Inspection Output (IOR)

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Inspection Information

Inspection Name 8088 & 8089 Ferndale TIMP OM

Status PLANNED

Start Year 2020

System Type GT

Protocol Set ID GT.2020.01

Operator(s) FERNDALE PIPELINE SYSTEM (570)

Lead Lex Vinsel

Team Members Scott Anderson

Observer(s) Scott Rukke, David Cullom, Anthony Dorrough, Deborah Becker, Derek Norwood, Darren Tinnerstet, Rell Koizumi

Supervisor Joe Subsits, Marion Garcia, Seth Perkins

Director Sean Mayo

Plan Submitted 09/01/2020

Plan Approval 09/03/2020 by Joe Subsits

All Activity Start 12/15/2020

All Activity End 03/03/2021

Inspection Submitted --

Inspection Approval --

Inspection Summary

Inspection Scope and Summary

Scope of this inspection is for the last 3 calendar years. (2017- 2018-2019)

Facilities visited and Total AFOD

Limited facilities visits due to COVAD pandemic. Some ROW inspections performed on Olympic Pipeline IntRAstate Laterals.

Summary of Significant Findings
(DO NOT Discuss Enforcement options)

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Primary Operator contacts and/or participants

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03Jan21 - 2020 Inspections for BP NA Ferndale, Gas IntERstate Pipeline

Scope (Assets)

Report Filters: Results: all

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88968 (91)	Ferndale Pipeline System	unit	88968	Storage Fields Bottle/Pipe - Holders Service Line Offshore GOM Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP OCS CDA	293	293	293	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	88968 (91)	GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail
2.	88968 (91)	Baseline Procedures (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	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.	8088 Ferndale TIMP	--	03/01/2021 03/03/2021	GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	all assets	all types	174	174	174	100.0%
2.	8089 Ferndale OM	--	12/15/2020 01/29/2021	Baseline Procedures (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	all assets	all types	121	121	121	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	8088 Ferndale TIMP	COMPLETED	03/04/2021	8088 Ferndale TIMP	88968 (91)
2.	Attendance List	8089 Ferndale OM	COMPLETED	01/30/2021	8089 Ferndale OM	--

Results (all values, 293 results)

309 (instead of 293) 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 NA, AR.CDA.CDACORR.P, 192.933 (192.917(e)(5))
   Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?*
   Assets Covered 88968 (91)
   Result Notes BP NA does not use CDA.

2. Question Result, ID, References NA, AR.CDA.CDACORR.R, 192.933 (192.917(e)(5))
   Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified by CDA as required?*
   Assets Covered 88968 (91)
   Result Notes BP NA does not use CDA.

AR.EC: External Corrosion Direct Assessment (ECDA)

3. Question Result, ID, References NA, AR.EC.ECDAREVQUAL.P, 192.915(a) (192.915(b))
   Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*
   Assets Covered 88968 (91)
   Result Notes BP NA does not use ECDA.

4. Question Result, ID, References NA, 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 88968 (91)
   Result Notes BP NA does not use ECDA.

5. Question Result, ID, References NA, 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 88968 (91)
   Result Notes BP NA does not use ECDA.

6. 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 88968 (91)
   Result Notes BP NA does not use ECDA.

7. Question Result, ID, References NA, AR.EC.ECDAPLAN.P, 192.925(a) (192.925(b))
   Question Text *Is an adequate ECDA plan and process in place for conducting ECDA?*
   Assets Covered 88968 (91)
   Result Notes BP NA does not use ECDA.

8. Question Result, ID, References NA, AR.EC.ECDAINTEGRATION.P, 192.917(b) (ASME B31.8S-2004 Section 4.5)
   Question Text *Is the process for integrating ECDA results with other information adequate?*
   Assets Covered 88968 (91)
   Result Notes BP NA does not use ECDA.

9. Question Result, ID, References NA, 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?*

Report Filters: Results: all

Assets Covered 88968 (91)

Result Notes BP NA does not use ECDA.

10. Question Result, ID, References NA, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))

Question Text *Do records demonstrate that the operator identified ECDA Regions?*

Assets Covered 88968 (91)

Result Notes BP NA does not use ECDA.

11. Question Result, ID, References NA, 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 88968 (91)

Result Notes BP NA does not use ECDA.

12. Question Result, ID, References NA, 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 88968 (91)

Result Notes BP NA does not use ECDA.

13. 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 88968 (91)

Result Notes BP NA does not use ECDA.

14. Question Result, ID, References NA, 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 88968 (91)

Result Notes BP NA does not use ECDA.

15. Question Result, ID, References NA, AR.EC.ECCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant external corrosion threats?*

Assets Covered 88968 (91)

Result Notes BP NA does not use ECDA.

16. Question Result, ID, References NA, AR.EC.ECCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88968 (91)

Result Notes BP NA does not use ECDA.

AR.IC: Internal Corrosion Direct Assessment (ICDA)

17. Question Result, ID, References NA, AR.IC.ICDAREVQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88968 (91)

Result Notes BP NA does not use ICDA.

18. Question Result, ID, References NA, AR.IC.ICDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Report Filters: Results: all

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 88968 (91)

Result Notes BP NA does not use ICDA.

19. 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 88968 (91)

Result Notes BP NA does not use ICDA.

20. Question Result, ID, References NA, AR.IC.ICDAPLAN.P, 192.927(c) (192.927(a), 192.927(b))

Question Text *Is an ICDA plan and process in place for conducting ICDA?*

Assets Covered 88968 (91)

Result Notes BP NA does not use ICDA.

21. 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 88968 (91)

Result Notes BP NA does not use ICDA.

22. Question Result, ID, References NA, AR.IC.ICDAINTEGRATION.P, 192.917(b)

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

Assets Covered 88968 (91)

Result Notes BP NA does not use ICDA.

23. 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 88968 (91)

Result Notes BP NA does not use ICDA.

24. 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 88968 (91)

Result Notes BP NA does not use ICDA.

25. Question Result, ID, References NA, AR.IC.ICDAPOSTASSESS.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 88968 (91)

Result Notes BP NA does not use ICDA.

26. Question Result, ID, References NA, AR.IC.ICCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant internal corrosion threats related to internal corrosion?*

Assets Covered 88968 (91)

Result Notes BP NA does not use ICDA.

27. Question Result, ID, References NA, AR.IC.ICCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes BP NA does not use ICDA.

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

28. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88968 (91)

Result Notes USPL-GP 32-0201 Requirements For ILI Projects Section 6.8 Data Evaluation

29. Question Result, ID, References Sat, 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 88968 (91)

Result Notes Reviewed Justin Harkrader Certifications for Level II(2) records USPL-GP 32-0201 Requirements For ILI Projects

30. Question Result, ID, References NA, AR.IL.ILIREVIEWQUAL.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 88968 (91)

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

31. Question Result, ID, References Sat, AR.IL.ILISPECS.P, 192.921(a)(1) (192.933(b))

Question Text *Does the process assure complete and adequate vendor ILI specifications?*

Assets Covered 88968 (91)

Result Notes USPL-GP 32-0201 Requirements For ILI Projects Section 6.1 In-Line Inspection Tool Run Preparation

32. Question Result, ID, References Sat, AR.IL.ILISPECS.R, 192.947(g) (192.933(b))

Question Text *Do records demonstrate that the ILI specifications were complete and adequate?*

Assets Covered 88968 (91)

Result Notes Reviewed Executive Summary - GMFL Inspection for Sumas to Cherry Point 16" 16-inch Natural Gas Line (Ferndale)

33. Question Result, ID, References Sat, AR.IL.ASSESSMETHOD.P, 192.919(b) (192.921(a), 192.937(c))

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

Assets Covered 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment Section D Subsection 1 Threat Risk Analysis & Subsection 2 Assessment Methodology

34. Question Result, ID, References Sat, AR.IL.ASSESSMETHOD.R, 192.947(g) (192.919(b), 192.921(a), 192.937(c))

Question Text *Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?*

Assets Covered 88968 (91)

Result Notes Reviewed Pipeline Integrity Management for 205B - Cherry Point - Intalco. Review appears adequate.

35. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.P, 192.921(a)(1) (192.937(c))

Question Text *Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?*

Assets Covered 88968 (91)

Result Notes USPL-GP 32-0200 ILI Data Evaluation & Resulting Repair Program, Section 8 ILI Tool Runs and Evaluation Process,

Report Filters: Results: all

36. Question Result, ID, References   Sat, AR.IL.ILIVALIDATE.R, 192.947(g) (192.921(a)(1))

Question Text   *Do records demonstrate that the operator has validated ILI assessment results per their process?*

Assets Covered   88968 (91)

Result Notes   Reviewed 250A Sumas Station - Cherry Point - DEF+IMU+GMFL - Final Report Mon 2/24/2020 3:12 PM, There is 1 area of metal loss corrosion anomalies near a girth weld reported during this tool run that were not evident in previous tool run data. **This location has been selected as a dig site SUMCP2019-001.**

37. Question Result, ID, References   NA, AR.IL.ILIVALIDATE.O, 192.921(a)(1)

Question Text   *From observation of field activities, do the employees and vendors validate ILI assessment results per their process?*

Assets Covered   88968 (91)

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

38. Question Result, ID, References   Sat, AR.IL.ILIINTEGRATION.P, 192.917(b)

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

Assets Covered   88968 (91)

Result Notes   USPL-GP 32-0200 ILI Data Evaluation&Resulting Repair Program, Section 7.1 Definition of Discovery

39. Question Result, ID, References   Sat, AR.IL.ILIINTEGRATION.R, 192.947(g) (192.917(b))

Question Text   *Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?*

Assets Covered   88968 (91)

Result Notes   Reviewed 250A Sumas Station - Cherry Point - DEF+IMU+GMFL - Final Report Mon 2/24/2020 3:12 PM, There is 1 area of metal loss corrosion anomalies near a girth weld reported during this tool run that were not evident in previous tool run data. **This location has been selected as a dig site SUMCP2019-001.**

40. Question Result, ID, References   Sat, AR.IL.ILIACCEPCRITERIA.P, 192.921(a)

Question Text   *Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?*

Assets Covered   88968 (91)

Result Notes   USPL-GP 32-0201 Requirements For ILI Projects Section 6.3 Site Completion Report and Data Quality Check, appears adequate.

41. Question Result, ID, References   Sat, AR.IL.ILIACCEPCRITERIA.R, 192.947(g) (192.921(a))

Question Text   *Do records indicate adequate implementation of the process for ILI survey acceptance?*

Assets Covered   88968 (91)

Result Notes   Reviewed Data Quality Assessment for Sumas to Cherry Point 16-inch Natural Gas LIne (Ferndale) from TD Williamson to BP USPL, Novermber 7, 2019. Records appear adequate.

42. 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   *Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?*

Assets Covered   88968 (91)

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

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

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

Assets Covered   88968 (91)

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

44. Question Result, ID, References   Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))

Question Text   *Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?*

Report Filters: Results: all

Assets Covered 88968 (91)

Result Notes USPL-GP 32-0200 ILI Data Evaluation&Resulting Repair Program Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines appears adequate.

45. Question Result, ID, References Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?*

Assets Covered 88968 (91)

Result Notes 250A Data Quality Letter_Sumas to Cherry Point 16-inch Natural Gas Line - DEF+IMU+GMFL - Final Report Mon 2/24/2020.

AR.LSR: Low Stress Reassessment

46. Question Result, ID, References NA, AR.LSR.LSRPLAN.P, 192.941(a) (192.941(b), 192.941(c))

Question Text *Is the process for performing low stress reassessment adequate?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

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

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 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

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

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

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

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

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

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

50. Question Result, ID, References NA, AR.LSR.LSRCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats following a LSR?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

51. Question Result, ID, References NA, AR.LSR.LSRCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

AR.OT: Other Technology

52. Question Result, ID, References NA, AR.OT.OTPLAN.P, 192.921(a)(4)

Question Text *Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?*

Report Filters: Results: all

Assets Covered 88968 (91)

Result Notes BP NA does not use "other technologies".

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

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 88968 (91)

Result Notes BP NA does not use "other technologies".

54. Question Result, ID, References NA, AR.OT.OTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(4))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?*

Assets Covered 88968 (91)

Result Notes BP NA does not use "other technologies".

55. Question Result, ID, References NA, AR.OT.OTREVQUAL.R, 192.947(d) (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 88968 (91)

Result Notes BP NA does not use "other technologies".

56. Question Result, ID, References NA, AR.OT.OTREVQUAL.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 88968 (91)

Result Notes BP NA does not use "other technologies".

57. 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 88968 (91)

Result Notes BP NA does not use "other technologies".

58. Question Result, ID, References NA, AR.OT.OTCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using Other Technology?*

Assets Covered 88968 (91)

Result Notes BP NA does not use "other technologies".

59. Question Result, ID, References NA, AR.OT.OTCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following the use of Other Technology?*

Assets Covered 88968 (91)

Result Notes BP NA does not use "other technologies".

AR.PTI: Integrity Assessment Via Pressure Test

60. Question Result, ID, References NA, AR.PTI.PRESSTESTREVQUAL.P, 192.915(a) (192.915(b) 192.921(a)(4))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate pressure test assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Integrity Assessment Via Pressure Test.

61. Question Result, ID, References NA, AR.PTI.PRESSTESTREVQUAL.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 88968 (91)

Result Notes BP NA does not use Integrity Assessment Via Pressure Test.

62. Question Result, ID, References Sat, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.921(a)(2))

Question Text *Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?*

Assets Covered 88968 (91)

Result Notes P-192.501 Pressure Testing: VIII(8). HYDROTESTING FOR INTEGRITY MANAGEMENT

63. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(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 88968 (91)

Result Notes BP NA does not use Integrity Assessment Via Pressure Test.

64. 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(d), 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 88968 (91)

Result Notes BP NA does not use Integrity Assessment Via Pressure Test.

65. Question Result, ID, References NA, AR.PTI.PTICORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Integrity Assessment Via Pressure Test.

66. Question Result, ID, References NA, AR.PTI.PTICORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88968 (91)

Result Notes BP NA does not use Integrity Assessment Via Pressure Test.

AR.RC: Repair Criteria (HCA)

67. Question Result, ID, References Sat, AR.RC.DISCOVERY.P, 192.933(b)

Question Text *Does the integrity assessment process properly define discovery and the required time frame?*

Assets Covered 88968 (91)

Result Notes USPL-GP 32-0200 ILI Data Evaluation&Resulting Repair Program, Section 7.1 Definition of Discovery,

68. 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 88968 (91)

Result Notes P0250_250A Sumas Station - Cherry Point_DEF+IMU+GmFL ILI_Final Report_11012019_1. R250A Sumas Station - Cherry Point - 2019

Report Filters: Results: all

Reviewed Excell Spreadsheet - 250A Sumas Station - Cherry Point - 2019 Repair Plan Progress Report - 7-Jul-20.

69. **Question Result, ID, References** Sat, AR.RC.IMPRC.P, 192.933(a) (192.933(c), 192.933(d))

Question Text *Does the Integrity Management Plan and/or maintenance processes include all of the actions that must be taken to address integrity issues in accordance with 192.933?*

Assets Covered 88968 (91)

Result Notes USPL-GP 32-0200 ILI Data Evaluation&Resulting Repair Program, Section 7.3 Excavation and Inspection or Repair Criteria for Gas Pipelines, Condition Catagory 1. And procedure P-192.711 Repairs Replacements Relocations refers to 49 CFR 192.933.

70. **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 88968 (91)

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

71. **Question Result, ID, References** Sat, AR.RC.CRITERIA.P, 192.711(b) (192.703(a), 192.703(b), 192.703(c), 192.713(a), 192.713(b))

Question Text *Does the repair process cover all of the elements for making repairs in covered segments?*

Assets Covered 88968 (91)

Result Notes P-192.711 Repairs Replacements Relocations, Exhibit RR-1 Permanent Repairs.

72. **Question Result, ID, References** NA, 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 88968 (91)

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

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

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

Assets Covered 88968 (91)

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

74. **Question Result, ID, References** Sat, AR.RC.LOOKBEYOND.P, 192.917(e)(5)

Question Text *Does the process require an evaluation of all pipeline segments with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?*

Assets Covered 88968 (91)

Result Notes P-192.901c Threat Identification and Risk Analysis Section A, Sub-section 8. Interactive Threats.

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

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 88968 (91)

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

AR.RMP: Repair Methods and Practices

76. **Question Result, ID, References** Sat, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))

Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes   P-192.605(b)(9) Personnel Safety in Trenches & P-192.711 Repairs Replacements Relocations

77. Question Result, ID, References   Sat, AR.RMP.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))

Question Text   *Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?*

Assets Covered   88968 (91)

Result Notes   P-192.711 Repairs Replacements Relocations: Section I(1) Safety

78. Question Result, ID, References   Sat, AR.RMP.HOTTAP.P, 192.605(b)(1) (192.627)

Question Text   *Is the process adequate for tapping pipelines under pressure?*

Assets Covered   88968 (91)

Result Notes   P-192.711 Repairs Replacements Relocations: Section XIL(14); Hot Tap & Stopple Procedures

79. Question Result, ID, References   Sat, AR.RMP.REPAIRREQT.P, 192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))

Question Text   *Does the repair process capture the requirements of 192.711 for transmission lines?*

Assets Covered   88968 (91)

Result Notes   P-192.711 Repairs Replacements Relocations: Section VIII(8), A, 1I

80. Question Result, ID, References   Sat, AR.RMP.FIELDREPAIRDEFECT.P, 192.605(b)(1) (192.713(a), 192.713(b))

Question Text   *Is the process adequate for the permanent field repair of defects in transmission lines?*

Assets Covered   88968 (91)

Result Notes   P-192.711 Repairs Replacements Relocations: Section VIII(8), A, 2

81. Question Result, ID, References   Sat, AR.RMP.FIELDREPAIRWELDS.P, 192.605(b) (192.715(a), 192.715(b), 192.715(c))

Question Text   *Is the process adequate for the permanent field repair of welds?*

Assets Covered   88968 (91)

Result Notes   P-192.711 Repairs Replacements Relocations: Section VII, VII. Permantnent Girth Weld Repair

82. Question Result, ID, References   Sat, AR.RMP.FIELDREPAIRLEAK.P, 192.605(b) (192.717(a), 192.717(b))

Question Text   *Is there an adequate process for the permanent field repair of leaks on transmission lines?*

Assets Covered   88968 (91)

Result Notes   P-192.711 Repairs Replacements Relocations: Section D Leaks

83. Question Result, ID, References   Sat, AR.RMP.WELDTEST.P, 192.605(b) (192.719(a), 192.719(b))

Question Text   *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?*

Assets Covered   88968 (91)

Result Notes   P-192.711 Repairs Replacements Relocations: Section B Company Approved Material

84. Question Result, ID, References   Sat, AR.RMP.CRACKNDT.P, 192.929(b) (ASME B31.8S-2004 Appendix A3.4)

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

Assets Covered   88968 (91)

Result Notes   USPL-GMS-018-002 Stress Corrosion Cracking (SCC) Management, Section 5.2 Condition Monitoring.

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

85. Question Result, ID, References   NA, AR.SCC.SCCDAREVQUAL.P, 192.915(a) (192.915(b))

Question Text   *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered   88968 (91)

Result Notes   BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

Report Filters: Results: all

86. **Question Result, ID, References** NA, AR.SCC.SCCDAREVQUAL.R, 192.947(e) (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 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

87. **Question Result, ID, References** NA, AR.SCC.SCCDAREVQUAL.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 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

88. **Question Result, ID, References** NA, AR.SCC.SCCDAPLAN.P, 192.929(b)

Question Text *Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

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

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

Assets Covered 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

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

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 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

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

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

Assets Covered 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

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

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

Assets Covered 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

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

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 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

94. **Question Result, ID, References** NA, AR.SCC.SCCCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats found following SCCDA?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

Report Filters: Results: all

95. **Question Result, ID, References** NA, AR.SCC.SCCCORR.R, 192.933 (192.917(e)(5))

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

   Assets Covered 88968 (91)

   Result Notes BP NA does not use Stress Corrosion Cracking Direct Assessment (SCCDA).

DC.COCMP: Compressor Station Construction

96. **Question Result, ID, References** Sat, DC.COCMP.CMPCOMBUSTIBLE.P, 192.303 (192.735(a), 192.735(b)) (also presented in: FS.CS)

   Question Text *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?*

   Assets Covered 88968 (91)

   Result Notes P-192.605(b)(6) Compressor Station Inspection-Maintenance, Section III(3)

   No Compressor Station on Ferndale Gas

DC.WELDINSP: Construction Weld Inspection

97. **Question Result, ID, References** Sat, DC.WELDINSP.WELDVISUALQUAL.P, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)

   Question Text *Does the operator have comprehensive written specifications or procedures for the inspection and testing of welds that meet the requirements of 192.241?*

   Assets Covered 88968 (91)

98. **Question Result, ID, References** Sat, DC.WELDINSP.WELDNDT.P, 192.243

   Question Text *Is there a process for nondestructive testing and interpretation in accordance with 192.243?*

   Assets Covered 88968 (91)

   Result Notes P-192.243 Non-Destructive Testing: Section VIII(8). MINIMUM COVERAGE OF RADIOGRAPHIC INSPECTION

99. **Question Result, ID, References** Sat, DC.WELDINSP.WELDREPAIR.P, 192.245 (192.303)

   Question Text *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?*

   Assets Covered 88968 (91)

   Result Notes P-192.243 Non-Destructive Testing: Section IX(9). PRODUCTION RADIOGRAPHIC INSPECTION

DC.WELDPROCEDURE: Construction Welding Procedures

100. **Question Result, ID, References** Sat, DC.WELDPROCEDURE.WELD.P, 192.225

   Question Text *Does the operator have written specifications requiring qualified welding procedures in accordance with 192.225?*

   Assets Covered 88968 (91)

   Result Notes P-192.243 Non-Destructive Testing, Section I(1) General, Section III(3) Personnel

101. **Question Result, ID, References** Sat, DC.WELDPROCEDURE.WELDWEATHER.P, 192.231 (192.225, 192.227)

   Question Text *Does the operator have written specifications that require the welding operation to be protected from weather conditions that would impair the quality of the completed weld?*

   Assets Covered 88968 (91)

   Result Notes P-192.225 Welding, Section VII(7). Weather

102. **Question Result, ID, References** Sat, DC.WELDPROCEDURE.MITERJOINT.P, 192.233

Question Text *Does the operator have written specifications or procedures that prohibit the use of certain miter joints as required by 192.233?*

Assets Covered 88968 (91)

Result Notes USPL GIS 18-331-1: Section 11.2 Spacing and Alignment, b & c

103. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDPREP.P, 192.235

Question Text *Does the operator have comprehensive written specifications or procedures that require preparations for welding in accordance with 192.235?*

Assets Covered 88968 (91)

Result Notes USPL GIS 18-331-1: Section 11 - Preparation for Welding Pipe

DC.COMM: Pipeline Commissioning

104. Question Result, ID, References Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b)) (also presented in: MO.GO)

Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*

Assets Covered 88968 (91)

Result Notes P-192.629/727 - Purging Idling Abandonment; Section E, 5

105. Question Result, ID, References Sat, EP.ERG.NOTICES.P, 192.615(a)(1) (also presented in: EP.ERG)

Question Text *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II(2)

106. Question Result, ID, References Sat, EP.ERG.COMMSYS.P, 192.615(a) (192.615(a)(2)) (also presented in: EP.ERG)

Question Text *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II

107. Question Result, ID, References Sat, IM.PM.PMMGENERAL.P, 192.935(a) (also presented in: IM.PM)

Question Text *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?*

Assets Covered 88968 (91)

Result Notes OMER Manual P-192.901h Preventive and Mitigative Measures Procedure, Section A. Identification of Additional Measures

108. Question Result, ID, References Sat, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a)) (also presented in: IM.PM)

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 88968 (91)

Result Notes Reviewed Spreadsheet Pipeline Preventative and Mitigative Measures Employed - 250A, Sumas to Cherry Point 16"(16-inch) & 250B, Cherry Point to Intalco 8"(8-inch). Records appear adequate. 2020 version of report.

109. Question Result, ID, References Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a)) (also presented in: IM.HC)

Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*

Assets Covered 88968 (91)

Result Notes Reviewed 250A Sumas - Cherry Point Class Location & HCA Identification Map, December 2020, done annually.

110. Question Result, ID, References NA, IM.HC.HCADATA.O, 192.905(c) (also presented in: IM.HC)

Question Text *Are HCAs correctly identified per up-to-date information?*

Assets Covered 88968 (91)

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

DC.DPC: Design of Pipe Components

111. Question Result, ID, References Sat, DC.DPC.INTCORRODE.P, 192.453 (192.476(a), 192.476(b), 192.476(c))

Question Text *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 88968 (91)

Result Notes P-192.453 Corrosion Control, Section XII(7) #5

DC.MA: Materials

112. Question Result, ID, References Sat, DC.MA.MARKING.P, 192.63

Question Text *Does the operator have specifications requiring pipe, valves, and fittings to be marked according to the requirements of 192.63?*

Assets Covered 88968 (91)

Result Notes P-192.711 Repairs Replacements Relocations Section A, 2

EP.ERG: Emergency Response

113. Question Result, ID, References Sat, EP.ERG.REVIEW.P, 192.605(a)

Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered 88968 (91)

Result Notes P-192.605(a) Manual Review, Page 1

OMER and Facility Response Plans are reviewed annually .

114. Question Result, ID, References Sat, EP.ERG.INCIDENTDATA.P, 192.605(b)(4) (191.5(a))

Question Text *Does the process include the steps necessary for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner?*

Assets Covered 88968 (91)

Result Notes P-192.617 Investigation Incidents Failures, Section II(2). Analysis of Pipeline Incidents

115. Question Result, ID, References Sat, EP.ERG.NOTICES.P, 192.615(a)(1) (also presented in: DC.COMM)

Question Text *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II(2)

116. Question Result, ID, References Sat, EP.ERG.COMMSYS.P, 192.615(a) (192.615(a)(2)) (also presented in: DC.COMM)

Question Text *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II

117. Question Result, ID, References Sat, EP.ERG.RESPONSE.P, 192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))

Question Text *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes P-192.615 Emergency Response, Section II(2), C

118. Question Result, ID, References Sat, EP.ERG.READINESS.P, 192.615(a) (192.615(a)(4))

Question Text *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II, D

119. Question Result, ID, References Sat, EP.ERG.PUBLICPRIORITY.P, 192.615(a) (192.615(a)(5))

Question Text *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II(2), E

120. Question Result, ID, References Sat, EP.ERG.PRESSREDUCESD.P, 192.615(a) (192.615(a)(6))

Question Text *Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II(2), F

121. Question Result, ID, References Sat, EP.ERG.PUBLICHAZ.P, 192.605(a) (192.615(a)(7))

Question Text *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II(2), G

122. Question Result, ID, References Sat, EP.ERG.AUTHORITIES.P, 192.615(a) (192.615(a)(8))

Question Text *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II(2), H

123. Question Result, ID, References Sat, EP.ERG.OUTAGERESTORE.P, 192.615(a) (192.615(a)(9))

Question Text *Does the emergency plan include procedures for safely restoring any service outage?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II, I

124. Question Result, ID, References Sat, EP.ERG.INCIDENTACTIONS.P, 192.615(a) (192.615(a)(10))

Question Text *Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section II(2), J

125. Question Result, ID, References Sat, EP.ERG.INCIDENTANALYSIS.P, 192.617

Question Text *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?*

Assets Covered 88968 (91)

Result Notes P-192.617 Investigation Incidents Failures, Section II(2). Analysis of Pipeline Incidents

126. Question Result, ID, References Sat, EP.ERG.POSTEVNTREVIEW.P, 192.615(b)(3)

Question Text *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?*

Report Filters: Results: all

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section VII(7)

127. Question Result, ID, References Sat, EP.ERG.LIAISON.P, 192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)

Question Text *Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?*

Assets Covered 88968 (91)

Result Notes P-192.615 Emergency Response, Section VIII(8)

FS.CSSYSPROT: Compressor Station System Protection

128. Question Result, ID, References Sat, FS.CSSYSPROT.CMPRELIEF.P, 192.605(b)(1) (192.731(a), 192.731(b), 192.731(c))

Question Text *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks?*

Assets Covered 88968 (91)

Result Notes P-192.739 Overpressure Safety Devices

129. Question Result, ID, References Sat, FS.CSSYSPROT.CMPESDTEST.P, 192.605(b) (192.731(c))

Question Text *Does the process provide adequate detail for inspecting and testing compressor station emergency shutdown devices at the required frequency?*

Assets Covered 88968 (91)

Result Notes P-192.739 Overpressure Safety Devices, Section VII(7). PROTECTIVE SHUTDOWN SWITCHES

130. Question Result, ID, References Sat, FS.CSSYSPROT.CMPGASDETREQ.P, 192.605(b) (192.736(b))

Question Text *Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings?*

Assets Covered 88968 (91)

Result Notes P-192.605(b)(6) Compressor Station Inspection-Maintenance, Section III(3)

131. Question Result, ID, References Sat, FS.CSSYSPROT.CMPGASDETOM.P, 192.605(b) (192.736(c))

Question Text *Does the process give detail how gas detection and alarm systems in compressor stations will be maintained to function properly and do procedures require performance tests?*

Assets Covered 88968 (91)

Result Notes P-192.605(b)(6) Compressor Station Inspection-Maintenance, Section III(3)

FS.CS: Compressor Stations

132. Question Result, ID, References Sat, FS.CS.CMPSUSD.P, 192.605(b)(5) (192.605(b)(7))

Question Text *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?*

Assets Covered 88968 (91)

Result Notes P-192.605(b)(5) Starting Up-Shutting Down Pipeline, Section II - START UP GUIDELINES & SHUT DOWN GUIDELINES

NA - No Compressor Station on Ferndale Gas

133. Question Result, ID, References Sat, FS.CS.CMPMAINT.P, 192.605(b)(6)

Question Text *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes P-192.605(b)(6) Compressor Station Inspection-Maintenance, Section I(1). COMPRESSOR MAINTENANCE

NA - No Compressor Station on Ferndale Gas

134. Question Result, ID, References Sat, DC.COCMP.CMPCOMBUSTIBLE.P, 192.303 (192.735(a), 192.735(b)) (also presented in: DC.COCMP)

Question Text *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?*

Assets Covered 88968 (91)

Result Notes P-192.605(b)(6) Compressor Station Inspection-Maintenance, Section III(3)

No Compressor Station on Ferndale Gas

FS.FG: Facilities General

135. Question Result, ID, References Sat, MO.GM.ABANDONPIPE.P, 192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g)) (also presented in: MO.GM)

Question Text *Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?*

Assets Covered 88968 (91)

Result Notes P-192.629/727 - Purging, Idling & Abandonment of Pipelines; Section IV(4) - Abandonment

136. Question Result, ID, References Sat, FS.FG.VAULTINSPECT.P, 192.605(b)(1) (192.749(a), 192.749(b), 192.749(c), 192.749(d)) (also presented in: MO.GM)

Question Text *What are process requirements for inspecting vaults having a volumetric internal content ≥200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*

Assets Covered 88968 (91)

Result Notes P-192.749 - Vault Maintenance; Section I(1) - General and Section II(2) - Safety Procedures

NA - No Vaults on the Ferndale Gas system

FS.VA: Valves

137. Question Result, ID, References Sat, FS.VA.CMPVLVTEST.P, 192.605(b) (192.745(a), 192.745(b))

Question Text *Does the process have requirements for transmission line valves that might be used in an emergency?*

Assets Covered 88968 (91)

Result Notes P-192.745 Inspection of Mainline Valves

IM.BA: Baseline Assessments

138. Question Result, ID, References Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e))

Question Text *Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?*

Assets Covered 88968 (91)

Result Notes P-192.901b Baseline Assessment Plan, Section L. Environmental and Safety Risks During Assessments

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

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

Assets Covered 88968 (91)

Result Notes Record of ILI tool runs per RE: 250A Sumas Station - Cherry point - DEF+IMU+GMFL - Final Report Mon 2/24/2020 is adequate to insure Integrity Assessments have been conducted in a safe manner.

140. 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) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?*

Assets Covered 88968 (91)

Result Notes Baseline Assessment Plan Procedure # P-192.901b

141. 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 88968 (91)

Result Notes Reviewed ILI Assessments - Master History Schedule - Excel

142. Question Result, ID, References **Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))**

Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*

Assets Covered 88968 (91)

Result Notes Baseline Assessment Plan Procedure # P-192.901b Section K New HCAs/Newly Installed Pipe

143. Question Result, ID, References **NA, 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 88968 (91)

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

144. Question Result, ID, References **Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))**

Question Text *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?*

Assets Covered 88968 (91)

Result Notes Baseline Assessment Plan Procedure # P-192.901b, Section I. Prioritized Schedule.

145. Question Result, ID, References **NA, 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 88968 (91)

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

146. 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 88968 (91)

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

IM.CA: Continual Evaluation and Assessment

147. 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 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section F Low Stress Reassessment.

148. Question Result, ID, References **Sat, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a), 192.939(b), 192.913(c))**

Question Text *Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?*

Assets Covered 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section G Re-assessment Timing, Waiver, and Deviation.

149. 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 88968 (91)

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

150. 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 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section D Reassessment Methods.

151. 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 88968 (91)

Result Notes Reviewed Integrity Management - Segment Level Review for 250A Sumas - Cherry Point (16-inch), 11/14/2019

152. Question Result, ID, References Sat, 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 88968 (91)

Result Notes Reviewed Record to File for reassessment intervals on 250A Sumas - Cherry Point (01Dec20) & 250B Cherry Point (August 18, 2017).

153. 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 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section D Reassessment Methods Sub-section 2. Assessment Methodology.

154. 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 88968 (91)

Result Notes Reviewed ILI Assessments - Master History Schedule - Excel for rationale for selection of the appropriate assessment. Records appear adequate.

155. Question Result, ID, References Sat, IM.CA.REASSESSWAIVER.P, 192.943(a) (192.943(b))

Question Text *Does the process include requirements for reassessment interval waivers (special permit per 190.341)?*

Assets Covered 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section G Re-assessment Timing, Waiver, and Deviation.

156. 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 88968 (91)

Report Filters: Results: all

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

157. **Question Result, ID, References** Sat, IM.CA.REASSESSEXCPERF.P, 192.913(a) (192.913(b), 192.913(c))

Question Text *Does the process include requirements for deviations from reassessment requirements based on exceptional performance?*

Assets Covered 88968 (91)

Result Notes P-192.901f Continuous Evaluation and Assessment, Section H Environmental/Safety Risks during Re-Assessments.

158. **Question Result, ID, References** NA, IM.CA.REASSESSEXCPERF.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 88968 (91)

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

IM.HC: High Consequence Areas

159. **Question Result, ID, References** Sat, IM.HC.HCAID.P, 192.905(a)

Question Text *Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?*

Assets Covered 88968 (91)

Result Notes P-192.901a High Consequence Area Identification Section A HCA Program Requirements

160. **Question Result, ID, References** Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a)) (also presented in: DC.COMM)

Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*

Assets Covered 88968 (91)

Result Notes Reviewed 250A Sumas - Cherry Point Class Location & HCA Identification Map, December 2020, done annually.

161. **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 *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?*

Assets Covered 88968 (91)

Result Notes P-192.901a High Consequence Area Identification Procedure Section C. HCA Identification Methodology (192.905(a)) Program Requirements, Method 1

162. **Question Result, ID, References** Sat, IM.HC.HCAMETHOD2.P, 192.903(2)(i) (192.903(2)(ii))

Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?*

Assets Covered 88968 (91)

Result Notes P-192.901a High Consequence Area Identification Procedure, Section C. HCA Identification Methodology (192.905(a)) Program Requirements, Method 2

163. **Question Result, ID, References** Sat, IM.HC.HCANEW.P, 192.905(c)

Question Text *Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?*

Assets Covered 88968 (91)

Result Notes P-192.901a High Consequence Area Identification Section A HCA Program Requirements

164. **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?*

Report Filters: Results: all

Assets Covered 88968 (91)

Result Notes Reviewed Class Location & HCA Identification for Ferndale Gas: 250A Sumas - Cherry Point, December 2020

165. Question Result, ID, References Sat, IM.HC.HCAPIR.P, 192.903 (192.905(a))

Question Text *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?*

Assets Covered 88968 (91)

Result Notes P-192.901a High Consequence Area Identification Section D. Potential Impact Radius (PIR)

166. 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 88968 (91)

Result Notes Reviewed Class Location & HCA Identification for Ferndale Gas: 250A Sumas - Cherry Point, December 2020

167. Question Result, ID, References Sat, IM.HC.HCASITES.P, 192.903 (192.905(b))

Question Text *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?*

Assets Covered 88968 (91)

Result Notes P-192.901a High Consequence Area Identification Appendix A - Identified Sites (s)

168. 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 88968 (91)

Result Notes Reviewed Class Location & HCA Identification for Ferndale Gas: 250A Sumas - Cherry Point, December 2020

169. 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 88968 (91)

Result Notes Method 1 is not used.

170. 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 88968 (91)

Result Notes Reviewed Class Location & HCA Identification for Ferndale Gas: 250A Sumas - Cherry Point, December 2020 appears to be adequate.

171. Question Result, ID, References NA, IM.HC.HCADATA.O, 192.905(c) (also presented in: DC.COMM)

Question Text *Are HCAs correctly identified per up-to-date information?*

Assets Covered 88968 (91)

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

IM.PM: Preventive and Mitigative Measures

172. Question Result, ID, References Sat, IM.PM.PMMGENERAL.P, 192.935(a) (also presented in: DC.COMM)

Question Text *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?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes OMER Manual P-192.901h Preventive and Mitigative Measures Procedure, Section A. Identification of Additional Measures

173. Question Result, ID, References Sat, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a)) (also presented in: DC.COMM)

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 88968 (91)

Result Notes Reviewed Spreadsheet Pipeline Preventative and Mitigative Measures Employed - 250A, Sumas to Cherry Point 16"(16-inch) & 250B, Cherry Point to Intalco 8"(8-inch). Records appear adequate. 2020 version of report.

174. Question Result, ID, References Sat, IM.PM.PMMTPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))

Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*

Assets Covered 88968 (91)

Result Notes P-192.901h Preventative and Mitigative Measures, Section A, Identification of Additional Measures Sub-section 2

175. 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 88968 (91)

Result Notes Reviewed Pipeline Preventative and Mitigative Measures Employed Spreadsheet for 250A, Sumas to Cherry Point 16"(16-inch)

176. Question Result, ID, References Sat, IM.PM.PMMREVQUAL.P, 192.915(c)

Question Text *Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?*

Assets Covered 88968 (91)

Result Notes OMER P-192.711 Repairs Replacements Relocations Procedure, Section XV(15) Construction Inspection

177. 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 88968 (91)

Result Notes Reviewed Repair and Inspection Report USPL-DRW-010-005, Exhibit 1. Reviewed certifications for Bernard Yost. Records appear adequate.

178. Question Result, ID, References Sat, IM.PM.PMMTPDSMYS.P, 192.935(d) (192.935(e), 192 Appendix E Table E.II.1)

Question Text *Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*

Assets Covered 88968 (91)

Result Notes BP NA does not use Low Stress Reassessment.

179. Question Result, ID, References NA, 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 88968 (91)

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

180. Question Result, ID, References Sat, IM.PM.PMMOF.P, 192.935(b)(2)

Question Text *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes	P-192.901h Preventative and Mitigative Measures, Section C, Pipelines Operating Below 30% SMYS,	

181. 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 — 88968 (91)

Result Notes — Reviewed Pipeline Integrity Management - Segment Level Review for 250A Sumas - Cherry Point appears adequate.

182. Question Result, ID, References — Sat, IM.PM.PMMASORCV.P, 192.935(c)

Question Text — *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?*

Assets Covered — 88968 (91)

Result Notes — P-192.901h Preventative and Mitigative Measures, Section G, Automatic Shut-Off Valves or Remote Control Valves,

183. Question Result, ID, References — Sat, 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 — 88968 (91)

Result Notes — Ferndale line is approx 30 miles long, remote control block valves are spaced every five(5) miles.

184. 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 — 88968 (91)

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

185. Question Result, ID, References — Sat, IM.PM.PMCORR.P, 192.933 (192.917(e)(5))

Question Text — *Does the process adequately account for taking required actions to address significant corrosion threats?*

Assets Covered — 88968 (91)

Result Notes — P-192.901h Preventative and Mitigative Measures, Section F, Corrosion.

186. Question Result, ID, References — Sat, IM.PM.PMCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered — 88968 (91)

Result Notes — Reviewed Pipeline Integrity Management - Segment Level Review for 250A Sumas - Cherry Point appears adequate.

IM.QA: Quality Assurance

187. 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 — 88968 (91)

Result Notes — P-192.901l Quality Assurance Procedure, Section 2. Integrity Management and Quality Assurance Program Reviews and Corrective Action Procedures Sub-section ((a (iv))

188. 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 SP0502-2010) be addressed by an appropriate approach?*

Assets Covered — 88968 (91)

Report Filters: Results: all

Result Notes P-192.901l Quality Assurance Procedure, Section C. Invoking non-mandatory statements in standards.

189. 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 88968 (91)

Result Notes Reviewed Pipeline Integrity Management Review, 250 Ferndale (spreadsheet) document records. The steps within the spreadsheet demonstrate the QA process.

190. 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))

Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*

Assets Covered 88968 (91)

Result Notes P-192.901 Pipeline Integrity Management Procedure, Section V(5) Documentation

191. 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 88968 (91)

Result Notes P-192.901k Management of Change Procedure, Section A. Documentation and Notification of Changes to the Integrity Management Program.

192. 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 88968 (91)

Result Notes Reviewed Management Of Change(MOC) document #195. Document shows process of MOC. Documentation appears adequate.

193. Question Result, ID, References Sat, IM.QA.IMPERFEFECTIVE.P, 192.945(a) (192.913(b), 192.951)

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

Assets Covered 88968 (91)

Result Notes P-192.901i Performance Measures, Section A. Performance Measures.

194. Question Result, ID, References Sat, IM.QA.IMPERFEFECTIVE.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 88968 (91)

Result Notes Reviewed 2019 IMP Annual Summary for Ferndale pipeline. Records appear adequate.

195. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b), 192.951)

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?*

Assets Covered 88968 (91)

Result Notes P-192.901i Performance Measures Procedure Section A. Performance Measures & Section B. Records

196. 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 88968 (91)

Result Notes Reviewed 2019 IMP Annual Summary for Ferndale pipeline. Appendic C, Gas IMP Performance Measures. Records appear adequate.

197. 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?*

Report Filters: Results: all

Assets Covered 88968 (91)

Result Notes P-192.901 Pipeline Integrity Management Procedure, Section V(5) Documentation

IM.RA: Risk Analysis

198. Question Result, ID, References Sat, IM.RA.RADATA.P, 192.917(b) (192.917(e)(1), 192.911(k))

Question Text *Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?*

Assets Covered 88968 (91)

Result Notes P-192.901c Threat Identification and Risk Analysis Procedure, Section A. Threat Identification.

199. Question Result, ID, References Sat, IM.RA.RAMETHOD.P, 192.917(c) (192.917(d))

Question Text *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?*

Assets Covered 88968 (91)

Result Notes P-192.901c Threat Identification and Risk Analysis Procedure, Section C. Risk Assessment (ASME 31B31.8S; Section 5)

200. 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 88968 (91)

Result Notes Reviewed Pipeline Integrity Management - Segment Level Review, 250 Ferndale, 250A Sumas - Cherry Point.

201. 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 88968 (91)

Result Notes Reviewed Copy of Threat Assessment Data -Copy-Excel, appears to be adequate.

202. Question Result, ID, References Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e), 192.913(b)(1))

Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*

Assets Covered 88968 (91)

Result Notes P-192.901c Threat Identification and Risk Analysis Procedure, Section A. Threat Identification.

203. 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 88968 (91)

Result Notes Reviewed Pipeline Integrity Management - Segment Level Review, 250 Ferndale, 250A Sumas - Cherry Point.

204. Question Result, ID, References Sat, IM.RA.RAFACTORS.P, 192.917(c)

Question Text *Does the process include requirements for factors that could affect the likelihood of a release, and for 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?*

Assets Covered 88968 (91)

Result Notes P-192.901c Threat Identification and Risk Analysis Procedure, Section C. Risk Assessment (ASME 31B31.8S; Section 5)

205. Question Result, ID, References Sat, IM.RA.RAFACTORS.R, 192.947(b) (192.917(c))

Report Filters: Results: all

	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 88968 (91)

Result Notes Reviewed Pipeline Integrity Management Review for 250 Ferndale 2019.

206. Question Result, ID, References Sat, IM.RA.RAMOC.P, 192.917(c)

Question Text *Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?*

Assets Covered 88968 (91)

Result Notes P-192.901c Threat Identification and Risk Analysis Procedure, Section D. The data collection process will involve field personnel and SME's. Validation of The Risk Assessment

207. 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 88968 (91)

Result Notes Reviewed 2017-2018 PIM summary for 250 Ferndale, no changes in risk assessment during this time frame.

208. Question Result, ID, References NA, 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 88968 (91)

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

MO.GC: Conversion to Service

209. Question Result, ID, References Sat, MO.GC.CONVERSION.P, 192.14(a) (192.14(b))

Question Text *If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?*

Assets Covered 88968 (91)

Result Notes P-192.14 Conversion of Service, Section I(1), II(2)

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

210. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMAL.P, 192.605(a) (192.605(c)(1))

Question Text *Does the process fully address the responsibilities during and after an abnormal operation?*

Assets Covered 88968 (91)

Result Notes P-192.605(c) Abnormal Operations, Section V(5) & VI(6)

211. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMALCHECK.P, 192.605(a) (192.605(c)(2))

Question Text *Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?*

Assets Covered 88968 (91)

Result Notes P-192.605(c) Abnormal Operations, Section II(2). DETECTION, INVESTIGATION OF AND RESPONSE TO ALARMS (ABNORMAL CONDITIONS)

212. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMALNOTIFY.P, 192.605(a) (192.605(c)(3))

Question Text *Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?*

Assets Covered 88968 (91)

Result Notes P-192.605(c) Abnormal Operations, Section III(3). FAILURE OF OPERATING EQUIPMENT WHICH COULD RESULT IN AN EMERGENCY CONDITION

Report Filters: Results: all

213. **Question Result, ID, References** Sat, MO.GOABNORMAL.ABNORMALREVIEW.P, 192.605(a) (192.605(c)(4))

Question Text *Does the process include requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?*

Assets Covered 88968 (91)

Result Notes P-192.605(c) Abnormal Operations, Section VII(7). PROCEDURES EFFECTIVENESS AND REVIEW

MO.GOCLASS: Gas Pipeline Class Location

214. **Question Result, ID, References** Sat, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), 192.611(d))

Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*

Assets Covered 88968 (91)

Result Notes P-192.619 - Maximum Operating Pressure; Section III(3) - Change in Class Location Requirements

215. **Question Result, ID, References** Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 88968 (91)

Result Notes P-192.613 - Continuing Surveillance of Class Location, Section I(1) - Visual Facility Inspection

216. **Question Result, ID, References** Sat, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?*

Assets Covered 88968 (91)

Result Notes P-192.5 - Class Location Survey and Determination; Section III(3); Paragraph - Change in Class Location Impact Study

MO.GOMAOP: Gas Pipeline MAOP

217. **Question Result, ID, References** Sat, MO.GOMAOP.MAOPDETERMINE.P, 192.605(b)(1) (192.619(a), 192.619(b))

Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?*

Assets Covered 88968 (91)

Result Notes P-192.619 - Maximum Operating Pressure; Section I(1) - Maximum Allowable Operating Pressure (MAOP) Determination

218. **Question Result, ID, References** Sat, MO.GOMAOP.MAOPLIMIT.P, 192.605(a) (192.605(b)(5))

Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*

Assets Covered 88968 (91)

Result Notes P-195.605(b)(5) - Starting Up & Shutting Down the Pipeline; Description Section (Page 1)

MO.GM: Gas Pipeline Maintenance

219. **Question Result, ID, References** Sat, MO.GM.ABANDONPIPE.P, 192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g)) (also presented in: FS.FG)

Question Text *Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes P-192.629/727 - Purging, Idling & Abandonment of Pipelines; Section IV(4) - Abandonment

220. Question Result, ID,
References
Sat, MO.GM.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))

Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*

Assets Covered 88968 (91)

Result Notes P-192.751 - Protection Against Ignitions; Section I(1) - General

221. Question Result, ID,
References
Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GMOPP)

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88968 (91)

Result Notes BP Pipelines Gas OMER Book 1 - Section 3 Specifics

222. Question Result, ID,
References
Sat, MO.GM.VALVEINSPECT.P, 192.605(b)(1) (192.745(a), 192.745(b))

Question Text *Are their processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*

Assets Covered 88968 (91)

Result Notes P-192.745 - Inspection of Mainline Valves; Description Section (Page 1) and Section II(2) - Valve Inspection

223. Question Result, ID,
References
Sat, FS.FG.VAULTINSPECT.P, 192.605(b)(1) (192.749(a), 192.749(b), 192.749(c), 192.749(d)) (also presented in: FS.FG)

Question Text *What are process requirements for inspecting vaults having a volumetric internal content ≥200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*

Assets Covered 88968 (91)

Result Notes P-192.749 - Vault Maintenance; Section I(1) - General and Section II(2) - Safety Procedures

NA - No Vaults on the Ferndale Gas system

MO.GOODOR: Gas Pipeline Odorization

224. Question Result, ID,
References
Sat, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*

Assets Covered 88968 (91)

Result Notes P-192.625 - Odorization of Gas; Section I(1) - Odorization of Gas

MO.GO: Gas Pipeline Operations

225. Question Result, ID,
References
Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS)

Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*

Assets Covered 88968 (91)

Result Notes P-192.613 - Continuing Surveillance of Class Location, Section I(1) - Visual Facility Inspection

226. Question Result, ID,
References
Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b)) (also presented in: DC.COMM)

Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*

Assets Covered 88968 (91)

Result Notes P-192.629/727 - Purging Idling Abandonment; Section E, 5

227. Question Result, ID, References   Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)

Question Text   *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered   88968 (91)

Result Notes   P-192.605(a) - Manual Review; Section I(1). Operations Maintenance & Emergency Response (OMER) Review Process (Book I(1))

228. Question Result, ID, References   Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))

Question Text   *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered   88968 (91)

Result Notes   P-192.605(a) - Manual Review; Section II(2). Operations Maintenance & Emergency Response Manual Review Process (Book II(2))

229. Question Result, ID, References   Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))

Question Text   *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered   88968 (91)

Result Notes   P-192.605(b)(3) - Maps and Records; Section I(1). SCOPE

230. Question Result, ID, References   Sat, MO.GO.SRC.P, 192.605(a) (192.605(d), 191.23(a))

Question Text   *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?*

Assets Covered   88968 (91)

Result Notes   P-191.23 - Safety-Related Conditions; Section I(1). REPORTING CRITERIA

231. Question Result, ID, References   Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))

Question Text   *Does the process require prompt response to the report of a gas odor inside or near a building?*

Assets Covered   88968 (91)

Result Notes   P-192.615 - Emergency Response; Section II(2), C, 1

232. Question Result, ID, References   Sat, MO.GO.UPRATE.P, 192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))

Question Text   *Is the pressure uprating process consistent with the requirements of 192.553?*

Assets Covered   88968 (91)

Result Notes   P-192.553 - Pipeline-Uprating; Section I(1). UPRATING REQUIREMENTS

MO.GMOPP: Gas Pipeline Overpressure Protection

233. Question Result, ID, References   Sat, MO.GMOPP.PRESSREGCAP.P, 192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))

Question Text   *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*

Assets Covered   88968 (91)

Result Notes   P-192.739 - Overpressure Safety Devices; Section III(3). RELIEF VALVES, 4

234. Question Result, ID, References   Sat, MO.GMOPP.PRESSREGTEST.P, 192.605(b)(1) (192.739(a), 192.739(b))

Question Text   *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*

Assets Covered   88968 (91)

Result Notes   P-192.739 - Overpressure Safety Devices; Section IV(4). COMPRESSOR STATIONS: INSPECTION AND TESTING OF RELIEF DEVICES

235. Question Result, ID, References   Sat, MO.GM.RECORDS.P, 192.605(b)(1) (192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)

Report Filters: Results: all

Question Text *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88968 (91)

Result Notes BP Pipelines Gas OMER Book 1 - Section 3 Specifics

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

236. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 88968 (91)

Result Notes P-192.705 - Right-of-Way Inspections; Section IV(4) - Right-of Way Inspections

237. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 88968 (91)

Result Notes P-192.705 - Right-of-Way Inspections; Section VII(7) - Pipeline Markers

238. Question Result, ID, References Sat, MO.RW.LEAKAGE.P, 192.706 (192.706(a), 192.706(b), 192.935(d))

Question Text *Does the process require leakage surveys to be conducted?*

Assets Covered 88968 (91)

Result Notes P-192.706 - Leakage Surveys; Section II(2) - Gas Leakage Survey Requirements

PD.DP: Damage Prevention

239. Question Result, ID, References Sat, PD.DP.PDPROGRAM.P, 192.614(a)

Question Text *Is a damage prevention program approved and in place?*

Assets Covered 88968 (91)

Result Notes P-192.614 - Damage Prevention Program; Entirety

240. Question Result, ID, References Sat, PD.DP.ONECALL.P, 192.614(b)

Question Text *Does the process require participation in qualified one-call systems?*

Assets Covered 88968 (91)

Result Notes P-192.614 - Damage Prevention Program; Section III(3) - Participation in State One-Call Notification Systems

241. Question Result, ID, References Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)

Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*

Assets Covered 88968 (91)

Result Notes P-192.614 - Damage Prevention Program; Section VIII(8) - Temporary Marking Method

242. Question Result, ID, References Sat, PD.DP.TPD.P, 192.614(c)(1)

Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*

Assets Covered 88968 (91)

Result Notes P-192.614 - Damage Prevention Program; Section IV(4) - Identify Excavators engage in excavation activities

243. Question Result, ID, References Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)

Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes P-192.614 - Damage Prevention Program; Section XI(11) - Response to Right-of-Way Encroachments and/or Unauthorized Excavation and Section XII(12) - Response to First-, Second- and Third-Party Damage

244. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered 88968 (91)

Result Notes P-192.901(c) - Threat Identification and Risk Analysis (TIMP document, not OMER document); Section A - Threat Identification; Subsection 6(b) - Identify Time Dependent Threats

245. 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 88968 (91)

Result Notes Reviewed Copy of Threat Assessment Data Excel showing the data associated with the evaluation of third party and mechanical damage threats.

PD.PA: Public Awareness

246. Question Result, ID, References Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered 88968 (91)

Result Notes BP Pipelines (North America), Inc., USPL Public Awareness Program (PAP) Section 4 describes process, Table 3 shows detail

247. Question Result, ID, References Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*

Assets Covered 88968 (91)

Result Notes Public Awareness Program(PAP) Section 5 and 6

248. Question Result, ID, References Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text *Does the operator's program documentation demonstrate management support?*

Assets Covered 88968 (91)

Result Notes PAP, Section 2

249. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))

Question Text *Has the continuing public education (awareness) program been established as required?*

Assets Covered 88968 (91)

Result Notes PAP, page 1 shows that Issue Date of June 20, 2006 and the Program Revision Log dates back to 2010.

250. Question Result, ID, References Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)

Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*

Assets Covered 88968 (91)

Result Notes PAP, Section 7, and Table 6

251. Question Result, ID, References Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)

Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes PAP, Sections 8, 8.1, 8.2 Appendix I(1) through VI(6)   Table 7 - Relevant Factors

252. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 88968 (91)

Result Notes P-195.440 Public Awareness, Sec. IX(9) PAP, Section 7 and see Table 6 - Language Translation

253. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered 88968 (91)

Result Notes PAP, Section 10.1 Annual Self Assessment

PD.RW: ROW Markers, Patrols, Monitoring

254. Question Result, ID, References Sat, MO.RW.PATROL.P, 192.705(a) (192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?*

Assets Covered 88968 (91)

Result Notes P-192.705 - Right-of-Way Inspections; Section IV(4) - Right-of Way Inspections

255. Question Result, ID, References Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text *Does the process adequately cover the requirements for placement of ROW markers?*

Assets Covered 88968 (91)

Result Notes P-192.705 - Right-of-Way Inspections; Section VII(7) - Pipeline Markers

RPT.NR: Notices and Reporting

256. Question Result, ID, References Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b)

Question Text *Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?*

Assets Covered 88968 (91)

Result Notes P-192.901 Pipeline Integrity Management Procedure, Section VI(6) Subsection A. 192.909 Changes to the operator's integrity management program.

257. 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 88968 (91)

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

258. Question Result, ID, References Sat, RPT.NR.NOTIFYIMPRESS.P, 192.933(a)(1)

Question Text *Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?*

Assets Covered 88968 (91)

Result Notes P-192.901 Pipeline Integrity Management Procedure, Section VI(6) Subsection C. 192.933 Actions taken to address integrity issues.

259. Question Result, ID, References NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))

Report Filters: Results: all

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 88968 (91)

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

260. Question Result, ID, References Sat, RPT.NR.IMDEVIATERPT.P, 192.913(b)(1)(vii)

Question Text *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered 88968 (91)

Result Notes P-192.901 Pipeline Integrity Management Procedure, Section VI(6) Subsection B. 192.921(a) Assessment Methods.

261. 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 88968 (91)

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

262. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.P, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text *Is there a process for annual reporting of integrity management performance data?*

Assets Covered 88968 (91)

Result Notes P-191.17 Annual Report Procedure

263. 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 88968 (91)

Result Notes Reviewed Annual Report for 2019, Parts F and G

RPT.RR: Regulatory Reporting (Traditional)

264. Question Result, ID, References Sat, RPT.RR.IMMEDREPORT.P, 191.5(b) (191.7)

Question Text *Is there a process to immediately report incidents to the National Response Center?*

Assets Covered 88968 (91)

Result Notes P-191.5 - Telephonic Notice of Certain Incidents; Procedure Steps Section

265. Question Result, ID, References Sat, RPT.RR.INCIDENTREPORT.P, 191.15(a)

Question Text *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?*

Assets Covered 88968 (91)

Result Notes P-191.15 - Reporting Incidents; Section I(1) - Incident Reporting

266. Question Result, ID, References Sat, RPT.RR.INCIDENTREPORTSUPP.P, 191.15(d)

Question Text *Does the process require preparation and filing of supplemental incident reports?*

Assets Covered 88968 (91)

Result Notes P-191.15 - Reporting Incidents; Section I(1) - Incident Reporting

267. Question Result, ID, References Sat, RPT.RR.SRCR.P, 192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(b))

Question Text *Do processes require reporting of safety-related conditions?*

Assets Covered 88968 (91)

Result Notes P-191.23 - Safety Related Conditions; Section III(3) - Reporting Procedure

Report Filters: Results: all

268. Question Result, ID, References Sat, RPT.RR.ABANDONWATERFACILITY.P, 192.605(b)(1) (192.727(g))

Question Text *Does the process require reports to be filed for each abandoned offshore pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?*

Assets Covered 88968 (91)

Result Notes P-192.629/727 - Purging, Idling & Abandonment of Pipelines; Section IV(4) - Abandonment, Subsection C - Reporting Requirements

269. Question Result, ID, References Sat, RPT.RR.OPID.P, 191.22(a) (191.22(c), 191.22(d))

Question Text *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered 88968 (91)

Result Notes P-191.22 - National Registry of Pipeline Operators Notifications; Section I(1) - Notification Criteria

TD.ATM: Atmospheric Corrosion

270. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.P, 192.605(b)(2) (192.479(a), 192.479(b), 192.479(c))

Question Text *Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XIII(8) - Atmospheric Corrosion and Coating Materials

271. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.P, 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c))

Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XIV(14) - Monitoring Atmospheric Corrosion

TD.CPMONITOR: External Corrosion - CP Monitoring

272. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.P, 192.605(b)(2) (192.463(a), 192.463(c))

Question Text *Does the process require CP monitoring criteria to be used that is acceptable?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section VIII(8) - Criteria Used to Determine the Adequacy of Cathodic Protection

273. Question Result, ID, References Sat, TD.CPMONITOR.TEST.P, 192.605(b)(2) (192.465(a))

Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section IX(9) - Monitoring External Corrosion Control

274. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.P, 192.605(b)(2) (192.465(b))

Question Text *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section IX(9) - Monitoring External Corrosion Control, Subsection C - Rectifiers and other Devices - Frequency of Evaluation

275. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.P, 192.605(b)(2) (192.465(c))

Question Text *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?*

Assets Covered 88968 (91)

Report Filters: Results: all

Result Notes P-192.453 - Corrosion Control; Section IX(9) - Monitoring External Corrosion Control, Subsection C - Rectifiers and other Devices - Frequency of Evaluation

276. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.P, 192.605(b)(2) (192.465(d))

Question Text *Does the process require that the operator promptly correct any identified deficiencies in corrosion control?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section IX(9) - Monitoring External Corrosion Control, Subsection D - Corrective Action

277. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.P, 192.469

Question Text *Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section IX(9) - Monitoring External Corrosion Control, Subsection D - Corrective Action

278. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.P, 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c))

Question Text *Does the process provide adequate instructions for the installation of test leads?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section VI(6) - Test Leads - Installation and Maintenance

279. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.P, 192.605(b)(2) (192.473(a))

Question Text *Does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system and does the process for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XI(11) - Interference Currents

280. Question Result, ID, References Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c)) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XVII(17) - Maintaining Records and Information

TD.CP: External Corrosion - Cathodic Protection

281. Question Result, ID, References Sat, TD.CP.POST1971.P, 192.605(b)(2) (192.455(a), 192.457(a), 192.452(a), 192.452(b))

Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section V(5) - Pipelines Required to have Cathodic Protection

282. Question Result, ID, References Sat, TD.CP.PRE1971.P, 192.605(b)(2) (192.457(b))

Question Text *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section V(5) - Pipelines Required to have Cathodic Protection

Note: Ferndale Gas system installed after 1971 so this is really NA

Report Filters: Results: all

283. **Question Result, ID, References** Sat, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e))

Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section IX(9) - Monitoring External Corrosion Control, Subsection B - Unprotected Pipe

Note: Ferndale Gas system is cathodically protected so really NA

284. **Question Result, ID, References** Sat, TD.CP.ELECISOLATE.P, 192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section X(10) - Electrical Isolations, Inspections, Tests and Safeguards

285. **Question Result, ID, References** Sat, TD.CP.FAULTCURRENT.P, 192.605(b)(2) (192.467(f))

Question Text *Does the process give sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section X(10) - Electrical Isolation, Inspections, Tests and Safeguards

286. **Question Result, ID, References** Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c)) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XVII(17) - Maintaining Records and Information

TD.COAT: External Corrosion - Coatings

287. **Question Result, ID, References** Sat, TD.COAT.NEWPIPE.P, 192.605(b)(2) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))

Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section III(3) - Coating Materials

288. **Question Result, ID, References** Sat, TD.COAT.NEWPIPEINSTALL.P, 192.605(b)(2) (192.461(c), 192.461(d), 192.461(e), 192.483(a))

Question Text *Does the process give adequate guidance for the application and inspection of protective coatings on pipe?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section III(3) - Coating Materials and Section IV(4) - Pipe Coating Inspections

TD.CPEXPOSED: External Corrosion - Exposed Pipe

289. **Question Result, ID, References** Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 192.605(b)(2) (192.459)

Question Text *Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination is required to determine the extent of the corrosion?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section VII(7) - Inspections of Exposed Sections of Pipe

Report Filters: Results: all

290. Question Result, ID, References — Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c)) (also presented in: TD.CPMONITOR, TD.CP)

Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XVII(17) - Maintaining Records and Information

TD.ICP: Internal Corrosion - Preventive Measures

291. Question Result, ID, References — Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b))

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XII(12) - Mitigating Internal Corrosion; Subsection A - Monitoring for Internal Corrosion; bullet (3)(i) - Inspection of removed pipe

292. Question Result, ID, References — Sat, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.485(c))

Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XVI(16) - How to Determine the Strength of Corroded Pipe

293. Question Result, ID, References — Sat, TD.ICP.REPAIR.P, 192.491(c) (192.485(a), 192.485(b))

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*

Assets Covered 88968 (91)

Result Notes P-192.711 - Repairs, Replacements & Relocations; Section VI(6) - Field Inspection / Evaluation of Pipe Defects, Subsection B - Corrosion and Exhibit RR-1 - Permanent Repairs table

TD.ICCG: Internal Corrosion - Corrosive Gas

294. Question Result, ID, References — Sat, TD.ICCG.CORRGAS.P, 192.605(b)(2) (192.475(a))

Question Text *Does the process require that the corrosive effect of the gas in the pipeline be investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XII(12) - Mitigating Internal Corrosion; Subsection A - Monitoring for Internal Corrosion; bullet (3)(i) - Inspection of removed pipe

295. Question Result, ID, References — Sat, TD.ICCG.CORRGASACTION.P, 192.605(b)(2) (192.477)

Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section XII(12) - Mitigating Internal Corrosion; Subsection A - Monitoring for Internal Corrosion

TD.SP: Special Permits

296. Question Result, ID, References — Sat, TD.SP.CONDITIONS.P, 190.341(d)(2)

Question Text *Has a process been developed as necessary for complying with the special permit conditions?*

Assets Covered 88968 (91)

Result Notes NA - No special permits in place

TD.SCC: Stress Corrosion Cracking

Report Filters: Results: all

297. Question Result, ID, References Sat, TD.SCC.SCCIM.P, 192.911(c) (192.917(a)(1))

Question Text *Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*

Assets Covered 88968 (91)

Result Notes P-192.901c Threat Identification and Risk Analysis Procedure, Section A. subsection 4. Identify Time-Dependent Threats: paragraph d. Determine if Stress Corrosion Cracking (SSC) is a threat for each HCA.

298. Question Result, ID, References Sat, 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 88968 (91)

Result Notes Reviewed SCC Management Program - Pre-Assessment for "250A Sumas Station - Cherry Point", SCC is a low threat for this pipeline.

299. 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 88968 (91)

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

TQ.QU: Qualification of Personnel - Specific Requirements

300. Question Result, ID, References Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))

Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*

Assets Covered 88968 (91)

Result Notes P-192.453 - Corrosion Control; Section I(1) - Qualifications

301. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))

Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*

Assets Covered 88968 (91)

Result Notes P-192.711 - Repairs, Replacements & Relocations; Section XII(12) - Hot Tap & Stopple Procedures; Subsection A - General; Bullet 3

302. Question Result, ID, References Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-06-01, 192.801, 192.328)

Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*

Assets Covered 88968 (91)

Result Notes P-192.319 - Excavation and Backfilling; Prerequisites (Page 1)

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

303. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*

Assets Covered 88968 (91)

Result Notes P-192.901l Quality Assurance Procedure, Section B. Personnel Qualifications and Training Requirements (192.915)

304. 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 88968 (91)

Report Filters: Results: all

Result Notes Reviewed records for Justim Harkrader, Inspection Engineer III, training, skills appear adequate.

305. Question Result, ID, Sat, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i),
References 192.907(b), 192.911(l))

Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*

Assets Covered 88968 (91)

Result Notes P-192.901l Quality Assurance Procedure, Section 2. Integrity Management and Quality Assurance Program Reviews and Corrective Action Procedures.

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

306. Question Result, ID, Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b),
References 192.805(b))

Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*

Assets Covered 88968 (91)

Result Notes P-192.225 - Welding; Section III(3) - Welder Qualification

307. Question Result, ID, NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))
References

Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*

Assets Covered 88968 (91)

Result Notes NA - all pipelines are considered high stress

TQ.TR: Training of Personnel

308. Question Result, ID, Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))
References

Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*

Assets Covered 88968 (91)

Result Notes P-192.615(b) - Emergency Response Review/Training; Section I(1) - Emergency Response Manual Review; Subsection B - Emergency Response Training

309. Question Result, ID, Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)
References

Question Text *Does the process require review of emergency response personnel performance?*

Assets Covered 88968 (91)

Result Notes P-192.615(b) - Emergency Response Review/Training; Section I(1) - Emergency Response Manual Review; Subsection C - Review of Employee Emergency Response Activities and Emergency Response Procedures

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Report Parameters: Results: all

Report Filters: Results: all

Inspection Results (IRR)

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- 88968 (91) (309)

Inspection Results Report (ALL Results) - Scp_PK 88968 (91)

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
1.	(and 1 other asset)	NA		AR.CDA	8.	AR.CDA.CDACORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?
2.	(and 1 other asset)	NA		AR.CDA	9.	AR.CDA.CDACORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats identified by CDA as required?
3.	(and 1 other asset)	NA		AR.EC	1.	AR.EC.ECDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?
4.	(and 1 other asset)	NA		AR.EC	2.	AR.EC.ECDAPREASSESS.R	192.947(g) (192.925(b)(1))	Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?
5.	(and 1 other asset)	NA		AR.EC	3.	AR.EC.ECDAREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	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?
6.	(and 1 other asset)	NA		AR.EC	4.	AR.EC.ECDAREVQUAL.O	192.915(a) (192.915(b))	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?
7.	(and 1 other asset)	NA		AR.EC	5.	AR.EC.ECDAPLAN.P	192.925(a) (192.925(b))	Is an adequate ECDA plan and process in place for conducting ECDA?
8.	(and 1	NA		AR.EC	6.	AR.EC.ECDAINTEGRATION.P	192.917(b) (ASME B31.8S-2004 Section 4.5)	Is the process for integrating ECDA results

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)							with other information adequate?
9.	(and 1 other asset)	NA		AR.EC	7.	AR.EC.ECDAINTEGRATION.R	192.947(g) (192.917(b))	Do records demonstrate that the operator integrated other data/information when evaluating data/results?
10.	(and 1 other asset)	NA		AR.EC	8.	AR.EC.ECDAREGION.R	192.947(g) (192.925(b)(1))	Do records demonstrate that the operator identified ECDA Regions?
11.	(and 1 other asset)	NA		AR.EC	9.	AR.EC.ECDAINDIRECT.R	192.947(g) (192.925(b)(2))	Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?
12.	(and 1 other asset)	NA		AR.EC	10.	AR.EC.ECDADIRECT.R	192.947(g) (192.925(b)(3))	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?
13.	(and 1 other asset)	NA		AR.EC	14.	AR.EC.ECDAPLANMOC.R	192.947(g) (192.925(b)(3)(iii))	Do records demonstrate that changes in the ECDA plan have been implemented and documented?
14.	(and 1 other asset)	NA		AR.EC	15.	AR.EC.ECDAPOSTASSESS.R	192.947(g) (192.925(b)(4))	Do records demonstrate that the requirements for post-assessment were met?
15.	(and 1 other asset)	NA		AR.EC	18.	AR.EC.ECCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant external corrosion threats?
16.	(and 1 other asset)	NA		AR.EC	19.	AR.EC.ECCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant external corrosion threats as required?
17.	(and 1 other asset)	NA		AR.IC	1.	AR.IC.ICDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?
18.	(and 1 other asset)	NA		AR.IC	2.	AR.IC.ICDAREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ICDA assessments or review and analyze assessment

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
								results, are qualified for the tasks they perform?
19.	(and 1 other asset)	NA		AR.IC	3.	AR.IC.ICDAREVQUAL.O	192.915(a) (192.915(b))	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?
20.	(and 1 other asset)	NA		AR.IC	4.	AR.IC.ICDAPLAN.P	192.927(c) (192.927(a), 192.927(b))	Is an ICDA plan and process in place for conducting ICDA?
21.	(and 1 other asset)	NA		AR.IC	5.	AR.IC.ICDAPREASSESS.R	192.927(c)(1) (192.947(g))	Do records demonstrate that the requirements for an ICDA pre-assessment were met?
22.	(and 1 other asset)	NA		AR.IC	6.	AR.IC.ICDAINTEGRATION.P	192.917(b)	Is the process for integrating ICDA results with other information adequate?
23.	(and 1 other asset)	NA		AR.IC	7.	AR.IC.ICDAINTEGRATION.R	192.917(b) (192.947(g))	Do records demonstrate that other data/information was integrated when evaluating data/results?
24.	(and 1 other asset)	NA		AR.IC	8.	AR.IC.ICDAREGION.R	192.947(g) (192.927(c)(2), 192.927(c)(5))	Do records demonstrate that ICDA Regions were adequately identified?
25.	(and 1 other asset)	NA		AR.IC	10.	AR.IC.ICDAPOSTASSESS.R	192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.477)	Do records demonstrate that the operator assessed the effectiveness of the ICDA process?
26.	(and 1 other asset)	NA		AR.IC	13.	AR.IC.ICCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant internal corrosion threats related to internal corrosion?
27.	(and 1 other asset)	NA		AR.IC	14.	AR.IC.ICCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant internal corrosion threats as required?
28.	(and 1 other asset)	Sat		AR.IL	1.	AR.IL.ILIREVIEWQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria?
29.	(and 1	Sat		AR.IL	2.	AR.IL.ILIREVIEWQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that personnel who conduct assessments or

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)							review assessment results are qualified per the process requirements?
30.	(and 1 other asset)	NA		AR.IL	3.	AR.IL.ILIREVIEWQUAL.O	192.915(a) (192.915(b))	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?
31.	(and 1 other asset)	Sat		AR.IL	4.	AR.IL.ILISPECS.P	192.921(a)(1) (192.933(b))	Does the process assure complete and adequate vendor ILI specifications?
32.	(and 1 other asset)	Sat		AR.IL	5.	AR.IL.ILISPECS.R	192.947(g) (192.933(b))	Do records demonstrate that the ILI specifications were complete and adequate?
33.	(and 1 other asset)	Sat		AR.IL	6.	AR.IL.ASSESSMETHOD.P	192.919(b) (192.921(a), 192.937(c))	Does the process specify the assessment methods that are appropriate for the pipeline specific integrity threats?
34.	(and 1 other asset)	Sat		AR.IL	7.	AR.IL.ASSESSMETHOD.R	192.947(g) (192.919(b), 192.921(a), 192.937(c))	Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?
35.	(and 1 other asset)	Sat		AR.IL	8.	AR.IL.ILIVALIDATE.P	192.921(a)(1) (192.937(c))	Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?
36.	(and 1 other asset)	Sat		AR.IL	9.	AR.IL.ILIVALIDATE.R	192.947(g) (192.921(a)(1))	Do records demonstrate that the operator has validated ILI assessment results per their process?
37.	(and 1 other asset)	NA		AR.IL	10.	AR.IL.ILIVALIDATE.O	192.921(a)(1)	From observation of field activities, do the employees and vendors validate ILI assessment results per their process?
38.	(and 1 other asset)	Sat		AR.IL	11.	AR.IL.ILIINTEGRATION.P	192.917(b)	Is the process for integrating ILI results with other information adequate?
39.	(and 1 other asset)	Sat		AR.IL	12.	AR.IL.ILIINTEGRATION.R	192.947(g) (192.917(b))	Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?
40.	(and 1	Sat		AR.IL	13.	AR.IL.ILIACCEPCRITERIA.P	192.921(a)	Is the process for ILI survey acceptance

Row	Assets	Result (Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)						criteria adequate to assure an effective assessment?
41.	(and 1 other asset)	Sat	AR.IL	14.	AR.IL.ILIACCEPCRITERIA.R	192.947(g) (192.921(a))	Do records indicate adequate implementation of the process for ILI survey acceptance?
42.	(and 1 other asset)	NA	AR.IL	15.	AR.IL.ILIDELAY.R	192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341)	Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?
43.	(and 1 other asset)	NA	AR.IL	18.	AR.IL.ILIIMPLEMENT.O	192.921(a)(1) (192.620(d), 192.605(b))	Are O&M and IMP procedural requirements for the performance of ILI assessments followed?
44.	(and 1 other asset)	Sat	AR.IL	19.	AR.IL.ILCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?
45.	(and 1 other asset)	Sat	AR.IL	20.	AR.IL.ILCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?
46.	(and 1 other asset)	NA	AR.LSR	1.	AR.LSR.LSRPLAN.P	192.941(a) (192.941(b), 192.941(c))	Is the process for performing low stress reassessment adequate?
47.	(and 1 other asset)	NA	AR.LSR	2.	AR.LSR.LSRBA.R	192.947(d) (192.919(c), 192.921(d), 192.941(a))	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?
48.	(and 1 other asset)	NA	AR.LSR	3.	AR.LSR.LSREXTCORR.R	192.947(d) (192.941(b))	Do records demonstrate that the requirements of 192.941(b) were implemented when performing low stress reassessment for external corrosion?
49.	(and 1 other asset)	NA	AR.LSR	4.	AR.LSR.LSRINTCORR.R	192.947(d) (192.941(c))	Do records demonstrate that the requirements of 192.941(c) were implemented when performing low stress reassessment for internal corrosion?
50.	(and 1 other asset)	NA	AR.LSR	5.	AR.LSR.LSRCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant

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								corrosion threats following a LSR?
51.	(and 1 other asset)	NA		AR.LSR	6.	AR.LSR.LSRCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following a LSR?
52.	(and 1 other asset)	NA		AR.OT	1.	AR.OT.OTPLAN.P	192.921(a)(4)	Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?
53.	(and 1 other asset)	NA		AR.OT	2.	AR.OT.OTPLAN.R	192.947(d) (192.921(a)(4), 192.933(b))	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?
54.	(and 1 other asset)	NA		AR.OT	3.	AR.OT.OTREVQUAL.P	192.915(a) (192.915(b), 192.921(a)(4))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?
55.	(and 1 other asset)	NA		AR.OT	4.	AR.OT.OTREVQUAL.R	192.947(d) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?
56.	(and 1 other asset)	NA		AR.OT	5.	AR.OT.OTREVQUAL.O	192.915(a) (192.915(b))	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?
57.	(and 1 other asset)	NA		AR.OT	6.	AR.OT.OTPLAN.O	192.921(a)(4)	Were assessments conducted using "other technology" adequately performed in accordance with the OT process?
58.	(and 1 other asset)	NA		AR.OT	7.	AR.OT.OTCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified using Other Technology?
59.	(and 1	NA		AR.OT	8.	AR.OT.OTCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address

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	other asset)						significant corrosion threats as required following the use of Other Technology?
60.	(and 1 other asset)	NA	AR.PTI	1.	AR.PTI.PRESSTESTREVQUAL.P	192.915(a) (192.915(b) 192.921(a)(4))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate pressure test assessment results meet appropriate training, experience, and qualification criteria?
61.	(and 1 other asset)	NA	AR.PTI	2.	AR.PTI.PRESSTESTREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?
62.	(and 1 other asset)	Sat	AR.PTI	3.	AR.PTI.PRESSTESTACCEP.P	192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.921(a)(2))	Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?
63.	(and 1 other asset)	NA	AR.PTI	4.	AR.PTI.PRESSTESTRESULT.R	192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 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))	Do the test records validate the pressure test?
64.	(and 1 other asset)	NA	AR.PTI	6.	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(d), 192.507(a), 192.507(b), 192.507(c),	From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?

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							192.513(a), 192.513(b), 192.513(c), 192.513(d)	
65.	(and 1 other asset)	NA		AR.PTI	7.	AR.PTI.PTICORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats?
66.	(and 1 other asset)	NA		AR.PTI	8.	AR.PTI.PTICORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required?
67.	(and 1 other asset)	Sat		AR.RC	2.	AR.RC.DISCOVERY.P	192.933(b)	Does the integrity assessment process properly define discovery and the required time frame?
68.	(and 1 other asset)	Sat		AR.RC	3.	AR.RC.DISCOVERY.R	192.947(f) (192.933(b))	Do records demonstrate that discovery was declared in the required time frame or justification was documented?
69.	(and 1 other asset)	Sat		AR.RC	4.	AR.RC.IMPRC.P	192.933(a) (192.933(c), 192.933(d))	Does the Integrity Management Plan and/or maintenance processes include all of the actions that must be taken to address integrity issues in accordance with 192.933?
70.	(and 1 other asset)	NA		AR.RC	5.	AR.RC.PRESSREDUCE.R	192.947(f) (192.933(a)(1))	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?
71.	(and 1 other asset)	Sat		AR.RC	8.	AR.RC.CRITERIA.P	192.711(b) (192.703(a), 192.703(b), 192.703(c), 192.713(a), 192.713(b))	Does the repair process cover all of the elements for making repairs in covered segments?
72.	(and 1 other asset)	NA		AR.RC	9.	AR.RC.SCHEDULEIMPL.R	192.947(f) (192.933(d))	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)?
73.	(and 1 other asset)	NA		AR.RC	10.	AR.RC.REMEDIATION.O	192.933(c) (192.933(a), 192.933(d))	Is anomaly remediation adequate for the covered segments being observed?
74.	(and 1 other asset)	Sat		AR.RC	11.	AR.RC.LOOKBEYOND.P	192.917(e)(5)	Does the process require an evaluation of all pipeline segments with similar environmental

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							and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?
75.	(and 1 other asset)	NA	AR.RC	12.	AR.RC.LOOKBEYOND.R	192.947(b) (192.917(e)(5), 192.459)	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?
76.	(and 1 other asset)	Sat	AR.RMP	1.	AR.RMP.SAFETY.P	192.605(b)(9) (192.713(b))	Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?
77.	(and 1 other asset)	Sat	AR.RMP	3.	AR.RMP.IGNITION.P	192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))	Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?
78.	(and 1 other asset)	Sat	AR.RMP	6.	AR.RMP.HOTTAP.P	192.605(b)(1) (192.627)	Is the process adequate for tapping pipelines under pressure?
79.	(and 1 other asset)	Sat	AR.RMP	9.	AR.RMP.REPAIRREQT.P	192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))	Does the repair process capture the requirements of 192.711 for transmission lines?
80.	(and 1 other asset)	Sat	AR.RMP	10.	AR.RMP.FIELDREPAIRDEFECT.P	192.605(b)(1) (192.713(a), 192.713(b))	Is the process adequate for the permanent field repair of defects in transmission lines?
81.	(and 1 other asset)	Sat	AR.RMP	13.	AR.RMP.FIELDREPAIRWELDS.P	192.605(b) (192.715(a), 192.715(b), 192.715(c))	Is the process adequate for the permanent field repair of welds?
82.	(and 1 other asset)	Sat	AR.RMP	20.	AR.RMP.FIELDREPAIRLEAK.P	192.605(b) (192.717(a), 192.717(b))	Is there an adequate process for the permanent field repair of leaks on transmission lines?
83.	(and 1 other asset)	Sat	AR.RMP	23.	AR.RMP.WELDTEST.P	192.605(b) (192.719(a), 192.719(b))	Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?
84.	(and 1 other asset)	Sat	AR.RMP	26.	AR.RMP.CRACKNDT.P	192.929(b) (ASME B31.8S-2004 Appendix A3.4)	Does the process require that when a pipeline segment that meets the conditions for cracking and/or possible SCC is exposed (i.e., the coating is removed), an NDE method (e.g., MPI,

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								UT) is employed to evaluate for cracking?
85.	(and 1 other asset)	NA		AR.SCC	1.	AR.SCC.SCCDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?
86.	(and 1 other asset)	NA		AR.SCC	2.	AR.SCC.SCCDAREVQUAL.R	192.947(e) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?
87.	(and 1 other asset)	NA		AR.SCC	3.	AR.SCC.SCCDAREVQUAL.O	192.915(a) (192.915(b))	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?
88.	(and 1 other asset)	NA		AR.SCC	4.	AR.SCC.SCCDAPLAN.P	192.929(b)	Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?
89.	(and 1 other asset)	NA		AR.SCC	5.	AR.SCC.SCCDADATA.R	192.947(g) (192.929(b)(1))	Do records demonstrate that data was collected and evaluated?
90.	(and 1 other asset)	NA		AR.SCC	6.	AR.SCC.SCCDAMETHOD.R	192.947(g) (192.929(b)(2))	Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?
91.	(and 1 other asset)	NA		AR.SCC	7.	AR.SCC.SCCDAMETHOD.O	192.929	From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?
92.	(and 1 other asset)	NA		AR.SCC	8.	AR.SCC.SCCDANEARNEUTRAL.R	192.947(g) (192.929(b)(2))	From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?
93.	(and 1 other asset)	NA		AR.SCC	9.	AR.SCC.SCCDAREASSESSINTRVL.R	192.947(d) (192.939(a)(3))	From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?
94.	(and 1	NA		AR.SCC	11.	AR.SCC.SCCCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions

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	other asset)							to address significant corrosion threats found following SCCDA?
95.	(and 1 other asset)	NA		AR.SCC	12.	AR.SCC.SCCCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following SCCDA?
96.	(and 1 other asset)	Sat	(2)	DC.COCMP	2.	DC.COCMP.CMPCOMBUSTIBLE.P	192.303 (192.735(a), 192.735(b))	Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?
97.	(and 1 other asset)	Sat		DC.WELDINSP	1.	DC.WELDINSP.WELDVISUALQUAL.P	192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)	Does the operator have comprehensive written specifications or procedures for the inspection and testing of welds that meet the requirements of 192.241?
98.	(and 1 other asset)	Sat		DC.WELDINSP	4.	DC.WELDINSP.WELDNDT.P	192.243	Is there a process for nondestructive testing and interpretation in accordance with 192.243?
99.	(and 1 other asset)	Sat		DC.WELDINSP	7.	DC.WELDINSP.WELDREPAIR.P	192.245 (192.303)	Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?
100.	(and 1 other asset)	Sat		DC.WELDPROCEDURE	1.	DC.WELDPROCEDURE.WELD.P	192.225	Does the operator have written specifications requiring qualified welding procedures in accordance with 192.225?
101.	(and 1 other asset)	Sat		DC.WELDPROCEDURE	7.	DC.WELDPROCEDURE.WELDWEATHER.P	192.231 (192.225, 192.227)	Does the operator have written specifications that require the welding operation to be protected from weather conditions that would impair the quality of the completed weld?
102.	(and 1 other asset)	Sat		DC.WELDPROCEDURE	10.	DC.WELDPROCEDURE.MITERJOINT.P	192.233	Does the operator have written specifications or procedures that prohibit the use of certain miter joints as required by 192.233?
103.	(and 1 other asset)	Sat		DC.WELDPROCEDURE	13.	DC.WELDPROCEDURE.WELDPREP.P	192.235	Does the operator have comprehensive written specifications or procedures that require preparations for welding

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								in accordance with 192.235?
104.	(and 1 other asset)	Sat	(2)	DC.COMM	5.	MO.GO.PURGE.P	192.605(b)(1) (192.629(a), 192.629(b))	Does the process include requirements for purging of pipelines in accordance with 192.629?
105.	(and 1 other asset)	Sat	(2)	DC.COMM	6.	EP.ERG.NOTICES.P	192.615(a)(1)	Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?
106.	(and 1 other asset)	Sat	(2)	DC.COMM	7.	EP.ERG.COMMSYS.P	192.615(a) (192.615(a)(2))	Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?
107.	(and 1 other asset)	Sat	(2)	DC.COMM	22.	IM.PM.PMMGENERAL.P	192.935(a)	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?
108.	(and 1 other asset)	Sat	(2)	DC.COMM	23.	IM.PM.PMMGENERAL.R	192.947(d) (192.935(a))	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?
109.	(and 1 other asset)	Sat	(2)	DC.COMM	24.	IM.HC.HCAID.R	192.947(d) (192.905(a), 192.907(a), 192.911(a))	Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?
110.	(and 1 other asset)	NA	(2)	DC.COMM	25.	IM.HC.HCADATA.O	192.905(c)	Are HCAs correctly identified per up-to-date information?
111.	(and 1 other asset)	Sat		DC.DPC	44.	DC.DPC.INTCORRODE.P	192.453 (192.476(a), 192.476(b), 192.476(c))	Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?
112.	(and 1 other asset)	Sat		DC.MA	9.	DC.MA.MARKING.P	192.63	Does the operator have specifications requiring pipe, valves, and fittings to be marked according

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								to the requirements of 192.63?
113.	(and 1 other asset)	Sat		EP.ERG	1.	EP.ERG.REVIEW.P	192.605(a)	Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?
114.	(and 1 other asset)	Sat		EP.ERG	4.	EP.ERG.INCIDENTDATA.P	192.605(b)(4) (191.5(a))	Does the process include the steps necessary for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner?
115.	(and 1 other asset)	Sat	(2)	EP.ERG	5.	EP.ERG.NOTICES.P	192.615(a)(1)	Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?
116.	(and 1 other asset)	Sat	(2)	EP.ERG	7.	EP.ERG.COMMSYS.P	192.615(a) (192.615(a)(2))	Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?
117.	(and 1 other asset)	Sat		EP.ERG	8.	EP.ERG.RESPONSE.P	192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))	Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?
118.	(and 1 other asset)	Sat		EP.ERG	9.	EP.ERG.READINESS.P	192.615(a) (192.615(a)(4))	Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?
119.	(and 1 other asset)	Sat		EP.ERG	11.	EP.ERG.PUBLICPRIORITY.P	192.615(a) (192.615(a)(5))	Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?
120.	(and 1 other asset)	Sat		EP.ERG	12.	EP.ERG.PRESSREDUCESD.P	192.615(a) (192.615(a)(6))	Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize

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								hazards to life or property?
121.	(and 1 other asset)	Sat		EP.ERG	13.	EP.ERG.PUBLICHAZ.P	192.605(a) (192.615(a)(7))	Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?
122.	(and 1 other asset)	Sat		EP.ERG	14.	EP.ERG.AUTHORITIES.P	192.615(a) (192.615(a)(8))	Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?
123.	(and 1 other asset)	Sat		EP.ERG	15.	EP.ERG.OUTAGERESTORE.P	192.615(a) (192.615(a)(9))	Does the emergency plan include procedures for safely restoring any service outage?
124.	(and 1 other asset)	Sat		EP.ERG	16.	EP.ERG.INCIDENTACTIONS.P	192.615(a) (192.615(a)(10))	Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?
125.	(and 1 other asset)	Sat		EP.ERG	17.	EP.ERG.INCIDENTANALYSIS.P	192.617	Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?
126.	(and 1 other asset)	Sat		EP.ERG	19.	EP.ERG.POSTEVNTREVIEW.P	192.615(b)(3)	Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?
127.	(and 1 other asset)	Sat		EP.ERG	21.	EP.ERG.LIAISON.P	192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)	Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?
128.	(and 1 other asset)	Sat		FS.CSSYSPROT	18.	FS.CSSYSPROT.CMPRELIEF.P	192.605(b)(1) (192.731(a), 192.731(b), 192.731(c))	Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks?

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129.	(and 1 other asset)	Sat		FS.CSSYSPROT	21.	FS.CSSYSPROT.CMPESDTEST.P	192.605(b) (192.731(c))	Does the process provide adequate detail for inspecting and testing compressor station emergency shutdown devices at the required frequency?
130.	(and 1 other asset)	Sat		FS.CSSYSPROT	23.	FS.CSSYSPROT.CMPGASDETREQ.P	192.605(b) (192.736(b))	Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings?
131.	(and 1 other asset)	Sat		FS.CSSYSPROT	24.	FS.CSSYSPROT.CMPGASDETOM.P	192.605(b) (192.736(c))	Does the process give detail how gas detection and alarm systems in compressor stations will be maintained to function properly and do procedures require performance tests?
132.	(and 1 other asset)	Sat		FS.CS	16.	FS.CS.CMPSUSD.P	192.605(b)(5) (192.605(b)(7))	Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?
133.	(and 1 other asset)	Sat		FS.CS	17.	FS.CS.CMPMAINT.P	192.605(b)(6)	Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service?
134.	(and 1 other asset)	Sat	(2)	FS.CS	18.	DC.COCMP.CMPCOMBUSTIBLE.P	192.303 (192.735(a), 192.735(b))	Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of 192.735(b)?
135.	(and 1 other asset)	Sat	(2)	FS.FG	1.	MO.GM.ABANDONPIPE.P	192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g))	Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?
136.	(and 1	Sat	(2)	FS.FG	3.	FS.FG.VAULTINSPECT.P	192.605(b)(1) (192.749(a),	What are process requirements for

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	other asset)						192.749(b), 192.749(c), 192.749(d))	inspecting vaults having a volumetric internal content â‰¥200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?
137.1	(and 1 other asset)	Sat		FS.VA	1.	FS.VA.CMPVLVTEST.P	192.605(b) (192.745(a), 192.745(b))	Does the process have requirements for transmission line valves that might be used in an emergency?
138.1	(and 1 other asset)	Sat		IM.BA	1.	IM.BA.BAENVIRON.P	192.911(o) (192.919(e))	Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?
139.1	(and 1 other asset)	Sat		IM.BA	2.	IM.BA.BAENVIRON.R	192.947(d) (192.911(o), 192.919(e))	Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?
140.1	(and 1 other asset)	Sat		IM.BA	3.	IM.BA.BAMETHODS.P	192.919(b) (192.921(a), 192.921(c), 192.921(h))	Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?
141.1	(and 1 other asset)	Sat		IM.BA	4.	IM.BA.BAMETHODS.R	192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))	Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?
142.1	(and 1 other asset)	Sat		IM.BA	5.	IM.BA.BANEW.P	192.911(p) (192.905(c), 192.921(f), 192.921(g))	Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?
143.1	(and 1 other asset)	NA		IM.BA	6.	IM.BA.BANEW.R	192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)	Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?
144.1	(and 1 other asset)	Sat		IM.BA	7.	IM.BA.BASCHEDULE.P	192.917(c) (192.919(c), 192.921(b))	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?

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145.1	(and 1 other asset)	NA		IM.BA	8.	IM.BA.BASCHEDULE.R	192.947(c) (192.921(d))	Do records demonstrate that all BAP required assessments were completed as scheduled?
146.1	(and 1 other asset)	NA		IM.BA	9.	IM.BA.BAENVIRON.O	192.911(o) (192.919(e))	From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?
147.1	(and 1 other asset)	Sat		IM.CA	1.	IM.CA.LOWSTRESSREASSESS.P	192.941(a) (192.941(b), 192.941(c))	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?
148.1	(and 1 other asset)	Sat		IM.CA	2.	IM.CA.REASSESSINTERVAL.P	192.937(a) (192.939(a), 192.939(b), 192.913(c))	Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?
149.1	(and 1 other asset)	NA		IM.CA	3.	IM.CA.LOWSTRESSREASSESS.R	192.947(d) (192.941(a), 192.941(b), 192.941(c))	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?
150.1	(and 1 other asset)	Sat		IM.CA	4.	IM.CA.PERIODICEVAL.P	192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))	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?
151.1	(and 1 other asset)	Sat		IM.CA	5.	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))	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?
152.1	(and 1 other asset)	Sat		IM.CA	6.	IM.CA.REASSESSINTERVAL.R	192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))	Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?
153.1	(and 1	Sat		IM.CA	7.	IM.CA.REASSESSMETHOD.P	192.937(c) (192.931)	Is the approach for establishing

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	other asset)							reassessment method(s) consistent with the requirements in 192.937(c)?
154.1	(and 1 other asset)	Sat		IM.CA	8.	IM.CA.REASSESSMETHOD.R	192.947(d) (192.937(c))	Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?
155.1	(and 1 other asset)	Sat		IM.CA	9.	IM.CA.REASSESSWAIVER.P	192.943(a) (192.943(b))	Does the process include requirements for reassessment interval waivers (special permit per 190.341)?
156.1	(and 1 other asset)	NA		IM.CA	10.	IM.CA.REASSESSWAIVER.R	192.947(d) (192.943(a), 192.943(b))	Do records demonstrate that reassessment interval waivers (special permit per 190.341) have been adequately implemented, if applicable?
157.1	(and 1 other asset)	Sat		IM.CA	11.	IM.CA.REASSESSEXCPERF.P	192.913(a) (192.913(b), 192.913(c))	Does the process include requirements for deviations from reassessment requirements based on exceptional performance?
158.1	(and 1 other asset)	NA		IM.CA	12.	IM.CA.REASSESSEXCPERF.R	192.947(d) (192.913(a), 192.913(b), 192.913(c))	Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?
159.1	(and 1 other asset)	Sat		IM.HC	1.	IM.HC.HCAID.P	192.905(a)	Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?
160.1	(and 1 other asset)	Sat	(2)	IM.HC	2.	IM.HC.HCAID.R	192.947(d) (192.905(a), 192.907(a), 192.911(a))	Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?
161.1	(and 1 other asset)	Sat		IM.HC	3.	IM.HC.HCAMETHOD1.P	192.903(1)(i) (192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))	Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?
162.1	(and 1	Sat		IM.HC	4.	IM.HC.HCAMETHOD2.P	192.903(2)(i) (192.903(2)(ii))	Is the integrity management process

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)							adequate for identification of 192.903 High Consequence Areas using Method (2)?
163.1	(and 1 other asset)	Sat		IM.HC	5.	IM.HC.HCANEW.P	192.905(c)	Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?
164.1	(and 1 other asset)	Sat		IM.HC	6.	IM.HC.HCANEW.R	192.947(d) (192.905(c))	Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?
165.1	(and 1 other asset)	Sat		IM.HC	7.	IM.HC.HCAPIR.P	192.903 (192.905(a))	Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?
166.1	(and 1 other asset)	Sat		IM.HC	8.	IM.HC.HCAPIR.R	192.947(d) (192.903, 192.905(a))	Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?
167.1	(and 1 other asset)	Sat		IM.HC	9.	IM.HC.HCASITES.P	192.903 (192.905(b))	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?
168.1	(and 1 other asset)	Sat		IM.HC	10.	IM.HC.HCASITES.R	192.947(d) (192.903, 192.905(b))	Do records indicate identification of identified sites being performed as required?
169.1	(and 1 other asset)	NA		IM.HC	11.	IM.HC.HCAMETHOD1.R	192.947(d) (192.903 (1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))	Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?
170.1	(and 1 other asset)	Sat		IM.HC	12.	IM.HC.HCAMETHOD2.R	192.947(d) (192.905(a), 192.903(2)(ii))	Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
171.1	(and 1 other asset)	NA	(2)	IM.HC	13.	IM.HC.HCADATA.O	192.905(c)	Are HCAs correctly identified per up-to-date information?
172.1	(and 1 other asset)	Sat	(2)	IM.PM	1.	IM.PM.PMMGENERAL.P	192.935(a)	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?
173.1	(and 1 other asset)	Sat	(2)	IM.PM	2.	IM.PM.PMMGENERAL.R	192.947(d) (192.935(a))	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?
174.1	(and 1 other asset)	Sat		IM.PM	3.	IM.PM.PMMTPD.P	192.917(e)(1) (192.935(b)(1), 192.935(e))	Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?
175.1	(and 1 other asset)	Sat		IM.PM	4.	IM.PM.PMMTPD.R	192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))	Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?
176.1	(and 1 other asset)	Sat		IM.PM	5.	IM.PM.PMMREVQUAL.P	192.915(c)	Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?
177.1	(and 1 other asset)	Sat		IM.PM	6.	IM.PM.PMMREVQUAL.R	192.947(e) (192.915(c))	Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?
178.1	(and 1 other asset)	Sat		IM.PM	7.	IM.PM.PMMTPDSMYS.P	192.935(d) (192.935(e), 192 Appendix E Table E.II.1)	Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?
179.1	(and 1 other asset)	NA		IM.PM	8.	IM.PM.PMMTPDSMYS.R	192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)	Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
180.	(and 1 other asset)	Sat		IM.PM	9.	IM.PM.PMMOF.P	192.935(b)(2)	Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?
181.	(and 1 other asset)	Sat		IM.PM	10.	IM.PM.PMMOF.R	192.947(d) (192.935(b)(2))	Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?
182.	(and 1 other asset)	Sat		IM.PM	11.	IM.PM.PMMASORCV.P	192.935(c)	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?
183.	(and 1 other asset)	Sat		IM.PM	12.	IM.PM.PMMASORCV.R	192.947(d) (192.935(c))	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?
184.	(and 1 other asset)	NA		IM.PM	13.	IM.PM.PMMIMPLEMENT.O	192.935(a)	Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?
185.	(and 1 other asset)	Sat		IM.PM	14.	IM.PM.PMCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats?
186.	(and 1 other asset)	Sat		IM.PM	15.	IM.PM.PMCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required?
187.	(and 1 other asset)	Sat		IM.QA	1.	IM.QA.QARM.P	192.911(l)	Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?
188.	(and 1 other asset)	Sat		IM.QA	2.	IM.QA.IMNONMANDT.P	192.7(a)	Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
								invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?
189.	(and 1 other asset)	Sat		IM.QA	5.	IM.QA.QARM.R	192.947(d) (192.911(l))	Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?
190.	(and 1 other asset)	Sat		IM.QA	6.	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))	Is the process adequate to assure that required records are maintained for the useful life of the pipeline?
191.	(and 1 other asset)	Sat		IM.QA	7.	IM.QA.IMMOC.P	192.911(k) (192.909(a), 192.909(b))	Is the process for management of changes that may impact pipeline integrity adequate?
192.	(and 1 other asset)	Sat		IM.QA	8.	IM.QA.IMMOC.R	192.947(d) (192.909(a), 192.909(b), 192.911(k))	Do records demonstrate that changes that may impact pipeline integrity are being managed as required?
193.	(and 1 other asset)	Sat		IM.QA	9.	IM.QA.IMPERFEFECTIVE.P	192.945(a) (192.913(b), 192.951)	Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?
194.	(and 1 other asset)	Sat		IM.QA	10.	IM.QA.IMPERFEFECTIVE.R	192.947(d) (192.913(b), 192.945(a), 192.951)	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?
195.	(and 1 other asset)	Sat		IM.QA	11.	IM.QA.IMPERFMETRIC.P	192.945(a) (192.913(b), 192.951)	Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?
196.	(and 1 other asset)	Sat		IM.QA	12.	IM.QA.IMPERFMETRIC.R	192.947(d) (192.913(b), 192.945(a), 192.951)	Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
197.	(and 1 other asset)	Sat		IM.QA	13.	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))	Are required records being maintained for the life of the pipeline?
198.	(and 1 other asset)	Sat		IM.RA	1.	IM.RA.RADATA.P	192.917(b) (192.917(e)(1), 192.911(k))	Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?
199.	(and 1 other asset)	Sat		IM.RA	2.	IM.RA.RAMETHOD.P	192.917(c) (192.917(d))	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?
200.	(and 1 other asset)	Sat		IM.RA	3.	IM.RA.THREATID.R	192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))	Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?
201.	(and 1 other asset)	Sat		IM.RA	4.	IM.RA.RADATA.R	192.947(b) (192.917(b), 192.917(e)(1), 192.911(k))	Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?
202.	(and 1 other asset)	Sat		IM.RA	5.	IM.RA.THREATID.P	192.917(a) (192.917(e), 192.913(b)(1))	Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?
203.	(and 1 other asset)	Sat		IM.RA	6.	IM.RA.RAMETHOD.R	192.947(b) (192.917(c), 192.917(d))	Do records demonstrate that the risk assessment follows ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?
204.	(and 1 other asset)	Sat		IM.RA	7.	IM.RA.RAFACTORS.P	192.917(c)	Does the process include requirements for factors that could affect the likelihood of a release, and for 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?

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
205	(and 1 other asset)	Sat		IM.RA	8.	IM.RA.RAFACTORS.R	192.947(b) (192.917(c))	Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?
206	(and 1 other asset)	Sat		IM.RA	9.	IM.RA.RAMOC.P	192.917(c)	Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?
207	(and 1 other asset)	Sat		IM.RA	10.	IM.RA.RAMOC.R	192.947(b) (192.917(c))	Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?
208	(and 1 other asset)	NA		IM.RA	11.	IM.RA.RAMOC.O	192.917(c)	Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?
209	(and 1 other asset)	Sat		MO.GC	1.	MO.GC.CONVERSION.P	192.14(a) (192.14(b))	If any pipelines were converted into Part 192 service, was a process developed addressing all the applicable requirements?
210	(and 1 other asset)	Sat		MO.GOABNORMAL	1.	MO.GOABNORMAL.ABNORMAL.P	192.605(a) (192.605(c)(1))	Does the process fully address the responsibilities during and after an abnormal operation?
211	(and 1 other asset)	Sat		MO.GOABNORMAL	3.	MO.GOABNORMAL.ABNORMALCHECK.P	192.605(a) (192.605(c)(2))	Does the process include requirements for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?
212	(and 1 other asset)	Sat		MO.GOABNORMAL	4.	MO.GOABNORMAL.ABNORMALNOTIFY.P	192.605(a) (192.605(c)(3))	Does the process include requirements for notifying responsible operator personnel when notice of an abnormal operation is received?
213	(and 1 other asset)	Sat		MO.GOABNORMAL	5.	MO.GOABNORMAL.ABNORMALREVIEW.P	192.605(a) (192.605(c)(4))	Does the process include requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the processes controlling abnormal operation and taking corrective action where deficiencies are found?

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
214.	(and 1 other asset)	Sat		MO.GOCLASS	1.	MO.GOCLASS.CLASSLOCATEREV.P	192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), 192.611(d))	Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?
215.	(and 1 other asset)	Sat	(2)	MO.GOCLASS	3.	MO.GO.CONTSURVEILLANCE.P	192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))	Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?
216.	(and 1 other asset)	Sat		MO.GOCLASS	5.	MO.GOCLASS.CLASSLOCATESTUDY.P	192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))	Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?
217.	(and 1 other asset)	Sat		MO.GOMAOP	1.	MO.GOMAOP.MAOPDETERMINE.P	192.605(b)(1) (192.619(a), 192.619(b))	Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?
218.	(and 1 other asset)	Sat		MO.GOMAOP	2.	MO.GOMAOP.MAOPLIMIT.P	192.605(a) (192.605(b)(5))	Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?
219.	(and 1 other asset)	Sat	(2)	MO.GM	1.	MO.GM.ABANDONPIPE.P	192.605(b)(1) (192.727(a), 192.727(b), 192.727(c), 192.727(d), 192.727(e), 192.727(f), 192.727(g))	Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?
220.	(and 1	Sat		MO.GM	5.	MO.GM.IGNITION.P	192.605(b)(1) (192.751(a),	Are there processes for minimizing the danger of accidental ignition where

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)						192.751(b), 192.751(c)	gas constitutes a hazard of fire or explosion?
221.	(and 1 other asset)	Sat	(2)	MO.GM	8.	MO.GM.RECORDS.P	192.605(b)(1) (192.709(a), 192.709(b), 192.709(c))	Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?
222.	(and 1 other asset)	Sat		MO.GM	9.	MO.GM.VALVEINSPECT.P	192.605(b)(1) (192.745(a), 192.745(b))	Are their processes for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?
223.	(and 1 other asset)	Sat	(2)	MO.GM	12.	FS.FG.VAULTINSPECT.P	192.605(b)(1) (192.749(a), 192.749(b), 192.749(c), 192.749(d))	What are process requirements for inspecting vaults having a volumetric internal content â‰¥200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?
224.	(and 1 other asset)	Sat		MO.GOODOR	1.	MO.GOODOR.ODORIZE.P	192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))	Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?
225.	(and 1 other asset)	Sat	(2)	MO.GO	1.	MO.GO.CONTSURVEILLANCE.P	192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))	Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?
226.	(and 1 other asset)	Sat	(2)	MO.GO	4.	MO.GO.PURGE.P	192.605(b)(1) (192.629(a), 192.629(b))	Does the process include requirements for purging of pipelines in accordance with 192.629?
227.	(and 1 other asset)	Sat		MO.GO	5.	MO.GO.OMANNUALREVIEW.P	192.605(a)	Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
								once each calendar year?
228.	(and 1 other asset)	Sat		MO.GO	7.	MO.GO.OMEFFECTREVIEW.P	192.605(a) (192.605(b)(8))	Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?
229.	(and 1 other asset)	Sat		MO.GO	9.	MO.GO.OMHISTORY.P	192.605(a) (192.605(b)(3))	Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?
230.	(and 1 other asset)	Sat		MO.GO	13.	MO.GO.SRC.P	192.605(a) (192.605(d), 191.23(a))	Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?
231.	(and 1 other asset)	Sat		MO.GO	16.	MO.GO.ODDOR.P	192.605(a) (192.605(b)(11))	Does the process require prompt response to the report of a gas odor inside or near a building?
232.	(and 1 other asset)	Sat		MO.GO	17.	MO.GO.UPRATE.P	192.13(c) (192.553(a), 192.553(b), 192.553(c), 192.553(d))	Is the pressure uprating process consistent with the requirements of 192.553?
233.	(and 1 other asset)	Sat		MO.GMOPP	1.	MO.GMOPP.PRESSREGCAP.P	192.605(b)(1) (192.743(a), 192.743(b), 192.743(c))	Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?
234.	(and 1 other asset)	Sat		MO.GMOPP	4.	MO.GMOPP.PRESSREGTEST.P	192.605(b)(1) (192.739(a), 192.739(b))	Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?
235.	(and 1 other asset)	Sat	(2)	MO.GMOPP	7.	MO.GM.RECORDS.P	192.605(b)(1) (192.709(a), 192.709(b), 192.709(c))	Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M)

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
								patrol, survey, inspection or test?
236.	(and 1 other asset)	Sat	(2)	MO.RW	1.	MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?
237.	(and 1 other asset)	Sat	(2)	MO.RW	5.	MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
238.	(and 1 other asset)	Sat		MO.RW	6.	MO.RW.LEAKAGE.P	192.706 (192.706(a), 192.706(b), 192.935(d))	Does the process require leakage surveys to be conducted?
239.	(and 1 other asset)	Sat		PD.DP	1.	PD.DP.PDPROGRAM.P	192.614(a)	Is a damage prevention program approved and in place?
240.	(and 1 other asset)	Sat		PD.DP	2.	PD.DP.ONECALL.P	192.614(b)	Does the process require participation in qualified one-call systems?
241.	(and 1 other asset)	Sat		PD.DP	3.	PD.DP.EXCAVATEMARK.P	192.614(c)(5)	Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?
242.	(and 1 other asset)	Sat		PD.DP	4.	PD.DP.TPD.P	192.614(c)(1)	Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?
243.	(and 1 other asset)	Sat		PD.DP	5.	PD.DP.TPDONECALL.P	192.614(c)(3)	Does the process specify how reports of TPD are checked against One-Call tickets?
244.	(and 1 other asset)	Sat		PD.DP	8.	PD.DP.DPINFOGATHER.P	192.917(b) (192.935(b)(1)(ii))	Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?
245.	(and 1 other asset)	Sat		PD.DP	9.	PD.DP.DPINFOGATHER.R	192.947(b) (192.917(b), 192.935(b)(1)(ii))	Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?
246.	(and 1 other asset)	Sat		PD.PA	1.	PD.PA.ASSETS.P	192.616(b) (API RP 1162 Section 2.7 Step 4)	Does the program clearly identify the specific pipeline systems and facilities to be

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
								included in the program, along with the unique attributes and characteristics of each?
247.1	(and 1 other asset)	Sat		PD.PA	2.	PD.PA.AUDIENCEID.P	192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)	Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?
248.1	(and 1 other asset)	Sat		PD.PA	3.	PD.PA.MGMTSUPPORT.P	192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)	Does the operator's program documentation demonstrate management support?
249.1	(and 1 other asset)	Sat		PD.PA	4.	PD.PA.PROGRAM.P	192.616(a) (192.616(h))	Has the continuing public education (awareness) program been established as required?
250.1	(and 1 other asset)	Sat		PD.PA	6.	PD.PA.MESSAGES.P	192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)	Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?
251.1	(and 1 other asset)	Sat		PD.PA	7.	PD.PA.SUPPLEMENTAL.P	192.616(c) (API RP 1162 Section 6.2)	Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?
252.1	(and 1 other asset)	Sat		PD.PA	12.	PD.PA.LANGUAGE.P	192.616(g) (API RP 1162 Section 2.3.1)	Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?
253.1	(and 1 other asset)	Sat		PD.PA	14.	PD.PA.EVALPLAN.P	192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)	Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?

Rows	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
254.	(and 1 other asset)	Sat	(2)	PD.RW	1.	MO.RW.PATROL.P	192.705(a) (192.705(b), 192.705(c))	Does the process adequately cover the requirements for patrolling the ROW and conditions reported?
255.	(and 1 other asset)	Sat	(2)	PD.RW	5.	MO.RW.ROWMARKER.P	192.707(a) (192.707(b), 192.707(c), 192.707(d))	Does the process adequately cover the requirements for placement of ROW markers?
256.	(and 1 other asset)	Sat		RPT.NR	14.	RPT.NR.NOTIFYIMCHANGE.P	192.909(b)	Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?
257.	(and 1 other asset)	NA		RPT.NR	15.	RPT.NR.NOTIFYIMCHANGE.R	192.947(i) (192.909(b))	Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?
258.	(and 1 other asset)	Sat		RPT.NR	16.	RPT.NR.NOTIFYIMPRESS.P	192.933(a)(1)	Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?
259.	(and 1 other asset)	NA		RPT.NR	17.	RPT.NR.NOTIFYIMPRESS.R	192.947(i) (192.933(a)(1))	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?
260.	(and 1 other asset)	Sat		RPT.NR	18.	RPT.NR.IMDEVIATERPT.P	192.913(b)(1)(vii)	Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?

Row	Assets	Result (Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
261.	(and 1 other asset)	NA		RPT.NR	19.	RPT.NR.IMDEVIATERPT.R	192.947(i) (192.913(b)(1)(vii))	Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?
262.	(and 1 other asset)	Sat		RPT.NR	20.	RPT.NR.IMPERFRPT.P	192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)	Is there a process for annual reporting of integrity management performance data?
263.	(and 1 other asset)	Sat		RPT.NR	21.	RPT.NR.IMPERFRPT.R	192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)	Do annual reports demonstrate that integrity management performance data were reported?
264.	(and 1 other asset)	Sat		RPT.RR	2.	RPT.RR.IMMEDREPORT.P	191.5(b) (191.7)	Is there a process to immediately report incidents to the National Response Center?
265.	(and 1 other asset)	Sat		RPT.RR	9.	RPT.RR.INCIDENTREPORT.P	191.15(a)	Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?
266.	(and 1 other asset)	Sat		RPT.RR	10.	RPT.RR.INCIDENTREPORTSUPP.P	191.15(d)	Does the process require preparation and filing of supplemental incident reports?
267.	(and 1 other asset)	Sat		RPT.RR	11.	RPT.RR.SRCR.P	192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(b))	Do processes require reporting of safety-related conditions?
268.	(and 1 other asset)	Sat		RPT.RR	15.	RPT.RR.ABANDONWATERFACILITY.P	192.605(b)(1) (192.727(g))	Does the process require reports to be filed for each abandoned offshore pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?
269.	(and 1 other asset)	Sat		RPT.RR	17.	RPT.RR.OPID.P	191.22(a) (191.22(c), 191.22(d))	Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?
270.	(and 1	Sat		TD.ATM	1.	TD.ATM.ATMCORRODE.P	192.605(b)(2) (192.479(a),	Does the process give adequate guidance identifying atmospheric

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)						192.479(b), 192.479(c))	corrosion and for protecting above ground pipe from atmospheric corrosion?
271.	(and 1 other asset)	Sat		TD.ATM	4.	TD.ATM.ATMCORRODEINSP.P	192.605(b)(2) (192.481(a), 192.481(b), 192.481(c))	Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?
272.	(and 1 other asset)	Sat		TD.CPMONITOR	1.	TD.CPMONITOR.MONITORCRITERIA.P	192.605(b)(2) (192.463(a), 192.463(c))	Does the process require CP monitoring criteria to be used that is acceptable?
273.	(and 1 other asset)	Sat		TD.CPMONITOR	5.	TD.CPMONITOR.TEST.P	192.605(b)(2) (192.465(a))	Does the process adequately describe how to monitor CP that has been applied to pipelines?
274.	(and 1 other asset)	Sat		TD.CPMONITOR	7.	TD.CPMONITOR.CURRENTTEST.P	192.605(b)(2) (192.465(b))	Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?
275.	(and 1 other asset)	Sat		TD.CPMONITOR	9.	TD.CPMONITOR.REVCURRENTTEST.P	192.605(b)(2) (192.465(c))	Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?
276.	(and 1 other asset)	Sat		TD.CPMONITOR	12.	TD.CPMONITOR.DEFICIENCY.P	192.605(b)(2) (192.465(d))	Does the process require that the operator promptly correct any identified deficiencies in corrosion control?
277.	(and 1 other asset)	Sat		TD.CPMONITOR	14.	TD.CPMONITOR.TESTSTATION.P	192.469	Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?
278.	(and 1 other asset)	Sat		TD.CPMONITOR	17.	TD.CPMONITOR.TESTLEAD.P	192.605(b)(2) (192.471(a), 192.471(b), 192.471(c))	Does the process provide adequate instructions for the installation of test leads?
279.	(and 1 other asset)	Sat		TD.CPMONITOR	20.	TD.CPMONITOR.INTFRCURRENT.P	192.605(b)(2) (192.473(a))	Does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system and does the process for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?
280.	(and 1	Sat	(3)	TD.CPMONITOR	23.	TD.CP.RECORDS.P	192.605(b)(2) (192.491(a),	Does the process include records requirements for the corrosion control

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)						192.491(b), 192.491(c)	activities listed in 192.491?
281.	(and 1 other asset)	Sat		TD.CP	1.	TD.CP.POST1971.P	192.605(b)(2) (192.455(a), 192.457(a), 192.452(a), 192.452(b))	Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?
282.	(and 1 other asset)	Sat		TD.CP	3.	TD.CP.PRE1971.P	192.605(b)(2) (192.457(b))	Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found?
283.	(and 1 other asset)	Sat		TD.CP	10.	TD.CP.UNPROTECT.P	192.605(b)(2) (192.465(e))	Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?
284.	(and 1 other asset)	Sat		TD.CP	12.	TD.CP.ELECISOLATE.P	192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))	Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?
285.	(and 1 other asset)	Sat		TD.CP	15.	TD.CP.FAULTCURRENT.P	192.605(b)(2) (192.467(f))	Does the process give sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?
286.	(and 1 other asset)	Sat	(3)	TD.CP	20.	TD.CP.RECORDS.P	192.605(b)(2) (192.491(a), 192.491(b), 192.491(c))	Does the process include records requirements for the corrosion control activities listed in 192.491?
287.	(and 1	Sat		TD.COAT	1.	TD.COAT.NEWPIPE.P	192.605(b)(2) (192.455(a)(1), 192.461(a),	Does the process require that each buried or submerged pipeline

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)						192.461(b), 192.483(a))	installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?
288.	(and 1 other asset)	Sat		TD.COAT	4.	TD.COAT.NEWPIPEINSTALL.P	192.605(b)(2) (192.461(c), 192.461(d), 192.461(e), 192.483(a))	Does the process give adequate guidance for the application and inspection of protective coatings on pipe?
289.	(and 1 other asset)	Sat		TD.CPEXPOSED	1.	TD.CPEXPOSED.EXPOSEINSPECT.P	192.605(b)(2) (192.459)	Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination is required to determine the extent of the corrosion?
290.	(and 1 other asset)	Sat	(3)	TD.CPEXPOSED	8.	TD.CP.RECORDS.P	192.605(b)(2) (192.491(a), 192.491(b), 192.491(c))	Does the process include records requirements for the corrosion control activities listed in 192.491?
291.	(and 1 other asset)	Sat		TD.ICP	1.	TD.ICP.EXAMINE.P	192.605(b)(2) (192.475(a), 192.475(b))	Does the process direct personnel to examine removed pipe for evidence of internal corrosion?
292.	(and 1 other asset)	Sat		TD.ICP	4.	TD.ICP.EVALUATE.P	192.605(b)(2) (192.485(c))	Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?
293.	(and 1 other asset)	Sat		TD.ICP	6.	TD.ICP.REPAIR.P	192.491(c) (192.485(a), 192.485(b))	Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?
294.	(and 1 other asset)	Sat		TD.ICCG	1.	TD.ICCG.CORRGAS.P	192.605(b)(2) (192.475(a))	Does the process require that the corrosive effect of the gas in the pipeline be investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?
295.	(and 1 other asset)	Sat		TD.ICCG	3.	TD.ICCG.CORRGASACTION.P	192.605(b)(2) (192.477)	Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?
296.	(and 1	Sat		TD.SP	1.	TD.SP.CONDITIONS.P	190.341(d)(2)	Has a process been developed as necessary for complying with the

Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)							special permit conditions?
297.1	(and 1 other asset)	Sat		TD.SCC	1.	TD.SCC.SCCIM.P	192.911(c) (192.917(a)(1))	Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?
298.1	(and 1 other asset)	Sat		TD.SCC	2.	TD.SCC.SCCIM.R	192.947(d) (192.917(a)(1))	Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?
299.1	(and 1 other asset)	NA		TD.SCC	3.	TD.SCC.SCCREPAIR.R	192.709(a) (192.703(b))	Do records document that the operator has properly remediated any occurrences of SCC?
300.1	(and 1 other asset)	Sat		TQ.QU	1.	TQ.QU.CORROSION.P	192.453 (192.805(b))	Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?
301.1	(and 1 other asset)	Sat		TQ.QU	3.	TQ.QU.HOTTAPQUAL.P	192.627 (192.805(b))	Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?
302.1	(and 1 other asset)	Sat		TQ.QU	6.	TQ.QU.EXCAVATE.P	192.805(b) (ADB-06-01, 192.801, 192.328)	Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?
303.1	(and 1 other asset)	Sat		TQ.QUIM	1.	TQ.QUIM.IMREVIEWQUAL.P	192.915(a) (192.915(b), 192.915(c), 192.935(b))	Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?
304.1	(and 1 other asset)	Sat		TQ.QUIM	2.	TQ.QUIM.IMREVIEWQUAL.R	192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))	Do records indicate adequate qualification of integrity management personnel?
305.1	(and 1 other asset)	Sat		TQ.QUIM	3.	TQ.QUIM.IMQC.P	192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))	Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?
306.1	(and 1	Sat		TQ.QUOMCONST	6.	TQ.QUOMCONST.WELDER.P	192.227(a) (192.225(a),	Does the process require welders to be qualified in

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Row	Assets	Result	(Note 1)	Sub-Group	Qst #	Question ID	References	Question Text
	other asset)						192.225(b), 192.328(a), 192.328(b), 192.805(b)	accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?
307.1	(and 1 other asset)	NA		TQ.QUOMCONST	7.	TQ.QUOMCONST.WELDERLOWSTRESS.P	192.227(b) (192.225(a), 192.225(b), 192.805(b))	Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?
308.1	(and 1 other asset)	Sat		TQ.TR	1.	TQ.TR.TRAINING.P	192.615(b)(2) (192.805(b))	Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?
309.1	(and 1 other asset)	Sat		TQ.TR	4.	TQ.TR.TRAININGREVIEW.P	192.615(b)(3)	Does the process require review of emergency response personnel performance?

1. Result is repeated (N) times in this report due to re-presentation of the question in multiple sub-groups.