

Form A- Annual Review 8438

UTC Standard Annual Review Inspection Report
 Intrastate Operators
 FORM A: Annual Review

Inspector and Operator Information

Inspection ID 8438	Inspection Link 8438	Inspector - Lead Darren Tinnerstet	Inspector - Assist
Operator McChord Pipeline	Unit McChord Pipeline	Records Location - City & State Tacoma, WA	
Inspection Start Date 11-16-2022	Inspection Exit Interview Date 11-16-2022	Engineer Submit Date 11-17-2022	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

Inspection Scope and Summary

Annual Review of McChord Pipeline Company.

The McChord Pipeline is a buried intrastate pipeline 14.25 miles in length, constructed in 1966 with 6-inch nominal steel pipe grade B, wall thickness of 0.188 inch to 0.432 inch. A one mile reroute was performed in 1996. The pipeline has a 720 psig MOP (36% SMYS) with a normal operating pressure at 450 psig (21% SMYS). The pipeline is divided into four sections with isolation valves between each section. The entire pipeline has about 400 foot elevation differential. The pipeline transports jet fuel from US Oil Refinery located in Tacoma near Commencement Bay to the McChord Air Base storage facility. Jurisdiction begins at the pump suction valves (P-1401) and ends at the custody transfer manifold valves downstream of the meters at McChord Air Force Base. The pipeline was hydrostatically tested in 1996, inline inspected in 2004 (GE pig), and MFL runs were completed in 2009, 2014 and 2019. Prior to each run they evaluate the tool to make sure complementary technologies are used. Tuboscope was used in 1996. GE used UT in 2004. In 2005, there was a pressure cycle analysis done by Kieffer and Assoc. along with the LF Pre-70 ERW study. In 2009, a MFL pig was run by Baker Hughes

McChords integrity management program considers all of its pipeline to be in a HCA or a HCA CA given it's location and proximity to HPAs, CNWs, ecological and drinking water USAs.

LF Pre-70 ERW mileage is at 13.25. The remaining 1 mile is not LF Pre-70 ERW.

Facilities visited and Total AFOD

McChord Pipeline administrative offices located at US Oil Refinery

AFOD - 1

Summary of Significant Findings
 (DO NOT Discuss Enforcement options)

No Violations or areas of concern.

Primary Operator contacts and/or participants

Joel Roppo - Chief Engineer

John Williamson - Chief Pipeline Inspector

Operator executive contact and mailing address for any official correspondence

Andrew Troske - Vice President

McChord Pipeline Company

3001 Marshall Ave.

Tacoma, WA 98421

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
20	1,3,8,9,10,12,14,15,17,24,25,26,27,29,30,31,32,35,37,	0	
Unsatisfactory Responses	Unsatisfactory List		
0			
Area of Concern Responses	Area of Concern List		
0			
Not Applicable Responses	Not Applicable List		
20	4,5,6,7,13,16,18,19,20,21,22,23,28,38,39,40,41,42,43,44		
Yes Responses	Yes List	No Responses	No List
2	34,36,	0	
Not Checked / Evaluated Responses	Not Checked / Evaluated List		
0			

**If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Operator	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
No Crew Inspection records found							

Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
No Facility Inspection records found						

Scheduled Inspection History

Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
McChord Pipeline Company (16 Inspection records)								
2021	McChord Pipeline Company	McChord Pipeline Company	8275	Standard Comprehensive - HL	Complete	11-30-2021	11-04-2024	Documents
2021	McChord Pipeline Company	McChord Pipeline Company	8276	PA - Public Awareness	Complete	11-30-2021	11-04-2025	Documents
2021	McChord Pipeline Company	McChord Pipeline Company	8277	Standard - Annual Review	Complete	11-30-2021	11-04-2022	Documents
2020	McChord Pipeline Company	McChord Pipeline Company	8016	LIMP - Liquid Transmission Integrity Management	Complete	06-12-2020	06-04-2023	Documents
2020	McChord Pipeline Company	McChord Pipeline Company	8017	DA - Drug & Alcohol	Complete	02-27-2020	02-25-2024	Documents
2020	McChord Pipeline Company	McChord Pipeline Company	8018	Standard - Annual Review	Complete	06-12-2020	06-04-2021	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7846	OQ - Operator Qualification	Complete	12-02-2019	11-05-2023	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7847	CRM - LIQUID	Complete	12-20-2019	11-06-2023	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7848	Standard - Annual Review	Complete	12-20-2019	11-06-2020	Documents
2019	McChord Pipeline Company	McChord Pipeline Company	7924	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	08-12-2019	07-22-2023	Documents
2018	McChord Pipeline Company	McChord Pipeline Company	7567	Standard Comprehensive - HL	Complete	10-26-2018	10-10-2021	Documents
2017	McChord Pipeline Company	McChord Pipeline Company	7236	LIMP - Liquid Transmission Integrity Management	Complete	10-12-2017	09-26-2020	Documents
2017	McChord Pipeline Company	McChord Pipeline Company	7474	PA - Public Awareness	Complete	12-04-2017	10-31-2021	Documents
2017	McChord Pipeline Company	McChord Pipeline Company	7508	Incident Investigation	Complete	10-20-2017	10-11-2017	Documents
2016	McChord Pipeline Company	McChord Pipeline Company	6754	Standard Comprehensive - HL	Complete	10-19-2016	10-11-2019	Documents
2015	McChord Pipeline Company	McChord Pipeline Company	6208	OM PPR LIQUID - Operations & Maintenance, Plans & Procedures Review	Complete	08-27-2015	08-11-2019	Documents

GAS System Operations History

Annual Report - Miles of Main

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No Report records found					

Annual Report GAS Transmission Miles

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
No Report records found		

Annual Report - Leaks

Year	Operator	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
No Report records found						

Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
No Report records found							

HL System Operations History

HL Annual Report - Miles of Pipe by Decade

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre-20s	1920-1929	1930-1939	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989
No Report records found												

HL Annual Report - HL Miles / HCAs

HL Annual Report - Breakout Tanks

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
No Report records found								

YEAR	Operator	Commodity Group	Crude Oil #5	Refined (not HVL) #5
No Report records found				

ANNUAL REPORT: ACCURACY/TRENDS

Question #1.

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.

1. Result

Satisfactory

1. Notes

no trends.

Access to Complete Distribution Annual Report

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
No Report records found					

Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
No Report records found			

Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group
No Report records found		

DAMAGE PREVENTION

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates
No Damages records found													

DIRT data on mismarks for prior year

Damage Cause	Number of Reports
No Report records found	

DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

SubmitCompanyID - UTCfinalName	Number of Reports
No Report records found	

Question #2.

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?
http://N/A

Q2.b. Is the annual report damages root cause information complete and accurate?
N/A

Q2.c. Does the operator have a process to evaluate practices not sufficient" category?
Yes. Maintenance Manual, Section J-6

Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?
Yes. Maintenance Manual, Section J-6

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?
Yes. Seven qualified in house locators.

Q2.f. Is the operator appropriately requalifying loc deficiencies?
N/A. No requalifications were required.

Q2.g. What is the number of damages resulting from mismarks?
0

Q2.h. What is the number of damages resulting from not locating within the time requirements?
0

Q2.i. Is the operator appropriately addressing disc excavation damage?
N/A

Q2.j. Are mapping corrections timely and according to written procedures?
N/A

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?
0

Q2.L. Is the operator appropriately focusing damage address the causes of excavation damage?
Damages have been minimal. Last excavation damage was caused by improper excavation practices.

2. Notes

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

3. Result

Satisfactory

3. Notes

Reviewed 2021 submission. No changes.

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Results

Not Applicable

4. Notes

No reportable incidents for the year 2021.

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
3199	McChord Pipeline Company	McChord Pipeline Company	1,186,063	Dennis Ritter	08-02-2017 12:12 PM	Intersection of 100th St and A St			Federal

Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of recurrence?

5. Result

Not Applicable

5. Notes

No accidents, failures, or leaks for the year 2021.

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
No Incident Notification records found						

6. Result
Not Applicable

6. Notes

No incident reports for the year 2021.

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No Incident Notification records found							

7. Result
Not Applicable

7. Notes

No SRC occurred during 2021 calendar year.

Question #8.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

8. Result
Satisfactory

8. Notes

Operations Manual, Section IV - Abnormal Operations.

Approximately 4-6 times throughout year, during jet fuel transfer volume transferred is compared to the volume recieved at the base and it triggers an alarm. Procedure from Section IV is followed when this occurs and involves shutting down pipeline and notifying pipeline inspector who physically drives the pipeline route to look for any visible AOC's. Once it is confirmed that no immediate threat exists, the pipeline is blocked in and re-pressurized to check integrity of line before startup procedures are implemented.

O&M & EMERGENCY PROGRAMS

Question #9.

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

9. Result

Satisfactory

9. Notes

Operations Manual does not have change log documenting what changes were made during revision. This is being rectified

Maintenance Manual had no changes made during 2021.

Administrative Manual had two minor changes - Updated call out list and Updated Management support for PA program.

Question #10.

If changes to the O&M were made, are changes acceptable?

10. Result

Satisfactory

10. Notes

Changes were acceptable and of minimal impact.

Question #11.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

11. Notes

Updated procedure for Manual operation of McChord Pipeline. This was in response to TSA Cybersecurity guidelines that were provided to facility operators.

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Satisfactory

12. Notes

Changes were satisfactory.

INTEGRITY MANAGEMENT PROGRAMS

Question #13

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

13. Result
Not Applicable

13. Notes

No changes made to LIMP program in 2021. LIMP program audit is due in 2023.

Question #14.

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

14. Result
Satisfactory

14. Notes

Reviewed IM Performance Measure Review Checklist - Appendix D-1 for 2021.

Question #15

Are IMP program changes acceptable?

15. Result
Satisfactory

15. Notes

Changes are acceptable.

Question #16	Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)	16. Results Not Applicable
16. Notes	No assessment / repair work was conducted during 2021	
Question #17	Does the operator's HCA location data correspond to the positional data located in UTC GIS?	17. Results Satisfactory
17. Notes	Pipeline is located in a heavily developed area with minimal change to HCA. The entire system is classified as "Could Affect" HCA.	
Question #18	What assessment work is planned for the upcoming year?	18. Results Not Applicable
18. Notes	No assessment work planned for year 2023. Next ILLI is scheduled for 2024.	
Question #19	Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?	19. Results Not Applicable
19. Notes	Operator does not have any low pressure systems.	
Question #20	Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)	20. Results Not Applicable
20. Notes	Operator does not have any low pressure systems.	
Question #21	Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?	21. Results Not Applicable
21. Notes	Operator has no plastic pipe in their system.	
Question #22	Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)	22. Results Not Applicable
22. Notes	Operator is a HL Transmission. No requirement for DIMP program.	
Question #23	What DIMP remediation work is anticipated for upcoming year?	23. Results Not Applicable
23. Notes	Operator is a HL Transmission. No requirement for DIMP program.	

OQ PROGRAM

Question #24	Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.	24. Results Satisfactory
24. Notes	No substantial changes to OQ program. Switching over to QSG (Pinion) software to track OQ training records. OQ program audit was conducted in 2022 with no significant findings or issues.	
Question #25	Are the OQ plan updates satisfactory?	25. Results Satisfactory
25. Notes	Changes are acceptable.	
Question #26	Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?	26. Results Satisfactory
26. Notes	Reviewed OQ records for: Inspectors Contractors Instrument Technicians CP Technicians	

PUBLIC AWARENESS PROGRAM

Question #27	Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?	27. Results Satisfactory
27. Notes	Reviewed 2021 PA Program effectiveness measurements. No significant changes were to PA program	
Question #28	Are changes to the PA program satisfactory?	28. Results Not Applicable
28. Notes	No significant changes made to program.	

CONTROL ROOM PROGRAM

Question #29

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Results

Satisfactory

29. Notes

Some changes to CRM manual are currently underway. The main change is removing the ability for a supervisor to supersede the actions of a controller. This was discovered during the CRM audit conducted in 2022 and is being handled through the Management of Change process.

Question #30

Are the CRM program changes satisfactory?

30. Results

Satisfactory

30. Notes

Changes are acceptable.

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

Is the operator developing and implementing an API 1173 Safety Management System?

31. Results

Satisfactory

31. Notes

Operator is not currently developing an SMS. Currently operating under Process Safety Management (PSM) which includes a substantial amount of API 1173 content.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Results

Satisfactory

32. Notes

Operator only has on unit for their entire system.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	UTC Unit ID	UTC Operator ID
No Unit records found					

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.C Pipe Location Information ; Q33.D How to get additional information ; Q33.E National Pipeline Mapping System ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.K Pipeline Location Information ; Q33.M Emergency Preparedness

33. Notes

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Results

YES

34. Notes

Pipeline only crosses one navigatable waterway (Puyallup River). Operator conducts a river scour study evdry 5 years.

Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results

Satisfactory

35. Notes

Reviewed 5 year underwater inspection of Puyallup River (8/24/2021). No significant findings or exposed pipe from river scour.

Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Results

YES

36. Notes

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results

Satisfactory

37. Notes

Landslides are not a major area of concern for pipeline. Earthquake effects would be dealt with as a SRC and procedure is to use CPM (Computational Pipeline Monitoring) leak detection system to determine if there is any significant damage that would require an emergency shutdown of the pipeline.

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Results

Not Applicable

38. Notes

Operator is HL Transmission only. No indoor meter sets.

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Results

Not Applicable

39. Notes

Operator is HL Transmission only. No indoor meter sets.

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Results

Not Applicable

40. Notes

Operator is HL Transmission only. No indoor meter sets.

Question #41

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Results

Not Applicable

41. Notes

Operator is HL Transmission only. No low pressure systems.

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02

ADB 2020-02 Low Pressure Systems

42. Results

Not Applicable

42. Notes

Operator is HL Transmission only. No low pressure systems.

Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

43. Results

Not Applicable

43. Notes

Operator is HL Transmission only. No low pressure systems.

Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

44. Results

Not Applicable

44. Notes

Operator is HL Transmission only. No low pressure systems or requirement for DIMP program.

SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.