

# Inspection Output (IOR)

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## Report Filters

Assets Northwest Natural-HEADQUARTERS / 88965 (1,826)

Results All

## Inspection Information

Inspection Name [8608] NWN DIMP 11Jul23	Operator(s) NORTHWEST NATURAL GAS CO (13840) Lead Lex Vinsel	Plan Submitted 06/08/2023 Plan Approval 06/15/2023 by Dennis Ritter
Status PLANNED	Observer(s) David Cullom, Scott Anderson, John Trier, Marina Rathbun	All Activity Start 07/11/2023 All Activity End 07/14/2023
Start Year 2023	Supervisor Dennis Ritter	Inspection Submitted -- Inspection Approval --
System Type GD	Director Scott Rukke	
Protocol Set ID WA.GD.2023.01		

## Inspection Summary

### Inspection Scope and Summary

DIMP Scope since last DIMP (every 3 years) Covers 2022, 2021, 2020)

### Facilities visited and Total AFOD

NWN HQ - Portland Oregon

### Summary of Significant Findings

None

### Primary Operator contacts and/or participants

Samantha Rookstool

Scott Lundgren

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

Joe Karney

Vice President of Engineering and Utility Operations

Northwest Natural

250 Southwest Taylor Street

Portland, Oregon 97204

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88965 (1,826)	Northwest Natural-HEADQUARTERS	unit	88965	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS	81	81	81	81	100.0%

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
					Copper Pipe Aluminum/Amphoteric					

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

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88965 (1,826)	--	GDIM	P, R, O, S	Detail	--

## Plan Implementations

Activity #	SMART Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	GDIM	--	07/11/2023	-- 07/14/2023		all planned questions	all assets	all types	81	81	81	81	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	GDIM	STARTED	--	GDIM	88965 (1,826)

## Results (all values, 81 results)

### GDIM.PM: Preventive and Mitigative Actions

1. Question Result, ID, References **Sat, GDIM.PM.IDENTIFYMEASURES.P, 192.1007(d)**  
 Question Text *Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix D, Table D-1 DIMP A/A Actions**  
  
*\*Page 79 of DIMP Revision April 02, 2023\**
2. Question Result, ID, References **Sat, GDIM.PM.IDENTIFYMEASURES.R, 192.1007(d)**  
 Question Text *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Reviewed Accelerated Action Documentation Form for 05/07/2020 for A/A Action: Enhanced EFV Remediation**
3. Question Result, ID, References **Sat, GDIM.PM.LEAKMANAGEMENT.P, 192.1007(d)**  
 Question Text *Does the plan include an effective leak management program (unless all leaks are repaired when found)?*

Assets Covered 88965 (1,826)  
Result Notes \*Section 8.2 Leak Management Program

*\*Page 45 of DIMP Revision April 02, 2023\**

4. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPM.R, 192.1007(d)

Question Text *Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?*

Assets Covered 88965 (1,826)

Result Notes \*Appendix D - DIMP A/A Actions (Accelerated Actions)

*\*Section 8. Identification and Implementation of Measures to Address Risk*

*\*Page 79 of DIMP Revision April 02, 2023\**

## GDIM.IM: Plan Implementation

5. Question Result, ID, References Sat, GDIM.QA.PLANIMPLEMENT.P, 192.1005

Question Text *Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?*

Assets Covered 88965 (1,826)

Result Notes Original plan date was Aug. 01, 2011

Found on the title page.

6. Question Result, ID, References Sat, GDIM.RA.SOURCES.P, 192.1007(a)(1)

Question Text *Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?*

Assets Covered 88965 (1,826)

Result Notes DIMP plan Revision April 03, 2023

Appendix A-1, page 59

## GDIM.KN: Knowledge of the System

7. Question Result, ID, References Sat, GDIM.RA.GAPS.P, 192.1007(a)(3)

Question Text *Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered 88965 (1,826)

Result Notes Section 5.2 (page 20\*)

*\*Page 20 of DIMP Revision April 02, 2023\**

8. Question Result, ID, References Sat, GDIM.RA.INFORMATION.P, 192.1007(a)(2)

Question Text *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)?*

Assets Covered 88965 (1,826)

Result Notes \*Section 5.0 Knowledge of system and Figure 5-0 (flow chart)

*\*Page 14 of DIMP Revision April 02, 2023\**

9. Question Result, ID, References Sat, GDIM.RA.INFONEEDS.P, 192.1007(a)(3)

Question Text *Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?*

Assets Covered 88965 (1,826)

Result Notes \*Section 5.0 Knowledge of system and Figure 5-0 (flow chart)

\*Page 14 of DIMP Revision April 02, 2023\*

10. Question Result, ID, References NA, GDIM.RA.INFONEEDS.R, 192.1007(a)(3)

Question Text *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered 88965 (1,826)

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

\*Section 5.2 Missing Data

\*Page 20 of DIMP Revision April 02, 2023\*

11. Question Result, ID, References Sat, GDIM.RA.NEWPIPEDATA.P, 192.1007(a)(5)

Question Text *Do the procedures require the capture and retention of data on any new pipeline installed?*

Assets Covered 88965 (1,826)

Result Notes \*Section 5.4 Data Capture for New Construction and Ongoing Operations & Maintenance

\*Appendix A-2

\*Page 21 of DIMP Revision April 02, 2023\*

12. Question Result, ID, References Sat, GDIM.RA.NEWPIPEDATA.R, 192.1007(a)(5)

Question Text *Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?*

Assets Covered 88965 (1,826)

Result Notes \*Section 5.4 Data Capture for New Construction and Ongoing Operations & Maintenance

Appendix A-2 (p 62)

\*Page 21 of DIMP Revision April 02, 2023\*

13. Question Result, ID, References Sat, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007(a)

Question Text *Do records demonstrate implementation of the element "Knowledge of the System"?*

Assets Covered 88965 (1,826)

Result Notes \*Section 5.4 Data Capture for New Construction and Ongoing Operations & Maintenance

\*Appendix E-4 Hazardous Leaks Repaired, Categorized by material, (HLR-M) Reports

\*Page 102 of DIMP Revision April 02, 2023\*

14. Question Result, ID, References Sat, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)

Question Text *Has the operator demonstrated an adequate understanding of the system?*

Assets Covered 88965 (1,826)

Result Notes \*Section 5. Knowledge of Facilities

Figure 5-0

\*Page 14 of DIMP Revision April 02, 2023\*

## GDIM.TH: Identify Threats

15. Question Result, ID, References Sat, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)

Question Text *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?*

Assets Covered 88965 (1,826)

Result Notes \*Section 6.0 Threat Identification

Figure 6-0 procedure flowchart

*\*Page 23 of DIMP Revision April 02, 2023\**

16. Question Result, ID, References Sat, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)

Question Text *Did the operator consider the information that was reasonably available to identify existing and potential threats?*

Assets Covered 88965 (1,826)

Result Notes \*Section 6.0 Threat Identification

Figure 6-0 procedure flowchart

*Page 23 of DIMP Revision April 02, 2023*

17. Question Result, ID, References Sat, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)

Question Text *In identifying threats did the information considered include all of the required data and information sources?*

Assets Covered 88965 (1,826)

Result Notes \*Section 6.1 Threat Identification

*\*Page 25 of DIMP Revision April 02, 2023\**

18. Question Result, ID, References Sat, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)

Question Text *Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?*

Assets Covered 88965 (1,826)

Result Notes \*Section 6.1.3 Threat Identification from External Sources

*\*Page 26 of DIMP Revision April 02, 2023\**

19. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTTH.R, 192.1007(b)

Question Text *Do records demonstrate implementation of the element "Identify Threats"?*

Assets Covered 88965 (1,826)

Result Notes \*Section 6.0 Threat Identification

Figure 6-0 procedure flowchart

*\*Page 23 of DIMP Revision April 02, 2023\**

## **GDIM.RR: Evaluate and Rank Risk**

20. Question Result, ID, References Sat, GDIM.RA.RISKRANKING.P, 192.1007(c)

Question Text *Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?*

Assets Covered 88965 (1,826)

Result Notes \*Section 7. Threat Identification

Appendix C-2 - Risk Algorithm

21. Question Result, ID, References **Sat, GDIM.RA.THREATSCONSIDERED.P, 192.1007(c)**  
Question Text *Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*  
Assets Covered **88965 (1,826)**  
Result Notes *\*Appendix C-2*

**Section 7.0 Evaluation and Ranking of Risk**

*Page 70 of DIMP Revision April 02, 2023*

22. Question Result, ID, References **Sat, GDIM.RA.LIKELIHOOD.P, 192.1007(c)**  
Question Text *Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?*  
Assets Covered **88965 (1,826)**  
Result Notes *\*Appendix C-2*

**Section 7.0 Evaluation and Ranking of Risk**

*Page 70 of DIMP Revision April 02, 2023*

23. Question Result, ID, References **Sat, GDIM.RA.CONSEQUENCE.P, 192.1007(c)**  
Question Text *Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*  
Assets Covered **88965 (1,826)**  
Result Notes *\*Appendix C-2*

**Section 7.0 Evaluation and Ranking of Risk**

*\*Page 70 of DIMP Revision April 02, 2023\**

24. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDE.R, 192.1007(c)**  
Question Text *If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?*  
Assets Covered **88965 (1,826)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

**NWN does not sub-divide systems.**

25. Question Result, ID, References **Sat, GDIM.RA.RESULTS.R, 192.1007(c)**  
Question Text *Are the results of the risk ranking supported by the risk evaluation model/method?*  
Assets Covered **88965 (1,826)**  
Result Notes **\*Section 7.4 Risk Assessment Validation**

**Figure 7-0**

*\*Page 40 of DIMP Revision April 02, 2023\**

26. Question Result, ID, References **Sat, GDIM.RA.RESULTSVALIDATION.R, 192.1007(c)**  
Question Text *Did the operator validate the results generated by the risk evaluation model/method?*  
Assets Covered **88965 (1,826)**  
Result Notes **\*Section 7.4 Risk Assessment Validation**

**Figure 7-0**

*\*Page 40 of DIMP Revision April 02, 2023\**

27. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)**  
Question Text *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?*  
Assets Covered **88965 (1,826)**  
Result Notes **Appendix D. Table D-1**

*\*Page 79 of DIMP Revision April 02, 2023\**

## **GDIM.EV: Measure Performance and Evaluate Effectiveness**

28. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREBASELINE.P, 192.1007(e)**  
Question Text *Does the plan contain procedures for how the operator established a baseline for each performance measure?*  
Assets Covered **88965 (1,826)**  
Result Notes **\*Section 9. Measurement of Performance, Monitoring Results, and Evaluation Effectiveness**

*\*Page 48 of DIMP Revision April 02, 2023\**

29. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREBASELINE.R, 192.1007(e)**  
Question Text *Does the plan establish a baseline for each performance measure?*  
Assets Covered **88965 (1,826)**  
Result Notes **\*Section 9. Measurement of Performance, Monitoring Results, and Evaluating Effectiveness**

*\*Page 48 of DIMP Revision April 02, 2023\**

30. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREDATA.P, 192.1007(e)**  
Question Text *Does the operator have procedures to collect the data for each performance measure?*  
Assets Covered **88965 (1,826)**  
Result Notes **\*Section 9. Measurement of Performance, Monitoring Results, and Evaluation Effectiveness**

*\*Page 48 of DIMP Revision April 02, 2023\**

31. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREMONITOR.P, 192.1007(e)**  
Question Text *Do the procedures require the operator to monitor each performance measure?*  
Assets Covered **88965 (1,826)**  
Result Notes **\*Section 9. 10 Additional Performance Measures**

*\*Page 50 of DIMP Revision April 02, 2023\**

32. Question Result, ID, References **Sat, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)**  
Question Text *When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness?*  
Assets Covered **88965 (1,826)**  
Result Notes **\*Appendix E-1. Performance Measures for Code Requirements and A/A Actions**

*\*Page 85 of DIMP Revision April 02, 2023\**

33. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEV.R, 192.1007(e)**  
Question Text *Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?*  
Assets Covered **88965 (1,826)**

Result Notes \*Section 9. Measurement of Performance, Monitoring Results, and Evaluating Effectiveness

\*Appendix E

\*Page 48 of DIMP Revision April 02, 2023\*

## GDIM.PE: Periodic Evaluation

34. Question Result, ID, References Sat, GDIM.CA.PERIODICEVAL.P, 192.1007(f)

Question Text *Do the procedures for periodic evaluation include all of the requirements of §192.1007(f)?*

Assets Covered 88965 (1,826)

Result Notes \*Section 9. Measurement of Performance, Monitoring Results, and Evaluation Effectiveness

Appendix E-1

\*Page 48 of DIMP Revision April 02, 2023\*

35. Question Result, ID, References Sat, GDIM.CA.PERIODICEVAL.R, 192.1007(f)

Question Text *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?*

Assets Covered 88965 (1,826)

Result Notes \*Appendix F-1 Revision Log Distribution Integrity Management Program Plan

\*Page 111 of DIMP Revision April 02, 2023\*

## GDIM.RP: Reporting

36. Question Result, ID, References Sat, GDIM.RR.ANNUALREPORT.P, 192.1007(g)

Question Text *Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?*

Assets Covered 88965 (1,826)

Result Notes \*Section 11.1 State & Federal Annual Reporting Requirements

\*Page 56 of DIMP Revision April 02, 2023\*

37. Question Result, ID, References Sat, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)

Question Text *Has the operator submitted the required reports?*

Assets Covered 88965 (1,826)

Result Notes SP 003 - Describes Annual Reporting Requirements

(REVIEW ANNUAL REPORTS)

## GDIM.RC: Records Required to be Kept

38. Question Result, ID, References Sat, GDIM.QA.RECORDREQUIREMENTS.P, 192.1011

Question Text *Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?*

Assets Covered 88965 (1,826)

Result Notes \*Section 12. Document and Record Retention.

\*Page 57 of DIMP Revision April 02, 2023\*

39. Question Result, ID, References Sat, GDIM.QA.PLANRETENTION.P, 192.1011

Question Text *Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?*

Assets Covered 88965 (1,826)

Result Notes *\*Section 12. Document and Record Retention.*

*\*Page 57 of DIMP Revision April 02, 2023\**

40. Question Result, ID, References Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011

Question Text *Has the operator maintained the required records?*

Assets Covered 88965 (1,826)

Result Notes *Copies for previous DIMP files are keep on record*

*Reviewed DIMP plan for March 31, 2015*

## GDIM.IMPL: GDIM Implementation

41. Question Result, ID, References Sat, GDIM.QA.ISSUESIMPL.R, 192.1005

Question Text *Have all issues raised in previous DIMP inspections been satisfactorily addressed?*

Assets Covered 88965 (1,826)

Result Notes *No issues found in 2020 inspection.*

42. Question Result, ID, References Sat, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)

Question Text *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?*

Assets Covered 88965 (1,826)

Result Notes *No issues found in 2020 inspection.*

*\*Section 5.2 Missing Data*

*\*Page 20 of DIMP Revision April 02, 2023\**

43. Question Result, ID, References Sat, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)

Question Text *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?*

Assets Covered 88965 (1,826)

Result Notes *No issues found in 2020 inspection.*

*\*Section 6.1.3 Threat Identification from External Sources*

*\*Page 26 of DIMP Revision April 02, 2023\**

44. Question Result, ID, References Sat, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)

Question Text *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?*

Assets Covered 88965 (1,826)

Result Notes *Appendix A-3 Knowledge of Facilities*

*Reviewed sample of drawing updates for GIS.*

45. Question Result, ID, References Sat, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)

Question Text *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?*

Assets Covered 88965 (1,826)

\*Page 111 of DIMP Revision April 02, 2023\*

46. Question Result, ID, References Sat, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)  
Question Text *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?*  
Assets Covered 88965 (1,826)  
Result Notes Reviewed as builds for 2021 and found information was complete.  
  
Appendix A-2 Knowledge of Facilities Attributes List.  
  
\*Page 62 of DIMP Revision April 02, 2023\*
47. Question Result, ID, References Sat, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)  
Question Text *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?*  
Assets Covered 88965 (1,826)  
Result Notes Reviewed Completed Pipe Inspection reports for 2020 and 2021.
48. Question Result, ID, References Sat, GDIM.RA.SMEIMPL.R, 192.1007(a)  
Question Text *If Subject Matter Experts (SMEs), is their documented knowledge and experience being appropriately used in the DIMP Program?*  
Assets Covered 88965 (1,826)  
Result Notes SME data is additional to data centric results.  
  
\*Section 6.1 Threat Identification  
  
\*Page 25 of DIMP Revision April 02, 2023\*
49. Question Result, ID, References NA, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)  
Question Text *Do operator personnel in the field understand their responsibilities under the DIMP plan?*  
Assets Covered 88965 (1,826)  
Result Notes No such activity/condition was observed during the inspection.
50. Question Result, ID, References Sat, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)  
Question Text *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?*  
Assets Covered 88965 (1,826)  
Result Notes No threat categories added to DIMP Plan
51. Question Result, ID, References NA, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)  
Question Text *Have any changes occurred that require re-evaluation of threats and risks?*  
Assets Covered 88965 (1,826)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
52. Question Result, ID, References NA, GDIM.RA.IMPLEMENTTHUPDATEIMPL.R, 192.1007(c)  
Question Text *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge?*  
Assets Covered 88965 (1,826)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
53. Question Result, ID, References NA, GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R, 192.1007(c)

Question Text *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*

Assets Covered 88965 (1,826)

Result Notes NWN does not subdivide systems.

54. Question Result, ID, References NA, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)

Question Text *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?*

Assets Covered 88965 (1,826)

Result Notes NWN does not subdivide systems.

55. Question Result, ID, References NA, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)

Question Text *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?*

Assets Covered 88965 (1,826)

Result Notes NWN does not subdivide systems.

56. Question Result, ID, References NA, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)

Question Text *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?*

Assets Covered 88965 (1,826)

Result Notes NWN does not subdivide systems.

57. Question Result, ID, References NA, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)

Question Text *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?*

Assets Covered 88965 (1,826)

Result Notes NWN does not subdivide systems.

58. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)

Question Text *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?*

Assets Covered 88965 (1,826)

Result Notes Reviewed Checklists for 2022 & 2023 that showed annual review per Section 10.1

\*Section 10.1 Plan Updating, Review Frequency and Documentation

\*Page 52 of DIMP Revision April 02, 2023\*

59. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)

Question Text *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)?*

Assets Covered 88965 (1,826)

Result Notes None during this time frame

Bare steel 2015

Cast Iron 1999

60. Question Result, ID, References NA, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)

Question Text *Have risks been re-evaluated and re-ranked because of the elimination/mitigation of an identified threat?*

Assets Covered 88965 (1,826)

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

61. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R, 192.1007(d)**  
 Question Text *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix D, Table D-1 DIMP A/A Actions-1**  
*\*Page 79 of DIMP Revision April 02, 2023\**
62. Question Result, ID, References **Sat, GDIM.PM.LEAKMANAGEMENTIMPL.R, 192.1007(d)**  
 Question Text *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix D-3 Leak Management Program Key Performance Metrics**  
*\*Page 84 of DIMP Revision April 02, 2023\**
63. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVDATAIMPL.R, 192.1007(e)**  
 Question Text *Is data being collected for the required performance measures in 192.1007(e)?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix E-1. Performance Performance Measures for Code Requirements and A/A Actions**  
*\*Page 86 of DIMP Revision April 02, 2023\**
64. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R, 192.1007(e)**  
 Question Text *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix E-5. Hazardous Leaks by Cause**  
*\*Page 104 of DIMP Revision April 02, 2023\**
65. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVBASELINEIMPL.R, 192.1007(e)**  
 Question Text *Is each performance measure being monitored from an established baseline?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix E-1. Performance Performance Measures for Code Requirements and A/A Actions**  
*\*Page 86 of DIMP Revision April 02, 2023\**
66. Question Result, ID, References **NA, GDIM.QA.IMPLEMENTEVRISKIMPL.R, 192.1007(e)**  
 Question Text *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
67. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVALFREQIMPL.R, 192.1007(f)**  
 Question Text *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix F-1. Revision Log Distribution Integrity Management Program Plan**  
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68. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)**  
 Question Text *Did the periodic evaluation include all required elements?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Checklist DIMP Annual Review Checklist for 2021**
- \*Section 10.1 Plan Updating , Review Frequency and Documentation**
- \*Page 5286 of DIMP Revision April 02, 2023\***
69. Question Result, ID, References **NA, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))**  
 Question Text *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
70. Question Result, ID, References **NA, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)**  
 Question Text *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
71. Question Result, ID, References **NA, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)**  
 Question Text *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
72. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)**  
 Question Text *Were procedures followed in conducting periodic evaluations and program improvements?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **\*Appendix F, Table F-1. Revision Log Distribution Integrity Management Program PlanE-1. Performance Performance Measures for Code Requirements and A/A Actions**
- \*Page 111 of DIMP Revision April 02, 2023\***
73. Question Result, ID, References **Sat, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)**  
 Question Text *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **Annual report submittal for 2022 - March 15, 2023**
- Supplemental 2022 - April 10, 2023**
- Annual Report submittal for 2021 - March 7, 2022**
74. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011**  
 Question Text *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **NWN keeps all previous versions of their DIMP plan.**

75. Question Result, ID, References **Sat, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011**  
 Question Text *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **NWN keeps all previous versions of their DIMP plan.**
76. Question Result, ID, References **Sat, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011**  
 Question Text *Were DIMP procedures followed as applicable to records retention?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **NWN keeps all previous versions of their DIMP plan.**
77. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)**  
 Question Text *Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".]*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
78. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)**  
 Question Text *Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
79. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)**  
 Question Text *Have all conditions been complied with that were required as part of the alternate inspection interval approval?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
80. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)**  
 Question Text *Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
81. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVACTIONIMPL.R, 192.1013(c)**  
 Question Text *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*  
 Assets Covered **88965 (1,826)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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.