Jake Zourko's welding qualifications were provided for this job. ****	X			
173.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) ****Notes – We looked at eye records for The NDT tech Joeseph Olaf that were required for the job we looked at. However, it was not a transmission pipeline.****	X			
174.	192.709	NDT Records (pipeline life) .243(f)	X			
175.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	X			
176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's)****Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***				X

**Comments:**

<b>CORROSION CONTROL RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
177.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
178.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)	X			
179.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) ****Notes – We looked at records for the inspection interval and visited the field several locations. TS-013977, TS-144893, TS-055824, TS-036466, TS-055212 were examined****	X			
180.	192.491	Test Lead Maintenance .471	X			
181.	192.491	Maps or Records .491(a)	X			
182.	192.491	Examination of Buried Pipe when exposed .459 *****Notes – Checked several construction jobs and crews. If the coating is broken they take PSP readings and check for coating disbondment, dents, generalized corrosion , .etc*****	X			
183.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed. ****Notes – Construction jobs indicate this and also we check EPCRs during DTC inspections***	X			
184.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	X			
185.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	X			
186.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) ****Notes – No bonds per DH****			X	
187.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) ****Notes – No bonds per DH****			X	
188.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
189.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation.	X			
190.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e)	X			
191.	192.491	Electrical Isolation (Including Casings) .467	X			

**Utilities and Transportation Commission**  
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<b>CORROSION CONTROL RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
192.	480-93-110(5)	Casings inspected/tested annually not to exceed <b>fifteen months</b>	X			
193.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods. <b>***Notes – AM demonstrated how to add a known current value into CP sections to look for shorts before conduction further investigations. i.e Cast Iron used as a casing for wrapped steel inserted in the CI**</b>	X			
194.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within <b>90 days</b> <b>***Notes – I did not note any shorted conditions during my record review****</b>			X	
195.	480-93-110(5)(c)	Casing shorts cleared when practical <b>***Notes – I did not note any shorted conditions during my record review****</b>			X	
196.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. <b>Twice annually/7.5 months</b> <b>***Notes – I did not note any shorted conditions during my record review****</b>			X	
197.	192.491	Interference Currents .473 <b>***Notes – I did not note any AC or DC interference during my record review****</b>			X	
198.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) <b>***Notes -None- The H2S levels of the gas are very low.****</b>			X	
199.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) <b>****Notes – Construction jobs indicate this and also we check EPCRs during DTC inspections***</b>	X			
200.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 <b>****Note – None – Only in use at JP (another unit) ****</b>			X	
201.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 <b>***Notes – The “utilidor” bridge crossing at 145th and I-5 in Seattle is exposed to the atmosphere, but no records were available at the time of inspection indicating that an atmospheric corrosion evaluation was being conducted.****</b>	■	X	■	■
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 <b>****Notes – S for .483 and N/A for the .485 portion of this questions****</b>	X			

**Comments:**

<b>PIPELINE INSPECTION (Field)</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
203.	192.161	Supports and anchors	X			
204.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? <b>****Notes – Please review DTC inspections. This standard audit did not have a DTC component. ****</b>			X	
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables <b>****Notes – Please review DTC inspections. This standard audit did not have a DTC component. ****</b>			X	
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? <b>****Notes – Please review DTC inspections. This standard audit did not have a DTC component. ****</b>			X	
207.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. <b>****Notes – Please review DTC inspections. This standard audit did not have a DTC component. ****</b>			X	
208.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified? <b>****Notes – Please review DTC inspections. This standard audit did not have a DTC component. ****</b>			X	
209.	480-93-015(1)	Odorization	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
210.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
211.	192.179	Valve Protection from Tampering or Damage	X			
212.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
213.	192.463	Levels of cathodic protection. <b>***Notes – There was a low CP reading in the field. Please see highlighted reading in the Field Data Collection form***</b>		X		
214.	192.465	Rectifiers	X			
215.	192.467	CP - Electrical Isolation	X			
216.	192.476	Systems designed to reduce internal corrosion	X			
217.	192.479	Pipeline Components exposed to the atmosphere	X			
218.	192.481	Atmospheric Corrosion: monitoring	X			
219.	192.491	Test Stations – Sufficient Number .469	X			
220.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
221.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
222.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? <b>***Notes – Also checked during West King DTC audits***</b>	X			
223.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
224.	192.605	Knowledge of Operating Personnel	X			
225.	480-93-124	Pipeline markers	X			
226.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? <b>***Notes – None noted in field that were damaged other than a light scrape. All information was still legible on the scraped marker.**</b>	X			
227.	192.719	Pre-pressure Tested Pipe (Markings and Inventory) <b>**Notes - None used or stored**</b>			X	
228.	192.195	Overpressure protection designed and installed where required?	X			
229.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	X			
230.	192.741	Telemetry, Recording Gauges	X			
231.	192.751	Warning Signs	X			
232.	192.355	Customer meters and regulators. Protection from damage	X			
233.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	X			
234.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
235.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) <b>***Notes – Checked NOB MDPE pipe storage. All dates were within limits.***</b>	X			
236.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	X			
237.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
238.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? <b>Yes X No</b>				
239.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?	X			
240.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? <b>***Notes – D Ritter was notified and visited the site near the seawall***</b>	X			
241.	192.745	Valve Maintenance (Transmission) <b>***Notes – Please remove from this form. No transmission lines are evaluated during a distribution audit***</b>				X

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
242.	192.747	Valve Maintenance (Distribution)	X			
<b>Facility Sites Visited: ***See field data checklist*****</b>						
<b>Facility Type</b>		<b>Facility ID Number</b>	<b>Location</b>			
<b>Comments:</b> ***Notes – See optional field data collection form for field data***						

**Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)**

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents
ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB-12-05	Mar 23, 12	Cast Iron Pipe (Supplementary Advisory Bulletin)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes

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For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>

# Attachment 1

## Distribution Operator Compressor Station Inspection

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If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		<b>COMPRESSOR STATION PROCEDURES</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
243.	.605(b)					
244.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
245.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			X	
246.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices ( <b>1 per yr/15 months</b> ), prompt repair or replacement			X	
247.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
248.		(b) Tank must be protected according to <b>NFPA #30</b>			X	
249.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems ( <b>must be performance tested</b> ), unless:			X	
250.		• <b>50% of the upright side areas</b> are permanently open, or			X	
251.		• It is an unattended field compressor station of <b>1000 hp or less</b>			X	

**Comments:**  
244-251 No Compressors

			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>COMPRESSOR STATION O&amp;M PERFORMANCE AND RECORDS</b>						
252.	.709	.731(a) Compressor Station Relief Devices ( <b>1 per yr/15 months</b> )			X	
253.		.731(c) Compressor Station Emergency Shutdown ( <b>1 per yr/15 months</b> )			X	
254.		.736(c) Compressor Stations – Detection and Alarms ( <b>Performance Test</b> )			X	

**Comments:**  
252-254 No Compressors

			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>COMPRESSOR STATIONS INSPECTION (Field)</b>						
(Note: Facilities may be “Grandfathered”)						
255.	.163	(c) Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
256.		Door latch must open from inside without a key			X	
257.		Doors must swing outward			X	
258.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
259.		Each gate located within 200 ft of any compressor plant building must open outward			X	
260.		When occupied, the door must be opened from the inside without a key			X	
261.		(e) Does the equipment and wiring within compressor stations conform to the <b>National Electric Code, ANSI/NFPA 70?</b>			X	
262.	.165	(a) If applicable, are there liquid separator(s) on the intake to the compressors?			X	
263.		(b) Do the liquid separators have a manual means of removing liquids?			X	
264.		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	

# Attachment 1

## Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)				S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)							
265.	.167	(a)	ESD system must:				
266.			- Discharge blowdown gas to a safe location			X	
267.			- Block and blow down the gas in the station			X	
268.			- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
269.			- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
270.			ESD system must be operable from at least two locations, each of which is:				
271.	.167		- Outside the gas area of the station			X	
272.			- Not more than 500 feet from the limits of the station			X	
273.			- ESD switches near emergency exits?			X	
274.		(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
275.		(c)	Are ESDs on platforms designed to actuate automatically by...				
276.			- For unattended compressor stations, when:				
277.			▪ The gas pressure equals MAOP plus 15%?			X	
278.			▪ An uncontrolled fire occurs on the platform?			X	
279.			- For compressor station in a building, when				
280.			▪ An uncontrolled fire occurs in the building?			X	
281.			▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to <b>NEC Class 1, Group D</b> is not a source of ignition)?			X	
282.	.171	(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
283.		(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
284.		(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
285.		(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
286.		(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
287.	.173		Is each compressor station building adequately ventilated?			X	
288.	.457		Is all buried piping cathodically protected?			X	
289.	.481		Atmospheric corrosion of aboveground facilities			X	
290.	.603		Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
291.			Are facility maps current/up-to-date?			X	
292.	.615		Emergency Plan for the station on site?			X	
293.	.619		Review pressure recording charts and/or SCADA			X	
294.	.707		Markers			X	
295.	.731		Overpressure protection – relief’s or shutdowns			X	
296.	.735		Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
297.			Is aboveground oil or gasoline storage tanks protected in accordance with <b>NFPA standard No. 30?</b>			X	
298.	.736		Gas detection – location			X	

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**Comments:**  
255-298 No Compressors