

Inspection Output (IOR)

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Inspection Information

Inspection Name	BP Ferndale Gas IMP-Intrastate	Operator(s)	FERNDALE PIPELINE SYSTEM (570)	Plan Submitted	08/28/2017
Status	PLANNED	Lead	Dennis Ritter	Plan Approval	09/05/2017 by Joe Subsits
Start Year	2017	Supervisor	David Mulligan, Joe Subsits	All Activity Start	06/05/2017
System Type	GT	Director	Alan E. Rathbun	All Activity End	06/09/2017
Protocol Set ID	GT.2016.02			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

AFODs

Pre Inspection 2

Inspection (field) 4

Post inspection 2

Summary:

2017 Gas Transmission Integrity management inspection of Ferndale Pipeline. This is a program inspection and no field inspection of assets was conducted. BP Pipelines (North America) (BP-NA) operates Ferndale Gas Pipeline. This is now the only gas pipeline BP-NA owns and operates. The rest were sold off 5 months ago. The IMP is the same for all gas transmission lines. Records were reviewed at BP-NA's headquarters in Chicago, IL. Integrity Management program records were reviewed as well as M&O records which support the IMP risk models. **There were no probable violations found during the inspection. The integrity program is supported by the records provided.**

There was one area of concern related to the form used for valve maintenance:

M&O Gas Pipeline Maintenance

Question 11--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?MO.GM.VALVEINSPECT.R

The form, VLVB1156 Mainline Block Valve Inspection, is completed in BP's work-order system, Maximo. There are a series of questions which the technician must fill out, Y, N, or NA. The last 4 questions on the form are as follows:

240 <-- Enter 1 if valve operates (opens/closes) adequately;

Enter 2 if valve needs repair.

Long Description:

460 Have you performed the applicable prescribed steps above?

Long Description:

490 Is "Yes" or "N/A" the answer to all the (Y/N/NA) questions

above?

Long Description:

495 If No, place an N in the observation box on that specific line.

What was found during a random inspection of valve maintenance work order records was that the technicians were inconsistent in filling out the form after question 240. Question 240 was always filled out correctly (typically with a "1" indicating the valve was operating adequately). However, for the three remaining questions, 460, 490 and 495, the answers were not consistent. Either they were filled in "NA" after answering question 240 with a "1", or "Y" for 460 followed by "NA" for the remaining, or "Y" for 240, 460 and 490. BP's procedures manual, OMER Book 1, P192.745 Inspection of Mainline Valves does not contain instructions for filling out the form, nor is it specific about which questions must be answered. The Maximo system, apparently allows the technician to enter "NA" even though its a "Y" or "N" question. As the work orders are approved by a scheduler and the Maintenance Supervisor, this seems to be an allowed practice. The concern is that data which the IM program uses for risk determination, comes, in part, from this database. If there is inconsistent data input, then there may be questionable data output to the IM risk model. NOTE-this was not found during the inspection which is why this is a concern not a probable violation.

Area of Concern Recommendation:

Send letter to BP indicating they should either develop instructions for its maintenance forms and train their technicians on them, or change the Maximo work order system to not allow "NA" for a "Y/N" question and the form be completely filled out before being allowed to close out (or other solution). The fact that supervisors and planners allowed the forms to be submitted this way is another concern that BP should investigate.

Inspection Follow-up: There were several areas where BP had found unsatisfactory tape wrap at soil-air interfaces during its atmospheric inspections. These are not violations as they have until the next atmospheric inspection to repair. However, these areas should be followed up and inspected during the next field inspection (see question (TD.ATM.ATMCORRODEINSP.R))

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required
									% Complete	
1.	Ferndale Gas	BP Ferndale Gas	other	Ferndale Gas	Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Plastic pipe AMAOP	143	143	143	143	100.0%

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total % Complete
					Service Line Bottle/Pipe - Holders Storage Fields Compressor Stations				

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Ferndale Gas	GT IM, Core	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	P, R, O, S	Detail	
2.	Ferndale Gas	n/a	EP.ERG.READINESS.O, EP.ERG.AUTHORITIES.P, EP.ERG.OUTAGERESTORE.P, EP.ERG.INCIDENTACTIONS.P, EP.ERG.INCIDENTANALYSIS.P, EP.ERG.INCIDENTANALYSIS.R, EP.ERG.POSTEVTREVIEW.P, EP.ERG.REVIEW.R, EP.ERG.POSTEVTREVIEW.R, EP.ERG.LIAISON.P, EP.ERG.LIAISON.R, EP.ERG.LOCATION.O, EP.ERG.NOTICES.R	P, R, O, S	Detail	
3.	Ferndale Gas	n/a	MO.GOMAOP	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directive	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	HQ IMP Records	--	06/05/2017 06/09/2017	GT IM, Core	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC	all assets	all types	127	127	127	100.0%
2	HQ IMP Records	--	06/05/2017 06/09/2017	n/a	all planned questions	all assets	all types	143	143	143	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	HQ IMP Records	COMPLETED	09/07/2017	HQ IMP Records	Ferndale Gas
2.	Inspection Scoping	Ferndale Gas	COMPLETED	09/01/2017	HQ IMP Records	Ferndale Gas

Results (Unsat, Concern values, 1 results)

MO.GM: Gas Pipeline Maintenance

1. Question Result, ID, References

Concern, 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	Ferndale Gas
Result Issue Summary	Send letter to BP-NA with concern noted and ask for response.
Result Notes	<p>Reviewed 2015, 2016, and 2017 valve maintenance records and random pulled work orders to see narrative</p> <p>WOs</p> <p>2016</p> <p>6432706-isolation valve-12" ball valve</p> <p>6148624 isolation valve 12" ball valve</p> <p>6432724 MLV 16" block valve</p> <p>6148642 MLV 16" block valve</p> <p>6454817-Scraper/launcher outlet valve-16" OK</p> <p>6174552-Scraper/launcher outlet valve-16" OK</p> <p>6175965-Sumas scraper/launcher inlet valve-6"</p> <p>6456306-Sumas Scraper/launcher inlet valve-6"</p> <p>6174552-Scraper/launcher outlet valve-16"</p> <p>6148519-cherry pt scraper out bypass valve 6"</p> <p>6432609-cherry pt scraper out bypass valve 6"</p> <p>2015</p> <p>5744408 MLV 16" block valve</p> <p>5314810 MLV 16" block valve</p> <p>These work orders do not appear to be filled out properly. The tech put an "na" in the field to answer a question 130 Has the mainline valve been flushed?" If this happens, he is supposed to answer question 490 with a "Y", however, the forms are filled in with an "na". Also question 240 and 460 are answered "na". No instructions in procedures.</p> <p>This "platform" is used in most of maintenance (Maximo) work orders. How many are required fields and what needs to be input?</p>

Report Parameters: Results: Unsat,Concern

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