

Inspection Output (IOR)

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Report Filters

Assets **Nippon Dynawave Packaging Company / 88971 (1,935)**

Results **All**

Inspection Information

Inspection Name	8603 - Nippon OQ	Operator(s)	NIPPON DYNAWAVE PACKAGING CO., LLC (22515)	Plan Submitted	01/19/2023
Status	PLANNED	Lead	Scott Anderson	Plan Approval	01/19/2023 by Dennis Ritter
Start Year	2023	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood	All Activity Start	05/17/2023
System Type	GT	Observer(s)	John Trier	All Activity End	05/17/2023
Protocol Set ID	WA.GT.2022.02	Supervisor	Dennis Ritter	Inspection Submitted	--
		Director	Scott Rukke	Inspection Approval	--

Inspection Summary

NOTE: Setup/Pre-plan Analysis is not required for this type of WA intrastate inspection

Inspection Scope and Summary

This inspection consisted of reviewing Nippon Dynawave Packaging's OQ plan and associated records. Nippon operates approximately 9 miles of a 12" steel transmission pipeline. Nippon uses Everline Consulting to complete their required field maintenance and formal inspections. OQs for Everline field staff and 3rd Party company Blue Sky Construction were checked during this inspection. Blue Sky Construction performed a re-route on the pipeline late in 2022, OQs were checked for individuals performing the work.

Facilities visited and Total AFOD

1 AFOD

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

No Significant Findings

Primary Operator contacts and/or participants

Kellen Rosales, Compliance Program Manager, Everline Consulting

Andi Jackson, Project Engineer Energy and Utilities, Nippon Dynawave Packaging

Brian Wood, Director Support Services, Nippon Dynawave Packaging

Operator executive contact and mailing address for any official correspondence

Brian Wood

Director, Support Services

Nippon Dynawave Packaging Co., LLC

3401 Industrial Way

Longview, WA 98632

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88971 (1,935)	Nippon Dynawave Packaging Company	unit	88971	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP CDA Abandoned	38	38	38	38	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.	88971 (1,935)	--	TQ.TR, TQ.OQ, TQ.QU, TQ.QUIM, TQ.QUOMCONST	P, R	Detail	--

Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Qst Assets	Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Nippon OQ	--	05/17/2023	--	05/17/2023	TQ.TR, TQ.OQ, TQ.QU, TQ.QUIM, TQ.QUOMCONST	all assets	all types	38	38	38	38	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".

3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Nippon OQ	COMPLETED	05/18/2023	Nippon OQ	88971 (1,935)

Results (all values, 38 results)

TQ.OQ: Operator Qualification

1. Question Result, ID, References Sat, TQ.OQ.OQPLAN.P, 192.805(a) (192.801(b))

Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*

Assets Covered 88971 (1,935)

Result Notes Nippon OQ Manual includes covered tasks, and the basis used for identifying covered tasks.

2. Question Result, ID, References [Sat, TQ.OQ.REEVALINTERVAL.P, 192.805\(g\)](#)
 Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Nippon OQ Manual Section 11.1](#)

3. Question Result, ID, References [Sat, TQ.OQ.NONQUALIFIED.P, 192.805\(c\)](#)
 Question Text *Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Nippon OQ Manual Section 12.1](#)

4. Question Result, ID, References [Sat, TQ.OQ.EVALMETHOD.P, 192.805\(b\) \(192.803, 192.809\(d\), 192.809\(e\)\)](#)
 Question Text *Are evaluation methods established and documented appropriate to each covered task?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Nippon OQ Manual Section 10](#)

5. Question Result, ID, References [Sat, TQ.OQ.OQCONTRACTOR.R, 192.807\(a\) \(192.807\(b\)\)](#)
 Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Nippon had one construction project in this inspection interval. The work was performed by Blue Sky Construction. Checked a sampling of multiple OQ covered employees, all were up to date.](#)

6. Question Result, ID, References [Sat, TQ.OQ.RECORDS.R, 192.807](#)
 Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Checked a sampling of multiple OQ covered employees for Everline and Blue Sky Construction, all were up to date. Reviewed a sampling of evaluations.](#)

7. Question Result, ID, References [Sat, TQ.OQ.TRAINING.P, 192.805\(h\)](#)
 Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Nippon OQ Manual Sections 13 and 15](#)

8. Question Result, ID, References [Sat, TQ.OQ.TRAINING.R, 192.807\(a\) \(192.807\(b\)\)](#)
 Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Reviewed evaluations for Everline maintenance field staff. Training evaluations were adequate.](#)

9. Question Result, ID, References [Sat, TQ.OQ.OQPLANCONTRACTOR.P, 192.805\(b\) \(192.805\(f\), 192.805\(c\)\)](#)
 Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Nippon OQ Manual Sections 1.4, 14, and 15](#)

10. Question Result, ID, References [Sat, TQ.OQ.OQCONTRACTOR.P, 192.805\(b\) \(192.805\(c\), 192.805\(d\), 192.805\(e\), 192.805\(f\)\)](#)
 Question Text *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*
 Assets Covered [88971 \(1,935\)](#)
 Result Notes [Nippon OQ Manual Section 15](#)

11. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)**
 Question Text *Does the OQ plan document that the operator has assured that the processes on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon OQ Manual Sections 5 and 15**
12. Question Result, ID, References **Sat, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)**
 Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon does not use mutual assistance, they use Everline field staff to complete covered tasks. Records were adequate.**
13. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.P, 192.803**
 Question Text *Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon OQ Manual Section 8**
14. Question Result, ID, References **Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)**
 Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*
 Assets Covered **88971 (1,935)**
 Result Notes **Reviewed contractor and Everline field staff OQs. Individuals were qualified to recognize and react to AOCs.**
15. Question Result, ID, References **Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))**
 Question Text *Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon OQ Manual Section 14**
16. Question Result, ID, References **NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))**
 Question Text *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
17. Question Result, ID, References **Sat, TQ.OQ.MOC.P, 192.805(f)**
 Question Text *Does the OQ program identify how changes to processes, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon OQ Manual Section 4.2**
18. Question Result, ID, References **Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i) (192.18)**
 Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon OQ Manual Section 2.1**
19. Question Result, ID, References **NA, TQ.OQ.CHANGERECD.R, 192.805(i) (192.805(f), 192.18)**

Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*

Assets Covered 88971 (1,935)

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

TQ.QU: Qualification of Personnel - Specific Requirements

20. 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 88971 (1,935)

Result Notes Nippon OQ Manual Section 7. O&M Section 10

21. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 88971 (1,935)

Result Notes Reviewed OQs of personnel implementing CP methods, all were adequate.

22. 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 88971 (1,935)

Result Notes Nippon OQ Manual Section 8. O&M section 15.12

23. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.R, 192.627 (192.807(a), 192.807(b))

Question Text *Do records indicate the qualification of personnel performing hot taps?*

Assets Covered 88971 (1,935)

Result Notes Reviewed individuals that performed tapping during the re-route, dates were adequate.

24. 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 88971 (1,935)

Result Notes Nippon OQ Manual Section 8. O&M sections 7.3 and 18

25. Question Result, ID, References Sat, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-06-01, 192.801, 192.328)

Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*

Assets Covered 88971 (1,935)

Result Notes Reviewed OQs for individuals who oversee marking, trenching, and backfilling operations, dates were adequate.

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

26. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b), 192.493)

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 88971 (1,935)

Result Notes Nippon OQ manual Section 8. IMP Section 12.2

27. 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), 192.493)

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

Assets Covered 88971 (1,935)
Result Notes Personnel were adequately qualified.

28. 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 88971 (1,935)
Result Notes Nippon OQ manual Section 8. IMP Section 12.2

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

29. Question Result, ID, Sat, TQ.QUOMCONST.INSPECTOR.P, 192.241(a) (192.241(c), 192.805(b), 192.328(a), 192.328(b))
References
Question Text *Does the process require welding inspection personnel to be adequately trained and qualified?*
Assets Covered 88971 (1,935)
Result Notes Nippon OQ manual Section 8. O&M Section 16.4
30. Question Result, ID, Sat, TQ.QUOMCONST.INSPECTOR.R, 192.241(a) (192.241(c), 192.807(a), 192.807(b))
References
Question Text *Do records indicate adequate qualification documentation for personnel who conduct welding inspections?*
Assets Covered 88971 (1,935)
Result Notes Blue Sky Construction had two employees qualified to visually inspect welds, they were adequately qualified.
31. Question Result, ID, Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))
References
Question Text *Do records indicate the qualification of nondestructive testing personnel?*
Assets Covered 88971 (1,935)
Result Notes Nippon used Acuren to perform NDT for the re-route project. The two individuals performing NDT had up to date qualifications.
32. Question Result, ID, Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c),
References 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))
Question Text *Do records indicate that welders are adequately qualified?*
Assets Covered 88971 (1,935)
Result Notes Reviewed welder OQs for the re-route project, they were adequately qualified.
33. 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 88971 (1,935)
Result Notes Nippon OQ manual Section 8. O&M Section 16.4
34. Question Result, ID, Sat, 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 88971 (1,935)
Result Notes Nippon OQ manual Section 8. O&M Section 16.4
35. Question Result, ID, Sat, TQ.QUOMCONST.NDT.P, 192.243(b)(2) (192.803, 192.805(b), 192.805(h), 192.328(a), 192.328(b))
References
Question Text *Does the process require nondestructive testing of welds to be performed by personnel who are trained and qualified in the established procedures and with the testing equipment employed?*
Assets Covered 88971 (1,935)
Result Notes Nippon OQ manual Section 8. O&M Section 16.12

TQ.TR: Training of Personnel

36. Question Result, ID, References **Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))**
Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*
Assets Covered **88971 (1,935)**
Result Notes **Nippon O&M Section 19.1**
37. Question Result, ID, References **Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))**
Question Text *Is training for emergency response personnel documented?*
Assets Covered **88971 (1,935)**
Result Notes **Reviewed emergency response topics and attendance lists.**
38. Question Result, ID, References **Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)**
Question Text *Does the process require review of emergency response personnel performance?*
Assets Covered **88971 (1,935)**
Result Notes **Nippon O&M Section 19.1**

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.