

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	8270 Klickitat PUD O&M/Procedures	Operator(s)	KLICKITAT PUBLIC UTILITY DISTRICT (39809)	Plan Submitted	09/01/2021
Status	PLANNED	Lead	Darren Tinnerstet	Plan Approval	09/02/2021 by Sean Mayo
Start Year	2021	Observer(s)	Scott Rukke, David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson	All Activity Start	09/16/2021
System Type	GT	Supervisor	Joe Subsits	All Activity End	10/07/2021
Protocol Set ID	GT.2021.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

Operations and Maintenance Plan and Procedures Review of Klickitat County PUD pipeline system.

Inspection was conducted virtually do to Operator Covid restrictions.

Documents reviewed included KPUD Operations and Maintenance Manual (OMM) and KPUD Emergency Procedures Manual (EPM)

### Facilities visited and Total AFOD

9/16/21, 9/20/21 - 9/21/21, 10/27/21 = 4 AFOD days (All virtual records reviews)

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

No issues found

### Primary Operator contacts and/or participants

Doug Senn - Tech 2

Alex Casimiro - Accounting Clerk

Jonah Humphries - Plant Superintendent

Roy Rodgers - CPE Consultant

### Operator executive contact and mailing address for any official correspondence

Jim Smith - KPUD General Manager

1313 South Columbus Ave.

Goldendale, WA 98620

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88970 (1,934)	Klickitat PUD	unit	88970	--	137	137	137	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.	88970 (1,934)	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.	KPUD PPR	--	09/16/2021	10/07/2021	n/a	all planned questions	all assets	all types	137	137	137	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	KPUD PPR	COMPLETED	10/07/2021	KPUD PPR	--

## Results (all values, 137 results)

147 (instead of 137) results are listed due to re-presentation of questions in more than one sub-group.

### AR.PTI: Integrity Assessment Via Pressure Test

- Question Result, ID, [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 [88970 \(1,934\)](#)

Result Notes [KPUD OMM Section 11.5.7.3](#)

[KPUD OMM Section 12.9](#)

### AR.RMP: Repair Methods and Practices

- Question Result, ID, [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 [88970 \(1,934\)](#)

Result Notes [KPUD OM Sections 5.7 and 5.8](#)

[Excavation Procedure P-2](#)

3. 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 **88970 (1,934)**  
 Result Notes **KPUD OM Section 6.1**
4. 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 **88970 (1,934)**  
 Result Notes **KPUD OM Section 6.6**
- Form F-24 - Hot Tap Checklist**
5. 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 **88970 (1,934)**  
 Result Notes **KPUD OMM Sections 10.2 and 11.5.6**
6. 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 **88970 (1,934)**  
 Result Notes **KPUD OM Sections 10.2 and 11.5.6**
7. 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 **88970 (1,934)**  
 Result Notes **KPUD OM Section 11.5.7**
8. 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 **88970 (1,934)**  
 Result Notes **KPUD Section 10.2**
9. Question Result, ID, References **Sat, AR.RMP.WELDTTEST.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 **88970 (1,934)**  
 Result Notes **KPUD Section 10.6**

## DC.COCMP: Compressor Station Construction

10. Question Result, ID, References **NA, DC.COCMP.CMPCOMBUSTIBLE.P, 192.303 (192.735(a), 192.735(b), NFPA 30)** (also presented in: FS.CS)  
 Question Text *Does the process require that flammable/combustible materials are stored as required, and aboveground oil or gasoline storage tanks, are installed at compressor stations according to 192.735(b)?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## DC.CO: Construction

11. Question Result, ID, References **NA, DC.CO.PLASTICJOINT.P, 192.303 (192.281(a), 192.281(b), 192.281(c), 192.281(d), 192.281(e))**  
 Question Text *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?*

Assets Covered 88970 (1,934)

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

12. Question Result, ID, References NA, DC.CO.PLASTICJOINTPROCEDURE.P, 192.283(a) (192.283(b), 192.283(c), 192.283(d))

Question Text *Does the process require plastic pipe joining procedures to be qualified in accordance with 192.283, prior to making plastic pipe joints?*

Assets Covered 88970 (1,934)

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

13. Question Result, ID, References NA, DC.CO.PLASTICJOINTQUAL.P, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.805)

Question Text *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?*

Assets Covered 88970 (1,934)

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

14. Question Result, ID, References NA, DC.CO.PLASTICJOINTINSP.P, 192.287 (192.805(h))

Question Text *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?*

Assets Covered 88970 (1,934)

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

## DC.WELDINSP: Construction Weld Inspection

15. 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 88970 (1,934)

Result Notes KPUD OMM Section 11.5.5

16. 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 88970 (1,934)

Result Notes KPUD OMM Section 11.5.5(b).

17. 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 88970 (1,934)

Result Notes KPUD OMM Section 11.5.6

## DC.WELDPROCEDURE: Construction Welding Procedures

18. 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 88970 (1,934)

Result Notes KPUD OMM Section 11.5.2

Appendix G - Welding Procedures

19. 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 88970 (1,934)  
Result Notes KPUD OMM Section 11.5.5 (b)

20. 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 88970 (1,934)  
Result Notes KPUD OMM Section 11.5.5 (h)

21. 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 88970 (1,934)  
Result Notes KPUD OMM Section 11.5.5

## DC.DPC: Design of Pipe Components

22. 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 88970 (1,934)  
Result Notes KPUD OMM Section 11.2.2

## DC.MA: Materials

23. 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 88970 (1,934)  
Result Notes KPUD OMM Section 11.3

## EP.ERG: Emergency Response

24. 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 88970 (1,934)  
Result Notes KPUD EPM Section 1.7

25. 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 88970 (1,934)  
Result Notes KPUD OMM Procedure P-6.

KPUD EPM Appendix A

26. Question Result, ID, References Sat, EP.ERG.NOTICES.P, 192.615(a)(1)

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

Assets Covered 88970 (1,934)

Result Notes KPUD EPM Sections 2.4 and 2.5

27. Question Result, ID, References Sat, EP.ERG.COMMSYS.P, 192.615(a) (192.615(a)(2))

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 88970 (1,934)

Result Notes KPUD EPM Section 6

KPUD Emergency Response Plan (ERP)

28. 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 88970 (1,934)

Result Notes KPUD EPM Section 4.1

KPUD ERP

29. 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 88970 (1,934)

Result Notes KPUD EPM Section 4.4.

30. 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 88970 (1,934)

Result Notes KPUD EPM Section 4.1

31. 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 88970 (1,934)

Result Notes KPUD OMM Section 8.8

KPUD EPM Appendix H

32. 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 88970 (1,934)

Result Notes KPUD EPM Section 4.3.3

33. 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 88970 (1,934)

Result Notes KPUD EPM Section 2

34. 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 88970 (1,934)  
Result Notes KPUD EPM Section 5.2

35. 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 88970 (1,934)  
Result Notes KPUD EPM Section 5.1
36. 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 88970 (1,934)  
Result Notes KPUD EPM Section 5.1
37. Question Result, ID, References Sat, EP.ERG.POSTEVTREVIEW.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?*  
Assets Covered 88970 (1,934)  
Result Notes KPUD EPM Section 5.1.4 (d)
38. 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 88970 (1,934)  
Result Notes KPUD EPM Section 6

## FS.CSSYSROT: Compressor Station System Protection

39. Question Result, ID, References NA, FS.CSSYSROT.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 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
40. Question Result, ID, References NA, FS.CSSYSROT.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 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
41. Question Result, ID, References NA, FS.CSSYSROT.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 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
42. Question Result, ID, References NA, FS.CSSYSROT.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 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

## FS.CS: Compressor Stations

43. Question Result, ID, References **NA, 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 **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
44. Question Result, ID, References **NA, 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 **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
45. Question Result, ID, References **NA, DC.COCMP.CMPCOMBUSTIBLE.P, 192.303 (192.735(a), 192.735(b), NFPA 30)** (also presented in: DC.COCMP)  
Question Text *Does the process require that flammable/combustible materials are stored as required, and aboveground oil or gasoline storage tanks, are installed at compressor stations according to 192.735(b)?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## FS.FG: Facilities General

46. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 6.7**
47. Question Result, ID, References **NA, 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 of 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## FS.VA: Valves

48. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 3.9**

**Appendix C - Emergency Valve List**

## MO.GC: Conversion to Service

49. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 6.9**



## MO.GOABNORMAL: Gas Pipeline Abnormal Operations

50. 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 [88970 \(1,934\)](#)  
Result Notes [KPUD OMM Section 8.5.1](#)  
  
[Appendix F - Abnormal Operating Procedure](#)
51. 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 [88970 \(1,934\)](#)  
Result Notes [KPUD OMM Section 8.5](#)
52. 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 [88970 \(1,934\)](#)  
Result Notes [KPUD OMM Section 8.4.2](#)
53. 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 [88970 \(1,934\)](#)  
Result Notes [KPUD OMM Section 8.4.3](#)

## MO.GOCLASS: Gas Pipeline Class Location

54. 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 [88970 \(1,934\)](#)  
Result Notes [KPUD OMM Section 3.5.8.](#)
55. 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 [88970 \(1,934\)](#)  
Result Notes [KPUD OMM Sections 3.4 and 3.5](#)
56. 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 [88970 \(1,934\)](#)  
Result Notes [KPUD OMM Section 3.5.5](#)

## MO.GOMAOP: Gas Pipeline MAOP

57. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 2.4**

**Appendix D - KPUD Design and testing document 7/31/2018**

58. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Sections 6.3.2 and 2.4.**

## **MO.GM: Gas Pipeline Maintenance**

59. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 6.7**

60. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 6.1**

61. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Sections 1.11.3 and 3.2**

62. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 3.9**

**Appendix - List of Critical Valves.**

**Appendix E, Form F-4 is for documenting valve inspections.**

63. Question Result, ID, References **NA, 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 of approximately 200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

64. Question Result, ID, References **NA, MO.GM.HOLDER.P, 192.605(a) (192.605(b)(10))**

Question Text *Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders?*

Assets Covered 88970 (1,934)

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

65. Question Result, ID, References NA, MO.GM.EQUIPPLASTICJOINT.P, 192.605(b) (192.756)

Question Text *Does the process require maintaining equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*

Assets Covered 88970 (1,934)

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

## MO.GOODOR: Gas Pipeline Odorization

66. 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 88970 (1,934)

Result Notes KPUD OMM Section 6.2.1

Procedure P-10

## MO.GO: Gas Pipeline Operations

67. 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 88970 (1,934)

Result Notes KPUD OMM Sections 3.4 and 3.5

68. Question Result, ID, References Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))

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

Assets Covered 88970 (1,934)

Result Notes KPUD OMM Section 6.5

69. 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 88970 (1,934)

Result Notes KPUD OMM Section 1.13.

70. 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 88970 (1,934)

Result Notes KPUD OMM Section 1.10

Recorded on Form F-32.

71. 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 88970 (1,934)  
Result Notes KPUD OMM Section 3.2.4

72. 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 88970 (1,934)  
Result Notes KPUD OMM Procedure P-5

73. Question Result, ID, References NA, MO.GO.CUSTNOTIFY.P, 192.13(c) (192.16(a), 192.16(b), 192.16(c), 192.16(d))  
Question Text *Is a customer notification process in place that satisfies the requirements of 192.16?*  
Assets Covered 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

74. 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 88970 (1,934)  
Result Notes KPUD OMM Sections 3.7 and 8.3

75. 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 88970 (1,934)  
Result Notes KPUD OMM Section 12.14

## MO.GMOPP: Gas Pipeline Overpressure Protection

76. Question Result, ID, References NA, 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 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

77. Question Result, ID, References NA, 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 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

78. 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)  
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 88970 (1,934)  
Result Notes KPUD OMM Sections 1.11.3 and 3.2

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

79. 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 88970 (1,934)  
Result Notes KPUD OMM Section 3.6

80. Question Result, ID, [Sat, MO.RW.ROWMARKER.P, 192.707\(a\) \(192.707\(b\), 192.707\(c\), 192.707\(d\)\)](#) (also presented in: References [PD.RW](#))  
 Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
 Assets Covered [88970 \(1,934\)](#)  
 Result Notes [KPUD OMM Section 5.5](#)
81. Question Result, ID, [Sat, MO.RW.LEAKAGE.P, 192.706 \(192.706\(a\), 192.706\(b\), 192.935\(d\)\)](#)  
 References  
 Question Text *Does the process require leakage surveys to be conducted?*  
 Assets Covered [88970 \(1,934\)](#)  
 Result Notes [KPUD OMM Section 3.8](#)
82. Question Result, ID, [NA, MO.RW.GOMHAZARD.P, 192.612\(a\) \(192.612\(c\)\(2\), 192.612\(c\)\(3\)\)](#) (also presented in: [PD.RW](#))  
 References  
 Question Text *Does the process require identification of pipelines in the Gulf of Mexico at risk of being exposed underwater or hazards to navigation?*  
 Assets Covered [88970 \(1,934\)](#)  
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)

## PD.DP: Damage Prevention

83. Question Result, ID, [Sat, PD.DP.PDPROGRAM.P, 192.614\(a\)](#)  
 References  
 Question Text *Is a damage prevention program approved and in place?*  
 Assets Covered [88970 \(1,934\)](#)  
 Result Notes [KPUD OMM Section 5](#)
84. Question Result, ID, [Sat, PD.DP.ONECALL.P, 192.614\(b\)](#)  
 References  
 Question Text *Does the process require participation in qualified one-call systems?*  
 Assets Covered [88970 \(1,934\)](#)  
 Result Notes [KPUD OMM Sections 5.2 and 5.4](#)
85. Question Result, ID, [Sat, PD.DP.EXCAVATEMARK.P, 192.614\(c\)\(5\)](#)  
 References  
 Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*  
 Assets Covered [88970 \(1,934\)](#)  
 Result Notes [KPUD OMM Section 5.6](#)
- [Procedure P-1](#)
86. Question Result, ID, [Sat, PD.DP.TPD.P, 192.614\(c\)\(1\)](#)  
 References  
 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 [88970 \(1,934\)](#)  
 Result Notes [KPUD OMM Section 5.2.2 \(a\)](#)
87. Question Result, ID, [Sat, PD.DP.TPDONECALL.P, 192.614\(c\)\(3\)](#)  
 References  
 Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*  
 Assets Covered [88970 \(1,934\)](#)  
 Result Notes [KPUD OMM Section 5.2.2 \(d\)](#)
88. Question Result, ID, [Sat, PD.DP.DPINFOGATHER.P, 192.917\(b\) \(192.935\(b\)\(1\)\(ii\)\)](#)  
 References  
 Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*  
 Assets Covered [88970 \(1,934\)](#)

## PD.PA: Public Awareness

89. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 5.3**  
**KPUD PAP Section 5.0**
90. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 5.3**  
**KPUD PAP Section 6.0**
91. 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 **88970 (1,934)**  
Result Notes **KPUD PAP Section 3.0**
92. 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 **88970 (1,934)**  
Result Notes **KPUD PAP Section 2.1**
93. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 5.3**  
**KPUD PAP Section 7**
94. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 5.3**  
**KPUD PAP Section 9.0**
95. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 5.3.2**

## KPUD PAP Section 7

96. 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 **88970 (1,934)**  
Result Notes **KPUD PAP Section 1.0**

## PD.RW: ROW Markers, Patrols, Monitoring

97. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 3.6**
98. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 5.5**
99. Question Result, ID, References **NA, MO.RW.GOMHAZARD.P, 192.612(a) (192.612(c)(2), 192.612(c)(3))** (also presented in: MO.RW)  
Question Text *Does the process require identification of pipelines in the Gulf of Mexico at risk of being exposed underwater or hazards to navigation?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## RPT.RR: Regulatory Reporting (Traditional)

100. 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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 9.1.3**  
  
**Procedure P-6**
101. Question Result, ID, References **NA, RPT.RR.TELREPORTGOM.P, 192.605(b)(1) (192.612(c)(1))**  
Question Text *Does the process include telephonic notification to the National Response Center of exposed or navigation hazard pipe in the Gulf of Mexico and its inlets?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
102. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORT.P, 191.15(a) (192.624(a)(1), 192.624(a)(2))**  
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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 9.2.1**
103. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORTSUPP.P, 191.15(d) (192.624(a))**  
Question Text *Does the process require preparation and filing of supplemental incident reports?*  
Assets Covered **88970 (1,934)**  
Result Notes **KPUD OMM Section 9.1.4 (b)**



104. Question Result, ID, References **Sat, RPT.RR.SRCR.P, 192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(b), 191.25(c))**  
 Question Text *Do processes require reporting of safety-related conditions?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **KPUD OMM Section 9.1.2 (c)**  
  
**Procedure P-5**
105. Question Result, ID, References **NA, RPT.RR.NOTIFYPERMITGOM.P, 192.605(b)(1) (192.612(c)(3)(ii))**  
 Question Text *Do the process require PHMSA notification when federal or state permits cannot be obtained in time?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
106. Question Result, ID, References **NA, 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 **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
107. 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/urate?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **KPUD OMM Section 9.1.5 (b)**

## TD.AMAOP: Alternative MAOP

108. Question Result, ID, References **NA, TD.AMAOP.AMAOP.P, 192.605(b)(2) (192.620(d)(5))**  
 Question Text *Is there a process for controlling internal corrosion on pipelines that may operate under the Alternative Maximum Operating Pressure rule?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
109. Question Result, ID, References **NA, TD.AMAOP.AMAOPINTFRCURRENT.P, 192.605(b)(2) (192.620(d)(6))**  
 Question Text *Does the process include (prior to operating an existing pipeline segment at an alternate maximum allowable operating pressure, or within six months after placing a new pipeline segment in service at an alternate maximum allowable operating pressure) required instructions for addressing any interference currents on the pipeline segment?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
110. Question Result, ID, References **NA, TD.AMAOP.AMAOPINDIRECT.P, 192.605(b)(2) (192.620(d)(7))**  
 Question Text *Does the process require that within six months after placing the cathodic protection of a new pipeline segment in operation, or within six months after an existing pipeline segment under Part 192 has been certified under the Alternative Maximum Operating Pressure rule, that adequacy be assessed of the indirect method such as close-interval survey, and the integrity of the coating using direct current voltage gradient (DCVG) or alternating current voltage gradient (ACVG)?*  
 Assets Covered **88970 (1,934)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
111. Question Result, ID, References **NA, TD.AMAOP.AMAOPTESTREAD.P, 192.605(b)(2) (192.620(d)(8))**  
 Question Text *Does the process for a pipeline segment operating at an alternate maximum allowable operating pressure require: \*Completion of remedial action within six months of a failed reading at a test station during annual monitoring; \*Or notification of each responsible pipeline safety party demonstrating that the*



*integrity of the pipeline is not compromised; \*And after completion of the remedial action to address a failed reading, confirm restoration of adequate corrosion control by a close interval survey on either side of the affected test station to the next test station?*

Assets Covered 88970 (1,934)

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

## TD.ATM: Atmospheric Corrosion

112. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.6

113. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.6.1(b)

## TD.CPMONITOR: External Corrosion - CP Monitoring

114. 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 88970 (1,934)

Result Notes KPUD OMM Section 4

115. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.4.2

116. Question Result, ID, References NA, 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 88970 (1,934)

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

KPUD OMM Section 4.4.2

KPUD pipeline is protected by sacrificial anodes and does not have a rectifier installed

117. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.4.2

KPUD Pipeline does not include any switches, diodes, or interference bonds installed

118. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.4.1(f) and 4.8

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119. Question Result, ID, References Sat, TD.CP.MONITOR.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 88970 (1,934)

Result Notes KPUD OMM Section 4.4.3

120. Question Result, ID, References Sat, TD.CP.MONITOR.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 88970 (1,934)

Result Notes KPUD OMM Section 4.4.3

121. Question Result, ID, References Sat, TD.CP.MONITOR.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 88970 (1,934)

Result Notes KPUD OMM Section 4.5.3

122. 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 88970 (1,934)

Result Notes KPUD OMM Sections 4.10 and 1.11.3

## TD.CP: External Corrosion - Cathodic Protection

123. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.4.1

124. Question Result, ID, References NA, 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 88970 (1,934)

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

125. Question Result, ID, References NA, TD.CP.ALUMINUM.P, 192.605(b)(2) (192.455(e))

Question Text *Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline?*

Assets Covered 88970 (1,934)

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

126. Question Result, ID, References NA, TD.CP.AMPHOTERIC.P, 192.605(b)(2) (192.463(b), 192.463(c))

Question Text *Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline?*

Assets Covered 88970 (1,934)

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

127. Question Result, ID, References NA, 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 88970 (1,934)

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

128. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.5.1

129. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.5.1

130. 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.MONITOR, TD.CP.EXPOSED)

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

Assets Covered 88970 (1,934)

Result Notes KPUD OMM Sections 4.10 and 1.11.3

## TD.COAT: External Corrosion - Coatings

131. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.3

132. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.3

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

133. 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 88970 (1,934)

Result Notes KPUD OMM Section 4.2

KPUD Procedure P-3

134. Question Result, ID, **Sat**, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c)) (also presented in: References TD.CP.MONITOR, TD.CP)  
Question Text *Does the process include records requirements for the corrosion control activities listed in 192.491?*  
Assets Covered **88970 (1,934)**  
Result Notes **KPUD OMM Sections 4.10 and 1.11.3**

## TD.ICP: Internal Corrosion - Preventive Measures

135. Question Result, ID, **Sat**, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b))  
References  
Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*  
Assets Covered **88970 (1,934)**  
Result Notes **KPUD OMM Section 4.7.2**
136. Question Result, ID, **Sat**, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.485(c))  
References  
Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*  
Assets Covered **88970 (1,934)**  
Result Notes **KPUD OMM Section 4.8.3**
137. Question Result, ID, **Sat**, TD.ICP.REPAIR.P, 192.491(c) (192.485(a), 192.485(b))  
References  
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 **88970 (1,934)**  
Result Notes **KPUD OMM Section 4.7.2**

## TD.ICCG: Internal Corrosion - Corrosive Gas

138. Question Result, ID, **NA**, TD.ICCG.CORRGAS.P, 192.605(b)(2) (192.475(a))  
References  
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 **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
139. Question Result, ID, **NA**, TD.ICCG.CORRGASACTION.P, 192.605(b)(2) (192.477)  
References  
Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## TD.SP: Special Permits

140. Question Result, ID, **NA**, TD.SP.CONDITIONS.P, 190.341(d)(2)  
References  
Question Text *Has a process been developed as necessary for complying with the special permit conditions?*  
Assets Covered **88970 (1,934)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## TQ.QU: Qualification of Personnel - Specific Requirements

141. Question Result, ID, **Sat**, TQ.QU.CORROSION.P, 192.453 (192.805(b))  
References  
Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*

Assets Covered 88970 (1,934)  
Result Notes KPUD OMM Section 4.1

142. 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 88970 (1,934)  
Result Notes KPUD OMM Section 6.6.4

143. 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 88970 (1,934)  
Result Notes KPUD OMM Sections 5.6 and 5.7

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

144. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 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 88970 (1,934)  
Result Notes KPUD OMM Section 11.5.3

145. Question Result, ID, References NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))  
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 88970 (1,934)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

## TQ.TR: Training of Personnel

146. 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 88970 (1,934)  
Result Notes KPUD EPM Section 11.0

147. 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 88970 (1,934)  
Result Notes KPUD EPM Section 5.1.4

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Report Parameters: Results: all

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.

# FORM V Gas OM/Procedures 8270

UTC O&M/Procedures  
Inspection Report  
Intrastate GAS  
FORM V Gas OM/Procedures:  
State-Specific Requirements

\*\* THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE PROCEDURES" MODULE IN THE MOST CURRENT WA-SPECIFIC GD QUESTION SET

## Inspector and Operator Information

<b>Inspection ID</b> 8270	<b>Inspection Link</b> 8270	<b>Inspector - Lead</b> Tinnerstet, Darren	<b>Inspector - Assist</b>
<b>Operator</b> Klickitat PUD	<b>Unit</b> Klickitat PUD	<b>Records Location - City &amp; State</b>	
<b>Inspection Start Date</b> 10-05-2021	<b>Inspection Exit Interview Date</b>	<b>Engineer Submit Date</b>	

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

Operations and Maintenance Plan and Procedures Review of Klickitat County PUD pipeline system.

Inspection was conducted virtually do to Operator Covid restrictions.

### Facilities visited and Total AFOD

9/16/21, 9/20/21 - 9/21/21, 10/27/21 = 4 AFOD days (All virtual records reviews)

### Summary of Significant Findings

(DO NOT Discuss Enforcement options)

No issues found

### Primary Operator contacts and/or participants

Doug Senn - Tech 2

Alex Casimiro - Accounting Clerk

Jonah Humphries - Plant Superintendent

Roy Rodgers - CPE Consultant

### Operator executive contact and mailing address for any official correspondence

Jim Smith - KPUD General Manager

1313 South Columbus Ave.

Goldendale, WA 98620

## Instructions and Ratings Definitions

### INSTRUCTIONS

S - Satisfactory

### INSPECTION RESULTS

Satisfactory Responses  
28

Satisfactory List

1,2,3,4,5,6,7,8,9,10,11,12,13,16,17,18,19,20,21,26,27,29,30,31,32,34,35,36,

Unanswered Questions  
0

Unanswered Questions List

U - Unsatisfactory

Unsatisfactory Responses  
0

Unsatisfactory List

Area Of Concern	Area of Concern Responses	Area of Concern List
	0	
N/A- Not Applicable (does not apply to this operator or system)	Not Applicable Responses 9	Not Applicable List 14,15,22,23,24,25,28,33,37
N/C - Not Checked/Evaluated (was not inspected during this inspection)	Not Checked / Evaluated Responses 0	Not Checked / Evaluated List

\*\*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 summarized in the "PROCEDURES: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.

## ▼ INTRASTATE GAS OPERATOR PROCEDURES

### ▼ MAPPING PROCEDURES

#### Question 1

Do procedures require accurate maps (or updates) of pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

#### Q1 Reference

RCW 81.88.080

#### Q1 Result

Satisfactory

#### Q1 Notes

KPUD OMM Section 9

#### Question 2

Do procedures require that NPMS submissions are updated every 12 months if system modifications (excludes distribution lines and gathering lines) occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

#### Q2 Reference

PHMSA ADB 08-07

#### Q2 Result

Satisfactory

#### Q2 Notes

KPUD OMM Section 9.5 (C)

Reviewed NPMS map and 2020 update.

## ▼ REPORTING PROCEDURES

#### Question 3

Do procedures specify that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?

#### Q3 Reference

WAC 480-93-018(5)

#### Q3 Result

Satisfactory

#### Q3 Notes

KPUD OMM Section 1.11.1 - Records

Hydrostatic 3/30/2018

As-Built 4/1/2018

#### Question 4

Do procedures require the submission of an annual report (Due March 15 for the preceeding calendar year) on construction defects and material failures that resulted in leaks?

#### Q4 Reference

WAC 480-93-200(10)(b)

#### Q4 Result

Satisfactory

#### Q4 Notes



KPUD OMM 9.2.4 (a) (III)

Form F-29 to be completed if necessary

#### Question 5

Do procedures require the operator to submit updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities? Do the procedures require immediate notification to the commission and municipal authorities if an emergency point of contact changes?

##### Q5 Reference

WAC 480-93-200(11)

##### Q5 Result

Satisfactory

##### Q5 Notes

KPUD OMM Section 9.2.5

Form F-30 to be completed

#### Question 6

Do procedures require submission of a written report, within 5 days of completion of the failure analysis of any incident or hazardous condition due to construction defects or material failures?

##### Q6 Reference

WAC 480-93-200(6)

##### Q6 Result

Satisfactory

##### Q6 Notes

KPUD OMM Section 9.2.3 - Five day reporting

Form F-28 to be completed

#### Question 7

Do procedures describe the process for damage reporting requirements outlined in RCW 19.122.053(3) and WAC 480-93-200 (7), (8) and (9)?

##### Q7 Reference

RCW 19.122.053

##### Q7 Reference 2

WAC 480-93-200(7) (8) and (9)

##### Q7 Result

Satisfactory

##### Q7 Notes

KPUD OMM Section 9.2.8

#### Question 8

Do procedures require that the operator file with the commission, not later than March 15 of each year, applicable to the preceding calendar year: copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety

##### Q8 Reference

WAC 480-93-200(10)

##### Q8 Result

Satisfactory

##### Q8 Notes

KPUD OMM Section 9.1.1

## ▼ DAMAGE PREVENTION PROCEDURES

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#### Question 9

Are operator's locating and excavation procedures in compliance with all RCW 19.122 requirements for facility operators?

##### Q9 Reference

RCW 19.122

##### Q9 Result

Satisfactory

##### Q9 Notes

KPUD OMM Procedure P-1

#### Question 10

Do the procedures require that the operator provide the following information to excavators who damage pipeline facilities? Notification requirements for excavators under RCW 19.122.050(1) A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.

##### Q10 Reference

RCW 19.122

##### Q10 Reference 2

WAC 480-93-200(8)

##### Q10 Result

Satisfactory

##### Q10 Notes

KPUD OMM Section 9.2.8.3

#### Question 11

Do the procedures outline a process by which the operator reports to the commission when the operator or its contractor observes or becomes aware of any of the following activities? An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; A person intentionally damages or removes marks indicating the location or presence of pipeline facilities.

**Q11 Reference**

RCW 19.122

**Q11 Result**

Satisfactory

**Q11 Notes**

KPUD OMM Section 9.2.8.4

**Question 12**

Do procedures include the use of a quality assurance program for monitoring the locating and marking of facilities? Does the procedure require regular field audits of the performance of locators/contractors and implementing appropriate corrective action when necessary?

**Q12 Reference**

PHMSA State Program Question

**Q12 Result**

Satisfactory

**Q12 Notes**

KPUD OMM Section 5.6.4

KPUD OMM Procedure P-1

**Question 13**

Do procedures outline a process by which locator and excavator personnel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

**Q13 Reference**

WAC 480-93-013

**Q13 Result**

Satisfactory

**Q13 Notes**

KPUD OMM Procedure P-1

**Question 14**

Does the operator have sufficiently detailed directional drilling/boring procedures which include taking actions necessary to protect their facilities from dangers posed by drilling/other trenchless technologies?

**Q14 Reference**

PHMSA State Programs Emphasis

**Q14 Result**

Not Applicable

**Q14 Notes**

Procedure for specific directional drilling or trenchless technologies does not currently exist. If contractor were to use one of these methods they would follow standard procedure for excavation.

**Question 15**

Does the operator have a sufficiently detailed procedure to review records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

**Q15 Reference**

PHMSA State Programs Emphasis

**Q15 Result**

Not Applicable

**Q15 Notes**

Procedure for reviewing records of damages to prevent reoccurrences does not currently exist. One is currently being developed and will be added in the near future.

## DESIGN/CONSTRUCTION PROCEDURES

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**Question 16**

Does the operator have sufficiently detailed procedures to ensure materials meet minimum requirements prescribed for the selection and qualification of pipe and components for use in all of their facilities, as described in Part 192, Subpart B? See 192.51, 192.55(Steel), 192.59(Plastic)

**Q16 Reference**

Part 192, Subpart B

**Q16 Result**

Satisfactory

**Q16 Notes**

KPUD OMM Section 12.15

Reviewed 7/31/2018 KPUD Pipe design specifications report

**Question 17**

Does the operator have sufficiently detailed procedures to assure that they are meeting minimum requirements for design of their pipeline systems in accordance with Part 192, Subpart C? Are the procedures consistent with the requirements in parts 192.103, 192.105 for steel and parts 192.121 and 192.123 for plastic?

**Q17 Reference**

Part 192, Subpart C

**Q17 Result**

Satisfactory

**Q17 Notes**

**Question 18**

Does the operator have sufficiently detailed procedures to ensure that notice of proposed new construction, or replacement of existing gas transmission lines greater than 100 feet in length is provided in a complete and timely manner in accordance with WAC 480-93-160?

**Q18 Reference**  
WAC 480-93-160

**Q18 Result**  
Satisfactory

**Q18 Notes**  
KPUD OMM Section 9.2.6

**Question 19**

Does the operator have a sufficiently detailed procedure that ensures each new transmission line and each replacement of line pipe, valve, fitting, or other line component of a transmission line is designed and constructed to accommodate the passage of instrumented internal inspection devices?

**Q19 Reference**  
WAC 480-93-180

**Q19 Result**  
Satisfactory

**Q19 Notes**  
KPUD OMM Section 11.2.3

**Question 20**

Does the operator have sufficiently detailed procedures that account for all Part 192, Subpart D requirements for design of pipeline components?

**Q20 Reference**  
Part 192, Subpart D

**Q20 Result**  
Satisfactory

**Q20 Notes**  
KPUD OMM Section 11.2

**Question 21**

Does the operator's welding procedures account for all requirements specified in WAC 480-93-080 and all applicable Part 192, Subpart E requirements?

**Q21 Reference**  
WAC 480-93-080

**Q21 Reference 2**  
Part 192, Subpart E

**Q21 Result**  
Satisfactory

**Q21 Notes**  
KPUD OMM Section 11.5

**Question 22**

Does the operator have a sufficiently detailed procedure that requires plastic pipe joiners to be re-qualified within 1 year/NTE 15months? Are procedures required to be located on site where plastic joining is performed? Does the procedure require plastic pipe joiners to re-qualify if no joints made during any 12 month period? Does the procedure specify the process the operator uses to track production joints or re-qualify joiners within the annual requirement?

**Q22 Reference**  
WAC 480-93-080(2)

**Q22 Result**  
Not Applicable

**Q22 Notes**  
Operator does not use plastic pipe.

**Question 23**

Does the operator have sufficiently detailed procedures to ensure compliance with construction requirements for transmission lines and mains in accordance with Part 192, Subpart G?

**Q23 Reference**  
Part 192, Subpart G

**Q23 Result**  
Not Applicable

**Q23 Notes**  
Operator does not use pipe other than steel.

**Question 24**

Does the operator have sufficiently detailed procedures to ensure protection of plastic pipe in accordance with WAC 480-93-178?

**Q24 Reference**  
WAC 480-93-178

**Q24 Result**  
Not Applicable

**Q24 Notes**  
Operator does not use plastic pipe.

**Question 25**

Does the operator's procedure ensure the siting, installation, testing and maintenance of service regulators is in compliance with WAC 480-93-140 and Part 192, Subpart H?

**Q25 Reference**  
WAC 480-93-140

**Q25 Reference 2**  
Part 192, Subpart H

**Q25 Result**  
Not Applicable

**Q25 Notes**

Operator does not have services or regulators.

## ▼ CORROSION CONTROL PROCEDURES

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**Question 26**

Do the operator's cathodic protection procedures contain sufficient detail to explain how CP-related surveys, reads, and tests will be conducted in accordance with WAC 480-93-110? Do procedures include recording the condition of all underground metallic facilities each time the facility is exposed? Does the procedure require CP test reads on all exposed facilities where the coating has been removed?

**Q26 Reference**  
WAC 480-93-110

**Q26 Result**  
Satisfactory

**Q26 Notes**

KPUD OMM Section 4

Manual specifications require annual CP readings, operator conducts them bi-annually.

Pipeline is protected with a double magnesium ribbon and coupons for instant off readings.

KPUD OMM Section 4.2 - Examination of Exposed Pipe.

KPUD OMM Procedure P-26.

**Question 27**

Does the operator have a sufficiently detailed written program for monitoring atmospheric corrosion, with required timeframes for completing remedial action? Does the operator have a written program to monitor for indications of internal corrosion? Does the IC program contain remedial action requirements for areas where IC is detected?

**Q27 Reference**  
WAC 480-93-110

**Q27 Result**  
Satisfactory

**Q27 Notes**

KPUD OMM Section 4.6 - atmospheric corrosion; Procedure P-31

KPUD OMM Section 4.7 - Internal corrosion. Operator has not had opportunity to examine internal pipe yet.

**Question 28**

Do the operator's corrosion control procedures specify the testing intervals for casings (NTE 15 months), confirmatory follow-up on shorted casings within 90 days of discovery, leak surveys of shorted casings (NTE 7.5 months) and test equipment accuracy checks in accordance with WAC 480-93-110(3) and (5)?

**Q28 Reference**  
WAC 480-93-110 (3) and (5)

**Q28 Result**  
Not Applicable

**Q28 Notes**

Operator has no casings installed.

## ▼ OPERATIONS & MAINTENANCE PROCEDURES

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**Question 29**

Does the operator's procedure specify detailed gas leak investigation, evaluation, classification, and remedial action/repair prioritization steps in sufficient detail in order to ensure compliance with WACs 480-93-185, -186, and -18601?

**Q29 Reference**  
WAC 480-93-185

**Q29 Reference 2**  
WAC 480-93-186

**Q29 Reference 3**  
WAC 480-93-18601

**Q29 Result**  
Satisfactory

**Q29 Notes**

KPUD OMM Section 3.7

KPUD Procedure P-8

KPUD Procedure P-33

**Question 30**

Does the operator have sufficiently detailed procedures for pressure testing and test records composition/retention requirements to ensure compliance with WAC 480-93-170 and Part 192 Subpart J?

**Q30 Reference**  
WAC 480-93-170

**Q30 Reference 2**  
Part 192 Subpart J

**Q30 Result**  
Satisfactory

**Q30 Notes**

KPUD OMM Section 11.5

KPUD OMM Section 2.4

**Question 31**

Do the operator's procedures contain sufficient detail to comply with the required entries for all gas leak records according to the criteria outlined in WAC 480-93-187(1-13)?

**Q31 Reference**

WAC 480-93-187

**Q31 Result**

Satisfactory

**Q31 Notes**

KPUD OMM Section 3.7

KPUD Procure P-8

**Question 32**

Does the operator's leak survey procedure contain sufficient detail to assure compliance with instrumentation accuracy, survey intervals, records retention, and self-audits of the leak survey program as specified in WAC 480-93-188?

**Q32 Reference**

WAC 480-93-188

**Q32 Result**

Satisfactory

**Q32 Notes**

KPUD OMM Section 3.8

Reviewed 11/30/2020 Form F-17 Pipeline Patrol report which contains calibration data.

**Question 33**

Does the operator have sufficiently detailed procedures that detail service valve maintenance consistent with the requirements in WAC 480-93-100 and Part 192, Subpart M? Do the procedures prescribe service valve maintenance intervals of 1 per yr/ NTE 15months? Is the maintenance selection criteria consistent with WAC 480-93-100(2)(a-f)?

**Q33 Reference**

WAC 480-93-100

**Q33 Reference 2**

Part 192 Subpart M

**Q33 Result**

Not Applicable

**Q33 Notes**

No service valves.

**Question 34**

Do the operators procedures specify detailed steps to comply with the proximity consideration requirement in WAC 480-93-020?

**Q34 Reference**

WAC 480-93-020

**Q34 Result**

Satisfactory

**Q34 Notes**

KPUD OMM Section 2.5

**Question 35**

Does the operator's OQ plan/procedure identify "New Construction" activities as covered tasks in accordance with WAC 480-93-013?

**Q35 Reference**

WAC 480-93-013

**Q35 Result**

Satisfactory

**Q35 Notes**

KPUD OMM Section 11.4

KPUD OMM Section 1.9

**Question 36**

Do the operator's procedures specify use of odorant testing instrumentation, calibration, and applicable intervals in accordance with WAC 480-93-015? Does the procedure mandate retention of records of tests performed and equipment calibration for 5 years?

**Q36 Reference**

WAC 480-93-015

**Q36 Result**

Satisfactory

**Q36 Notes**

KPUD OMM Section 6.2

Form F-22

▼ PROCEDURES: SUMMARY OF REQUIRED COMMENTS

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**PROCEDURE REVIEW SUMMARY:** Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

▼ ADDITIONAL HEADER TEMPLATE

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**Question 37**

Template for additional questions

**Q37 Reference**

WAC 480-75-330

**Q37 Result**

Not Applicable

**Q37 Notes**

None

**Comments Template for additional comment boxes**

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