

Inspection Information

Inspection Name	2018 PSE Transmission - Intrastate	Operator(s)	PUGET SOUND ENERGY (22189)	Plan Submitted	04/26/2018
		Lead	David Cullom	Plan Approval	04/30/2018 by Joe Subsites
Status	PLANNED	Observer(s)	Denise Crawford	All Activity Start	06/11/2018
Start Year	2018	Supervisor	Joe Subsites	All Activity End	06/19/2018
System Type	GT	Director	Sean Mayo	Inspection Submitted	--
Protocol Set ID	GT.2018.01			Inspection Approval	--

Inspection Summary

There were no probable violations or areas of concern observed during this inspection.

Field Days were 6/11-6/14 The exit interview was conducted on 6/19.

This review consisted of records verification and field validation. Several facilities were visited in the field from Edmonds to Tumwater, WA to verify proper pressure regulation, cathodic protection, and odorant levels. New field locations were selected for this inspection that were not previously observed during the last transmission inspection. The assets were well maintained when visited in the field and had no noted record keeping issues. Some program areas are managed at the corporate level, such as OQ, damage prevention, and public awareness. If additional detail on a specific pipeline safety program is needed, one should reference other inspections, such as the West King County and Snohomish inspections, conducted during this inspection year.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.		PSE Intrastate Trans	other	PSE Intrastate Trans	Compressor Stations Storage Fields Bottle/Pipe - Holders Service Line Offshore Vault GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Plastic pipe AMAOP Abandoned	124	124	124	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.		GT IM Implementation, GT IM, Core	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	R, O	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Records And Field	--	06/11/2018 06/19/2018	GT IM Implementation, GT IM, Core	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	all assets	all types	124	124	124	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

This inspection has no Form data entry.

Results (all values, 124 results)

136 (instead of 124) results are listed due to re-presentation of questions in more than one sub-group.

AR.CDA: Confirmatory Direct Assessment

1. Question Result, ID, References **Sat**, AR.CDA.CDAREVQUAL.R, 192.947(h) (192.915(a), 192.915(b))
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*
Assets Covered
Result Notes The intrastate pipelines have gone through a CDA. Alan Mulkey and Michelle Gallardo perform the CDA as a reassessment method after performing ECDA. At the 7 year mark they do the CDA. I checked Alan and Michelle's OQ records for conducting the assessment. Exp 12/31/2019 (4yr qual)
2. Question Result, ID, References NA, AR.CDA.CDAREVQUAL.O, 192.915(a) (192.915(b))
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
Assets Covered
Result Notes No such activity/condition was observed during the inspection.
3. Question Result, ID, References **Sat**, AR.CDA.CDAEXTCORR.R, 192.947(h) (192.931(b))
Question Text *Do records indicate that the external corrosion plan was properly implemented?*
Assets Covered
Result Notes For pre-assessment, indirect inspection, direct examination, and post assessment We looked at South Seattle in the TIMP audit.

Other projects include a casing that was removed at North Midway (New HCA - due to the day care) and a CDA was done on South Seattle. 2017 a CDA was done with DCVG.

South Seattle pre-assessment and direct examination was reviewed. There were 2 digs. One indication was a coating holiday that resulted in no corrosion present. This was on the 20" South Seattle line.
4. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, AR.PTI, AR.SCC, IM.PM)
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.
5. Question Result, ID, References NA, AR.CDA.CDAINTCORR.R, 192.947(h) (192.931(c))
Question Text *Do records demonstrate that the internal corrosion plan was properly implemented?*
Assets Covered
Result Notes No such activity/condition was observed during the inspection. PSE wrote an ICDA plan and added it to the TIMP plan but haven't used it.
6. Question Result, ID, References NA, AR.CDA.CDAINDICATION.R, 192.947(h) (192.931(d))
Question Text *Do records demonstrate that the next assessment should have been accelerated?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review. There was a coating anomaly on the South Seattle. No indications on North Midway.

AR.EC: External Corrosion Direct Assessment (ECDA)

7. Question Result, ID, References **Sat**, AR.EC.ECDAPREASSESS.R, 192.947(g) (192.925(b)(1))

- Question Text *Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?*
- Assets Covered
- Result Notes Lynnwood in 2015 and parts of North Midway in 2015 and 2016. They looked at regions, feasibility, tool selection form. The threats are incorrect operations from the South Seattle one. Third party is high across the board. Since TIMP started they haven't found 3PD to be an active threat.
8. Question Result, ID, References **Sat**, AR.EC.ECDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))
- Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*
- Assets Covered
- Result Notes See previous response. Vendors do not perform ECDA for PSE.
9. Question Result, ID, References NA, AR.EC.ECDAREVQUAL.O, 192.915(a) (192.915(b))
- Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
- Assets Covered
- Result Notes No such activity/condition was observed during the inspection.
10. Question Result, ID, References **Sat**, AR.EC.ECDAINTEGRATION.R, 192.947(g) (192.917(b))
- Question Text *Do records demonstrate that the operator integrated other data/information when evaluating data/results?*
- Assets Covered
- Result Notes PSE updates the risk model in Dynamic Risk. They use a spreadsheet to export data to Dynamic Risk (software) It has well defined data steward subject areas.
11. Question Result, ID, References **Sat**, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))
- Question Text *Do records demonstrate that the operator identified ECDA Regions?*
- Assets Covered
- Result Notes This is part of the preassessment. For example Olympia, is one region due to the geography.
12. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.IC, AR.IL, AR.LSR, AR.OT, AR.PTI, AR.SCC, IM.PM)
- Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
- Assets Covered
- Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.
13. Question Result, ID, References **Sat**, AR.EC.ECDAINDIRECT.R, 192.947(g) (192.925(b)(2))
- Question Text *Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?*
- Assets Covered
- Result Notes North Midway Region 6 2016. They did full ECDA. They had an indication of 11% prior to digging. (flagged as minor) the other indication was a verification dig.
14. Question Result, ID, References **Sat**, AR.EC.ECDADIRECT.R, 192.947(g) (192.925(b)(3))
- Question Text *Do records demonstrate that excavations, direct examinations, and data collection were performed in accordance with NACE SP 0502-2010, Sections 5 and 6.4.2 and ASME B31.8S-2004, Section 6.4?*
- Assets Covered
- Result Notes The practices are suitable.
15. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.R, 192.947(g) (192.925(b)(3)(iii))
- Question Text *Do records demonstrate that changes in the ECDA plan have been implemented and documented?*
- Assets Covered
- Result Notes No such event occurred, or condition existed, in the scope of inspection review. No MOCs for any changes per PSE.

16. Question Result, ID, References **Sat**, AR.EC.ECDAPOSTASSESS.R, 192.947(g) (192.925(b)(4))
Question Text *Do records demonstrate that the requirements for post-assessment were met?*
Assets Covered
Result Notes They used 4 forms. Remaining life was shown for HCA 6. No corrosion was found.

AR.IC: Internal Corrosion Direct Assessment (ICDA)

17. Question Result, ID, References NA, AR.IC.ICDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ICDA assessments or review and analyze assessment results, are qualified for the tasks they perform?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

18. Question Result, ID, References NA, AR.IC.ICDAREVQUAL.O, 192.915(a) (192.915(b))
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

19. Question Result, ID, References NA, AR.IC.ICDAPREASSESS.R, 192.927(c)(1) (192.947(g))
Question Text *Do records demonstrate that the requirements for an ICDA pre-assessment were met?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

20. Question Result, ID, References NA, AR.IC.ICDAINTEGRATION.R, 192.917(b) (192.947(g))
Question Text *Do records demonstrate that other data/information was integrated when evaluating data/results?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

21. Question Result, ID, References NA, AR.IC.ICDAREGION.R, 192.947(g) (192.927(c)(2), 192.927(c)(5))
Question Text *Do records demonstrate that ICDA Regions were adequately identified?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

22. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IL, AR.LSR, AR.OT, AR.PTI, AR.SCC, IM.PM)
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.

23. Question Result, ID, References NA, AR.IC.ECDAPOSTASSESS.R, 192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.477)
Question Text *Do records demonstrate that the operator assessed the effectiveness of the ICDA process?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.IL: In-Line Inspection (Smart Pigs)

24. Question Result, ID, References NA, AR.IL.ILIREVIEWQUAL.R, 192.947(g) (192.915(a), 192.915(b))
Question Text *Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?*
Assets Covered

	Result Notes	No such event occurred, or condition existed, in the scope of inspection review. Sumas is the only one so far that uses ILI tools.
25.	Question Result, ID, References	NA, AR.IL.ILIREVIEWQUAL.O, 192.915(a) (192.915(b))
	Question Text	<i>From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?</i>
	Assets Covered	
	Result Notes	No such activity/condition was observed during the inspection.
26.	Question Result, ID, References	NA, AR.IL.ILISPECS.R, 192.947(g) (192.933(b))
	Question Text	<i>Do records demonstrate that the ILI specifications were complete and adequate?</i>
	Assets Covered	
	Result Notes	No such event occurred, or condition existed, in the scope of inspection review. Sumas is the only one so far that uses ILI tools
27.	Question Result, ID, References	Sat , AR.IL.ASSESSMETHOD.R, 192.947(g) (192.919(b), 192.921(a), 192.937(c))
	Question Text	<i>Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?</i>
	Assets Covered	
	Result Notes	It is in the pre-inspection forms and in the TIMP annual report. North Midway was reviewed.
28.	Question Result, ID, References	NA, AR.IL.ILIVALIDATE.R, 192.947(g) (192.921(a)(1))
	Question Text	<i>Do records demonstrate that the operator has validated ILI assessment results per their process?</i>
	Assets Covered	
	Result Notes	No such event occurred, or condition existed, in the scope of inspection review.
29.	Question Result, ID, References	NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.LSR, AR.OT, AR.PTI, AR.SCC, IM.PM)
	Question Text	<i>Do records demonstrate that required actions are being taken to address significant corrosion threats as required?</i>
	Assets Covered	
	Result Notes	No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.
30.	Question Result, ID, References	NA, AR.IL.ILIVALIDATE.O, 192.921(a)(1)
	Question Text	<i>From observation of field activities, do the employees and vendors validate ILI assessment results per their process?</i>
	Assets Covered	
	Result Notes	No such event occurred, or condition existed, in the scope of inspection review. Sumas is the only system so far that uses ILI tools.
31.	Question Result, ID, References	NA, AR.IL.ILINTEGRATION.R, 192.947(g) (192.917(b))
	Question Text	<i>Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?</i>
	Assets Covered	
	Result Notes	No such event occurred, or condition existed, in the scope of inspection review. Sumas is the only one so far that uses ILI
32.	Question Result, ID, References	NA, AR.IL.ILIACCEPTCRITERIA.R, 192.947(g) (192.921(a))
	Question Text	<i>Do records indicate adequate implementation of the process for ILI survey acceptance?</i>
	Assets Covered	
	Result Notes	No such event occurred, or condition existed, in the scope of inspection review. Sumas is the only one so far that uses ILI
33.	Question Result, ID, References	NA, AR.IL.ILIDELAY.R, 192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341)
	Question Text	<i>Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?</i>

Assets Covered

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

34. Question Result, ID, NA, AR.IL.ILIMPLEMENT.O, 192.921(a)(1) (192.620(d), 192.605(b))
References

Question Text *Are O&M and IMP procedural requirements for the performance of ILI assessments followed?*

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Sumas is the only one so far that uses ILI

AR.LSR: Low Stress Reassessment

35. Question Result, ID, NA, AR.LSR.LSRBA.R, 192.947(d) (192.919(c), 192.921(d), 192.941(a))
References

Question Text *Do records demonstrate that a baseline assessment meeting the requirements of 192.919 and 192.921 was performed prior to performing a low stress reassessment?*

Assets Covered

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

36. Question Result, ID, NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.OT, AR.PTI, AR.SCC,
References IM.PM)

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.

37. Question Result, ID, NA, AR.LSR.LSREXTCORR.R, 192.947(d) (192.941(b))
References

Question Text *Do records demonstrate that the requirements of 192.941(b) were implemented when performing low stress reassessment for external corrosion?*

Assets Covered

Result Notes No such activity/condition was observed during the inspection.

38. Question Result, ID, NA, AR.LSR.LSRINTCORR.R, 192.947(d) (192.941(c))
References

Question Text *Do records demonstrate that the requirements of 192.941(c) were implemented when performing low stress reassessment for internal corrosion?*

Assets Covered

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

AR.OT: Other Technology

39. Question Result, ID, NA, AR.OT.OTPLAN.R, 192.947(d) (192.921(a)(4), 192.933(b))
References

Question Text *Do records demonstrate that the assessments were performed in accordance with the process and vendor recommendations and that defects were identified and categorized within 180 days, if applicable?*

Assets Covered

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

40. Question Result, ID, NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, AR.PTI, AR.SCC,
References IM.PM)

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.

41. Question Result, ID, NA, AR.OT.OTREQUAL.R, 192.947(d) (192.915(a), 192.915(b))
References

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?*

Assets Covered

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

42. Question Result, ID, References NA, AR.OT.OTREQUAL.O, 192.915(a) (192.915(b))
 Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
 Assets Covered
 Result Notes No such activity/condition was observed during the inspection.
43. Question Result, ID, References NA, AR.OT.OTPLAN.O, 192.921(a)(4)
 Question Text *Were assessments conducted using "other technology" adequately performed in accordance with the OT process?*
 Assets Covered
 Result Notes No such activity/condition was observed during the inspection.

AR.PTI: Integrity Assessment Via Pressure Test

44. Question Result, ID, References NA, AR.PTI.PRESSTESTREQUAL.R, 192.947(g) (192.915(a), 192.915(b))
 Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*
 Assets Covered
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
45. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, AR.SCC, IM.PM)
 Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
 Assets Covered
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.
46. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.505(e), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))
 Question Text *Do the test records validate the pressure test?*
 Assets Covered
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
47. Question Result, ID, References NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(e), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))
 Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*
 Assets Covered
 Result Notes No such activity/condition was observed during the inspection.

AR.RC: Repair Criteria

48. Question Result, ID, References **Sat**, AR.RC.DISCOVERY.R, 192.947(f) (192.933(b))
 Question Text *Do records demonstrate that discovery was declared in the required time frame or justification was documented?*
 Assets Covered
 Result Notes The CenturyLink vault at North Midway was the last anomaly found on August 31, 2015. It was repaired Sept 4, 2015.
49. Question Result, ID, References NA, AR.RC.PRESSREDUCE.R, 192.947(f) (192.933(a)(1))
 Question Text *Do records demonstrate that an acceptable pressure reduction was promptly taken for each immediate repair condition or when a repair schedule could not be met?*
 Assets Covered
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
50. Question Result, ID, References **Sat**, AR.RC.SCHEDULEIMPL.R, 192.947(f) (192.933(d))

Question Text *Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?*

Assets Covered

51. Question Result, ID, NA, AR.RC.REMEDIATION.O, 192.933(c) (192.933(a), 192.933(d))
References

Question Text *Is anomaly remediation adequate for the covered segments being observed?*

Assets Covered

Result Notes No such activity/condition was observed during the inspection.

52. Question Result, ID, **Sat**, AR.RC.LOOKBEYOND.R, 192.947(b) (192.917(e)(5), 192.459)
References

Question Text *From the review of the results of integrity assessments, were all pipeline segments evaluated with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?*

Assets Covered

Result Notes They evaluate for "similar service conditions"

AR.RMP: Repair Methods and Practices

53. Question Result, ID, **Sat**, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-2004 Section 7)
References

Question Text *From the review of records, were all repairs performed in accordance with processes, applicable sections of 49 CFR Parts 192 and the guidance of ASME B31.8S-2004, Section 7, and the Pipeline Repair Manual, Revision 5?*

Assets Covered

Result Notes Sept 2015 they used an epoxy/composite sleeve.

54. Question Result, ID, **Sat**, AR.RMP.REPAIRQUAL.R, 192.807(b) (192.805(h))
References

Question Text *From the review of selected records, were personnel performing repairs, other than welding, and post repair tests qualified for the task they performed?*

Assets Covered

Result Notes OQ Clock Spring Records Richard McCartney and David Zetterberg were working on the Sept 4, 2015 composite sleeve repair. Both had active training records from the manufacturer.

55. Question Result, ID, NA, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)
References

Question Text *From the review of records, were any components that were replaced constructed to the same or higher standards as the original component?*

Assets Covered

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. They only repair indicated was the Clock Spring.

56. Question Result, ID, NA, AR.RMP.CRACKNDT.R, 192.947(g) (192.929(b))
References

Question Text *From the review of records, when a pipeline segment that meets the conditions of possible cracking and/or SCC is exposed (i.e., the coating is removed), was an NDE method (e.g., MPI, UT) employed to evaluate for cracking and/or SCC?*

Assets Covered

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

AR.SCC: Stress Corrosion Cracking Direct Assessment (SCCDA)

57. Question Result, ID, NA, AR.SCC.SCCDAREVQUAL.R, 192.947(e) (192.915(a), 192.915(b))
References

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*

Assets Covered

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

58. Question Result, ID, NA, AR.SCC.SCCDAREVQUAL.O, 192.915(a) (192.915(b))
References

Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered

Result Notes No such activity/condition was observed during the inspection.

59. Question Result, ID, NA, AR.SCC.SCCDADATA.R, 192.947(g) (192.929(b)(1))
References

Question Text *Do records demonstrate that data was collected and evaluated?*

Assets Covered

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

60. Question Result, ID, NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, AR.PTI, IM.PM)
References

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered

Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.

61. Question Result, ID, NA, AR.SCC.SCCDAMETHOD.R, 192.947(g) (192.929(b)(2))
References

Question Text *Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?*

Assets Covered

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

62. Question Result, ID, NA, AR.SCC.SCCDAMETHOD.O, 192.929
References

Question Text *From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?*

Assets Covered

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

63. Question Result, ID, NA, AR.SCC.SCCDANEARNEUTRAL.R, 192.947(g) (192.929(b)(2))
References

Question Text *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?*

Assets Covered

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

64. Question Result, ID, NA, AR.SCC.SCCDAREASSESSINTRVL.R, 192.947(d) (192.939(a)(3))
References

Question Text *From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?*

Assets Covered

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

EP.ERG: Emergency Response

65. Question Result, ID, **Sat**, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also
References presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered

Result Notes Records for mailings for each segment were available. There is only 8 miles of intrastate transmission. I checked from 2015-2017 for Olympia and South Seattle as samples.

IM.BA: Baseline Assessments

66. Question Result, ID, **Sat**, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o), 192.919(e))
References

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

Assets Covered

Result Notes I reviewed a procedure for it.

67. Question Result, ID, References **Sat**, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))
 Question Text *Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?*
 Assets Covered
 Result Notes For any new segment the top threats are indicated in the GSI TIMP Annual Report.
68. Question Result, ID, References **Sat**, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)
 Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*
 Assets Covered
 Result Notes 397.8ft and 35ft were in the casing.
69. Question Result, ID, References **Sat**, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d))
 Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*
 Assets Covered
 Result Notes The North Midway new HCA location was due for baseline completion 2023. It was completed in 2017.
70. Question Result, ID, References NA, IM.BA.BAENVIRON.O, 192.911(o) (192.919(e))
 Question Text *From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?*
 Assets Covered
 Result Notes No such activity/condition was observed during the inspection.

IM.CA: Continual Evaluation and Assessment

71. Question Result, ID, References NA, IM.CA.LOWSTRESSREASSESS.R, 192.947(d) (192.941(a), 192.941(b), 192.941(c))
 Question Text *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?*
 Assets Covered
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
72. Question Result, ID, References **Sat**, 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
 Result Notes This is done in the Dynamic Risk software package.
73. 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 *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*
 Assets Covered
 Result Notes No such event occurred, or condition existed, in the scope of inspection review. They removed a casing and looked at the entire length and found no injurious corrosion.
74. Question Result, ID, References **Sat**, 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
 Result Notes This is in the annual report and on the ECDA preassessment form.
75. Question Result, ID, References NA, IM.CA.REASSESSWAIVER.R, 192.947(d) (192.943(a), 192.943(b))
 Question Text *Do records demonstrate that reassessment interval waivers (special permit per 190.341) have been adequately implemented, if applicable?*
 Assets Covered
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.

76. Question Result, ID, References NA, IM.CA.REASSESEXCPERF.R, 192.947(d) (192.913(a), 192.913(b), 192.913(c))
Question Text *Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

IM.HC: High Consequence Areas

77. Question Result, ID, References **Sat**, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a))
Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*
Assets Covered
Result Notes THE GFR P&I inspector checks this against the PIR and mark-up. It is a maint task in SAP. They do they review and GSI summarizes the findings in the annual report.

78. Question Result, ID, References **Sat**, IM.HC.HCANEW.R, 192.947(d) (192.905(c))
Question Text *Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?*
Assets Covered
Result Notes The North Midway had an added HCA. South Seattle (Grady Way 2,000ft or so and a small section at the Union Hall. The Union Hall added 118ft' and the 4' tie in was also added.

79. Question Result, ID, References **Sat**, IM.HC.HCAPIR.R, 192.947(d) (192.903, 192.905(a))
Question Text *Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?*
Assets Covered
Result Notes The values are in the GSI TIMP Annual Report.

80. Question Result, ID, References **Sat**, IM.HC.HCASITES.R, 192.947(d) (192.903, 192.905(b))
Question Text *Do records indicate identification of identified sites being performed as required?*
Assets Covered
Result Notes They only new identified site is the day care on the North Midway line.

81. 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 *Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review. They use method 2.

82. Question Result, ID, References **Sat**, IM.HC.HCAMETHOD2.R, 192.947(d) (192.905(a), 192.903(2)(ii))
Question Text *Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?*
Assets Covered
Result Notes I looked at several HCA maps.

83. Question Result, ID, References **Sat**, IM.HC.HCADATA.O, 192.905(c)
Question Text *Are HCAs correctly identified per up-to-date information?*
Assets Covered
Result Notes I did not observe any items in the field that would indicate the HCAs are incorrect.

IM.PM: Preventive and Mitigative Measures

84. Question Result, ID, References **Sat**, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a))

- Question Text *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?*
- Assets Covered
- Result Notes For P&M every October, they meet and discuss the risk model. The operator asks themselves the basic question "should we doing more than we are" TPD does come up with a higher threat. For example, They went to an Olympia Golf course and educated the property owner about damage prevention as a means to help lower the threat for that line.
85. Question Result, ID, References **Sat**, IM.PM.PMMTPD.R, 192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))
- Question Text *Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?*
- Assets Covered
- Result Notes They have a construction standby person who is on site when excavation is anticipated to occur near their assets.
86. Question Result, ID, References **Sat**, IM.PM.PMMREVQUAL.R, 192.947(e) (192.915(c))
- Question Text *Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?*
- Assets Covered
- Result Notes Construction standby inspections are a method PSE uses to supervise construction. They receive additional training to help them anticipate risks and safety issues on the job site.
87. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, AR.PTI, AR.SCC)
- Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
- Assets Covered
- Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE hasn't had to add a P&M measure for corrosion to the IMP plan. In 2011, they found corrosion under a casing. PSE removes casings if the line is an HCA.
88. Question Result, ID, References **Sat**, IM.PM.PMMTPDSMYS.R, 192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)
- Question Text *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?*
- Assets Covered
89. Question Result, ID, References **Sat**, IM.PM.PMMOF.R, 192.947(d) (192.935(b)(2))
- Question Text *Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?*
- Assets Covered
- Result Notes No segments have significant outside force threats.
90. Question Result, ID, References NA, IM.PM.PMMASORCV.R, 192.947(d) (192.935(c))
- Question Text *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?*
- Assets Covered
- Result Notes No such event occurred, or condition existed, in the scope of inspection review. No installation of valves due to study of response times.
91. Question Result, ID, References NA, IM.PM.PMMIMPLEMENT.O, 192.935(a)
- Question Text *Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?*
- Assets Covered
- Result Notes No such activity/condition was observed during the inspection.

IM.QA: Quality Assurance

92. Question Result, ID, References **Sat**, 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-2004, Section 12?*
- Assets Covered
- Result Notes Every two years this is done. PSE counts TIMP and Transmission UTC audits towards this requirement.
93. Question Result, ID, References **Sat**, 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
- Result Notes They have a MOC document. They recently added cyclic fatigue, atmospheric corrosion, ICDA. All the MOCs from the previously edited document get published in the annual report.
94. Question Result, ID, References **Sat**, IM.QA.IMPERFEFFECTIVE.R, 192.947(d) (192.913(b), 192.945(a), 192.951)
- Question Text *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?*
- Assets Covered
- Result Notes Performance is measured and PSE is not finding much changing. They have refined their risk model, but from a process standpoint.
95. Question Result, ID, References **Sat**, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b), 192.945(a), 192.951)
- Question Text *Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?*
- Assets Covered
- Result Notes Threat specific metrics have been working as planned. Miles inspected, repair results, they track leaks, ECDAs. It is showing the system has not been changing rapidly.
96. 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 *Are required records being maintained for the life of the pipeline?*
- Assets Covered
- Result Notes I reviewed historical MAOP records in the previous transmission audit and will continue to do so as better methods to inventory systems and subsystems are developed. PSE has been able to consistently produce records to substantiate system MAOPs when requested.
- IM.RA: Risk Analysis
97. Question Result, ID, References **Sat**, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(e)(1), 192.911(k))
- Question Text *Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?*
- Assets Covered
- Result Notes PSE collects data on the entire transmission system and apply it to covered segments if needed.
98. Question Result, ID, References **Sat**, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))
- Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*
- Assets Covered
- Result Notes Appendix B has every HCA with each top 3 threats.
99. Question Result, ID, References **Sat**, IM.RA.RAMETHOD.R, 192.947(b) (192.917(c), 192.917(d))
- Question Text *Do records demonstrate that the risk assessment follows ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?*
- Assets Covered
100. Question Result, ID, References **Sat**, IM.RA.RAFACTORS.R, 192.947(b) (192.917(c))
- Question Text *Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?*

Assets Covered

Result Notes Appendix E has this. Appendix B has the result

101. Question Result, ID, References **Sat**, IM.RA.RAMOC.R, 192.947(b) (192.917(c))
Question Text *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?*
Assets Covered
Result Notes New EPCRs are added and the data is "revised"

102. Question Result, ID, References **Sat**, IM.RA.RAMOC.O, 192.917(c)
Question Text *Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*
Assets Covered

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

103. Question Result, ID, References **Sat**, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))
Question Text *Did personnel respond to indications of abnormal operations as required by the process?*
Assets Covered
Result Notes They had an AOC in 2016 for the Redmond Gate Station (Union Hill)

MO.GOCLASS: Gas Pipeline Class Location

104. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO)
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
Assets Covered
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GM: Gas Pipeline Maintenance

105. Question Result, ID, References **Sat**, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))
Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*
Assets Covered
106. Question Result, ID, References **Sat**, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))
Question Text *Are field inspection and partial operation of transmission line valves adequate?*
Assets Covered
Result Notes Valve operation was adequate during the field portion.

MO.GO: Gas Pipeline Operations

107. Question Result, ID, References NA, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS)
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
Assets Covered
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.GMOPP: Gas Pipeline Overpressure Protection

108. Question Result, ID, References **Sat**, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))
Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*
Assets Covered
Result Notes I reviewed the last three years records and there were no assets that did not meet the required time frame deadlines.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

109. Question Result, ID, References **Sat**, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered

110. Question Result, ID, References **Sat**, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW)
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
Assets Covered
Result Notes Ground patrols are conducted and DPIR is often employed.

111. Question Result, ID, References **Sat**, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))
Question Text *Do records indicate leakage surveys conducted as required?*
Assets Covered

PD.DP: Damage Prevention

112. Question Result, ID, References **Sat**, PD.DP.PDPROGRAM.R, 192.614(c)
Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
Assets Covered
Result Notes Damage prevention program specifics will also be reviewed in the West King and Snohomish inspections.

113. Question Result, ID, References **Sat**, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))
Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*
Assets Covered
Result Notes Notes and data are collected throughout the O&M process to create information that can be used, if needed, to support damage prevention program needs. For example, notes for encroachment or digging, .etc.

PD.PA: Public Awareness

114. Question Result, ID, References **Sat**, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: EP.ERG)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
Assets Covered
Result Notes Records for mailings for each segment were available. There is only 8 miles of intrastate transmission. I checked from 2015-2017 for Olympia and South Seattle as samples.

PD.RW: ROW Markers, Patrols, Monitoring

115. Question Result, ID, References **Sat**, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered

116. Question Result, ID, References **Sat**, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
Assets Covered
Result Notes Ground patrols are conducted and DPIR is often employed.

RPT.NR: Notices and Reporting

117. Question Result, ID, References **NA**, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b))
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?*

Assets Covered

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

118. Question Result, ID, References NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))
- Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*

Assets Covered

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

119. Question Result, ID, References NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii))
- Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered

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

120. Question Result, ID, References **Sat**, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)
- Question Text *Do annual reports demonstrate that integrity management performance data were reported?*

Assets Covered

Result Notes PSE produces two annual reports- one internally for TIMP by GSI and the report that is sent to PHMSA and the UTC.

TD.ATM: External Corrosion - Atmospheric

121. Question Result, ID, References **Sat**, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))
- Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered

122. Question Result, ID, References **Sat**, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))
- Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*

Assets Covered

Result Notes AC is checked in station audits and in Signe's Bridge checklist.

TD.CPMONITOR: External Corrosion - CP Monitoring

123. Question Result, ID, References **Sat**, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))
- Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered

Result Notes I checked every record for the last 3 yrs.

124. Question Result, ID, References **Sat**, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a)
- Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered

Result Notes The methods are suitable.

125. Question Result, ID, References **Sat**, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))
- Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered

Result Notes CP checks and depolarization readings (if needed) looked good.

126. Question Result, ID, References **Sat**, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))
- Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered

Result Notes There were a couple low reads and they re-mediated the issue and returned to collect follow-up readings.

127. Question Result, ID, References **Sat**, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))
Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*
Assets Covered
Result Notes PSE monitors for AC current and coordinates with SPU and in Tacoma.

128. Question Result, ID, References NA, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a)
Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

129. Question Result, ID, References **Sat**, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)
Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
Assets Covered
Result Notes Michelle had records for North Midway I reviewed.

TD.ICP: Internal Corrosion - Preventive Measures

130. Question Result, ID, References **Sat**, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))
Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
Assets Covered
Result Notes In 2012 they removed the Sigale pipeline and looked inside for IC.

TD.ICCG: Internal Corrosion - Corrosive Gas

131. Question Result, ID, References **Sat**, TD.ICCG.CORRGAS.R, 192.491(c) (192.475(a))
Question Text *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*
Assets Covered
Result Notes Records for gas quality for obtained and reviewed from King County's biogas injection site in South King Co.

TD.SCC: Stress Corrosion Cracking

132. Question Result, ID, References NA, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1))
Question Text *Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

133. Question Result, ID, References NA, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b))
Question Text *Do records document that the operator has properly remediated any occurrences of SCC?*
Assets Covered
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TQ.OQ: Operator Qualification

134. Question Result, ID, References **Sat**, TQ.OQ.RECORDS.R, 192.807
Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
Assets Covered
Result Notes OQ records were reviewed for selected jobs and for everything verified during the field portion of the inspection

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

135. Question Result, ID, References **Sat**, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))

Question Text *Do records indicate adequate qualification of integrity management personnel?*

Assets Covered

Result Notes IM personnel are senior engineers and corrosion specialists. I review OQ records regularly for PSE's program employees that make critical decisions. I checked Alan and Michelle's OQ records this inspection.

TQ.TR: Training of Personnel

136. Question Result, ID, References **Sat**, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text *Is training for emergency response personnel documented?*

Assets Covered

Result Notes GFRs have specialized training and it is well documented.