

Form A- Annual Review 8609

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

Inspector and Operator Information

Inspection ID 8609	Inspection Link 8609	Inspector - Lead Lex Vinsel	Inspector - Assist
Operator Northwest Natural	Unit Headquarters (HQ)	Records Location - City & State Portland Oregon	
Inspection Start Date 07-17-2023	Inspection Exit Interview Date 07-26-2023	Engineer Submit Date	

Inspection Summary

You must include the following in your inspection summary:

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

*Inspection Scope and Summary

Annual Review of NorthWest Natural remote

*Facilities visited and Total AFOD

Inspection is done remotely

AFOD - 1

* Summary of Significant Findings

None

* Primary Operator contacts and/or participants

Lisa Sherer

Samantha Rookstool

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Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

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

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

ANNUAL REPORT: ACCURACY/TRENDS

Question #1. Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.	1. Result Satisfactory
1. Notes	
1-a - Control Room Management annual revision (03/28/2023) Emergency Response and Recovery Plan 2023 Update. Manuals sent on April 13, 2023	
1-b - Contacts up to date for inspection.	

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
2022	Northwest Natural	2011.2	934.52	88,254	55.91
2021	Northwest Natural	3920.9	906.27	84,916.5	55.1
2020	Northwest Natural	1967.9	907.01	84,165	56.9
2019	Northwest Natural	1938.3	883.40	80,978	57.6
2018	Northwest Natural	1899	870.88	79,417	57.9
2017	Northwest Natural	1841.6	852.80	76,841	58.6
2016	Northwest Natural	1798.9	836.51	74,484	59.3
2015	Northwest Natural	1765.08	832.29	72,398	60.7

YEAR	Operator	Commodity Group	Total Total Miles
Northwest Natural (8 Report records)			
2022	Northwest Natural	Natural Gas	3.6
2021	Northwest Natural	Natural Gas	3.6
2020	Northwest Natural	Natural Gas	3.5
2019	Northwest Natural	Natural Gas	3.5
2018	Northwest Natural	Natural Gas	3.5
2015	Northwest Natural	Natural Gas	3.4
2016	Northwest Natural	Natural Gas	3.4
2017	Northwest Natural	Natural Gas	3.4

YEAR	Operator	Commodity Group
No Report records found		

DAMAGE PREVENTION

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN
2022	Northwest Natural	26,192	57	5	30	22	0	88,254	17	27	2011.2
2021	Northwest Natural	30,698	89	11	40	35	3	84,916.5	23	35	3920.9
2020	Northwest Natural	31,069	83	14	33	35	1	84,165	44	52	1967.9
2019	Northwest Natural	30,492	78	9	34	33	2	80,978			
2018	Northwest Natural	29,965	97	2	45	43	7	79,417			
2017	Northwest Natural	28,290	104	15	45	39	5	76,839			
2016	Northwest Natural	26,259	75	7	38	27	3	74,482			
2015	Northwest Natural	24,885	99	7	42	8	42	72,397			

DIRT data on mismarks for prior year

Damage Cause	Number of Reports
No Report records found	

DIRT Timeliness - Prior Year Reports must be submitted wit

SubmitCompanyID - UTCfinalName	Number of Reports
No Report records found	

Question #2.

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?

Yes

Q2.b. Is the annual report damages root cause informatio

Yes

Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

Yes

Q2.e. Is the operator or its contractor qualified and follow

Yes

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

Part of the DIRT submission.

Q2.h. What is the number of damages resulting from not I

See Dirt report

Q2.j. Are mapping corrections timely and according to written procedures?
See DIRT reports

Q2.k. Does the operator follow a process to evaluate caus
See DIRT report

2. Notes

NPMS SUBMISSIONS/CHANGES

Question #3.

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

3. Result

Satisfactory

3. Notes

Submitted Feb 27, 2023 to NPMS

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4

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

4. Results

Not Applicable

4. Notes

No federally reportable incidents found

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No Incident Notification records found									

Question #5.

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

5. Result

Satisfactory

5. Notes

Question #6.

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

Q6: Incident Reports

6. Result

Satisfactory

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
4239	Scott Anderson	Northwest Natural	14632 NE 18th St	09-13-2023 07:18 PM	<input type="checkbox"/>	State
4230	Anthony Dorrough	Northwest Natural	14001 SE 1st St	09-04-2023 04:48 PM	<input type="checkbox"/>	State
4227	Anthony Dorrough	Northwest Natural	3614 NW 16th St	08-21-2023 05:22 PM	<input checked="" type="checkbox"/>	State
4157	Derek Norwood	Northwest Natural	NW 94th St & NW 25th Ct	03-03-2023 10:03 AM	<input checked="" type="checkbox"/>	State
4143	Derek Norwood	Northwest Natural	602 SE 117th Ave	02-02-2023 01:30 PM	<input checked="" type="checkbox"/>	State
4116	Scott Anderson	Northwest Natural	11616 NE 122nd Pl	12-20-2022 12:19 AM	<input type="checkbox"/>	Non-Reportable
4107	Dennis Ritter	Northwest Natural	301 NE 107th AVE	11-29-2022 09:35 AM	<input checked="" type="checkbox"/>	State
4095	Scott Anderson	Northwest Natural	11411 NW 34th Ct	10-27-2022 11:58 AM	<input checked="" type="checkbox"/>	State
4067	Anthony Dorrough	Northwest Natural	406 W St	08-26-2022 05:39 PM	<input checked="" type="checkbox"/>	State
4059	Scott Anderson	Northwest Natural	2145 34th St.	08-13-2022 02:20 PM	<input checked="" type="checkbox"/>	State
4054	Scott Rukke	Northwest Natural	4315 S. Settler Drive	08-05-2022 10:08 AM	<input checked="" type="checkbox"/>	State
4046	Lex Vinsel	Northwest Natural	15302 NE 45th St	06-30-2022 06:24 PM	<input checked="" type="checkbox"/>	State
4028	Anthony Dorrough	Northwest Natural	SE Mill Plain Blvd & SE 160th Ave	06-20-2022 10:35 AM	<input checked="" type="checkbox"/>	State
4016	Derek Norwood	Northwest	1208 NE 165th Ct	05-07-2022 03:10 PM	<input checked="" type="checkbox"/>	State

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
		Natural				
4004	Derek Norwood	Northwest Natural	1034 NE 6th Ave	04-11-2022 08:13 AM	✓	State
4000	Scott Anderson	Northwest Natural	2308 E. Mill Plain Blvd	04-07-2022 09:15 AM	✓	State
3993	Lex Vinsel	Northwest Natural	Intersection of NW Bliss Rd & NW 26th Ave	03-28-2022 01:25 PM	✓	State
3990	Scott Anderson	Northwest Natural	16409 SE 1st St	03-14-2022 12:30 PM	✓	State
3989	Anthony Dorrough	Northwest Natural	111 Hwy 197	02-26-2022 09:25 PM	✓	State
3984	Derek Norwood	Northwest Natural	2200 NE 155th Ave	02-14-2022 05:34 PM	✓	State
3973	Darren Tinnerstet	Northwest Natural	330 E Mill Plain Drive	01-03-2022 02:01 PM	✓	State

6. Notes

Question #7.

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

Q7: Report of SRCs

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

7. Result

Not Applicable

7. Notes

No Safety Related Conditions found

Question #8.

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

8. Result

Not Applicable

8. Notes

No Abnormal Operating Condition found.

O&M & EMERGENCY PROGRAMS

Question #9.

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

Operator Manuals on Sharepoint

9. Result

Satisfactory

9. Notes

Submitted April 13, 2023 Changes were made in O&M manual

Question #10.

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

10. Result

Satisfactory

10. Notes

Changes appear acceptable and current

Question #11.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

11. Notes

Yes, there were changes and they appear adequate.

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Satisfactory

12. Notes

Reviewed Revision Log for 2022

INTEGRITY MANAGEMENT PROGRAMS

Question #13

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

13. Result

Satisfactory

13. Notes

Question #14.

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

14. Result

Satisfactory

14. Notes

Reviewed Checklist for previous Effective Evaluation. April 8, 2021

Question #15

Are IMP program changes acceptable?

15. Result

Satisfactory

15. Notes

DIMP program changes reviewed during DIMP inspection on July 11, 2023.

Question #16

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

16. Results

Not
Applicable

16. Notes

None required

ABs and Cast Iron complete for Washington.

Question #17

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

17. Results
Satisfactory

17. Notes

UTC GIS is up to date with operator HCA location data?

Question #18

What assessment work is planned for the upcoming year?

18. Results
Satisfactory

18. Notes

Review of Camus Line (Transmission) P04 will have an ILI run in the fall.

Question #19

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

19. Results
Not
Applicable

19. Notes

No low pressure systems in Washington

Question #20

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

20. Results
Not
Applicable

20. Notes

No low pressure systems in Washington

Question #21

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

21. Results
Satisfactory

21. Notes

See (ME) in dimp plan page 105 for appendix E6

Question #22

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

22. Results
Not
Applicable

22. Notes

No DIMP remediation work occurred in 2022

Question #23

What DIMP remediation work is anticipated for upcoming year?

23. Results
Not
Applicable

23. Notes

No anticipated DIMP work in 2023.

▼ **OQ PROGRAM**

Question #24

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

24. Results
Not Checked/Evaluated

24. Notes

OQ inspection [8608] covers the OQ program updates.

Question #25

Are the OQ plan updates satisfactory?

25. Results
Not Checked/Evaluated

25. Notes

OQ inspection [8608] covers the OQ program updates

Question #26

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Results
Not Checked/Evaluated

26. Notes

OQ inspection [8608] covers the OQ program updates

▼ **PUBLIC AWARENESS PROGRAM**

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Results
Satisfactory

27. Notes

For 2022 - there were minor changes updating names and general spacing issues.

Question #28

Are changes to the PA program satisfactory?

28. Results
Satisfactory

28. Notes

Changes appear appropriate.

▼ **CONTROL ROOM PROGRAM**

Question #29

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

29. Results
Satisfactory

29. Notes

There were changes to the CRM program for 2022. Reviewed Revision Log for 2022.

Question #30

Are the CRM program changes satisfactory?

30. Results

Satisfactory

30. Notes

CRM changes appear satisfactory?

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

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

31. Results

Satisfactory

31. Notes

April 2022, Hired a Safety Management System person (Peter Cathcart) to begin implementation.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

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

32. Results

Satisfactory

32. Notes

No changes needed

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	UTC Unit ID	UTC Operator ID
Northwest Natural (5 Unit records)					
NWN- HQ	Distribution	Intrastate	Gas	1826	111
NWN- Columbia Gorge	Distribution	Intrastate	Gas	79	111
NWN- Clark	Distribution	Intrastate	Gas	78	111
NWN- Transmission	Transmission	Intrastate	Gas	1879	111
NWN- Mobile LNG	Distribution	Intrastate	Gas	1911	111

OPERATOR'S PUBLIC WEB PAGE

Question #33

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

33. Results

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

33. Notes

Northwestnatural.com

ADVISORY BULLETIN REVIEW

Question #34

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

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Results

YES

34. Notes

DIMP / Natural Forces and a rain gauge.

Northwest Environmental team will send notices for any weather conditions that would require additional monitoring of pipe.

Question #35

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

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results

Satisfactory

35. Notes

DIMP / Natural Forces and a rain gauge.

Northwest Environmental team will send notices for any weather conditions that would require additional monitoring of pipe.

Question #36

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

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Results

YES

36. Notes

Jun 4, 2020 Completed seismic study of NWN pipelines Transmission and High Pressure Distribution (including the State of Washington)

Question #37

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

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results

Satisfactory

37. Notes

Question #38

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

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Results

YES

38. Notes

NWN has inside meter sets in WA

Question #39

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

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Results

Satisfactory

39. Notes

Engineering Procedure created due to this ADM

Engineering Procedure D-14 - Non Traditional Meter Set Design Requirements Effective 12/03/21.

Question #40

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

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Results

Satisfactory

40. Notes

Reviewed spreadsheet for WA Inside Meters and they appear adequate.

Question #41

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Results

Not Applicable

41. Notes

Operator does not have any low pressure systems.

Question #42

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

ADB 2020-02

ADB 2020-02 Low Pressure Systems

42. Results

Not Applicable

42. Notes

Operator does not have any low pressure systems.

Question #43

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

ADB 2020-02

ADB 2020-02 Low Pressure Systems

43. Results

Not Applicable

43. Notes

Operatore dows not have any low pressure systems.

Question #44

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

ADB 2020-02

ADB 2020-02 Low Pressure Systems

44. Results

Not Applicable

44. Notes

Operators does not have any low pressure systems.

SUMMARY OF REQUIRED COMMENTS

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

#4 - N/A - No federally reportable incidents found

#7 - N/A - No Safety Related Conditions found

#8 - N/A - No Abnormal Operating Condition found

#16 - N/A - None required. ABs and Cast Iron complete for Washington

#19 - N/A - No low pressure systems in Washington

#20 - N/A - No low pressure systems in Washington

#22 - N/A - No DIMP remediation work occurred in 2022

#23 - N/A - No anticipated DIMP work in 2023

#24 - N/A - OQ inspection [8608] covers the OQ program updates

#25 - N/A - OQ inspection [8608] covers the OQ program updates

#26 - N/A - OQ inspection [8608] covers the OQ program updates

#41 - N/A - Operator does not have any low pressure systems.

#42 - N/A - Operator does not have any low pressure systems.

#43 - N/A - Operator does not have any low pressure systems.

#44 - N/A - Operator does not have any low pressure systems.