

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	Georgia Pacific IMP Inspection	Operator(s)	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted	01/03/2020
Status	PLANNED	Lead	David Cullom	Plan Approval	01/08/2020 by Joe Subits
Start Year	2020	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity Start	08/11/2020
System Type	GT	Supervisor	Joe Subits	All Activity End	08/13/2020
Protocol Set ID	GT.2020.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

Georgia Pacific Consumer Products (Camas) LLC is located at 401 Adams Street in Camas Washington. The Company operates approximately 1 mile of natural gas transmission Pipeline in Clark County Washington beginning at the Williams Pipeline Interconnection in the City of Washougal and ending at the GP Camas Facility. The 10" line was installed in 1993 and is FBE coated. The next ILI is scheduled for 2023. ECDA was done for the first cycle in 2003 and MFL ILI was used in 2013. The last IMP plan and record inspection was conducted in 2017 by Lex Vinsel.

There were no areas of concern or probable violations noted for this inspection.

**AFODs (2) on site with (1) remote field (Covid-19) for the exit interview and closure questions**

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86255	Georgia-Pacific	unit	86255	Compressor Stations Storage Fields Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP Abandoned	182	182	182	100.0%

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

## Plans

Plan #	Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	86255	GT IM Implementation, GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directive s	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	GT IMP Inspection	--	08/11/2020	08/13/2020	n/a	all planned questions	all assets	all types	182	182	182	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

## Forms

This inspection has no Form data entry.

## Results (all values, 182 results)

186 (instead of 182) results are listed due to re-presentation of questions in more than one sub-group.

### AR.CDA: Confirmatory Direct Assessment

1. Question Result, ID, References **Sat, AR.CDA.CDAREVQUAL.P, 192.915(a) (192.915(b))**  
 Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate CDA assessment results meet appropriate training, experience, and qualification criteria?*  
 Assets Covered **86255**  
 Result Notes **See appendix K in the IMP manual for SME information. Roy Rogers replaced Bob as the SME.**
2. Question Result, ID, References **Sat, AR.CDA.CDAREVQUAL.R, 192.947(h) (192.915(a), 192.915(b))**  
 Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*  
 Assets Covered **86255**  
 Result Notes **See appendix K in the IMP manual for SME information. Roy Rogers replaced Bob as the SME.**
3. Question Result, ID, References **NA, AR.CDA.CDAREVQUAL.O, 192.915(a) (192.915(b))**  
 Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
4. Question Result, ID, References **Sat, AR.CDA.CDAPLAN.P, 192.931(a) (192.931(b), 192.931(c), 192.931(d))**  
 Question Text *Is an adequate Confirmatory Direct Assessment Plan in place?*  
 Assets Covered **86255**  
 Result Notes **CDA is only used if they extend their years past ILI**
5. Question Result, ID, References **Sat, AR.CDA.CDAEXTCORR.R, 192.947(h) (192.931(b))**  
 Question Text *Do records indicate that the external corrosion plan was properly implemented?*  
 Assets Covered **86255**  
 Result Notes **The operator has a ICDA plan, an ECDA plan if needed.**
6. Question Result, ID, References **Sat, AR.CDA.CDAINTCORR.R, 192.947(h) (192.931(c))**

Question Text *Do records demonstrate that the internal corrosion plan was properly implemented?*

Assets Covered 86255

Result Notes The ICDA plan is in Appendix M. It was done in combination with ECDA.

7. Question Result, ID, References Sat, AR.CDA.CDAINDICATION.R, 192.947(h) (192.931(d))

Question Text *Do records demonstrate that the next assessment should have been accelerated?*

Assets Covered 86255

Result Notes The records of the 2013 ILI run identified no anomalies on the regulated portion of the line.

8. Question Result, ID, References NA, AR.CDA.CDACORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?*

Assets Covered 86255

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

9. Question Result, ID, References NA, AR.CDA.CDACORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified by CDA as required?*

Assets Covered 86255

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

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

10. Question Result, ID, References NA, AR.EC.ECDAREVQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

11. Question Result, ID, References NA, AR.EC.ECDAPREASSESS.R, 192.947(g) (192.925(b)(1))

Question Text *Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

12. Question Result, ID, References NA, AR.EC.ECDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

13. Question Result, ID, References NA, AR.EC.ECDAREVQUAL.O, 192.915(a) (192.915(b))

Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

14. Question Result, ID, References NA, AR.EC.ECDAPLAN.P, 192.925(a) (192.925(b))

Question Text *Is an adequate ECDA plan and process in place for conducting ECDA?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

15. Question Result, ID, References NA, AR.EC.ECDAINTEGRATION.P, 192.917(b) (ASME B31.8S-2004 Section 4.5)

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

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

16. Question Result, ID, References NA, AR.EC.ECDAINTEGRATION.R, 192.947(g) (192.917(b))

Question Text *Do records demonstrate that the operator integrated other data/information when evaluating data/results?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

17. Question Result, ID, References NA, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))

Question Text *Do records demonstrate that the operator identified ECDA Regions?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

18. Question Result, ID, References NA, AR.EC.ECDAINDIRECT.R, 192.947(g) (192.925(b)(2))

Question Text *Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

19. Question Result, ID, References NA, AR.EC.ECDADIRECT.R, 192.947(g) (192.925(b)(3))

Question Text *Do records demonstrate that excavations, direct examinations, and data collection were performed in accordance with NACE SP 0502-2010, Sections 5 and 6.4.2 and ASME B31.8S-2004, Section 6.4?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

20. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.R, 192.947(g) (192.925(b)(3)(iii))

Question Text *Do records demonstrate that changes in the ECDA plan have been implemented and documented?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

21. Question Result, ID, References NA, AR.EC.ECDAPOSTASSESS.R, 192.947(g) (192.925(b)(4))

Question Text *Do records demonstrate that the requirements for post-assessment were met?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

22. Question Result, ID, References NA, AR.EC.ECCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant external corrosion threats?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

23. Question Result, ID, References **NA, AR.EC.ECCORR.R, 192.933 (192.917(e)(5))**  
Question Text *Do records demonstrate that required actions are being taken to address significant external corrosion threats as required?*  
Assets Covered **86255**  
Result Notes **ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.**

## AR.IC: Internal Corrosion Direct Assessment (ICDA)

24. Question Result, ID, References **NA, AR.IC.ICDAREVQUAL.P, 192.915(a) (192.915(b))**  
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?*  
Assets Covered **86255**  
Result Notes **ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.**

25. Question Result, ID, References **NA, AR.IC.ICDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**  
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ICDA assessments or review and analyze assessment results, are qualified for the tasks they perform?*  
Assets Covered **86255**  
Result Notes **ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.**

26. Question Result, ID, References **NA, AR.IC.ICDAREVQUAL.O, 192.915(a) (192.915(b))**  
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*  
Assets Covered **86255**  
Result Notes **ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.**

27. Question Result, ID, References **NA, AR.IC.ICDAPLAN.P, 192.927(c) (192.927(a), 192.927(b))**  
Question Text *Is an ICDA plan and process in place for conducting ICDA?*  
Assets Covered **86255**  
Result Notes **ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.**

28. Question Result, ID, References **NA, AR.IC.ICDAPREASSESS.R, 192.927(c)(1) (192.947(g))**  
Question Text *Do records demonstrate that the requirements for an ICDA pre-assessment were met?*  
Assets Covered **86255**  
Result Notes **ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.**

29. Question Result, ID, References **NA, AR.IC.ICDAINTEGRATION.P, 192.917(b)**  
Question Text *Is the process for integrating ICDA results with other information adequate?*  
Assets Covered **86255**  
Result Notes **ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.**

30. Question Result, ID, References **NA, AR.IC.ICDAINTEGRATION.R, 192.917(b) (192.947(g))**  
Question Text *Do records demonstrate that other data/information was integrated when evaluating data/results?*  
Assets Covered **86255**

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

31. Question Result, ID, References NA, AR.IC.ICDAREGION.R, 192.947(g) (192.927(c)(2), 192.927(c)(5))

Question Text *Do records demonstrate that ICDA Regions were adequately identified?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

32. Question Result, ID, References NA, AR.IC.ICDAPOSTASSESS.R, 192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.477)

Question Text *Do records demonstrate that the operator assessed the effectiveness of the ICDA process?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

33. Question Result, ID, References NA, AR.IC.ICCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant internal corrosion threats related to internal corrosion?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

34. Question Result, ID, References NA, AR.IC.ICCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant internal corrosion threats as required?*

Assets Covered 86255

Result Notes ECDA, and ICDA is not used this inspection cycle. No such event occurred, or condition existed, in the scope of inspection review. ILI was the last assessment method.

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

35. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 86255

Result Notes The analyst is at Enduro, Paul Giles, Level III Analyst,

36. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?*

Assets Covered 86255

37. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.O, 192.915(a) (192.915(b))

Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 86255

38. Question Result, ID, References Sat, AR.IL.ILISPECS.P, 192.921(a)(1) (192.933(b))

Question Text *Does the process assure complete and adequate vendor ILI specifications?*

Assets Covered 86255

Result Notes This is contained in the project files

39. Question Result, ID, References Sat, AR.IL.ILISPECS.R, 192.947(g) (192.933(b))

Question Text *Do records demonstrate that the ILI specifications were complete and adequate?*  
Assets Covered 86255

40. Question Result, ID, References Sat, AR.IL.ASSESSMETHOD.P, 192.919(b) (192.921(a), 192.937(c))

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

Assets Covered 86255

Result Notes 3rd Party damage and weather are the main threats. This is in Section 6.4.2.

41. Question Result, ID, References Sat, AR.IL.ASSESSMETHOD.R, 192.947(g) (192.919(b), 192.921(a), 192.937(c))

Question Text *Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?*

Assets Covered 86255

Result Notes Although

42. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.P, 192.921(a)(1) (192.937(c))

Question Text *Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?*

Assets Covered 86255

Result Notes There was a validation dig done on non-jurisdictional piping It was called 17.2% and it was 15.6%.

43. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.R, 192.947(g) (192.921(a)(1))

Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*

Assets Covered 86255

Result Notes A validation dig was done on non-jurisdictional piping. Nothing since last inspection.

44. Question Result, ID, References NA, AR.IL.ILIVALIDATE.O, 192.921(a)(1)

Question Text *From observation of field activities, do the employees and vendors validate ILI assessment results per their process?*

Assets Covered 86255

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

45. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.P, 192.917(b)

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

Assets Covered 86255

Result Notes There is not a lot of other data available information to integrate with this first ILI run.

46. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.R, 192.947(g) (192.917(b))

Question Text *Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?*

Assets Covered 86255

Result Notes This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.

47. Question Result, ID, References Sat, AR.IL.ILIACCEPCRITERIA.P, 192.921(a)

Question Text *Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?*

Assets Covered 86255

Result Notes The acceptance criteria is in the project file. The speed tolerance, sensor failure tolerance, is in the project file.

48. Question Result, ID, References Sat, AR.IL.ILIACCEPCRITERIA.R, 192.947(g) (192.921(a))

Question Text *Do records indicate adequate implementation of the process for ILI survey acceptance?*

Assets Covered 86255

Result Notes This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.

49. Question Result, ID, References NA, AR.IL.ILIDELAY.R, 192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341)

Question Text *Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?*

Assets Covered 86255

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

50. Question Result, ID, References NA, AR.IL.ILIIMPLEMENT.O, 192.921(a)(1) (192.620(d), 192.605(b))

Question Text *Are O&M and IMP procedural requirements for the performance of ILI assessments followed?*

Assets Covered 86255

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

51. Question Result, ID, References Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?*

Assets Covered 86255

Result Notes A severe corrosion defect is in Section 7.3 in the IMPM manual

52. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?*

Assets Covered 86255

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No significant corrosion threat are identified. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.

## AR.LSR: Low Stress Reassessment

53. Question Result, ID, References NA, AR.LSR.LSRPLAN.P, 192.941(a) (192.941(b), 192.941(c))

Question Text *Is the process for performing low stress reassessment adequate?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

54. Question Result, ID, References NA, AR.LSR.LSRBA.R, 192.947(d) (192.919(c), 192.921(d), 192.941(a))

Question Text *Do records demonstrate that a baseline assessment meeting the requirements of 192.919 and 192.921 was performed prior to performing a low stress reassessment?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

55. Question Result, ID, References NA, AR.LSR.LSREXTCORR.R, 192.947(d) (192.941(b))

Question Text *Do records demonstrate that the requirements of 192.941(b) were implemented when performing low stress reassessment for external corrosion?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

56. Question Result, ID, References NA, AR.LSR.LSRINTCORR.R, 192.947(d) (192.941(c))

Question Text *Do records demonstrate that the requirements of 192.941(c) were implemented when performing low stress reassessment for internal corrosion?*

Assets Covered 86255

57. Question Result, ID, References NA, AR.LSR.LSRCORR.P, 192.933 (192.917(e)(5))



Question Text *Does the process adequately account for taking required actions to address significant corrosion threats following a LSR?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

58. Question Result, ID, References NA, AR.LSR.LSRCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following a LSR?*

Assets Covered 86255

## AR.OT: Other Technology

59. Question Result, ID, References NA, AR.OT.OTPLAN.P, 192.921(a)(4)

Question Text *Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?*

Assets Covered 86255

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

60. Question Result, ID, References NA, AR.OT.OTPLAN.R, 192.947(d) (192.921(a)(4), 192.933(b))

Question Text *Do records demonstrate that the assessments were performed in accordance with the process and vendor recommendations and that defects were identified and categorized within 180 days, if applicable?*

Assets Covered 86255

Result Notes GP Camas doe not use "Other Technology" such as guided wave or other methods.

61. Question Result, ID, References NA, AR.OT.OTREQUAL.P, 192.915(a) (192.915(b), 192.921(a)(4))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?*

Assets Covered 86255

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

62. Question Result, ID, References NA, AR.OT.OTREQUAL.R, 192.947(d) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?*

Assets Covered 86255

Result Notes GP Camas doe not use "Other Technology" such as guided wave or other methods.

63. Question Result, ID, References NA, AR.OT.OTREQUAL.O, 192.915(a) (192.915(b))

Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 86255

Result Notes GP Camas doe not use "Other Technology" such as guided wave or other methods.

64. Question Result, ID, References NA, AR.OT.OTPLAN.O, 192.921(a)(4)

Question Text *Were assessments conducted using "other technology" adequately performed in accordance with the OT process?*

Assets Covered 86255

Result Notes GP Camas doe not use "Other Technology" such as guided wave or other methods.

65. Question Result, ID, References NA, AR.OT.OTCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using Other Technology?*

Assets Covered 86255

Result Notes Other Technology

66. Question Result, ID, References **NA, AR.OT.OTCORR.R, 192.933 (192.917(e)(5))**  
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following the use of Other Technology?*  
Assets Covered **86255**  
Result Notes **GP Camas doe not use "Other Technology" such as guided wave or other methods.**

## AR.PTI: Integrity Assessment Via Pressure Test

67. Question Result, ID, References **NA, AR.PTI.PRESSTESTREVQUAL.P, 192.915(a) (192.915(b) 192.921(a)(4))**  
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate pressure test assessment results meet appropriate training, experience, and qualification criteria?*  
Assets Covered **86255**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

68. Question Result, ID, References **NA, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**  
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*  
Assets Covered **86255**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

69. Question Result, ID, References **NA, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.921(a)(2))**  
Question Text *Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?*  
Assets Covered **86255**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

70. Question Result, ID, References **NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))**  
Question Text *Do the test records validate the pressure test?*  
Assets Covered **86255**  
Result Notes **This method is not used.**

71. Question Result, ID, References **NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))**  
Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*  
Assets Covered **86255**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

72. Question Result, ID, References **NA, AR.PTI.PTICORR.P, 192.933 (192.917(e)(5))**  
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*  
Assets Covered **86255**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

73. Question Result, ID, References **NA, AR.PTI.PTICORR.R, 192.933 (192.917(e)(5))**  
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*  
Assets Covered **86255**  
Result Notes **This method is not used.**

## AR.RC: Repair Criteria (HCA)

74. Question Result, ID, References **Sat, AR.RC.DISCOVERY.P, 192.933(b)**  
 Question Text *Does the integrity assessment process properly define discovery and the required time frame?*  
 Assets Covered **86255**  
 Result Notes **Section 7.2 has discovery and timeframe.**
75. Question Result, ID, References **NA, AR.RC.DISCOVERY.R, 192.947(f) (192.933(b))**  
 Question Text *Do records demonstrate that discovery was declared in the required time frame or justification was documented?*  
 Assets Covered **86255**  
 Result Notes **There were no anomalies found on the jurisdictional portion of the line that required action.**
76. Question Result, ID, References **Sat, AR.RC.IMPRC.P, 192.933(a) (192.933(c), 192.933(d))**  
 Question Text *Does the Integrity Management Plan and/or maintenance processes include all of the actions that must be taken to address integrity issues in accordance with 192.933?*  
 Assets Covered **86255**
77. Question Result, ID, References **NA, AR.RC.PRESSREDUCE.R, 192.947(f) (192.933(a)(1))**  
 Question Text *Do records demonstrate that an acceptable pressure reduction was promptly taken for each immediate repair condition or when a repair schedule could not be met?*  
 Assets Covered **86255**  
 Result Notes **There were no anomalies found on the jurisdictional portion of the line that required action.**
78. Question Result, ID, References **Sat, AR.RC.CRITERIA.P, 192.711(b) (192.703(a), 192.703(b), 192.703(c), 192.713(a), 192.713(b))**  
 Question Text *Does the repair process cover all of the elements for making repairs in covered segments?*  
 Assets Covered **86255**  
 Result Notes **Section 15.10 and 15.11, 15.4, Section 15**
79. Question Result, ID, References **NA, AR.RC.SCHEDULEIMPL.R, 192.947(f) (192.933(d))**  
 Question Text *Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?*  
 Assets Covered **86255**  
 Result Notes **There were no anomalies found on the jurisdictional portion of the line that required action.**
80. Question Result, ID, References **NA, AR.RC.REMEDIATION.O, 192.933(c) (192.933(a), 192.933(d))**  
 Question Text *Is anomaly remediation adequate for the covered segments being observed?*  
 Assets Covered **86255**  
 Result Notes **There were no anomalies found on the jurisdictional portion of the line that required action.**
81. Question Result, ID, References **NA, AR.RC.LOOKBEYOND.P, 192.917(e)(5)**  
 Question Text *Does the process require an evaluation of all pipeline segments with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- No corrosion has been found**
82. Question Result, ID, References **NA, AR.RC.LOOKBEYOND.R, 192.947(b) (192.917(e)(5), 192.459)**  
 Question Text *From the review of the results of integrity assessments, were all pipeline segments evaluated with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?*

Assets Covered 86255

Result Notes There were no anomalies found on the jurisdictional portion of the line that required action.

## AR.RMP: Repair Methods and Practices

83. Question Result, ID, References NA, AR.RMP.CRACKNDT.P, 192.929(b) (ASME B31.8S-2004 Appendix A3.4)

Question Text *Does the process require that when a pipeline segment that meets the conditions for cracking and/or possible SCC is exposed (i.e., the coating is removed), an NDE method (e.g., MPI, UT) is employed to evaluate for cracking?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

84. Question Result, ID, References NA, AR.RMP.CRACKNDT.R, 192.947(g) (192.929(b))

Question Text *From the review of records, when a pipeline segment that meets the conditions of possible cracking and/or SCC is exposed (i.e., the coating is removed), was an NDE method (e.g., MPI, UT) employed to evaluate for cracking and/or SCC?*

Assets Covered 86255

Result Notes This pipeline has not been exposed during this inspection time period. SCC, due to the coating type, is not an issue. No such event occurred, or condition existed, in the scope of inspection review.

## AR.SCC: Stress Corrosion Cracking Direct Assessment (SCCDA)

85. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Epoxy coating on the line.

86. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.R, 192.947(e) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*

Assets Covered 86255

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

87. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.O, 192.915(a) (192.915(b))

Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 86255

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

88. Question Result, ID, References NA, AR.SCC.SCCDAPLAN.P, 192.929(b)

Question Text *Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?*

Assets Covered 86255

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Epoxy coating on the line.

89. Question Result, ID, References NA, AR.SCC.SCCDADATA.R, 192.947(g) (192.929(b)(1))

Question Text *Do records demonstrate that data was collected and evaluated?*

Assets Covered 86255

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

90. Question Result, ID, References **NA, AR.SCC.SCCDAMETHOD.R, 192.947(g) (192.929(b)(2))**  
 Question Text *Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
91. Question Result, ID, References **NA, AR.SCC.SCCDAMETHOD.O, 192.929**  
 Question Text *From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
92. Question Result, ID, References **NA, AR.SCC.SCCDANEARNEUTRAL.R, 192.947(g) (192.929(b)(2))**  
 Question Text *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
93. Question Result, ID, References **NA, AR.SCC.SCCDAREASSESSINTRVL.R, 192.947(d) (192.939(a)(3))**  
 Question Text *From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
94. Question Result, ID, References **NA, AR.SCC.SCCCORR.P, 192.933 (192.917(e)(5))**  
 Question Text *Does the process adequately account for taking required actions to address significant corrosion threats found following SCCDA?*  
 Assets Covered **86255**
95. Question Result, ID, References **NA, AR.SCC.SCCCORR.R, 192.933 (192.917(e)(5))**  
 Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following SCCDA?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## DC.COMM: Pipeline Commissioning

96. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.P, 192.935(a) (also presented in: IM.PM)**  
 Question Text *Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*  
 Assets Covered **86255**  
 Result Notes **Excess depth (5ft instead of 3 ft)**
- Station Security**
  - Additional line markers**
  - Line tape has been buried over the pipe during installation**
  - CP is checked 4 times year**
  - Valves checked 2x per year instead of 1**

Patrols 4x per year instead of one.

97. Question Result, ID, References **NA, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a))** (also presented in: IM.PM)  
Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*  
Assets Covered **86255**  
Result Notes **No pipeline commissioning has occurred during this inspection time period. (These notes are repeated in two dissimilar questions. They are linked and changes to one set of notes modifies the other.) The operator is monitoring for AC induction due to the proximity of HV lines, but not as a part of a specific P&M measure due to a corrosion threat.**
98. Question Result, ID, References **NA, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a))** (also presented in: IM.HC)  
Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*  
Assets Covered **86255**  
Result Notes **No pipeline commissioning has occurred during this inspection time period. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.**
99. Question Result, ID, References **Sat, IM.HC.HCADATA.O, 192.905(c)** (also presented in: IM.HC)  
Question Text *Are HCAs correctly identified per up-to-date information?*  
Assets Covered **86255**

## IM.BA: Baseline Assessments

100. Question Result, ID, References **Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e))**  
Question Text *Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?*  
Assets Covered **86255**  
Result Notes **This is in the BAP portion of the IMP Section 6.1**
101. Question Result, ID, References **NA, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o), 192.919(e))**  
Question Text *Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?*  
Assets Covered **86255**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.**
102. Question Result, ID, References **Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a), 192.921(c), 192.921(h))**  
Question Text *Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?*  
Assets Covered **86255**  
Result Notes **They use B31.8S**
103. Question Result, ID, References **NA, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))**  
Question Text *Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?*  
Assets Covered **86255**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.**

104. Question Result, ID, References **Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))**  
 Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*  
 Assets Covered **86255**  
 Result Notes **This is triggered by public awareness. As with the previous inspection noted by LV< No new pipe has been or is anticipated to be installed.**
105. Question Result, ID, References **NA, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)**  
 Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.**
106. Question Result, ID, References **NA, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))**  
 Question Text *Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?*  
 Assets Covered **86255**  
 Result Notes **This line is short in length and cannot be prioritized. It is however covered in Section 6.3 in the IMP Plan.**
107. Question Result, ID, References **NA, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d))**  
 Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.**
108. Question Result, ID, References **NA, IM.BA.BAENVIRON.O, 192.911(o) (192.919(e))**  
 Question Text *From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?*  
 Assets Covered **86255**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.**

## IM.CA: Continual Evaluation and Assessment

109. Question Result, ID, References **NA, IM.CA.LOWSTRESSREASSESS.P, 192.941(a) (192.941(b), 192.941(c))**  
 Question Text *Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?*  
 Assets Covered **86255**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
110. Question Result, ID, References **NA, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a), 192.939(b), 192.913(c))**  
 Question Text *Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?*  
 Assets Covered **86255**  
 Result Notes **Table 3 in the IMP Manual. Lex reviewed the Pf from the Enduro report. 2854/800=3.56. I reviewed the Enduro report again as well.**
111. Question Result, ID, References **NA, IM.CA.LOWSTRESSREASSESS.R, 192.947(d) (192.941(a), 192.941(b), 192.941(c))**

- Question Text *Do records demonstrate that the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion is adequate and being performed as required?*
- Assets Covered 86255
- Result Notes **Low Stress Reassessment is not used.** No such relevant facilities/equipment existed in the scope of inspection review.
112. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))
- Question Text *Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*
- Assets Covered 86255
- Result Notes Section 8.1.3 in The IMP Manual has the process for periodic eval and risk assessment using
113. Question Result, ID, References NA, IM.CA.PERIODICEVAL.R, 192.947(d) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e), 192.937(b))
- Question Text *Do records demonstrate that periodic evaluations of pipeline integrity have been performed based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*
- Assets Covered 86255
- Result Notes This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.
114. Question Result, ID, References Sat, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))
- Question Text *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*
- Assets Covered 86255
- Result Notes The operator is currently using a 10-year reassessment interval. This system had an ILI run in 2013 and is scheduled for a run in 2023, but they may consider going to a 15 year interval.
115. Question Result, ID, References Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931)
- Question Text *Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?*
- Assets Covered 86255
- Result Notes Section operator using ILI
116. Question Result, ID, References Sat, IM.CA.REASSESSMETHOD.R, 192.947(d) (192.937(c))
- Question Text *Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?*
- Assets Covered 86255
- Result Notes Using MFL ILI for their system threats is suitable.
117. Question Result, ID, References Sat, IM.CA.REASSESSWAIVER.P, 192.943(a) (192.943(b))
- Question Text *Does the process include requirements for reassessment interval waivers (special permit per 190.341)?*
- Assets Covered 86255
- Result Notes Section 8.3 of the IMP
118. Question Result, ID, References NA, IM.CA.REASSESSWAIVER.R, 192.947(d) (192.943(a), 192.943(b))
- Question Text *Do records demonstrate that reassessment interval waivers (special permit per 190.341) have been adequately implemented, if applicable?*
- Assets Covered 86255
- Result Notes No such event occurred, or condition existed, in the scope of inspection review.
119. Question Result, ID, References NA, IM.CA.REASSESEXCPERF.P, 192.913(a) (192.913(b), 192.913(c))
- Question Text *Does the process include requirements for deviations from reassessment requirements based on exceptional performance?*
- Assets Covered 86255



Result Notes No such event occurred, or condition existed, in the scope of inspection review. The operator does not take deviations

120. Question Result, ID, References NA, IM.CA.REASSESEXCPERF.R, 192.947(d) (192.913(a), 192.913(b), 192.913(c))

Question Text Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?

Assets Covered 86255

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

## IM.HC: High Consequence Areas

121. Question Result, ID, References Sat, IM.HC.HCAID.P, 192.905(a)

Question Text Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?

Assets Covered 86255

Result Notes They use Method 2 This is still in IMP Section 2 Appendix B. Nothing has changed since Lex's inspection.

122. Question Result, ID, References NA, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a)) (also presented in: DC.COMM)

Question Text Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?

Assets Covered 86255

Result Notes No pipeline commissioning has occurred during this inspection time period. This system had an ILI run in 2013, The last inspection of the IMP plan, including the ILI results, was performed in 2017 (Insp 7245), and there have been no changes since then.

123. Question Result, ID, References Sat, IM.HC.HCAMETHOD1.P, 192.903(1)(i) (192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))

Question Text Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?

Assets Covered 86255

Result Notes The whole line is an HCA.

124. Question Result, ID, References NA, IM.HC.HCAMETHOD2.P, 192.903(2)(i) (192.903(2)(ii))

Question Text Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?

Assets Covered 86255

Result Notes No such event occurred, or condition existed, in the scope of inspection review. They do not use method 2.

125. Question Result, ID, References Sat, IM.HC.HCANEW.P, 192.905(c)

Question Text Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?

Assets Covered 86255

Result Notes IMP Section 11.1.2 and in

126. Question Result, ID, References NA, IM.HC.HCANEW.R, 192.947(d) (192.905(c))

Question Text Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?

Assets Covered 86255

Result Notes No newly identified HCAs have emerged. No such event occurred, or condition existed, in the scope of inspection review.

127. Question Result, ID, References Sat, IM.HC.HCAPIR.P, 192.903 (192.905(a))

Question Text *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?*

Assets Covered 86255

Result Notes Section 2 contains the PIR calc

128. Question Result, ID, References Sat, IM.HC.HCAPIR.R, 192.947(d) (192.903, 192.905(a))

Question Text *Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?*

Assets Covered 86255

Result Notes They use Method 2 This is still in IMP Section 2 Appendix B

129. Question Result, ID, References Sat, IM.HC.HCASITES.P, 192.903 (192.905(b))

Question Text *Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?*

Assets Covered 86255

Result Notes This is in Section 2.2.d.

130. Question Result, ID, References Sat, IM.HC.HCASITES.R, 192.947(d) (192.903, 192.905(b))

Question Text *Do records indicate identification of identified sites being performed as required?*

Assets Covered 86255

Result Notes GP's consultant performs patrols on the 1.04-mile pipeline regularly and there have been no identified site changes

131. Question Result, ID, References NA, IM.HC.HCAMETHOD1.R, 192.947(d) (192.903 (1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))

Question Text *Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?*

Assets Covered 86255

Result Notes They use Method 2 This is still in IMP Section 2 Appendix B No such event occurred, or condition existed, in the scope of inspection review.

132. Question Result, ID, References Sat, IM.HC.HCAMETHOD2.R, 192.947(d) (192.905(a), 192.903(2)(ii))

Question Text *Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?*

Assets Covered 86255

Result Notes IMP Section 2 Appendix B contains this. Regular, frequent ROW patrols are conducted.

133. Question Result, ID, References Sat, IM.HC.HCADATA.O, 192.905(c) (also presented in: DC.COMM)

Question Text *Are HCAs correctly identified per up-to-date information?*

Assets Covered 86255

## IM.PM: Preventive and Mitigative Measures

134. Question Result, ID, References Sat, IM.PM.PMMGENERAL.P, 192.935(a) (also presented in: DC.COMM)

Question Text *Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*

Assets Covered 86255

Result Notes Excess depth (5ft instead of 3 ft)

Station Security

Additional line markers

Line tape has been buried over the pipe during installation.

CP is checked 4 times year

Valves checked 2x per year instead of 1

Patrols 4x per year instead of one.

135. Question Result, ID, References **NA, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a))** (also presented in: DC.COMM)  
Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*  
Assets Covered **86255**  
Result Notes **No pipeline commissioning has occurred during this inspection time period. (These notes are repeated in two dissimilar questions. They are linked and changes to one set of notes modifies the other.) The operator is monitoring for AC induction due to the proximity of HV lines, but not as a part of a specific P&M measure due to a corrosion threat.**
136. Question Result, ID, References **Sat, IM.PM.PMMTPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))**  
Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*  
Assets Covered **86255**  
Result Notes **Third Party Damage is contained in the O&M Section 18**
137. Question Result, ID, References **NA, IM.PM.PMMTPD.R, 192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))**  
Question Text *Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?*  
Assets Covered **86255**  
Result Notes **The operator has had no history of damages or near misses on their system. No such event occurred, or condition existed, in the scope of inspection review.**
138. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.P, 192.915(c)**  
Question Text *Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?*  
Assets Covered **86255**  
Result Notes **MERT is qualified to do excavation standby if Roy wasn't available.**
139. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.R, 192.947(e) (192.915(c))**  
Question Text *Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?*  
Assets Covered **86255**  
Result Notes **I verified Roy Roger's training and experience. He currently performs these functions. Previously, Cosentino Consulting performed these functions and their qualifications were also reviewed.**
140. Question Result, ID, References **Sat, IM.PM.PMTPDMSMYS.P, 192.935(d) (192.935(e), 192 Appendix E Table E.II.1)**  
Question Text *Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*  
Assets Covered **86255**  
Result Notes **Section 4.2 in the O&M and Appendix H for IMP. All records required by .947 are listed in Section 15 and a pointer is in the O&M to Section to remind those that some records need to be kept longer.**
141. Question Result, ID, References **Sat, IM.PM.PMTPDMSMYS.R, 192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)**  
Question Text *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?*  
Assets Covered **86255**

- Result Notes The ROW clearing (very visible swath) and prompt replacement of markers is an effective P&M Third Party Damage P&M measure.
142. Question Result, ID, References Sat, IM.PM.PMMOF.P, 192.935(b)(2)
- Question Text *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?*
- Assets Covered 86255
- Result Notes Outside Force threats are covered in the checklist. Faults are identified and the outside force. This is in Appendix C
143. Question Result, ID, References Sat, IM.PM.PMMOF.R, 192.947(d) (192.935(b)(2))
- Question Text *Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?*
- Assets Covered 86255
- Result Notes GP Camas has a very extensive file on the tectonic fault lines in the area, but all lie outside of the ROW. Due to the proximity and the unknown effects of the extent of ground movement, it is still considered a threat.
144. Question Result, ID, References NA, IM.PM.PMMASORCV.P, 192.935(c)
- Question Text *Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?*
- Assets Covered 86255
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review. Taps are set up to install an RCV or ASV.
145. Question Result, ID, References Sat, IM.PM.PMMASORCV.R, 192.947(d) (192.935(c))
- Question Text *Do records demonstrate that the operator has determined, based on risk, whether automatic shut-off valves or remote control valves should be added to protect high consequence areas?*
- Assets Covered 86255
- Result Notes Considered as a P&M measure in 2013 reassessment
146. Question Result, ID, References Sat, IM.PM.PMMIMPLEMENT.O, 192.935(a)
- Question Text *Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?*
- Assets Covered 86255
- Result Notes The ROW clearing (very visible swath) and prompt replacement of markers is an effective P&M Third Party Damage P&M measure. I observed the ROW in the field portion of the inspection, and it was well marked and had readily visible contact information
147. Question Result, ID, References Sat, IM.PM.PMCORR.P, 192.933 (192.917(e)(5))
- Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*
- Assets Covered 86255
- Result Notes No significant corrosion threats. Section 4
148. Question Result, ID, References NA, IM.PM.PMCORR.R, 192.933 (192.917(e)(5))
- Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
- Assets Covered 86255
- Result Notes No significant corrosion threat. No such event occurred, or condition existed, in the scope of inspection review. AC checks continue to be gathered during CP readings. This is mostly to monitor for the 15VAC human safety limit.

## IM.QA: Quality Assurance

149. Question Result, ID, References Sat, IM.QA.QARM.P, 192.911(l)

Question Text *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?*

Assets Covered 86255

Result Notes Section 12 of the IMP contains this.

150. Question Result, ID, References Sat, IM.QA.IMNONMANDT.P, 192.7(a)

Question Text *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?*

Assets Covered 86255

Result Notes This is still in IMP Section 1.6.3

151. Question Result, ID, References Sat, IM.QA.QARM.R, 192.947(d) (192.911(l))

Question Text *Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?*

Assets Covered 86255

Result Notes Reviews are tracked using a revision sheet to ensure the steps required in Section 12 are followed.

152. Question Result, ID, References Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))

Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*

Assets Covered 86255

Result Notes This is in section 15 under record keeping.

153. Question Result, ID, References Sat, IM.QA.IMMOC.P, 192.911(k) (192.909(a), 192.909(b))

Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*

Assets Covered 86255

Result Notes Section 11.

154. Question Result, ID, References Sat, IM.QA.IMMOC.R, 192.947(d) (192.909(a), 192.909(b), 192.911(k))

Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*

Assets Covered 86255

Result Notes Appendix K was updated to use Roy Rogers instead of Bob.

155. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.P, 192.945(a) (192.913(b), 192.951)

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

Assets Covered 86255

Result Notes Section 10 of the IMP.

156. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.R, 192.947(d) (192.913(b), 192.945(a), 192.951)

Question Text *Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*

Assets Covered 86255

Result Notes There has been no data to analyze for trending. The pipeline has no TPD history, leaks, or failures.

157. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b), 192.951)

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?*

Assets Covered 86255

Result Notes No leaks - no hits. No metrics to report

158. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b), 192.945(a), 192.951)

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

Assets Covered 86255

Result Notes There has been no data to analyze for trending. The pipeline has no Third Party Damage history, leaks, or failures.

159. Question Result, ID, References Sat, IM.OA.RECORDS.R, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))

Question Text *Are required records being maintained for the life of the pipeline?*

Assets Covered 86255

Result Notes I reviewed several historical pipeline records and this has not been an issue for GP.

## IM.RA: Risk Analysis

160. Question Result, ID, References Sat, IM.RA.RADATA.P, 192.917(b) (192.917(e)(1), 192.911(k))

Question Text *Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?*

Assets Covered 86255

Result Notes IMP Section 3

161. Question Result, ID, References Sat, IM.RA.RAMETHOD.P, 192.917(c) (192.917(d))

Question Text *Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment?*

Assets Covered 86255

Result Notes Risk Analysis Section 5.

162. Question Result, ID, References Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))

Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*

Assets Covered 86255

Result Notes I reviewed corrosion IM data and it showed no issues. The pipeline has no Third Party Damage history, leaks, or failures.

163. Question Result, ID, References Sat, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(e)(1), 192.911(k))

Question Text *Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?*

Assets Covered 86255

Result Notes I reviewed corrosion IM data and it showed no issues. The pipeline has no Third Party Damage history, leaks, or failures.

164. Question Result, ID, References Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e), 192.913(b)(1))

Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*

Assets Covered 86255

Result Notes Section 3 and Appendix C External Threats.

165. Question Result, ID, References Sat, IM.RA.RAMETHOD.R, 192.947(b) (192.917(c), 192.917(d))

Question Text *Do records demonstrate that the risk assessment follows ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?*

Assets Covered 86255

Result Notes The system is homogenous in the materials used and outside threats are also uniform across the 1.04 mi pipeline system.

166. Question Result, ID, References Sat, IM.RA.RAFACTORS.P, 192.917(c)

Question Text *Does the process include requirements for factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?*

Assets Covered 86255

Result Notes GP uses Method 1 and identifies the entire line as an HCA.

167. Question Result, ID, References Sat, IM.RA.RAFACTORS.R, 192.947(b) (192.917(c))

Question Text *Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?*

Assets Covered 86255

Result Notes This is in Appx D of the current Cosentino Consulting created manual.

168. Question Result, ID, References Sat, IM.RA.RAMOC.P, 192.917(c)

Question Text *Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?*

Assets Covered 86255

Result Notes Section 11.2.d has new construction and 11.1 and 11.2 both have new categories of additional data that could cause potential changes

169. Question Result, ID, References Sat, IM.RA.RAMOC.R, 192.947(b) (192.917(c))

Question Text *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?*

Assets Covered 86255

Result Notes There has not been new information and the pipeline has not experienced condition changes to date.

170. Question Result, ID, References Sat, IM.RA.RAMOC.O, 192.917(c)

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

Assets Covered 86255

Result Notes I confirmed that the system reflects what is contained in the IMP

## PD.DP: Damage Prevention

171. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered 86255

172. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered 86255

Result Notes I verified this information in the process of reviewing many leak surveys and patrols. There has not been an ILI assessment during this inspection time period.

## RPT.NR: Notices and Reporting

173. Question Result, ID, References Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b)

Question Text *Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?*

Assets Covered 86255

174. Question Result, ID, References NA, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b))

Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?*

Assets Covered 86255

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

175. Question Result, ID, References Sat, RPT.NR.NOTIFYIMPRESS.P, 192.933(a)(1)

Question Text *Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?*

Assets Covered 86255

Result Notes Section 11.4.3 For the records portion, no changes.

176. Question Result, ID, References NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))

Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*

Assets Covered 86255

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

177. Question Result, ID, References NA, RPT.NR.IMDEVIATERPT.P, 192.913(b)(1)(vii)

Question Text *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered 86255

Result Notes The operator is not using exceptional performance to deviate from IMP program No such event occurred, or condition existed, in the scope of inspection review.

178. Question Result, ID, References NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii))

Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered 86255

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

179. Question Result, ID, References NA, RPT.NR.IMPERFRPT.P, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text *Is there a process for annual reporting of integrity management performance data?*

Assets Covered 86255

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

180. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text *Do annual reports demonstrate that integrity management performance data were reported?*

Assets Covered 86255

Result Notes HCA mileage has been the only item to report. Additionally, the operator has reported the installation date.

## TD.SCC: Stress Corrosion Cracking

181. Question Result, ID, References NA, TD.SCC.SCCIM.P, 192.911(c) (192.917(a)(1))

Question Text *Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*

Assets Covered 86255

182. Question Result, ID, References NA, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1))



Question Text *Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*

Assets Covered 86255

Result Notes The line is FBE coated. No such relevant facilities/equipment existed in the scope of inspection review.

183. Question Result, ID, NA, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b))  
References

Question Text *Do records document that the operator has properly remediated any occurrences of SCC?*

Assets Covered 86255

Result Notes The line is FBE coated. No such relevant facilities/equipment existed in the scope of inspection review.

## TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

184. Question Result, ID, Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b))  
References

Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*

Assets Covered 86255

185. Question Result, ID, Sat, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i),  
References 192.947(d))

Question Text *Do records indicate adequate qualification of integrity management personnel?*

Assets Covered 86255

Result Notes Records were reviewed for current IM personnel and previous personnel under Cosentino Consulting.

186. Question Result, ID, Sat, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i),  
References 192.907(b), 192.911(l))

Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*

Assets Covered 86255

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Report Parameters: Results: all

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