

## Results and Notes Review

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### AR.RCHCA: Repair Criteria (HCA)

**Question ID, References** [AR.RCHCA.DISCOVERY.P](#) , 195.452(f)(4) (195.452(h)(2))

Question Text *Does the integrity assessment process properly define discovery and the required time frame for anomalies in a pipeline segment that can affect an HCA?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual 1.3

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**Question ID, References** [AR.RCHCA.DISCOVERY.R](#) , 195.452(h)(2)

Question Text *From the review of the results of selected ILI and remediation projects, did discovery of all anomalies occur promptly, but no later than 180 days of completion of the assessment?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.RCHCA.IMPRC.P](#) , 195.452(f)(4) (195.452(h)(4))

Question Text *Does process have criteria for remedial action to address integrity issues raised by the assessment methods and information analysis?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual1.2

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**AR.RCOM: Repair Criteria (O and M)**

**Question ID, References** [AR.RCOM.REMEDIATIONOM.O](#) , 195.422(a) (195.422(b); 195.401(b)(1)195.402(a); 195.402(c)(14); 195.569; 195.579(c))

Question Text *Do the performance and documentation of remediation meet procedural requirements for non-IM repairs?*

Result **NA**

Assets Covered Tidewater

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

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**AR.RCHCA: Repair Criteria (HCA)**

**Question ID, References** [AR.RCHCA.IMPRC.R](#) , 195.452(l)(1)(ii) (195.452(f)(4))

Question Text *Do records demonstrate that prompt action is taken to address all anomalous conditions discovered through the integrity assessment or information analysis?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes The MFL tool discovery was August 11, 2010 and a gouge measured at 48% wall loss was not remediation until May 25, 2011.

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**Question ID, References** [AR.RCHCA.IMPRC.O](#) , 195.452(h)(4)

Question Text *From an observation of a repair, was it remediated in accordance with its categorized repair schedule?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes One repair exceeded the 180 day.

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**Question ID, References** [AR.RCHCA.IMREPAIR.P](#) , 195.452(f)(4) (195.452(h)(1))

Question Text *Does the process require that repairs be performed in a manner to ensure the integrity of the pipeline until the next scheduled assessment?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual1.1

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**Question ID, References** [AR.RCHCA.PRESSREDUCE.R](#) , 195.452(l)(1)(ii) (95.404(a); 195.404 (b); 195.452(h)(1)(ii); 195.452(h)(4)(i); 195.55(a))

Question Text *From the review of the results of ILI and remediation projects, was an acceptable pressure reduction promptly taken for each Immediate Repair condition or when a repair schedule could not be met?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.RCHCA.DEFECTCAT.R](#) , 195.452(l)(1)(ii) (195.452(h)(4))

Question Text *From the review of the results of integrity assessments and remediation projects, were there any defects that were not properly categorized?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes The ILI vendor did not categorize a gouge with 48% wall loss.  
See question #4 (AR.RCHCA.IMPRC.R).

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**Question ID, References** [AR.RCHCA.PRESSREDUCE.P](#) , 195.452(f)(4) (195.428; 195.452(h)(1)(i); 195.452(h)(1)(ii))

Question Text *Does the process for pressure reduction meet the code requirements?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes IMP Manual1.2  
Procedure does not specify a reduction in normal operating pressure for immediate repair condition is discovered.

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**Question ID, References** [AR.RCHCA.IMSCHEDULE.R](#) , 195.452(l)(1)(ii) (195.452.(h)(3))

Question Text *Do records demonstrate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(3)?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes The ILI vendor did not capture prioritized anomaly schedule and Tidewater did not provide justification for a gouge with 48% metal loss that was not repaired in 180 days.  
See question #4 (AR.RCHCA.IMPRC.R).

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**Question ID, References** [AR.RCHCA.SCHEDULEIMPL.R](#) , 195.452(l)(1)(ii) (195.452(h)(4))

Question Text *From the review of the results of selected ILI and remediation projects, were defects in segments that could affect an HCA remediated or dispositioned within the applicable mandatory time limits of 195.452(h)(4)?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes A 48% metal loss anomaly was not repaired within 180 days criteria and Tidewater did not take a pressure reduction. the pipeline MOP is 285 psig (14.8% SMYS).

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### AR.EC: External Corrosion Direct Assessment (ECDA)

**Question ID, References** [AR.EC.ECDAPLAN.P](#) , 195.588(b)(1) (195.588(b)(2); 195.588(b)(3); 195.588(b)(4); 195.588(b)(5))

Question Text *Has an ECDA plan and processes been prepared for conducting ECDA?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.EC.ECDAPREASSESS.R](#) , 195.589(c) (195.588(b)(2))

Question Text *Do records indicate that the ECDA pre-assessment process complies with NACE SP0502 Section 3 and 195.588?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.EC.ECDAINDIRECT.R](#) , 195.589(c) (195.588(b)(3))

Question Text *Do records indicate that the ECDA indirect examination process complies with NACE SP0502 Section 4 and 195.588?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.EC.ECDAINDIRECT.O](#) , 195.588(c) (195.452(j)(5)(iii))

Question Text *Was the indirect examination performed in accordance with the operator's procedures and 195.588(b)(3)?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.EC.ECDADIRECT.R](#) , 195.589(c) (195.588(b)(4))

Question Text *Do records indicate that excavations and data collection were performed in accordance with NACE SP0502, Sections 5 and 6.4.2?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.EC.ECDADIRECT.O](#) , 195.588(b)(4) (195.452(j)(5)(iii))

Question Text *Was the direct examination performed in accordance with requirements?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.EC.ECDAPOSTASSESS.R](#) , 195.589(c) (195.588(b)(5); 195.452(j)(3); 195.452(j)(4))

Question Text *Do records indicate that requirements were met for post assessment?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.EC.ECDAPLANMOC.R](#) , 195.588(c) (195.588(b)(4)(iii))

Question Text *Do records indicate that the operator established and implemented criteria and internal notification procedures for any changes in the ECDA Plan?*

**Result NA**

Assets Covered Tidewater

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

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### **AR.IL: In-Line Inspection (Smart Pigs)**

**Question ID, References** [AR.IL.ILIREVIEWQUAL.P](#) , 195.452(f)(8) (195.452(g))

Question Text *Does the process specify qualification requirements for personnel who review and evaluate ILI assessment results and information analysis?*

**Result Sat**

Assets Covered Tidewater

Result Notes IMP Manual7.3

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**Question ID, References** [AR.IL.ILIREVIEWQUAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(8); 195.452(g))

Question Text *Does the process demonstrate that personnel who review and evaluate ILI assessment results and information analysis are qualified?*

**Result Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.IL.ILIIMPLPERQUAL.P](#) , 195.505(b)

Question Text *Does the process identify the qualification requirements for personnel who perform ILI covered tasks?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual7.3

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**Question ID, References** [AR.IL.ILIIMPLPERQUAL.R](#) , 195.505(b)

Question Text *Do records demonstrate that personnel who perform ILI covered tasks are qualified?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.IL.ILISPECS.P](#) , 195.452(f)(4) (195.452(h))

Question Text *Do processes assure complete and adequate vendor ILI specifications?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual7.3

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**Question ID, References** [AR.IL.METHOD.P](#) , 195.452(f)(5) (195.452(j)(5))

Question Text *Do processes specify the assessment methods that are appropriate for the pipeline specific integrity threats?*

Result **Unsat**



Assets Covered Tidewater

Summary (none)

Result Notes IMP Manual3.3

BNN rail pipeline need risk threats identified in procedure for casing shorts, ground fault from AC current, etc.

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**Question ID, References** [AR.IL.METHOD.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(j)(5))

Question Text *Are the assessment methods shown in the baseline and/or continual assessment plan appropriate for the pipeline specific integrity threats?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.IL.ASSESSCHEDULE.P](#) , 195.452(f)(2) (195.452(c); 195.452(d); 195.452(e))

Question Text *Does the continual assessment plan include a prioritized schedule in accordance with §195.452 (d) that is based on the risk factors required by §195.452(e)?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual7.2

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**Question ID, References** [AR.IL.ASSESSCHEDULE.R](#) , 195,452(l)(1)(ii) (195.452(b)(5); 195.452(c); 195.452(d); 195.452(f)(2); 195.452(f)(5))

Question Text *Does a review of records indicate that continual assessments are implemented as specified in the plan?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.II.LIVALIDATE.P](#) , 195.452(f)(4) (195.452(b)(6))

Question Text *Does the process provide for validating ILI results?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes IMP Manual 7.3

ILI vendor did not provide a unity plots that analyze tool performance that guaranteed the tool performance was met.

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**Question ID, References** [AR.II.LIVALIDATE.R](#) , 195.452(l)(1)(ii) (195.452(b)(6))

Question Text *Does a review of records for validating ILI assessment results demonstrate that the process was implemented appropriately?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.II.LIINTEGRATION.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Is the process for integrating ILI results with other information adequate?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual 7.1

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**Question ID, References** [AR.II.LIINTEGRATION.R](#) , 195.452(l)(1)(ii) (195.452(g))

Question Text *Did the operator integrate other data/information when evaluating tool data/results in the records reviewed?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.IL.ILIACCEPCRITERIA.P](#) , 195.452(f)(4) (195.452(j)(5)(i))

Question Text *Were survey acceptance criteria defined to ensure a successful ILI tool run?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Procedure does not include acceptance criteria for a successful ILI run such as: missing data, lost sensor channels, distance inaccuracy, velocity overruns or under runs, and physical damage to the sensors.

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**Question ID, References** [AR.IL.ILIACCEPCRITERIA.R](#) , 195.452(l)(1)(ii) (195.452(c)(1)(i)(A))

Question Text *Do records demonstrate that the selected ILI tool run met the defined ILI tool run acceptance criteria?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Defined ILI tool acceptance criteria was not available to evaluate vendor's data.

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**Question ID, References** [AR.IL.ILIANALYSIS.R](#) , 195.452(l)(1)(ii) (195.452(h)(1); 195.452(g))

Question Text *Do records demonstrate that the ILI data and other information were adequate to identify anomalies requiring remediation?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Unity plot was not provided by vendor.

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**Question ID, References** [AR.IL.ILIDELAY.R](#) , 195.452(l)(1)(ii) (195.452(j)(1))

Question Text *Do records demonstrate that the performance of integrity assessments had been delayed such that a schedule or required timeframes was exceeded?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.IL.ILISTANDARD.P](#) , 195.452(b)(6)

Question Text *Does the process incorporate recognized industry practices, or an acceptable alternative method, in performing ILI integrity assessments?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual7.3

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**Question ID, References** [AR.IL.ILISTANDARD.R](#) , 195.452(l)(1)(ii) (195.452(b)(6))

Question Text *Do records demonstrate that recognized industry practices, or an acceptable alternative method, have been incorporated in performing ILI integrity assessments?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Tidewater records did not include if the ILI vendor referenced any recognized industry practice standards.

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**Question ID, References** [AR.IL.ILIIMPLEMENT.O](#) , 195.452(b)(5)

Question Text *Have the ILI procedures been followed?*

Result **Sat**

Assets Covered Tidewater

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## AR.OT: Other Technology

**Question ID, References** [AR.OT.OTPLAN.P](#) , 195.452(f)(5) (195.452(c)(1)(i)(D); 195.452(j)(5)(iv); 195.452(h)(4))

Question Text *If "Other Technologies" are used, has a process been developed?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.OT.OTPLAN.R](#) , 195.452(l)(1)(ii) (195.452(j)(5)(iv); 195.452(f)(5))

Question Text *From the review of selected integrity assessments results, do records show the assessments were performed in accordance with procedures and vendor recommendations?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.OT.OTPLAN.O](#) , 195.452(j)(5)(iv)

Question Text *Has the process for the use of "Other Technology" been followed?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.OT.OTDEFECTCAT.R](#) , 195.452(l)(1)(ii) (195.452(f)(4); 195.452(h)(2))

Question Text *From the review of the results of selected integrity assessments, were defects identified and categorized within 180 days or other applicable timeframe?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.OT.ASSESSMENTREVIEW.P](#) , 195.452(f)(8) (195.452(j)(5))

Question Text *Does the process specify qualification requirements for personnel who review the results of an integrity assessment and information analysis using Other Technology?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.OT.ASSESSMENTREVIEW.R](#) , 195.452(l)(1)(ii) (195.452(f)(8))

Question Text *From the review of the results of selected integrity assessments, were personnel who review the results of an integrity assessment and information analysis using Other Technology qualified?*

**Result NA**

Assets Covered Tidewater

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

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## AR.PTI: Integrity Assessment Via Pressure Test

**Question ID, References** [AR.PTI.PRESSTESTCORR.P](#) , 195.452(f)(3) (195.452(g)(3))

Question Text *Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?*

**Result** NA

Assets Covered Tidewater

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

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**Question ID, References** [AR.PTI.PRESSTESTCORR.R](#) , 195.589(c) (195.452(f)(3); 195.452(g)(3))

Question Text *From the review of corrosion control records, was the corrosion control program proven to be effective when pressure testing was the integrity assessment method used?*

**Result** NA

Assets Covered Tidewater

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

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**Question ID, References** [AR.PTI.PRESSTESTRESULT.R](#) , 195.452(l)(1)(ii) (195.452(f)(2); 195.452(c))

Question Text *From the review of the results of pressure tests, do the test records validate the pressure test?*

**Result** NA

Assets Covered Tidewater

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

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**Question ID, References** [AR.PTI.PRESSTESTRESULT.O](#) , 195.452(j)(5)(ii) (195.452(c)(1)(i)(b))

Question Text *Was the pressure test conducted in accordance with procedures?*

Result **NA**

Assets Covered Tidewater

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

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## AR.RC: Repair Criteria

**Question ID, References** [AR.RC.INTEGRATION.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the process require the evaluation of all available information about the integrity of the entire pipeline and the consequences of failure when evaluating the integrity of each pipeline segment that can affect an HCA?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual 7.1

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**Question ID, References** [AR.RC.INTEGRATION.R](#) , 195.452(l)(1)(ii) (195.452(g))

Question Text *From the review of the results of ILI and remediation projects, were all available information considered about the integrity of the entire pipeline and consequences of failure when evaluating the integrity of each pipeline segment that can affect an HCA?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.RC.REMEDIATION.O](#) , 195.452(h) (195.402(a); 195.402(c)(14); 195.422(a); 195.569; 195.589(c))

Question Text *Are anomaly remediation and documentation of remediation adequate?*

Result **Sat**

Assets Covered Tidewater

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**AR.RMP: Repair Methods and Practices****Question ID, References** [AR.RMP.SAFETY.O](#) , 195.422(a) (195.402(c)(14))Question Text *Are repairs made in a safe manner and to prevent injury to persons and/or property damage?*Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.RMP.METHOD.P](#) , 195.402(c)(3) (195.452(h)(1); 195.585)Question Text *Does the process identify permissible repair methods for each type of defect?*Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual 1.6 & O&M Manual Section 500.

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**Question ID, References** [AR.RMP.METHOD.R](#) , 195.404(c)(1) (195.422(a); 195.422(b); 195.452(h)(1))Question Text *From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195?*Result **Sat**Assets Covered Tidewater

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**Question ID, References** [AR.RMP.REPAIRQUAL.R](#) , 195.505(b) (195.507(a); 195.505(c); 195.452(h)(1))Question Text *From the review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed?*Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.RMP.PIPECONDITION.R](#) , 195.404(c)(1) (195.404(c)(2))

Question Text *From the review of the results of integrity assessment and remediation projects and/or field observation, do repair records document all information needed to understand the conditions of the pipe and its environment and provide the information needed to support the Integrity Management risk model?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.RMP.REPLACESTD.R](#) , 195.422(b)

Question Text *From the review of the results of integrity assessment and remediation projects and/or field observation, were components that were replaced constructed to the same or higher standards as the original component?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.RMP.WELDERQUAL.R](#) , 195.214(a) (195.214(b); 195.222(a); 195.222(b); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.RMP.WELDQUAL.R](#) , 195.226(a) (195.226(b); 195.226(c); 195.230(a); 195.230(b); 195.230(c); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were weld defects repaired in accordance with §195.226 or §195.230?*

**Result NA**

Assets Covered Tidewater

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

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**Question ID, References** [AR.RMP.WELDINSPECT.R](#) , 195.228(a) (195.228(b);195.234(a); 195.234(b); 195.234(c); 195.234(d); 195.234(e); 195.452(h)(1))

Question Text *From the review of the results of integrity assessment and remediation projects, were welds inspected and examined in accordance with 195.228 or 195.234?*

**Result Sat**

Assets Covered Tidewater

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**Question ID, References** [AR.RMP.CRACKREMEDATION.P](#) , 195.452(f)(3) (195.452(g))

Question Text *If cracks, SCC, or crack like features to be a threat on pipeline segments, have criteria been developed for remedial actions to address integrity issues raised by the assessment method?*

**Result Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes IMP Manual 1.6  
Tidewater's procedure does not include remedial actions for SCC. Data is not gathered to evaluate potential threats whenever the pipeline is exposed.

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**Question ID, References** [AR.RMP.CRACKREMEDATION.R](#) , 195.452(l)(1)(ii) (195.452(f)(3))

Question Text *If the IM risk assessment and integrity assessments found cracks, SCC, or crack like features cracking to be a threat on pipeline segments, have remedial actions been taken to address integrity issues when assessment criteria have been exceeded?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Tidewater does not have records for evaluating the exposed pipeline for the threat of SCC.

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**Question ID, References** [AR.RMP.CRACKNDE.P](#) , 195.452(f)(4)

Question Text *Does the process require that when a pipeline segment that meets the conditions for cracks, SCC, or crack like features is exposed an NDE method must be employed to evaluate for cracking?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Pipeline is not currently checked for cracks, SCC or crack like features using Magnetic Particle Inspection or other appropriate NDE. The company will document exposed pipe with appropriate NDE method to document that SCC is not a threat to the pipelines.

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**Question ID, References** [AR.RMP.CRACKNDE.R](#) , 195.452(l)(1)(ii) (195.452(f)(4); 195.404(c))

Question Text *Do records indicate that when a pipeline segment that meets the conditions for cracks, SCC, or crack like features were exposed an NDE method was employed to evaluate for cracking?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Tidewater has not evaluate their exposed pipeline for the threat of SCC.

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**Question ID, References** [AR.RMP.CRACKNDE.O](#) , 195.452(h)(1)

Question Text *From an observation at an excavation site with suspected cracks, SCC, or crack like features, did the operator's personnel perform an NDE of the segment?*

Result **NA**

Assets Covered Tidewater

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

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### IM.CA: Continual Evaluation and Assessment

**Question ID, References** [IM.CA.PERIODICEVAL.P](#) , 195.452(f)(5) (195.452(e); 195.452(j)(1); 195.452(j)(2); 195.452(g))

Question Text *Does the process include adequate provisions for performing periodic evaluations of pipeline integrity?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual, Section 4.0 & 5.3 (IMP review)

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**Question ID, References** [IM.CA.PERIODICEVAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(e); 195.452(j)(1); 195.452(j)(2); 195.452(g))

Question Text *Do records indicate that periodic evaluations of pipeline integrity are performed on a technically justified frequency?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.CA.ASSESSINTERVAL.P](#) , 195.452(f)(5) (195.452(e); 195.452(g))

Question Text *Did the operator's plan identify all of the risk factors that reflect the conditions on the pipeline segment to establish an assessment schedule?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual, Section 3.3 and Table 3.1

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**Question ID, References** [IM.CA.ASSESSINTERVAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(e); 195.452(j)(1); 195.452(j)(3))

Question Text *Are assessment intervals consistent with the risks identified for the pipeline and the results of previous assessments?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.CA.ASSESSMETHOD.P](#) , 195.452(f)(5) (195.452(j)(5); 195.452(g))

Question Text *Does process specify the assessment methods that are appropriate for the pipeline specific integrity threats?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual, Section 7.2

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**Question ID, References** [IM.CA.ASSESSMETHOD.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(j)(5))

Question Text *Are assessment methods shown in the assessment plan appropriate for the pipeline specific integrity threats?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Tidewater does not have records for evaluating their pipeline for the threat of SCC. No assessment method has been used.

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**Question ID, References** [IM.CA.ASSESSNOTIFY.P](#) , 195.452(f)(5) (195.452(j)(4); 195.452(m))

Question Text *Does the process include adequate methodology for submitting variance notifications to PHMSA for assessment intervals longer than the 5-year maximum assessment interval and unavailable technology?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual, Section 7.3

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**Question ID, References** [IM.CA.ASSESSNOTIFY.R](#) , 195.452(l)(1)(ii) (195.452(f)(5); 195.452(m); 195.452(j)(4))

Question Text *Have variance notifications been submitted to PHMSA for assessment intervals longer than the 5-year maximum assessment interval and unavailable technology?*

Result **NA**

Assets Covered Tidewater

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

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## IM.HC: High Consequence Areas

**Question ID, References** [IM.HC.HCALLOCATION.P](#) , 195.452(f)(1) (195.452(a); 195.452(d)(3))

Question Text *Does the process that requires identification of HCA-affecting segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual, Section 2.2  
100% of the pipeline is considered as HCA.

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**Question ID, References** [IM.HC.HCALLOCATION.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a); 195.452(b)(2); 195.452(d)(3))

Question Text *Do records show that locations and boundaries of HCA-affecting segments are correctly identified and maintained up-to-date?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.HC.HCALLOCATION.O](#) , 195.452(b)(5) (195.452(a); 195.452(b)(2); 195.453(f)(1))

Question Text *Are locations and boundaries of segments that can affect HCAs correctly identified and maintained up-to-date?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.HC.HCAIDENT.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Is the process adequate to determine all locations where pipeline systems "could affect" a high consequence area, including pipelines that are located in HCAs?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual, Section 2.2  
100% of the pipelines are considered as HCA.

---

**Question ID, References** [IM.HC.HCAIDENT.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))

Question Text *Do records indicate that all locations where a pipeline system is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, an adequate and convincing technical justification is provided?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.HC.HCARELEASE.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include technically adequate methods to determine the locations/scenarios and volume of potential commodity releases?*

Result **Sat**

Assets Covered Tidewater

Result Notes Appendix - C of Integrated Contingency Plan for Washington State

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**Question ID, References** [IM.HC.HCARELEASE.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))

Question Text *Do records indicate that identified release locations and spill volumes are appropriate, technically adequate, and determined consistent with the documented process?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.HC.HCAOVERLAND.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include a technically adequate analysis of overland flow of liquids to determine the extent of commodity spread and its effects on HCAs?*

Result **Sat**

Assets Covered Tidewater

Result Notes Appendix - C of Integrated Contingency Plan for Washington State and Figure C. 8-1.

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**Question ID, References** [IM.HC.HCAOVERLAND.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do records indicate the overland spread analysis (if applicable) is technically adequate and consistent with program requirements?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.HC.HCAH2OTRANSP.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include a technically adequate analysis approach for water transport of liquids to determine the extent of commodity spread and its effects on HCAs?*

Result **Sat**

Assets Covered Tidewater

Result Notes Appendix - C of Integrated Contingency Plan for Washington State

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**Question ID, References** [IM.HC.HCAH2OTRANSP.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do records indicate that water transport analysis (if applicable) is technically adequate and consistent with its program requirements?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.HC.HCAAIRDISP.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process include a technically adequate analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Need air dispersion analysis for release scenarios.

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**Question ID, References** [IM.HC.HCAAIRDISP.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do records indicate that the analysis of air dispersion of vapors (if applicable) is technically adequate and consistent with its program requirements?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Company has not completed an air analysis for dispersion of vapors.

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**Question ID, References** [IM.HC.HCAINDIRECT.P](#) , 195.452(f)(1) (195.452(a))

Question Text *Does the process identify all locations of segments that do not intersect, but could indirectly affect, an HCA (buffer zone)?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 2.2

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**Question ID, References** [IM.HC.HCAINDIRECT.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(a))

Question Text *Do the records indicate that endpoints of segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [IM.HC.HCABOUNDING.R](#) , 195.452(f)(1) (195.452(b)(4))

Question Text *Does the HCA analysis bound historical releases/accidents?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.HC.HCACAT3.P](#) , 195.452(f)(1) (195.452(b)(2))

Question Text *Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 2.2

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**Question ID, References** [IM.HC.HCACAT3.R](#) , 195.452(l)(1)(ii) (195.452(f)(1); 195.452(b)(2))

Question Text *Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?*

Result **Sat**

Assets Covered Tidewater

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## IM.PM: Preventive and Mitigative Measures

**Question ID, References** [IM.PM.PMMGENERAL.P](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2))

Question Text *Do the processes to identify additional preventive and mitigative actions include consideration of risk and cover a spectrum of alternatives? (Note: Leak detection and EFRDs are covered in more detail in subsequent questions within this sub-module.)*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 6

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**Question ID, References** [IM.PM.PMMGENERAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))

Question Text *Is there documentation of preventive and mitigative actions that have been considered and implemented?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.PM.PMMIMPLEMENT.O](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2); 195.452(i)(3); 195.452(i)(4))

Question Text *Have preventive and mitigative actions been implemented as described in the records?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [IM.PM.PMMRISK.P](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2))

Question Text *Does the process evaluate the effects of potential actions on reducing the likelihood and consequences of pipeline releases?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 3.0 & 6.2  
the pipeline to B&N rail facility has check valves at ends of the pipeline. The three parallel pipelines to Tesoro will be installed with new MOV's at each ends of the pipelines during the calendar year of 2015.

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**Question ID, References** [IM.PM.PMMRISK.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))

Question Text *Do records demonstrate evaluation of the effects of potential actions on reducing the likelihood and consequences of pipeline releases?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.PM.PMMBASIS.P](#) , 195.452(f)(6) (195.452(i)(1); 195.452(i)(2))

Question Text *Does the process provide adequate basis for deciding which candidate preventive and mitigative actions are implemented?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes IMP Manual Section 3.0

The procedure needs to consider input from operations, maintenance, engineering, and corrosion control to be considered in decision-making process.

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**Question ID, References** [IM.PM.PMMBASIS.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))

Question Text *Do records indicate that the P&MM decision making process has been applied as specified?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Company need develop records of input from operations, maintenance, engineering, corrosion control, etc.

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**Question ID, References** [IM.PM.IMLEAKDETEVAL.P](#) , 195.452(f)(6) (195.452(i)(3))

Question Text *Does the process for evaluating leak detection capability consider all of the 195.452(i)(3) required factors and other relevant factors?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 6.3

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**Question ID, References** [IM.PM.IMLEAKDETEVAL.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(3))

Question Text *Do records indicate that all required and other relevant leak detection evaluation factors have been adequately evaluated?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.PM.IMLEAKDETHCA.R](#) , 195.452(l)(1)(ii) (195.452(i)(3))

Question Text *What leak detection measures are taken to prevent and mitigate the consequences of a pipeline failure on an HCA?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.PM.IMLEAKDETHCA.O](#) , 195.452(i)(3)

Question Text *Have leak detection measures taken to prevent and mitigate the consequences of a pipeline failure in an HCA been implemented?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [IM.PM.PMMEFRD.P](#) , 195.452(f)(6) (195.452(i)(4))

Question Text *Do processes for evaluating the need for additional EFRDs consider all of the 195.452(i)(4) required factors and other relevant factors?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 6.4

MOV's are located at the Snake River and B&N terminals.

MOV's are not located at the Snake River and Tesoro terminals for the three parallel pipelines. Capital project for 2015 include installing MOV's.

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**Question ID, References** [IM.PM.PMMEFRD.R](#) , 195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(4))

Question Text *Do records indicate that all required and other relevant EFRD evaluation factors were adequately evaluated and any actions taken as appropriate?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.PM.PMMEFRD.O](#) , 195.452(i)(4)

Question Text *Have identified EFRD projects been implemented as planned?*

Result **NA**

Assets Covered Tidewater

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

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## IM.QA: Quality Assurance

**Question ID, References** [IM.QA.IMPERFEFFECTIVE.P](#) , 195.452(f)(7) (195.452(k))

Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*

Result **Sat**



Assets Covered Tidewater

Result Notes IMP Manual Section 4.0

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**Question ID, References** [IM.QA.IMPERFEFFECTIVE.R](#) , 195.452(l)(1)(ii) (195.452(f)(7); 195.452(k))

Question Text *Do records indicate the methods to measure program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.QA.IMPERFMETRIC.P](#) , 195.452(f)(7) (195.452(k))

Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 4.1

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**Question ID, References** [IM.QA.IMPERFMETRIC.R](#) , 195.452(l)(1)(ii) (195.452(f)(7); 195.452(k))

Question Text *Do records indicate that performance metrics are providing meaningful insight into integrity management program performance?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.QA.RECORDS.P](#) , 195.452(l) (195.404(c)(1); 195.452(c)(2))

Question Text *Is the process adequate to assure that the records required for integrity management program applications are*

*maintained?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 5.1

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**Question ID, References** [IM.QA.RECORDS.R](#) , 195.452(l)(1)(ii) (195.452(c)(2))

Question Text *From a review of records, has the operator documented decisions, analysis, and actions taken to implement and evaluate each key integrity management program activity?*

Result **Sat**

Assets Covered Tidewater

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## IM.RA: Risk Analysis

**Question ID, References** [IM.RA.RAMETHOD.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Do processes for evaluating risk to HCAs require consideration of all relevant threat categories and risk factors when evaluating pipeline segments?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 3.0

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**Question ID, References** [IM.RA.RAINTEGRATE.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Do processes for evaluating risk to HCAs include the appropriate risk factors and other information?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 3.2

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**Question ID, References** [IM.RA.SCCRISK.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the IM risk assessment process give adequate criteria for evaluating and determining if stress corrosion cracking is a threat on the pipeline(s)?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Procedure did not address assessment processes to determine if SCC is a threat on the pipeline.

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**Question ID, References** [IM.RA.SCCRISK.R](#) , 195.452(l)(1)(ii) (195.452(f)(3))

Question Text *Has an IM risk assessment been performed addressing the threat of stress corrosion cracking on their pipeline segments that could affect an HCA?*

Result **Unsat**

Assets Covered Tidewater

Summary (none)

Result Notes Tidewater has not evaluate their pipeline for the threat of SCC.

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**Question ID, References** [IM.RA.RADATA.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Are processes for data and information input into the risk analysis process adequate and appropriate?*

Result **Sat**

Assets Covered Tidewater

Result Notes IMP Manual Section 3.2

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**Question ID, References** [IM.RA.RADATA.R](#) , 195.452(l)(1)(ii) (195.452(f)(3); 195.452(g))

Question Text *Are adequate data and information input into the risk analysis process?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.RA.RADATA.O](#) , 195.452(f)(3) (195.452(g))

Question Text *Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [IM.RA.RASEGMENT.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the risk analysis process adequately represent and consider the variation in risk factors along the line such that segment-specific risk results and insights are obtained?*

Result **NA**

Assets Covered Tidewater

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

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**Question ID, References** [IM.RA.RAREULTS.R](#) , 195.452(l)(1)(ii) (195.452(f)(3); 195.452(g))

Question Text *Are results of the process to evaluate risk useful for drawing conclusions and insights for decision making?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.RA.RAFACILITY.P](#) , 195.452(f)(3) (195.452(g))

Question Text *Does the process include technically adequate approaches to identify and evaluate the risks of facilities that can affect HCAs?*

Result **Sat**

Assets Covered Tidewater

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**Question ID, References** [IM.RA.RAFACILITY.R](#) , 195.452(l)(1)(ii) (195.452(f)(3); 195.452(g))

Question Text *Has the analysis of risk of facilities been performed as required?*

Result **Sat**

Assets Covered Tidewater

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## RPT.NR: Notices and Reporting

**Question ID, References** [RPT.NR.NOTIFICATIONS.R](#) , 195.452(l)(1)(ii) (195.452(m))

Question Text *Has notification been made if Other Technology is used, technology is unavailable, the 5 year reassessment interval cannot be met, remediation schedule cannot be met and pressure cannot be reduced, or a pressure reduction exceeds 365 days?*

Result **NA**

Assets Covered Tidewater

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

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## RPT.RR: Regulatory Reporting (Traditional)

**Question ID, References** [RPT.RR.ANNUALREPORTIMINSPECT.R](#) , 195.49Question Text *Is Annual Report Part F Data complete and accurate?*Result **Sat**Assets Covered Tidewater

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**Question ID, References** [RPT.RR.ANNUALREPORTIMASSESS.R](#) , 195.49Question Text *Is Annual Report Part G data complete and accurate?*Result **Sat**Assets Covered Tidewater

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