

Inspection Output (IOR)

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Inspection Information

Inspection Name	7259 Avista TIMP	Operator(s)	AVISTA CORP (31232)	Plan Submitted	10/04/2017
Status	PLANNED	Lead	Scott A Rukke	Plan Approval	10/06/2017 by Joe Subsits
Start Year	2017	Supervisor	Joe Subsits	All Activity Start	07/17/2017
System Type	GT	Director	Alan E. Rathbun	All Activity End	07/21/2017
Protocol Set ID	GT.2016.02			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

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

NOTE:

We are drafting an interpretation request regarding the first 4 miles of 12-inch on the Kettle Falls pipeline system to ask PHMSA if the pipeline should be classified as transmission. Avista replaced the 8-inch in 2010 with 12-inch heavier wall to drop the stress level below 20%. They not say it is no longer transmission even though it serves a transmission pipeline.

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

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

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

Inspection question set sent to Randy Bareither on 2/17/2017

Method 2. PIR's range from 65'-169'.

FAQ-150. What requirements must an operator meet if there are no high consequence areas on any of its transmission pipelines. [06/20/2005]

An operator need not develop an integrity management program if there are no high consequence areas on its system. The operator must have completed an evaluation to determine that no high consequence areas exist, and this evaluation must be maintained available for inspection. Even if no HCAs exist, however, there are some requirements in Subpart O with which an operator must comply:

- An operator must have a process to periodically evaluate its pipeline to determine if new HCAs have been created. Changes along the pipeline route, including housing construction and creation of new facilities meeting criteria in the definition of identified sites could cause HCAs to come into existence. An operator must be able to demonstrate that it has periodically evaluated its pipeline to assure that there continue to be no HCAs.
- For transmission pipelines operating below 30 percent of SMYS in class 3 or 4 locations but not in an HCA, enhanced protection against third-party damage must be implemented in accordance with 192.935(d).
- An operator must submit semi-annual "performance measure" reports in accordance with 192.945(a) indicating that there are no HCAs on its system.

If the periodic evaluation identifies that a new HCA exists, then the operator must prepare an integrity management plan and meet all the requirements of subpart O.

Field inspection of the Kettle Falls Transmission conducted 9/13/2017 to 9/15/2017. SR

In office inspection conducted on 11/14/2017. SR

The actual Williams Gate is located off 9 Mile Rd.and Wenger Rd. Avista replaced the 8" with 12" X52 0.321wt from Indian Trails Rd and High Voltage Corridor where it switches back to 8" and where their definition of transmission starts.

They do not classify this as transmission because it is under 20% SMYS. We will get an interpretation from PHMSA.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required
								% Complete		
1.	7259 TIMP	Headquarters TIMP	other	--	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Service Line	73	73	66	90.4%	

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total % Complete
					Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Plastic pipe AMAOP				

a. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	7259 TIMP	n/a	IM	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directive s	Involved Groups/Subgroup s	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Office Inspection	--	07/17/2017 07/21/2017	GT IM	IM	7259 TIMP	all types	66	66	66	100.0%

a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

b. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Attendance List 11/14/2017	COMPLETED	11/16/2017	Office Inspection	7259 TIMP

Results (all values, 66 results)

IM.BA: Baseline Assessments

1. Question Result, ID, References	Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a);192.921(c);192.921(h))
Question Text	Does the process include requirements for specifying an assessment method(s) for each covered segment that is best suited for identifying anomalies associated with specific threats identified for the segment?
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's on the Kettle Falls transmission line. Section 4.1.1 (Pg. 151)

2. Question Result, ID, References	NA, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b);192.921(a);192.921(c);192.921(h))
Question Text	<i>Do records demonstrate that the assessment method(s) specified for each covered segment is best suited for identifying anomalies associated with specific threats identified for the segment?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's and has conducted no assessments.
3. Question Result, ID, References	Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c);192.921(b))
Question Text	<i>Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?</i>
Assets Covered	7259 TIMP
Result Notes	No covered segments in WA but procedures are present. Section 5.0 (Pg 192)
4. Question Result, ID, References	NA, IM.BA.BASCHEDULE.R, 192.947(c) (192.917(c);192.919(c);192.921(b))
Question Text	<i>Do records demonstrate that the BAP contains a schedule for completing the assessment activities for all covered segments that appropriately considered the applicable risk factors in the prioritization of the schedule as required by the process?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Section 1.1.2 (Pg 6) - Addressed here in plan but N/A for Avista
5. Question Result, ID, References	Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c);192.921(f);192.921(g))
Question Text	<i>Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?</i>
Assets Covered	7259 TIMP
Result Notes	No covered segments in WA. Procedures are present. Section 5.4 (Pg 192-193) / Section 13.2.2 (Pg 284)
6. Question Result, ID, References	NA, IM.BA.BANEW.R, 192.947(d) (192.905(c);192.911(p);192.921(f);192.921(g))
Question Text	<i>Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's.
7. Question Result, ID, References	Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e))
Question Text	<i>Does the process include requirements for conducting integrity assessments (baseline and reassessment) in a manner that minimizes environmental and safety risks?</i>
Assets Covered	7259 TIMP

Result Notes No covered segments. Procedures are present. Section 4.4.1 (Pg 156) pg 185; Section 6.5 (Pg 198); 6.7 (pg 202) E&R #1 – Defect Excavation and Assessment; Section 13.3.1 pg 285

8. Question Result, ID, References NA, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o);192.919(e))

Question Text Do records demonstrate that integrity assessments (baseline and reassessment) have been conducted in a manner that minimizes environmental and safety risks?

Assets Covered 7259 TIMP

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
Avista has no HCA's.

IM.CA: Continual Evaluation and Assessment

9. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 192.937(b) (192.917(a);192.917(b);192.917(c);192.917(d);192.917(e))

Question Text Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?

Assets Covered 7259 TIMP

Result Notes No covered segments, procedures in Section 7.1 pg 205 (7.2.2) pg 209

10. Question Result, ID, References NA, IM.CA.PERIODICEVAL.R, 192.947(d) (192.917(a);192.917(b);192.917(c);192.917(d);192.917(e);192.937(b))

Question Text Do records demonstrate that periodic evaluations of pipeline integrity have been performed based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?

Assets Covered 7259 TIMP

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. There are no HCA's on the Kettle Falls transmission line.

11. Question Result, ID, References Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931)

Question Text Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?

Assets Covered 7259 TIMP

Result Notes No HCA's, procedures in Section 7.2.2, i. – iv. (Pg 211); Section 7.2.1 (Pgs 206-207); Section 4.1.1 (Pg 151); Section 4.2 (Pg 154); Section 4.3 (Pg 155); Section 7.2.1 Pgs 206-209 meet the requirements of 192.931

12. Question Result, ID, References NA, IM.CA.REASSESSMETHOD.R, 192.947(d) (192.937(c))

Question Text Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?

Assets Covered 7259 TIMP

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

13. Question Result, ID, References Sat, IM.CA.LOWSTRESSREASSESS.P, 192.941(a) (192.941(b);192.941(c))

Question Text Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?

Assets Covered 7259 TIMP

Result Notes	No covered segments, procedures found in Section 7.2.1 (Pg 207-209) (Low Stress Reassessment)
14. Question Result, ID, References	NA, IM.CA.LOWSTRESSREASSESS.R, 192.947(d) (192.941(a);192.941(b);192.941(c))
Question Text	<i>Do records demonstrate that the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion is adequate and being performed as required?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's. Section 7.2.1 (Pg 207-209) (Low Stress Reassessment)
15. Question Result, ID, References	Sat, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a);192.939(b);192.913(c))
Question Text	<i>Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?</i>
Assets Covered	7259 TIMP
Result Notes	Avista has no HCA's but has addressed these requirements in their plan. Section 7.2.2 (Pg 209); Table 7.2-2 (Pg 212) Max Interval at various SMYS levels (>=50% >=30% - <50%, <30%); Table 7.2-1 (Pg 210) Minimum Reassessment Intervals
16. Question Result, ID, References	NA, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a);192.939(a);192.939(b);192.913(c))
Question Text	<i>Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's procedures?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's.
17. Question Result, ID, References	Sat, IM.CA.REASSESSWAIVER.P, 192.943(a) (192.943(b))
Question Text	<i>Does the process include requirements for reassessment interval waivers?</i>
Assets Covered	7259 TIMP
Result Notes	No HCA's but addressed in Section 7.2.3 (Pg 217)
18. Question Result, ID, References	NA, IM.CA.REASSESSWAIVER.R, 192.947(d) (192.943(a);192.943(b))
Question Text	<i>Do records demonstrate that reassessment interval waivers have been adequately implemented, if applicable?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's.
19. Question Result, ID, References	NA, IM.CA.REASSESEXCPERF.P, 192.913(a) (192.913(b);192.913(c))
Question Text	<i>Does the process include requirements for deviations from reassessment requirements based on exceptional performance?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's.
20. Question Result, ID, References	NA, IM.CA.REASSESEXCPERF.R, 192.947(d) (192.913(a);192.913(b);192.913(c))
Question Text	<i>Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?</i>

Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's.

IM.HC: High Consequence Areas

21. Question Result, ID, References	Sat, IM.HC.HCAID.P, 192.905(a)
Question Text	<i>Does the process include the methods defined in 192.903 High Consequence Area (1) and/or 192.903 High Consequence Area (2) to be applied to each pipeline for the identification of high consequence areas?</i>
Assets Covered	7259 TIMP
Result Notes	No HCA's but addressed in Section 2.1.1, (Pgs 33-38) (We utilize Method 2)
22. Question Result, ID, References	Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a);192.907(a);192.911(a))
Question Text	<i>Do records demonstrate that the identification of pipeline segments in high consequence areas was completed by December 17, 2004 in accordance with process requirements?</i>
Assets Covered	7259 TIMP
Result Notes	No HCA's were identified but the study was done by 2004. App 2-1, 1.1.4 – 1.5.3, (Pgs 302-305);
23. Question Result, ID, References	Sat, IM.HC.HCAPIR.P, 192.903 (192.905(a))
Question Text	<i>Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?</i>
Assets Covered	7259 TIMP
Result Notes	Avista has no HCA's but does have a procedure which is addressed in Section 2.1.1, (Pgs 33-38) (We utilize Method 2)
24. Question Result, ID, References	NA, IM.HC.HCAPIR.R, 192.947(d) (192.903;192.905(a))
Question Text	<i>Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No HCA's.
25. Question Result, ID, References	Sat, IM.HC.HCASITES.P, 192.903 (192.905(b))
Question Text	<i>Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?</i>
Assets Covered	7259 TIMP
Result Notes	No Identified Sites but a procedure is in place. Section 2.1.1 (Pgs 33-34); Appendix 2-1, Clause 1.4 (Pg 303)
26. Question Result, ID, References	Sat, IM.HC.HCASITES.R, 192.947(d) (192.903;192.905(b))
Question Text	<i>Do records indicate identification of identified sites being performed as required?</i>
Assets Covered	7259 TIMP
Result Notes	No Identified Sites but a procedure is in place. Section 2.3.1 (Pg 38-41); Appendix 2-1, 1.4.1 (Pg 303); WA IMP Binder - Public Safety Officials Tab

27. Question Result, ID, References	Sat, IM.HC.HCAMETHOD1.P, 192.903(1)(i) (192.903(1)(ii);192.903(1)(iii);192.903(1)(iv))
Question Text	<i>Is the integrity management process adequate for application of 192.903 High Consequence Area definition (1) for identification of HCAs?</i>
Assets Covered	7259 TIMP
Result Notes	No HCA's but addressed in plan. Section 2.1.1 (Pg 33)
28. Question Result, ID, References	NA, IM.HC.HCAMETHOD1.R, 192.947(d) (192.903 (1)(i);192.903(1)(ii);192.903(1)(iii);192.903(1)(iv))
Question Text	<i>Do records demonstrate that application of the 192.903 High Consequence Area definition (1) for the identification of HCAs was adequate?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No HCA's and method 2 is utilized.
29. Question Result, ID, References	Sat, IM.HC.HCAMETHOD2.P, 192.903(2)(i) (192.903(2)(ii))
Question Text	<i>Is the integrity management process adequate for application of 192.903 High Consequence Area definition (2) for identification of HCAs?</i>
Assets Covered	7259 TIMP
Result Notes	No HCA's but method 2 is used and addressed in their plan Section 2.1.1, (Pgs 33-38) (We utilize Method 2); Appendix 2-1, Clauses 1 (Pg 299) and 1.5.1 (Pg 303) Clauses 1.4 & 1.5 (Pg 303)
30. Question Result, ID, References	NA, IM.HC.HCAMETHOD2.R, 192.947(d) (192.905(a);192.903(2)(ii))
Question Text	<i>Do records demonstrate that the application of 192.903 High Consequence Area definition (2) for identification of HCAs was adequate?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No HCA's but addressed in plan. App 2-1 1.3 (Pg 302); WA IMP Binder
31. Question Result, ID, References	NA, IM.HC.HCANEW.P, 192.905(c)
Question Text	<i>Does the process include a requirement for evaluation of newly identified areas that may show that a pipeline segment impacts a high consequence area?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No HCA's.
32. Question Result, ID, References	NA, IM.HC.HCANEW.R, 192.947(d) (192.905(c))
Question Text	<i>Do records demonstrate that evaluations of newly identified areas that may show that a pipeline segment impacts a high consequence area are being performed as required?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No HCA's identified to date.

IM.PM: Preventive and Mitigative Measures

33. Question Result, ID, References	Sat, IM.PM.PMMGENERAL.P, 192.935(a)
Question Text	<i>Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?</i>

Assets Covered	7259 TIMP
Result Notes	No HCA's but procedures are in place. Section 8.2 (Pg 218); Section 8.2.5 (Pg 228)
34. Question Result, ID, References	NA, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a))
Question Text	<i>Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No HCA's.
35. Question Result, ID, References	Sat, IM.PM.PMMTPD.P, 192.917(e)(1) (192.935(b)(1);192.935(e))
Question Text	<i>Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?</i>
Assets Covered	7259 TIMP
Result Notes	No HCA's but procedure in place. Section 8.2.2 (Pg 223–226); See P&M Comm. Binder; Annual Reports Binder (Performance Measures)
36. Question Result, ID, References	NA, IM.PM.PMMTPD.R, 192.947(d) (192.917(e)(1);192.935(b)(1);192.935(e))
Question Text	<i>Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No covered segments but addressed - Section 8.2.2 (Pg 223–226); See P&M Comm. Binder; Annual Reports Binder (Performance Measures)
37. Question Result, ID, References	Sat, IM.PM.PMMTPDSMYS.P, 192.935(d) (192.935(e);192 Table E.II.1)
Question Text	<i>Does the process include requirements for preventive and mitigative requirements for pipelines operating below 30% SMYS?</i>
Assets Covered	7259 TIMP
Result Notes	Reviewed leak survey records for the entire kettle Falls system. All class 3 areas where surveyed once annually and in between the annual surveys they conduct a special survey. The entire class 3 areas are surveyed twine annually. WA Transmission Excavation Standby book. Excavation standby tickets 6 in Spokane and 20 in Colville. See considerations. Applicable to non HCA segments. FAQ-150 gives guidance for 192.935(d)

FAQ-150. What requirements must an operator meet if there are no high consequence areas on any of its transmission pipelines. [06/20/2005]

An operator need not develop an integrity management program if there are no high consequence areas on its system. The operator must have completed an evaluation to determine that no high consequence areas exist, and this evaluation must be maintained available for inspection. Even if no HCAs exist, however, there are some requirements in Subpart O with which an operator must comply:

- An operator must have a process to periodically evaluate its pipeline to determine if new HCAs have been created. Changes along the pipeline route, including housing construction and creation of new facilities meeting criteria in the definition of identified sites could cause HCAs to come into existence. An operator must be able to demonstrate that it has periodically evaluated its pipeline to assure that there continue to be no HCAs.

- For transmission pipelines operating below 30 percent of SMYS in class 3 or 4 locations but not in an HCA, enhanced protection against third-party damage must be implemented in accordance with 192.935(d).

192.935(d)

(d) Pipelines operating below 30% SMYS. An operator of a transmission pipeline operating below 30% SMYS located in a high consequence area must follow the requirements in paragraphs (d)(1) and (d)(2) of this section. An operator of a transmission pipeline operating below 30% SMYS located in a Class 3 or Class 4 area but not in a high consequence area must follow the requirements in paragraphs (d)(1), (d)(2) and (d)(3) of this section

(1) Apply the requirements in paragraphs (b)(1)(i) and (b)(1)(iii) of this section to the pipeline; and

(2) Either monitor excavations near the pipeline, or conduct patrols as required by § 192.705 of the pipeline at bi-monthly intervals. If an operator finds any indication of unreported construction activity, the operator must conduct a follow up investigation to determine if mechanical damage has occurred.

(3) Perform semi-annual leak surveys (quarterly for unprotected pipelines or cathodically protected pipe where electrical surveys are impractical).

38. Question Result, ID, References

Sat, IM.PM.PMMPDMSMYS.R, 192.947(d) (192.935(d);192.935(e);192 Table E.II.1)

Question Text

Do records demonstrate that preventive and mitigative requirements for pipelines operating below 30% SMYS are being performed as required?

Assets Covered

7259 TIMP

Result Notes

Reviewed all of the leak surveys for the class areas on the system. Done twice per year. No leaks noted.

Reviewed the standby records for excavation tickets. All good. Also reviewed some locations in the field where excavations were being conducted and all records were good.

Notes to consider during the office inspection:

Under 30% in a class 3?

(d) Pipelines operating below 30% SMYS. An operator of a transmission pipeline operating below 30% SMYS located in a high consequence area must follow the requirements in paragraphs (d)(1) and (d)(2) of this section. **An operator of a transmission pipeline operating below 30% SMYS located in a**

Class 3 or Class 4 area but not in a high consequence area must follow the requirements in paragraphs (d)(1), (d)(2) and (d)(3) of this section

- (1) Apply the requirements in paragraphs (b)(1)(i) and (b)(1)(iii) of this section to the pipeline; and
- (2) Either monitor excavations near the pipeline, or conduct patrols as required by § 192.705 of the pipeline at bi-monthly intervals. If an operator finds any indication of unreported construction activity, the operator must conduct a follow up investigation to determine if mechanical damage has occurred.
- (3) Perform semi-annual leak surveys (quarterly for unprotected pipelines or cathodically protected pipe where electrical surveys are impractical).

39. Question Result, ID, References	Sat, IM.PM.PMMOF.P, 192.935(b)(2)
Question Text	<i>Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?</i>
Assets Covered	7259 TIMP
Result Notes	Addressed in Section 8.2.3 (Pg 226)
40. Question Result, ID, References	NA, IM.PM.PMMOF.R, 192.947(d) (192.935(b)(2))
Question Text	<i>Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.
41. Question Result, ID, References	Sat, IM.PM.PMMCORR.P, 192.917(e)(5)
Question Text	<i>Does the process adequately account for taking required actions to address significant corrosion threats?</i>
Assets Covered	7259 TIMP
Result Notes	Section 8.2.4 (Pg 227)
42. Question Result, ID, References	NA, IM.PM.PMMCORR.R, 192.947(b) (192.917(e)(5))
Question Text	<i>Do records demonstrate that required actions are being taken to address significant corrosion threats as required?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No covered segments.
43. Question Result, ID, References	NA, IM.PM.PMMASORCV.P, 192.935(c)
Question Text	<i>Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.
44. Question Result, ID, References	NA, IM.PM.PMMASORCV.R, 192.947(d) (192.935(c))
Question Text	<i>Do records demonstrate that the operator has determined, based on risk, whether automatic shut-off valves or remote control valves should be added to protect high consequence areas?</i>
Assets Covered	7259 TIMP

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No HCA's.

IM.QA: Quality Assurance

45. Question Result, ID, References	Sat, IM.QA.QARM.P, 192.911(l)
Question Text	Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?
Assets Covered	7259 TIMP
Result Notes	Procedures are in Section 1.2.2 (Pg 18); Section 12.4 (Pg 269); Corrective Actions to be completed in accordance with Section 12.7 (Pg 273); Section 12.8 (Pg 276)
46. Question Result, ID, References	NA, IM.QA.QARM.R, 192.947(d) (192.911(l))
Question Text	Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S, Section 12?
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.
47. Question Result, ID, References	Sat, IM.QA.IMPERSONNEL.P, 192.915(a) (192.915(b);192.915(c))
Question Text	Does the process include requirements to assure personnel involved in the integrity management program are qualified for their assigned responsibilities?
Assets Covered	7259 TIMP
Result Notes	Section 12.5.3 (Pgs 270); Section 1.2.2 (Pgs 9)
48. Question Result, ID, References	NA, IM.QA.IMPERSONNEL.R, 192.947(e) (192.915(a);192.915(b);192.915(c))
Question Text	Do records demonstrate that personnel involved in the integrity management program are qualified for their assigned responsibilities?
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No covered segments.
49. Question Result, ID, References	Sat, IM.QA.IMNONMANDT.P, 192.7(a)
Question Text	Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2008) be addressed by an appropriate approach?
Assets Covered	7259 TIMP
Result Notes	No covered segments in WA. This is addressed in (B31.8 – 12.2 (6) – Annual Plan Review) Section 1.1.2 (Pg 8)
50. Question Result, ID, References	Sat, IM.QA.IMMOC.P, 192.911(k) (192.909(a);192.909(b))
Question Text	Is the process for management of changes that may impact pipeline integrity adequate?
Assets Covered	7259 TIMP
Result Notes	Addressed in Section 13.6 (Pg 291-296) Record of Change Form (Figure 13.6-1, Pg. 293); Section 13.7 (Pg 297); Section 13.2 (Pg 283); Section 13.3.2 (Pg 286); Sections 13.2.1-13.2.4 (Pgs 283-285); Section 13.4 (Pgs 287-290), Figure 13-1 (Pg 279); Figure 13.6-1 (Pg 293-296); Section 13.0 (Pg 277)
51. Question Result, ID, References	NA, IM.QA.IMMOC.R, 192.947(d) (192.909(a);192.909(b);192.911(k))
Question Text	Do records demonstrate that changes that may impact pipeline integrity are being managed as required?

Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. Avista has no HCA's but does have a process for tracking management of change requirements in their Section 13.6 (Pg 291-296) Record of Change Form (Figure 13.6-1, Pg. 293); Section 13.7 (Pg 297); Section 13.2 (Pg 283); Section 13.3.2 (Pg 286); Sections 13.2.1-13.2.4 (Pgs 283-285); Section 13.4 (Pgs 287-290), Figure 13-1 (Pg 279); Figure 13.6-1 (Pg 293-296); Section 13.0 (Pg 277)

52. Question Result, ID, References	NC, IM.QA.IMPERFEFFECTIVE.P, 192.945(a) (192.913(b);192.951)
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Question Text	Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?
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Assets Covered	7259 TIMP
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Result Notes	No covered segments in WA but process is addressed in Section 9.2 (Pg 242); Section 9.3 (Pg 243)
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FAQ 150 covers requirements under 192.945(a)

FAQ-150. What requirements must an operator meet if there are no high consequence areas on any of its transmission pipelines. [06/20/2005]

An operator need not develop an integrity management program if there are no high consequence areas on its system. The operator must have completed an evaluation to determine that no high consequence areas exist, and this evaluation must be maintained available for inspection. Even if no HCAs exist, however, there are some requirements in Subpart O with which an operator must comply:

- An operator must have a process to periodically evaluate its pipeline to determine if new HCAs have been created. Changes along the pipeline route, including housing construction and creation of new facilities meeting criteria in the definition of identified sites could cause HCAs to come into existence. An operator must be able to demonstrate that it has periodically evaluated its pipeline to assure that there continue to be no HCAs.

- For transmission pipelines operating below 30 percent of SMYS in class 3 or 4 locations but not in an HCA, enhanced protection against third-party damage must be implemented in accordance with 192.935(d).

- An operator must submit semi-annual "performance measure" reports in accordance with 192.945(a) indicating that there are no HCAs on its system.

If the periodic evaluation identifies that a new HCA exists, then the operator must prepare an integrity management plan and meet all the requirements of subpart O

Enforcement Guidance in 192 WinDOT

Guidance Information	<p>1. <u>This section has been amended from the original requirement to submit semi-annual reports of the program effective to an annual reporting of performance as part of the PHMSA annual report. The change was effective January 1, 2011.</u></p> <p>2. Failure to submit an annual report should be cited under §191.17. Failure to collect and document the necessary performance measure should be cited under §192.945.</p>
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53. Question Result, ID, References	Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b);192.951)
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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?
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Assets Covered	7259 TIMP
Result Notes	No covered segments in WA but process addressed in Section 9.2 (Pg 242); Section 9.3 (Pg 243)
54. Question Result, ID, References	NA, IM.QA.IMPERFEFFECTIVE.R, 192.947(d) (192.913(b);192.945(a);192.951)
Question Text	<i>Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No covered segments in WA.
55. Question Result, ID, References	NA, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b);192.945(a);192.951)
Question Text	<i>Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No covered segments in WA.
56. Question Result, ID, References	Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b);192.947(c);192.947(d);192.947(e);192.947(f);192.947(g);192.947(h);192.947(i);192.911(n))
Question Text	<i>Is the process adequate to assure that required records are maintained for the useful life of the pipeline?</i>
Assets Covered	7259 TIMP
Result Notes	No covered segments in WA but this process is found in Section 10.1.1 (Pg 244) Section 3.1 (Pg 52) / Section 3.3 (Pg 78) / Section 10.1.2 (Pg 254) To be in conformance with Section 4 (pg 151) / Section 5.0 (Pg 192) / Section 10.1.2 (Pg 254) / Appendix 5-1 (Pgs 310-311) Section 10.2 (Pgs 259) Section 12.5 (Pgs 270) Section 6.4 (Pg 196) / Section 10.1.2, Table 10.1-1 (Pg 245) Section 6.4 (Pg 196) / Section 10.1.2, Table 10.1-1 (Pg 245) Section 7.2.1 (Pg 206)(Confirmatory Direct Assessment) / Section 10.1.2, Table 10.1-1 (Pg 245) Section 10.1.2, Table 10.1-1 (Pg 245-247)
57. Question Result, ID, References	Sat, IM.QA.RECORDS.R, 192.947(a) (192.947(b);192.947(c);192.947(d);192.947(e);192.947(f);192.947(g);192.947(h);192.947(i))
Question Text	<i>Are required records being maintained for the useful life of the pipeline?</i>
Assets Covered	7259 TIMP
Result Notes	All necessary records were maintained.

IM.RA: Risk Analysis

58. Question Result, ID, References	Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e);192.913(b)(1))
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Question Text	<i>Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?</i>
Assets Covered	7259 TIMP
Result Notes	No covered segments but procedures are in place. Section 3.1 (Pgs 52) List of Threats; Section 3.3 (Pg 124) cyclic fatigue and seam threats 3.5.3 Page 148 Interactive threats 3.1 pg 52 All 9 threats potential
59. Question Result, ID, References	NA, IM.RA.THREATID.R, 192.947(b) (192.917(a);192.917(e);192.913(b)(1))
Question Text	<i>Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No covered segments.
60. Question Result, ID, References	Sat, IM.RA.RADATA.P, 192.917(b) (192.917(e)(1);192.911(k))
Question Text	<i>Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?</i>
Assets Covered	7259 TIMP
Result Notes	No covered segments but the procedures are in place. Section 3.1 (Pg 52); Table 3-1 (Pg 55) Section 3.3.2 (Pgs 78), Table 3.2-1 (Pg 69); Section 3.2 (Pg 68) Section 3.6 (Pg 149) Ongoing re-evaluation Section 13.2.2 (Pg 284)
61. Question Result, ID, References	NA, IM.RA.RADATA.R, 192.947(b) (192.917(b);192.917(e)(1);192.911(k))
Question Text	<i>Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?</i>
Assets Covered	7259 TIMP
Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No HCA's
62. Question Result, ID, References	Sat, IM.RA.RAMETHOD.P, 192.917(c) (192.917(d))
Question Text	<i>Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment?</i>
Assets Covered	7259 TIMP
Result Notes	No covered segments in WA. Procedures are in place - Section 3.3 (Pg 78) Risk Assess Methodology; Section 3.7 (Pg 149) Validation of Risk Assessment (IRAS software)
63. Question Result, ID, References	Sat, IM.RA.RAFACTORS.P, 192.917(c)
Question Text	<i>Does the process include requirements that factors that could affect the likelihood of a release, and factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?</i>
Assets Covered	7259 TIMP

Result Notes	No covered segments in WA but procedures are in place - Section 3.3 (Pg 78) Risk Assess Methodology; Section 3.3.3 (Pg 131) Consequence Assessment
	i. Section 3.1 (Pg 52);
	ii. Section 3.1 (Pg 52), Table 3-1 (Pg 55)
	iii. Table 3.2-1 (Pg 69);
	iv. Section 3.3 (Pg 78);
	v. Section 3.0 (Pg 51), App 2-1 pg 299

64. Question Result, ID, References	NA, IM.RA.RAFACTORS.R, 192.947(b) (192.917(c))
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Question Text	<i>Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?</i>
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Assets Covered	7259 TIMP
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Result Notes	No such relevant facilities/equipment existed in the scope of inspection review.No covered segments in WA.
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65. Question Result, ID, References	Sat, IM.RA.RAMOC.P, 192.917(c)
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Question Text	<i>Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?</i>
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Assets Covered	7259 TIMP
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Result Notes	No covered segments in WA but procedures are in place. i. Section 3.6 (Pg 149);
	ii. Section 7.1 (Pg 205);
	iii. Section 3.7.4 (Pg 150);
	iv. Section 3.6, Section 3.7 (149-150)

66. Question Result, ID, References	NA, IM.RA.RAMOC.R, 192.947(b) (192.917(c))
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Question Text	<i>Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?</i>
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Assets Covered	7259 TIMP
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Result Notes	No such relevant facilities/equipment existed in the scope of inspection review. No covered segments in WA.
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Report Parameters: Results: all

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