

Inspection Output (IOR)

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Inspection Information

Inspection Name	2017 PSE DIMP Program Review Intrastate	Operator(s)	PUGET SOUND ENERGY (22189)	Plan Submitted	06/05/2017
Status	PLANNED	Lead	David Cullom	Plan Approval	06/07/2017 by Joe Subsits
Start Year	2017	Supervisor	Joe Subsits	All Activity Start	10/02/2017
System Type	GD	Director		All Activity End	10/05/2017
Protocol Set ID	GD.2017.01			Inspection Submitted	06/05/2017
				Inspection Approval	--

Inspection Summary

This plan contains 85 questions so I can cover Form 22 (Program) and Form 24 (District Implementation activities for Pierce, Kittitas, Thurston/Lewis) - DC

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.		PSE DIMP	unit	1829	--	84	84	84	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.		n/a	GDIM.RR, GDIM.IMPL, GDIM.TH, GDIM.EV, GDIM.PE, GDIM.IM, GDIM.PM, GDIM.RC, GDIM.MF, GDIM.RP, GDIM.RA.INFORMATION.P, GDIM.RA.GAPS.P, GDIM.RA.INFONEEDS.R, GDIM.RA.NEWPIPEDATA.P, GDIM.RA.NEWPIPEDATA.R, GDIM.RA.DEMOKNOWLEDGE.R, GDIM.RA.DEMOUNDERSTANDING.R	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	DIMP HQ	--	10/02/2017 10/05/2017	GDIM (Form 22), GDIM Implementation (Form 24)	GDIM		all types	84	84	84	100.0%

a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

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

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Gas Distribution IM	DIMP HQ	STARTED	--	DIMP HQ	

Results (all values, 85 results)

86 (instead of 85) results are listed due to re-presentation of questions in more than one sub-group.

PRR.REPORT: Reporting

1. Question Result, ID, References	Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12) (also presented in: GDIM.IMPL)
Question Text	<i>Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?</i>
Assets Covered	
Result Notes	This comes from standards and is due March 15. Reviewed the 2016 report submitted March 2017.

GDIM.IM: Plan Implementation

2. Question Result, ID, References	Sat, GDIM.QA.PLANIMPLEMENT.P, 192.1005
Question Text	<i>Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?</i>
Assets Covered	
Result Notes	They completed the plan 8/2/17.
3. Question Result, ID, References	Sat, GDIM.RA.SOURCES.P, 192.1007(a)(1)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	The DIMP plan has this in Appendix B and references to "system knowledge.xls"

GDIM.KN: Knowledge of the System

4. Question Result, ID, References	Sat, GDIM.RA.INFORMATION.P, 192.1007(a)(2)
Question Text	<i>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.)?</i>
Assets Covered	
Result Notes	DIMP Plan section 4. It also references Appendix B. Appendix A in System Knowledge has it as well.
5. Question Result, ID, References	Sat, GDIM.RA.GAPS.P, 192.1007(a)(3)
Question Text	<i>Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?</i>
Assets Covered	
Result Notes	DIMP Plan Appendix A Section 4.
6. Question Result, ID, References	Sat, GDIM.RA.INFONEEDS.P, 192.1007(a)(3)
Question Text	<i>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.)?</i>

Assets Covered	
Result Notes	6.3 has ongoing review of threats. Section 10 has accelerated/additional actions to be taken.

7. Question Result, ID, References	Sat, GDIM.RA.INFONEEDS.R, 192.1007(a)(3)
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Question Text	<i>Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?</i>
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Assets Covered	
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Result Notes	The CS reports addresses this. They created a new checklist to find locations (Exposed PE Pipe Report) for Aldyl HD.
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8. Question Result, ID, References	Sat, GDIM.RA.NEWPIPEDATA.P, 192.1007(a)(5)
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Question Text	<i>Do the procedures require the capture and retention of data on any new pipeline installed?</i>
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Assets Covered	
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Result Notes	This is in GOS 2500.1700 and GOS 2500.1800 (D-4 Cards). GOS 2500.0500 Maps and Records also is mentioned in the procedure and it discusses records storage and retention
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9. Question Result, ID, References	Sat, GDIM.RA.NEWPIPEDATA.R, 192.1007(a)(5)
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Question Text	<i>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?</i>
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Assets Covered	
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Result Notes	Reviewed a D-4. Also checked the GIS.
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10. Question Result, ID, References	Sat, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007(a)
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Question Text	<i>Do records demonstrate implementation of the element "Knowledge of the System"?</i>
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Assets Covered	
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Result Notes	The CSAR and supporting records demonstrate a good knowledge of the system.
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11. Question Result, ID, References	Sat, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)
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Question Text	<i>Has the operator demonstrated an adequate understanding of the system?</i>
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Assets Covered	
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Result Notes	We conduct standard audits and review the programs and tasks that collect information for use in the DIMP program
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GDIM.TH: Identify Threats

12. Question Result, ID, References	Sat, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)
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Question Text	<i>In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?</i>
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Assets Covered	
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Result Notes	They have 8 primary threats identified and sub threats are also identified.
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13. Question Result, ID, References	Sat, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)
Question Text	<i>Did the operator consider the information that was reasonably available to identify existing and potential threats?</i>
Assets Covered	
Result Notes	They participate in AGA to find best practices from other companies.
14. Question Result, ID, References	Sat, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)
Question Text	<i>In identifying threats did the information considered include all of the required data and information sources?</i>
Assets Covered	
Result Notes	PSE looked at SHRIMP. PSE also purchased a written plan framework from the NGA/SGA.
15. Question Result, ID, References	Sat, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	They used NGA/SGA DIM Framework Document and User's Guide
16. Question Result, ID, References	Sat, GDIM.RA.IMPLEMENTTH.R, 192.1007(b)
Question Text	<i>Do records demonstrate implementation of the element "Identify Threats"?</i>
Assets Covered	

GDIM.RR: Evaluate and Rank Risk

17. Question Result, ID, References	Sat, GDIM.RA.RISKRANKING.P, 192.1007(c)
Question Text	<i>Do the procedures contain the method(s) used to determine the relative importance of each threat and estimate and rank the risks posed?</i>
Assets Covered	
Result Notes	DIMP Plan Appendix C
18. Question Result, ID, References	Sat, GDIM.RA.THREATSCONSIDERED.P, 192.1007(c)
Question Text	<i>Do the procedures to evaluate and rank risk consider each applicable current and potential threat?</i>
Assets Covered	
Result Notes	DIMP Appendix C They also have a consequence table that can add.
19. Question Result, ID, References	Sat, GDIM.RA.LIKELIHOOD.P, 192.1007(c)
Question Text	<i>Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?</i>
Assets Covered	
Result Notes	DIMP Appendix C
20. Question Result, ID, References	Sat, GDIM.RA.CONSEQUENCE.P, 192.1007(c)
Question Text	<i>Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?</i>

Assets Covered	
Result Notes	DIMP Appendix C
21. Question Result, ID, References	Sat, GDIM.RA.SUBDIVIDE.R, 192.1007(c)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	DIMP Appendix C Section 3.2.1 The risk matrix shows they must be grouped by type. 3.2.1.1, 3.2.1.2
22. Question Result, ID, References	Sat, GDIM.RA.RESULTS.R, 192.1007(c)
Question Text	<i>Are the results of the risk ranking supported by the risk evaluation model/method?</i>
Assets Covered	
Result Notes	They store this in the CSAR Appendix A (old pg. 68 per RB)
23. Question Result, ID, References	Sat, GDIM.RA.RESULTSVALIDATION.R, 192.1007(c)
Question Text	<i>Did the operator validate the results generated by the risk evaluation model/method?</i>
Assets Covered	
Result Notes	They go through an annual "stop-light" meeting where they validate trends and check status changes. DIMP Appendix C Section 4.7 SME qualifications are also in Table 2-2.
24. Question Result, ID, References	Sat, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)
Question Text	<i>Do records demonstrate implementation of the element "Evaluate and Rank Risk"?</i>
Assets Covered	
Result Notes	Reviewed System Matrix by Asset and Threat

GDIM.PM: Preventive and Mitigative Actions

25. Question Result, ID, References	Sat, GDIM.PM.IDENTIFYMEASURES.P, 192.1007(d)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	DIMP Plan Section 7. Additional and Accelerated action. When the relative risk score becomes moderate (further evaluation) or high it is added as an A&A action
26. Question Result, ID, References	Sat, GDIM.PM.IDENTIFYMEASURES.R, 192.1007(d)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	Additional and Accelerated Action report.
27. Question Result, ID, References	Sat, GDIM.PM.LEAKMANAGEMENT.P, 192.1007(d)
Question Text	<i>Does the plan include an effective leak management program (unless all leaks are repaired when found)?</i>
Assets Covered	

Result Notes The GOS 2625.1100 is the leak survey program. We review this program in detail during the standard inspections throughout the year.

28. 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

Result Notes They have 33 Additional and Accelerated Action in Appendix B. We discussed the heater maintenance program, for example, that is a program to ensure that then heaters are maintained properly for system reliability.

GDIM.EV: Measure Performance and Evaluate Effectiveness

29. 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

Result Notes DIMP plan Section 8. The baseline is a 5yr avg from when DIMP was implemented. The initial baseline, for example, shows the leak average going down.

30. 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

Result Notes The CSAR is PSE's record for this.

31. 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

Result Notes The DIMP report has the metrics.

32. 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

Result Notes The DIMP Section 8 flow chart Appendix A contains this information.

33. Question Result, ID, References Sat, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)

Question Text When measures are required to reduce risk, do the procedures provide how their effectiveness will be measured?

Assets Covered

Result Notes Each program has an effectiveness evaluation. Each program has 0-3 to measure effectiveness. The DIMP Summary of AA actions has this.

34. 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

Result Notes The CSAR contains this.

GDIM.PE: Periodic Evaluation

35. 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	
Result Notes	The program is updated every year. Plan updates occur every 5 years. They have minimum qualifications for the SMEs. Pg. 3 has a summary of all changes since the last publication.
36. 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	
Result Notes	Pg. 3 has a summary of all changes since the last publication.

GDIM.RP: Reporting

37. 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	
Result Notes	DIMP Section 10 references Section 8. CSAR Part 3
38. Question Result, ID, References	Sat, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)
Question Text	Has the operator submitted the required reports?
Assets Covered	
Result Notes	Lee Maxwell said July 21st they were submitted to the UTC.

GDIM.MF: Report Mechanical Fitting Failures

39. Question Result, ID, References	Sat, GDIM.RR.MECHANICALFITTING.P, 192.1009
Question Text	Are there procedures to collect information necessary to comply with the reporting requirements of 192.1009?
Assets Covered	
Result Notes	This is in Section 10 of the DIMP.

GDIM.RC: Records Required to be Kept

40. 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	
Result Notes	The Section 11 header contains this.

41. Question Result, ID, References	Sat, GDIM.QA.PLANRETENTION.P, 192.1011
Question Text	<i>Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?</i>
Assets Covered	
Result Notes	This is in Section 3
42. Question Result, ID, References	Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011
Question Text	<i>Has the operator maintained the required records?</i>
Assets Covered	
Result Notes	PSE showed last the last versions of the plans 2011, 2012 (2), 2017.

GDIM.IMPL: GDIM Implementation

43. Question Result, ID, References	Sat, GDIM.QA.ISSUESIMPL.R, 192.1005
Question Text	<i>Have all issues raised in previous DIMP inspections been satisfactorily addressed?</i>
Assets Covered	
Result Notes	No AOCs or PVs
44. Question Result, ID, References	Sat, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)
Question Text	<i>Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?</i>
Assets Covered	
Result Notes	PE pipe (Exposed PE pipe report) was done to take inventory
45. Question Result, ID, References	Sat, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)
Question Text	<i>Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?</i>
Assets Covered	
Result Notes	DIMP Plan Section 4 addresses the GIS system updates. They added a service connection point to the GIS to add enhanced functionality.
46. Question Result, ID, References	Sat, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)
Question Text	<i>Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?</i>
Assets Covered	
Result Notes	Through collecting information they confirmed they had another PE pipe manufacturer. DIMP Plan Appendix B (PE pipe history)
47. Question Result, ID, References	Sat, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)
Question Text	<i>Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?</i>
Assets Covered	
Result Notes	D-4 cards or tie-ins.
48. Question Result, ID, References	Sat, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)

Question Text	<i>Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?</i>
Assets Covered	
Result Notes	There are QA/QC checks. Leak management self audits are performed, etc.
49. Question Result, ID, References	Sat, GDIM.RA.SMEIMPL.R, 192.1007(a)
Question Text	<i>If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?</i>
Assets Covered	
Result Notes	DIMP SMEs have validation meetings every year. For example the heater failure went through (SME) peer review in the GSI DIMP team
50. Question Result, ID, References	Sat, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)
Question Text	<i>Do operator personnel in the field understand their responsibilities under the DIMP plan?</i>
Assets Covered	
Result Notes	They have a presentation that was shared with 11 bases. When we perform DTC inspections, we check the crews to ensure paperwork is filled out and the work is being performed properly.
51. Question Result, ID, References	Sat, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)
Question Text	<i>Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?</i>
Assets Covered	
Result Notes	For example, depth of cover, mechanical fitting failure split from bolt on tees, stiffener corrosion are all new threats that have emerged by continuing to conduct root cause analysis and find trends.
52. Question Result, ID, References	Sat, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)
Question Text	<i>Have any changes occurred that require re-evaluation of threats and risks?</i>
Assets Covered	
Result Notes	They reevaluate every year.
53. Question Result, ID, References	Sat, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	Northwest Operating Group, AGA, WEI conference, and advisory bulletins are all used.
54. Question Result, ID, References	Sat, GDIM.RA.IMPLEMENTTHUPDATEIMPL.R, 192.1007(c)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	Add new threats - risk is evaluated.
55. Question Result, ID, References	Sat, GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R, 192.1007(c)
Question Text	<i>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?</i>

Assets Covered	
Result Notes	This is in Appendix C Section 3.1.
56. Question Result, ID, References	Sat, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	The categories look suitable.
57. Question Result, ID, References	Sat, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)
Question Text	<i>Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?</i>
Assets Covered	
Result Notes	Two years ago it was a combined bridge/slide inspection. Since then, PSE has split them out. There were also changes to the docks/wharfs program.
58. Question Result, ID, References	Sat, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)
Question Text	<i>If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?</i>
Assets Covered	
Result Notes	They go through a validation process. And then the item is re-risk ranked.
59. Question Result, ID, References	Sat, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)
Question Text	<i>If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?</i>
Assets Covered	
Result Notes	Each one, once split out is re risk ranked.
60. Question Result, ID, References	Sat, GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)
Question Text	<i>Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?</i>
Assets Covered	
Result Notes	Appendix D had a summary of mitigative measures. Mitigative is GOS or code driven. Accelerated Actions are above and beyond normal operation tasks.
61. Question Result, ID, References	Sat, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)
Question Text	<i>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.)?</i>
Assets Covered	
Result Notes	Bare steel completed 2014. Converted Farm Taps 2013, Copper services 2014. Above ground regulators 2014, Sidewalk regulators 2014, Steel Services in Casing 2014.
62. Question Result, ID, References	Sat, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)
Question Text	<i>If answering "Satisfactory/Yes" to previous question implementation question GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, have risks (192.1007(c)) been re-evaluated and ranked because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?</i>

Assets Covered	
Result Notes	They validate every year.
63. 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?
Assets Covered	
Result Notes	DIMP Summary of AA's each program sheet summarizes the threat.
64. 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	
65. 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	
Result Notes	Section 8 in DIMP plan the annual results are in the CS report part 3.
66. 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	
67. 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	
Result Notes	DIMP Plan is the 5 yr. avg. For the AA it uses the current 5 years.
68. Question Result, ID, References	Sat, 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	
Result Notes	Performance measures are used to measure the effectiveness of each AA.
69. 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	
Result Notes	Annually there is an update to the plan. CSAR AAs are updated every year. The DIMP plan was updated this year. The procedure is in Section 9 of the plan.
70. Question Result, ID, References	Sat, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)
Question Text	Did the periodic evaluation include all required elements?
Assets Covered	

Result Notes	PSE has had modifications and changes that have occurred from continually improving the program.
71. Question Result, ID, References	Sat, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))
Question Text	<i>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?</i>
Assets Covered	
Result Notes	Two years ago they noticed there was an increased leak risk for bolt on tees. That was established in 2015 with 2014 data.
72. Question Result, ID, References	Sat, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)
Question Text	<i>If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?</i>
Assets Covered	
Result Notes	The buried meter program was only partially meeting PSE's goals. PSE has changed it to "high" risk due to the amount out outstanding buried meters
73. Question Result, ID, References	Sat, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)
Question Text	<i>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?</i>
Assets Covered	
74. Question Result, ID, References	Sat, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)
Question Text	<i>Were procedures followed in conducting periodic evaluations and program improvements?</i>
Assets Covered	
Result Notes	Requirements Section 9. CS Section 4. This is a best practice per AGA.
75. Question Result, ID, References	Sat, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)
Question Text	<i>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?</i>
Assets Covered	
Result Notes	Looked at last 3 years records.
76. Question Result, ID, References	Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12) (also presented in: PRR.REPORT)
Question Text	<i>Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?</i>
Assets Covered	
Result Notes	This comes from standards and is due March 15. Reviewed the 2016 report submitted March 2017.
77. Question Result, ID, References	Sat, GDIM.RR.MECHANICALFITTINGRPTIMPL.R, 192.1009 (191.12)
Question Text	<i>Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?</i>
Assets Covered	

78. Question Result, ID, References	Sat, GDIM.RR.MECHANICALFITTINGDIMPIMPL.O, 192.1009 (191.12)
Question Text	<i>Were procedure(s) followed for collecting the appropriate information and submitting PHMSA Form F-7100.1-2?</i>
Assets Covered	
79. Question Result, ID, References	Sat, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011
Question Text	<i>Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?</i>
Assets Covered	
Result Notes	These are contained in Section 11.
80. Question Result, ID, References	Sat, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011
Question Text	<i>Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?</i>
Assets Covered	
Result Notes	The plans are kept in archive for longer than 10 yrs.
81. Question Result, ID, References	Sat, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011
Question Text	<i>Were DIMP procedures followed as applicable to records retention?</i>
Assets Covered	
Result Notes	Yes, They store records longer than the required minimum.
82. Question Result, ID, References	NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)
Question Text	<i>Has approval been received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark questions 40-44 "N/A".]</i>
Assets Covered	
Result Notes	No such event occurred, or condition existed, in the scope of inspection review.
83. Question Result, ID, References	NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)
Question Text	<i>Have the periodic inspections been conducted at the specified alternate intervals?</i>
Assets Covered	
Result Notes	No such event occurred, or condition existed, in the scope of inspection review.
84. Question Result, ID, References	NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)
Question Text	<i>Have all conditions been complied with that were required as part of the alternate inspection interval approval?</i>
Assets Covered	
Result Notes	No such event occurred, or condition existed, in the scope of inspection review.
85. Question Result, ID, References	NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)
Question Text	<i>Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?</i>
Assets Covered	
Result Notes	No such event occurred, or condition existed, in the scope of inspection review.

86. Question Result, ID, References	NA, GDIM.PI.PERIODICINSPDEVACTIONIMPL.R, 192.1013(c)
Question Text	<i>If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?</i>
Assets Covered	
Result Notes	No such event occurred, or condition existed, in the scope of inspection review.

Report Parameters: Results: all

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