

Inspection Output (IOR)

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Inspection Information

Inspection Name	8291 PSE Transmission Standard Comprehensive	Operator(s)	PUGET SOUND ENERGY (22189) Lead Darren Tinnerstet	Plan Submitted	02/23/2021
Status	PLANNED	Observer(s)	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson	Plan Approval	02/23/2021 by Joe Subsits
Start Year	2021	Supervisor	Joe Subsits	All Activity Start	04/26/2021
System Type	GT	Director	Sean Mayo	All Activity End	04/30/2021
Protocol Set ID	GT.2021.01			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary:

This inspection was a standard transmission inspection and included a review of all operations and maintenance records since the last inspection in 2018. Records were reviewed for 2018, 2019 and 2020 and included cathodic protection, leak surveys, reporting, regulator inspections, valve inspection, patrolling, odorization, etc. During the field portion of the visit, we checked CP, odorization, markers, reliefs and valves.

Facilities visited and Total AFOD:

Records were reviewed remotely with PSE on the following days due to COVID restriction protocols: April 26th, April 27th, April 30th

Total AFOD: 2 days

Field observations were conducted on April 28th and April 29th at the following locations:

Olympia

Cedar Hills

South Seattle

North Midway

Green Lake / Lynnwood

Summary of Significant Findings:

No probable violations or areas of concern were discovered during this inspection.

Primary Operator contacts and/or participants:

Danielle Troupe
Senior Regulatory Compliance Analyst

Vidushi Rainia
Compliance Program Manager

Operator executive contact and mailing address for any official correspondence:

8291 PSE Transmission Standard
Comprehensive

Booga K. Gilbertson
Senior VP of Operations

355 110th Ave. NE, M/S EST 11W

Bellevue, WA 98004

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88986 (1878)	Puget Sound Energy-TRANSMISSION	unit	88986	Compressor Stations Bottle/Pipe - Holders Storage Fields Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP Abandoned	72	72	72	72	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.	88986 (1878)	Baseline Records (Form 1), Baseline Pipeline Field Inspection (Form 1)	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 Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	PSE Transmission	--	04/26/2021	04/30/2021	n/a	all planned questions	all assets	all types	72	72	72	72	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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	PSE Transmission	COMPLETED	05/10/2021	PSE Transmission	88986 (1878)

Results (all values, 72 results)

80 (instead of 72) results are listed due to re-presentation of questions in more than one sub-group.

AR.PTI: Integrity Assessment Via Pressure Test

1. Question Result, ID, NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d),
References 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 88986 (1878)

Result Notes Does not currently use Pressure Testing.

Appendix I TIMP Plan - Section 6 is Pressure Testing Plan if need

Use direct assessment and inline assessment only

Will add pressure testing plan as needed in future

AR.RMP: Repair Methods and Practices

2. Question Result, ID, Sat, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))
References

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered 88986 (1878)

3. Question Result, ID, Sat, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))
References

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88986 (1878)

Result Notes Reviewed records for 2019 North Midway replacement project.

DC.CO: Construction

4. Question Result, ID, Sat, DC.CO.CLEAR.R, 192.325(a) (192.325(b), 192.325(c), 192.325(d))
References

Question Text *Do records indicate that transmission lines or mains are installed with clearances specified in 192.325, and (if plastic) installed as to prevent heat damage to the pipe?*

Assets Covered 88986 (1878)

Result Notes reviewed GOS 2525.1700 Section 6.10 underground clearance

Fitter sign off on as-builts for adherence to GOP standards.

5. Question Result, ID, Sat, DC.CO.COVERONSHORE.R, 192.327(a) (192.327(b), 192.327(c), 192.327(d), 192.327(e))
References

Question Text *Is onshore piping minimum cover provided as specified in 192.327?*

Assets Covered 88986 (1878)

Result Notes GOP 2525.1700 Section 7.4

Fitters sign off on as-builts that adherence to GOP standards is attained.

DC.WELDINSP: Construction Weld Inspection

6. Question Result, ID, Sat, DC.WELDINSP.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233,
References 192.243, 192.245)

Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*

Assets Covered 88986 (1878)

Result Notes Reviewed Mag Particle report for 2019 North Midway project - Atelya Edwards 9/16/2020 (Sam Hicks was QA Inspector)

Radiographic Examination report -Robert Madden 10/14/2019

7. Question Result, ID, References Sat, DC.WELDINSP.WELDNDT.R, 192.243

Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*

Assets Covered 88986 (1878)

Result Notes Reviewed Mag Particle report for 2019 North Midway project - Atelya Edwards 9/16/2020

Radiographic Examination report -Robert Madden 10/14/2019

DC.WELDPROCEDURE: Construction Welding Procedures

8. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225

Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*

Assets Covered 88986 (1878)

Result Notes Reviewed qualification of welding procedures. Updated Welding manual procedures submitted to UTC on 5/3/2021.

DC.DPC: Design of Pipe Components

9. Question Result, ID, References Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))

Question Text *Are transmission line valves being installed as required by 192.179?*

Assets Covered 88986 (1878)

Result Notes Reviewed as-built plans and GIS maps with valve locations.

10. Question Result, ID, References NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))

Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 88986 (1878)

Result Notes Have not had any changes or additions to pipe during audit scope period.

11. Question Result, ID, References NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))

Question Text *Does the transmission project's design and construction comply with 192.476?*

Assets Covered 88986 (1878)

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

DC.MO: Maintenance and Operations

12. Question Result, ID, References NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5)

Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*

Assets Covered 88986 (1878)

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

EP.ERG: Emergency Response

13. Question Result, ID, References NA, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered 88986 (1878)

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

Each group supervisor reviews each 1284 form.

Reviewed Gas Event Review Form (GERF) - internal monitoring report for operator personnel

14. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4),
References 192.616(c), ADB-05-03) (also presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 88986 (1878)

Result Notes Reviewed notifications for 2018-2020

King County public officials - Cedar Hills / Lynnwood / North Midway

Thurston County - Olympia

Reviewed records for notifications to Emergency Officials for 2018-2020

PAPA

ERT (Emergency Responder Training's) - significantly less trainings in 2020 due to Covid related restrictions.

MO.GC: Conversion to Service

15. Question Result, ID, NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b))
References

Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*

Assets Covered 88986 (1878)

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

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

16. Question Result, ID, NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))
References

Question Text *Did personnel respond to indications of abnormal operations as required by the process?*

Assets Covered 88986 (1878)

Result Notes No abnormal operating conditions during audit scope.

Reviewed procedures for discovering and reporting AOC's (TIMP Plan)

Over pressure events are main risk historically.

17. Question Result, ID, NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))
References

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered 88986 (1878)

Result Notes Have not had any AOC's in audit scope period.

Reviewed processes (Blue Card Process - AOC reporting Card)

GOS 2575.2700 - section 7 Remediation

MO.GOCLASS: Gas Pipeline Class Location

18. Question Result, ID, NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c),
References 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered 88986 (1878)

Result Notes No class changes - built to class 4 standards.

JP does one each year.

19. Question Result, ID, Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also
References presented in: MO.GO)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 88986 (1878)

MO.GOMAOP: Gas Pipeline MAOP

20. Question Result, ID, Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b))
References

Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*

Assets Covered 88986 (1878)

Result Notes Reviewed North Midway 16" HP main:

System MAOP 250 psig - components used rated higher by design.

16" stopple fitting 600 psig

2" save-a-valve 1440 psig

16" .375 wall X56 Grade FBE 1050 psi

ISO ANSI 600 API with design pressure of 569 psig.

MO.GM: Gas Pipeline Maintenance

21. Question Result, ID, Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also
References presented in: MO.GMOPP)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88986 (1878)

Result Notes Leak Survey Maps reviewed (also patrol records):

Cedars Hills 2020

Lynnwood 2019

North Midway 2018 - 2020

South Seattle 2020

Olympia 2018 - 2020

Reviewed repair records for 2019 North Midway project.

22. Question Result, ID, References Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))
Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*
Assets Covered 88986 (1878)
Result Notes Reviewed operator procedures for minimizing accidental ignitions.
23. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))
Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*
Assets Covered 88986 (1878)
Result Notes Reviewed valve maintenance records for 2018-2020 for the following locations:
- Olympia
 - Lynnwood
 - Cedar Hills
 - North Midway
24. Question Result, ID, References Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))
Question Text *Are field inspection and partial operation of transmission line valves adequate?*
Assets Covered 88986 (1878)
Result Notes Select valves partially operated during field audit. See Form R for detailed description.

MO.GOODOR: Gas Pipeline Odorization

25. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))
Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
Assets Covered 88986 (1878)
Result Notes Reviewed gas odorization records for 2018-2020 - no readings above .8 LEL for audit scope period.
- Also reviewed Ordorizer maintenance records for 2018-2020

MO.GO: Gas Pipeline Operations

26. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS)
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*
Assets Covered 88986 (1878)
27. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)
Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*

Assets Covered 88986 (1878)
Result Notes GOS 2425.1000 - Section 4 Manual Review

Reviewed GOS 2425.2100 (2020) Main Replacements

Reviewed annual reviews conducted for 2018-2020.

28. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))

Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered 88986 (1878)
Result Notes GOS 2425.1000 Section 3 General Requirements

Reviewed IFS QC Effectiveness Study (2020)

Reviewed ELM QC Effectiveness Study (2019)

29. Question Result, ID, References Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))

Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*

Assets Covered 88986 (1878)
Result Notes GIS Maps available to field personnel.

Image Site - Internal document searching program (as-builts, D-4, work orders)

30. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)

Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered 88986 (1878)
Result Notes Pressure control tech provided as-builts while onsite at RS-1340 (North Seattle).

CP Tech Scott Salazar was able to bring up pipe installation history in the field during audit.

31. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))

Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*

Assets Covered 88986 (1878)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

MO.GMOPP: Gas Pipeline Overpressure Protection

32. Question Result, ID, References Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*

Assets Covered 88986 (1878)
Result Notes Reviewed pressure relief records for 2018-2020 for the following locations:

Olympia - reviewed pressure relief review records (annually)

Lynnwood - monitor station

Cedar hills - reviewed pressure relief review records (annually)

North Midway

33. Question Result, ID, References **Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))** (also presented in: MO.GM)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered **88986 (1878)**

Result Notes **Leak Survey Maps reviewed (also patrol records):**

Cedars Hills 2020

Lynnwood 2019

North Midway 2018 - 2020

South Seattle 2020

Olympia 2018 - 2020

Reviewed repair records for 2019 North Midway project.

34. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))**

Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*

Assets Covered **88986 (1878)**

Result Notes **Reviewed OQ records for the following Pressure Control Tech's:**

Rick Ferder - expires 12/31/2023

Steve Thomas - expires 12/31/2023

Also reviewed test records for regulator stations for 2018-2020.

35. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)**

Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*

Assets Covered **88986 (1878)**

Result Notes **Select regulator stations inspected during field audit. See Form R for detailed description.**

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

36. Question Result, ID, References **Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: PD.RW)

Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered **88986 (1878)**

Result Notes **Reviewed Atmospheric and Exposed pipe patrols for 2018-2020 - Green River Crossing**

Reviewed follow-up for 3/21/2019 notification - satisfactory follow up.

Reviewed pipeline marker patrol records for 2018-2020

Markers are replaced or repaired at time of patrol which eliminates the need to track the 45-day requirement.

37. Question Result, ID, [Sat, MO.RW.ROWMARKER.O, 192.707\(a\) \(192.707\(b\), 192.707\(c\), 192.707\(d\)\)](#) (also presented in: References [PD.RW](#))

Question Text *Are line markers placed and maintained as required?*

Assets Covered [88986 \(1878\)](#)

Result Notes [Observed adequate line markers during field audit.](#)

38. Question Result, ID, [Sat, MO.RW.ROWCONDITION.O, 192.705\(a\) \(192.705\(c\)\)](#) (also presented in: [PD.RW](#))
References

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered [88986 \(1878\)](#)

Result Notes [ROW conditions were clear and acceptable during field visits.](#)

39. Question Result, ID, [Sat, MO.RW.LEAKAGE.R, 192.709\(c\) \(192.706, 192.706\(a\), 192.706\(b\), 192.935\(d\)\)](#)
References

Question Text *Do records indicate leakage surveys conducted as required?*

Assets Covered [88986 \(1878\)](#)

Result Notes [Leak Survey Maps reviewed \(also patrol records\):](#)

[Cedars Hills 2020](#)

[Lynnwood 2019](#)

[North Midway 2018 - 2020](#)

[South Seattle 2020](#)

[Olympia 2018 - 2020](#)

PD.DP: Damage Prevention

40. Question Result, ID, [Sat, PD.DP.PDPROGRAM.R, 192.614\(c\)](#)
References

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered [88986 \(1878\)](#)

Result Notes [Reviewed 2020 Damage Prevention Program Plan](#)

[High Profile tickets require a Public Improvement Inspector \(PI\) to be notified and appear onsite](#)

PD.PA: Public Awareness

41. Question Result, ID, [Sat, EP.ERG.LIAISON.R, 192.605\(a\) \(192.615\(c\)\(1\), 192.615\(c\)\(2\), 192.615\(c\)\(3\), 192.615\(c\)\(4\), 192.616\(c\), ADB-05-03\)](#) (also presented in: [EP.ERG](#))
References

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered [88986 \(1878\)](#)

Result Notes [Reviewed notifications for 2018-2020](#)

[King County public officials - Cedar Hills / Lynnwood / North Midway](#)

[Thurston County - Olympia](#)

Reviewed records for notifications to Emergency Officials for 2018-2020

PAPA

ERT (Emergency Responder Training's) - significantly less trainings in 2020 due to Covid related restrictions.

42. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered 88986 (1878)
Result Notes Reviewed 6.3.3 section of Damage Prevention plan

Do not meet requirement of multi-lingual County definition of 15% population speaking a certain language.

Still provide notifications in 11 different languages.

Reviewed "No what's below" publication, which is produced in Spanish as well.

PD.RW: ROW Markers, Patrols, Monitoring

43. Question Result, ID, References Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*
Assets Covered 88986 (1878)
Result Notes Reviewed Atmospheric and Exposed pipe patrols for 2018-2020 - Green River Crossing

Reviewed follow-up for 3/21/2019 notification - satisfactory follow up.

Reviewed pipeline marker patrol records for 2018-2020

Markers are replaced or repaired at time of patrol which eliminates the need to track the 45-day requirement.

44. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)
Question Text *Are line markers placed and maintained as required?*
Assets Covered 88986 (1878)
Result Notes Observed adequate line markers during field audit.

45. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*
Assets Covered 88986 (1878)
Result Notes ROW conditions were clear and acceptable during field visits.

RPT.RR: Regulatory Reporting (Traditional)

46. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)
Question Text *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*
Assets Covered 88986 (1878)
Result Notes 2020 submitted 3/12/2021

2019 submitted 3/9/2020

2018 submitted 3/12/2019

Operator is aware of upcoming changes for 2022, working on final form.

47. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))**
Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*
Assets Covered **88986 (1878)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
48. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2))**
Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*
Assets Covered **88986 (1878)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
49. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)**
Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe using the most recent Form?*
Assets Covered **88986 (1878)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
50. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c))**
Question Text *Do records indicate safety-related condition reports were filed as required?*
Assets Covered **88986 (1878)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
51. Question Result, ID, References **Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))**
Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*
Assets Covered **88986 (1878)**
Result Notes **2020 submitted on 2/19/2021**

2019 submitted on 3/6/2020

2018 submitted on 2/15/2019
52. Question Result, ID, References **Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))**
Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*
Assets Covered **88986 (1878)**
Result Notes **Reviewed PHMSA portal for operator units and company information.**

TD.ATM: Atmospheric Corrosion

53. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))**
Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*
Assets Covered **88986 (1878)**
Result Notes **Reviewed 2020 Atmospheric corrosion patrol for Green River Bridge Crossing.**
54. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))**
Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered 88986 (1878)

Result Notes Observed exposed pipeline under bridge on North Midway Ipipeine. Wrap was sufficient and no areas of concern were noted.

TD.CPMONITOR: External Corrosion - CP Monitoring

55. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered 88986 (1878)

Result Notes Reviewed rectifier inspections 2018 / 2019/ 2020

Olympia (1)

South Seattle (1)

Cedar Hills (Galvanic)

Lynnwood (2)

8/20/2019 Short - cleared a water short (closed 11/14/2019)

Reviewed repair notes and records.

North Midway (2)

11/5/2019 - Short - Shorting of pipe on bridge. Repairing bridge supports with FR shields in 2021.

56. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a))

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 88986 (1878)

Result Notes Obtained CP readings from select sites during field audit. See Form R for detailed description.

***Note** – During inspection IC system was down on the Olympia line and all PSP reads were below -850 mV. Once system was repaired new PSP readings were obtained on 5/18/2021 and provided to Staff

57. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))

Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered 88986 (1878)

Result Notes Review CP records for 2018 /2019 / 2020

Olympia (4) No low reads

South Seattle (5) No low reads

Cedar Hills (2) No low reads

Lynnwood (2)

7/22/2020 low reading -666 mV. - reviewed follow up records of diagnosis and repair.

North Midway (5)

12/28/2019 low reading -610 mV - part of bridge shorting issue (to be remediated in 2021)

4/22/2020 low reading -642 mV - part of bridge issue

58. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)

Question Text *Are impressed current sources properly maintained and are they functioning properly?*

Assets Covered 88986 (1878)

Result Notes Inspected several rectifiers during field audit. See Form R for detailed description.

***Note** – During inspection IC system was down on the Olympia line and all PSP reads were below -850 mV. Once system was repaired new PSP readings were obtained on 5/18/21 and provided to Staff

59. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))

Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*

Assets Covered 88986 (1878)

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

60. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))

Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered 88986 (1878)

Result Notes Reviewed remediation records (see question #6, Cathodic Protection Monitoring).

61. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))

Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*

Assets Covered 88986 (1878)

Result Notes Added test leads to replaced pipe

Reviewed as-built's for North Midway project in 2019.

Corrosion Control is involved in the design and implementation of new or replacement projects

62. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))

Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*

Assets Covered 88986 (1878)

Result Notes No records of stray current issues.

Reviewed 4515.1205 - PS and AOC procedures

63. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered 88986 (1878)

Result Notes Reviewed GIS maps of CP Impressed systems

Also reviewed GIS maps for Galvanic system (Cedar Hills)

TD.CP: External Corrosion - Cathodic Protection

64. Question Result, ID, References Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
Assets Covered 88986 (1878)
Result Notes Reviewed Cedar Hills commissioning records (2009)

Also reviewed records for North Midway and South Seattle.

Olympia does not fall under this requirement, installed pre 1971.
65. Question Result, ID, References NA, TD.CP.PRE1971.O, 192.457(b)
Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?*
Assets Covered 88986 (1878)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
66. Question Result, ID, References NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))
Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*
Assets Covered 88986 (1878)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
67. Question Result, ID, References Sat, TD.CP.ELECIISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))
Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
Assets Covered 88986 (1878)
Result Notes Reviewed 2018-2020 casing records for North Midway and Olympia

Monolithic insulators
68. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)
Question Text *Do records indicate the location of all items listed in 192.491(a)?*
Assets Covered 88986 (1878)
Result Notes Reviewed GIS maps of CP Impressed systems

Also reviewed GIS maps for Galvanic system (Cedar Hills)

TD.COAT: External Corrosion - Coatings

69. Question Result, ID, References Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*
Assets Covered 88986 (1878)

TD.CPEXPOSED: External Corrosion - Exposed Pipe

70. Question Result, ID, References **Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)**
Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
Assets Covered **88986 (1878)**
Result Notes **Reviewed 2018-2020 EPCR (Exposed Pipeline Condition Report)**

3 required remediation - reviewed repair records and condition reports.

71. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a)** (also presented in: TD.CPMONITOR, TD.CP)
Question Text *Do records indicate the location of all items listed in 192.491(a)?*
Assets Covered **88986 (1878)**
Result Notes **Reviewed GIS maps of CP Impressed systems**

Also reviewed GIS maps for Galvanic system (Cedar Hills)

TD.ICP: Internal Corrosion - Preventive Measures

72. Question Result, ID, References **Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))**
Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
Assets Covered **88986 (1878)**
Result Notes **Reviewed 2018-2020 Exposed Pipe Condition Reports (EPCR)**

73. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))**
Question Text *Do records document adequate evaluation of internally corroded pipe?*
Assets Covered **88986 (1878)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

74. Question Result, ID, References **NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))**
Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
Assets Covered **88986 (1878)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.OO: Operator Qualification

75. Question Result, ID, References **Sat, TQ.OO.OQCONTRACTOR.R, 192.807(a) (192.807(b))**
Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
Assets Covered **88986 (1878)**
Result Notes **Reviewed OQ records for contractor personnel working on 2019 North Midway pipeline dent repair and iso install.**

Craig Kraft (IFS) - Foreman, checked welding OQ's and IFS

Pat Johnson (IFS) - IFS OQ's only

Verified records are maintained for 5 years.

76. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 88986 (1878)

Result Notes Reviewed Welding Qualification Test Report for 2018

Reviewed Qualification standards of private OQ contractor training program provided by Midwest Gas Association (MEA)

TQ.QU: Qualification of Personnel - Specific Requirements

77. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 88986 (1878)

Result Notes Reviewed OQ's Michelle Gallardo - Corrosion Engineer in Gas System Integrity.

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

78. Question Result, ID, References Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered 88986 (1878)

Result Notes 2019 North Midway repair project NDT

Nicholas Rossiello - reviewed OQ's

79. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text *Do records indicate that welders are adequately qualified?*

Assets Covered 88986 (1878)

Result Notes Reviewed Welding OQ record for Craig Kraft on 2019 North Midway repair.

TQ.TR: Training of Personnel

80. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text *Is training for emergency response personnel documented?*

Assets Covered 88986 (1878)

Result Notes GFR are all trained gas first responders.

Reviewed training scenarios document that GFR take

GOP 2425.2300 - Emergency Plans

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of

documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.

FORM D: Intrastate GT Standard Records & Field 8291

UTC Standard Comprehensive Inspection Report
Intrastate GAS Transmission
FORM D: State-Specific Requirements

**** THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS TRANSMISSION OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE RECORDS" and "BASELINE FIELD OBSERVATIONS" MODULES IN THE MOST CURRENT WA-SPECIFIC GT QUESTION SET**

PRINT Form (select "save and keep working" first)

PHMSA Advisory Bulletins

Inspector and Operator Information

Inspection ID	Inspection Link	Inspector - Lead	Inspector - Assist
8291	8291	Tinnerstet, Darren	
Operator	Unit	Records Location - City & State	
Puget Sound Energy	Transmission	Georgetown, WA	
Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date	
04-26-2021	04-30-2021	05-24-2021	

You must include the following in your inspection summary:

- *Inspection Scope
- *Facilities visited and Total AFOD
- * Summary of Significant Findings

Inspection Scope and Summary

This inspection was a standard transmission inspection and included a review of all operations and maintenance records since the last inspection in 2018. Records were reviewed for 2018, 2019 and 2020 and included cathodic protection, leak surveys, reporting, regulator inspections, valve inspection, patrolling, odorization, etc. During the field portion of the visit, we checked CP, odorization, markers, reliefs and valves.

Facilities visited and Total AFOD

Records were reviewed remotely with PSE on the following days due to COVID restriction protocols: April 26th, April 27th, April 30th

Total AFOD: 2 days

Field observations were conducted on April 28th and April 29th at the following locations:

- Olympia
- Cedar Hills
- South Seattle
- North Midway
- Green Lake / Lynnwood

Summary of Significant Findings

No probable violations or areas of concern were discovered during this inspection.

Primary Operator contacts and/or participants

Danielle Troupe
Senior Regulatory Compliance Analyst

Vidushi Rainia
Compliance Program Manager

Operator executive contact and mailing address for any official correspondence

Booga K. Gilbertson
Senior VP of Operations

355 110th Ave. NE, M/S EST 11W
Bellevue, WA 98004

Instructions and Ratings Definitions

INSTRUCTIONS

INSPECTION RESULTS

S - Satisfactory Satisfactory Satisfactory List

Unanswered Unanswered

Responses 1,2,3,4,5,7,8,9,10,11,12,13,14,15,16,17,19,20,21,22,24,25,26,27,29,30,31,33,34,35,36,37,38 Questions Questions
32 0 List

U - Unsatisfactory Unsatisfactory Responses Unsatisfactory List
0

Area Of Concern Area of Concern Responses Area of Concern List
0

N/A- Not Applicable (does not apply to this operator or system) Not Applicable Responses Not Applicable List
5 6,18,23,28,32,

N/C - Not Checked/Evaluated (was not inspected during this inspection) Not Checked / Evaluated Responses Not Checked / Evaluated List
0

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

INTRASTATE GT RECORDS REVIEW

MAPPING RECORDS

Question 1

Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?

Q1 Reference

RCW 81.88.080

Q1 Result

Satisfactory

Q1 Notes

Golden Givens documentation sent to UTC providing shape files.

Question 2

Do records indicate that NPMS submissions are updated every 12 months if system modifications occurred, and if no modifications occurred an email to that effect was submitted to NPMS?

Q2 Reference

PHMSA ADB 08-07

Q2 Result

Satisfactory

Q2 Notes

reviewed 2018-2020 submissions

Question 3

Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?

Q3 Reference

WAC 480-93-018(5)

Q3 Result

Satisfactory

Q3 Notes

Reviewed MRT (Maps Records Technology) reports for 2018-2020

2020 showed significant delays in attaining six month deadline but this was mainly due to Covid-19 related issues.

REPORTING RECORDS

Question 4

Do records indicate that the operator has submitted timely and complete (in accordance with WAC 480-93-200(10)) reports of construction defects and material failures that resulted in leaks? (Reports due annually on March 15 for the preceding calendar year).

Q4 Reference

WAC 480-93-200(10)(b)

Q4 Result

Satisfactory

Q4 Notes

Reviewed Failure Analysis reports submitted for 2018-2020.

Question 5

Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities? Do the procedures require immediate notification to the commission and municipal authorities if an emergency point of contact changes?

Q5 Reference

WAC 480-93-200(11)

Q5 Result

Satisfactory

Q5 Notes

Reviewed Energy Resotration Plan, submitted on 11/16/2020, which contained updated

Reviewed Procedure 2425.2300 - Section 8 which requires immediate notification.

Question 6

Do records indicate that the operator submits timely and complete written failure analysis reports within 5 days of completion of the failure analysis of any incident or hazardous condition due to construction defects or material failures?

Q6 Reference

WAC 480-93-200(6)

Q6 Result

Not Applicable

Q6 Notes

Operator did not have any failre analysis reports or hazardous conditions

Question 7

Do records indicate that the operator meets damage reporting requirements outlined in RCW 19.122.053(3) and WAC 480-93-200 (7), (8) and (9)?

Q7 Reference

RCW 19.122.053

Q7 Reference 2

WAC 480-93-200(7) (8) and (9)

Q7 Result

Satisfactory

Q7 Notes

Reviewed Damage Prevention Plan

Question 8

Do records indicate that the operator filed with the commission, not later than March 15 of each year, applicable to the preceding calendar year: a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.2-1 annual report?

Q8 Reference

WAC 480-93-200(10)

Q8 Result

Satisfactory

Q8 Notes

reviewed 2018-2020 reports submitted

DAMAGE PREVENTION RECORDS

Question 9

Do records indicate that the operator's locating and excavation practices are in compliance with all RCW 19.122 requirements for facility operators? Does the records sample indicate that locates are made within two business days?

Q9 Reference

RCW 19.122

Q9 Result

Satisfactory

Q9 Notes

Reviewed operators two-day locate anaylsis .

Goal was 96% within two days. Acutal was 97%

ELM Report 2020

Question 10

Do records indicate that the operator provides the following information to excavators who damage pipeline facilities? Notification requirements for excavators under RCW 19.122.050(1) A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.

Q10 Reference

RCW 19.122

Q10 Reference 2

WAC 480-93-200(8)

Q10 Result

Satisfactory

Q10 Notes

Reviewed operator letter that is provided to contactor's who damage their facilities, regardless of fault.

Question 11

Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of any of the following activities? An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate;A person intentionally damages or removes marks indicating the location or presence of pipeline facilities.

Q11 Reference

RCW 19.122

Q11 Result

Satisfactory

Q11 Notes

Operator has not had any instances to report for transmission

Reviewed procedure in Damage Prevention Plan for process to complete this requirement.

Question 12

Do records indicate that the operator uses a quality assurance program for monitoring the locating and marking of facilities? Does the operator conduct regular field audits of the performance of locators/contractors and implement appropriate corrective action when necessary?

Q12 Reference

PHMSA State Program Question

Q12 Result

Satisfactory

Q12 Notes

Reviewed ELM quality assurance report for 2020

ELM also conducts quarterly in house reviews and meets with PSE to discuss findings.

Question 13

Do records indicate that the operator's (organic or contracted) locator and excavator personel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

Q13 Reference

WAC 480-93-013

Q13 Result

Satisfactory

Q13 Notes

Reviewed ELM OQ plan for PSE which is submitted to and approved by PSE.

Contractor agrees to meet PSE's standard of OQ for all locating personnell.

Question 14

Do records indicate that the operator is meeting requirements in RCW 19.122.035 with respect to their duties after notice of excavation? Are examinations of uncovered pipe conducted prior to reburial? Does the operator immediately notify local first respondeers and the commission of any blowing gas leak that has ignited or represents a probable hazard to persons or property?

Q14 Reference

RCW 19.122.035

Q14 Result

Satisfactory

Q14 Notes

Reviewed operator records

Reviewed Field Procedures 0100.1040

reviewed sample Form 1284 - Operations Emergecny Information and leak reporting

Question 15

Do records indicate that the operator reviews records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

Q15 Reference

PHMSA State Programs Emphasis - no link

Q15 Result

Satisfactory

Q15 Notes

Reviewed operator's damage analysis report which thoroughly breakdowns damage data.

The two main damage causes are no requesting locates and carelss operations.

DESIGN/CONSTRUCTION RECORDS**Question 16**

Do records indicate that the operator is providing notice of proposed new construction or replacement of existing gas transmission lines greater than 100 feet in length is provided in a complete and timely manner in accordance with WAC 480-93-160?

Q16 Reference

WAC 480-93-160

Q16 Result

Satisfactory

Q16 Notes

Golden Givens Project - review docket

Question 17

Do records indicate that the operator ensures each new transmission line and each replacement of line pipe, valve, fitting, or other line component of a transmission line is designed and constructed to accommodate passage of an internal inspection device?

Q17 Reference
WAC 480-93-180

Q17 Result
Satisfactory

Q17 Notes

Stoppie fitting installed on North Midwy is same one used to launch robotic pig. It is ILL capable by design. Pipe is same grade and design as currently used line.

Question 18

Do records indicate that plastic pipe joiners are re-qualified within 1 year/NTE 15 months? Do records indicate the operator tracks production joints or re-qualifies joiners within the annual requirement if no joints made within any 12-month period in accordance with WAC 480-94-080(2)?

Q18 Reference
WAC 480-93-160

Q18 Result
Not Applicable

Q18 Notes

No plastic PE transmission piping.

Question 19

Are the operator's welding qualification and identification records compliant with WAC 480-93-080(1)? Do records indicate that when testing welders or qualifying procedures, the operator is using the necessary testing equipment and recording/documenting all essential variables?

Q19 Reference
WAC 480-93-080(1)

Q19 Result
Satisfactory

Q19 Notes

Reviewed following welder records for 2019 North Midway repair project:

Craig Kraft (IFS) -

Question 20

Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130? Does the operator ensure, when practical, that there is a minimum of fifty feet of separation between regulator stages?

Q20 Reference
WAC 480-93-130

Q20 Result
Satisfactory

Q20 Notes

GOS Standard _____

RS-1340 (Lynnwood Greenwood) installed 1956 (pre-code)

Question 21

Do construction/installation records indicate that the operator is complying with WAC 480-93-115 requirements to seal the casing ends of any transmission line installed in a casing or conduit? If casings are installed, is the operator installing only bare steel casings?

Q21 Reference
WAC 480-93-115

Q21 Result
Satisfactory

Q21 Notes

Question 22

Do records indicate that the operator performs pressure tests on all new or replacement gas pipeline installations?

Q22 Reference
WAC 480-93-170(2)

Q22 Result
Satisfactory

Q22 Notes

reviewed pressure test records for North Midway repair project in 2019.

initial leak test 120

Pressure test 400

Hydrotest 1250 psi - stopple

Reviewed as-builts with chart of all pressure tests conducted (also records to support tests)

Question 23

Do records indicate that the operator locates compressor stations consistent with the requirements in WAC 480-93-040?

Q23 Reference
WAC 480-93-040

Q23 Result
Not Applicable

Q23 Notes

No compressor stations for Transmission line.

Question 24

Do records indicate that the operator is reporting, conducting, and documenting pressure testing in accordance with the list of requirements in WAC 480-93-170? Is the operator ensuring that all pressure test equipment is maintained, tested/calibrated in accordance with the appropriate intervals?

Q24 Reference

WAC 480-93-170

Q24 Result

Satisfactory

Q24 Notes

reviewed pressure test records which documented calibration records for tests conducted.

CORROSION CONTROL RECORDS

Question 25

Do the operator's cathodic protection records demonstrate that all CP-related surveys, reads, and tests are conducted in accordance with the requirements in WAC 480-93-110? Do records indicate that the operator documents/records the condition of all underground metallic facilities each time the facility is exposed? Does the operator conduct CP test reads on all exposed facilities where the coating has been removed?

Q25 Reference

WAC 480-93-110

Q25 Result

Satisfactory

Q25 Notes

records reviewed CP and EPCR's

Atmospheric EC Leak surveys - Wednesday

Question 26

Do corrosion control records demonstrate that the operator is complying with testing intervals for casings (NTE 15 months), confirmatory follow-up on shorted casings within ninety (90) days of discovery, leak surveys of shorted casings (NTE 7.5 months) and test equipment accuracy checks in accordance with WAC 480-93-110(3) and (5)?

Q26 Reference

WAC 480-93-110(3) and (5)

Q26 Result

Satisfactory

Q26 Notes

Reviewed records for 2018-2020 for casings.

Question 27

Do corrosion control records demonstrate that the operator is adhering to its programs for monitoring atmospheric corrosion and taking action within required timeframes for completing remedial action? Do the records demonstrate appropriate monitoring for indications of internal corrosion? Do records demonstrate that the operator has taken appropriate remedial action for areas where internal corrosion is detected?

Q27 Reference

WAC 480-93-110

Q27 Result

Satisfactory

Q27 Notes

Reviewed AC records

NA for internal corrosion.

Question 28

For casings without test leads installed prior to September 5, 1992, is the operator able to demonstrate that other test/inspection methods are acceptable, and that test leads are not necessary to monitor for electrical isolation and adequate cathodic protection levels?

Q28 Reference

WAC 480-93-110(5)(a)

Q28 Result

Not Applicable

Q28 Notes

NA - All casings have test leads.

OPERATIONS & MAINTENANCE RECORDS

Question 29

Do leak records demonstrate the operator performs detailed gas leak investigation, evaluation, classification, and remedial action/repair prioritization steps in compliance with WACs 480-93-185, -186, and -18601?

Q29 Reference

WAC 480-93-185

Q29 Reference 2

WAC 480-93-186

Q29 Reference 3

WAC 480-93-18601

Q29 Result

Satisfactory

Q29 Notes

NO leaks during audit scope

Reviewed sample distribution records.

Question 30

Do leak records meet all content requirements consistent with the criteria in WAC 480-93-187(1-13)?

Q30 Reference
WAC 480-93-187

Q30 Result
Satisfactory

Q30 Notes

Question 31

Do leak survey records demonstrate compliance with the instrumentation, accuracy, survey interval, records retention, and self-audit of the leak survey program requirements as specified in WAC 480-93-188?

Q31 Reference
WAC 480-93-188

Q31 Result
Satisfactory

Q31 Notes

Question 32

Do leak survey records indicate that the operator is performing special leak surveys under all conditions specified in WAC 480-93-188(4)?

Q32 Reference
WAC 480-93-188(4)

Q32 Result
Not Applicable

Q32 Notes

NO special leak surveys

Question 33

Do maintenance records indicate that valve maintenance is performed consistent with the requirements in WAC 480-93-100?

Q33 Reference
WAC 480-93-100

Q33 Result
Satisfactory

Q33 Notes

Reviewed valve maintenance records

Question 34

Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?

Q34 Reference
WAC 480-93-020

Q34 Result
Satisfactory

Q34 Notes

Golden Givens project - review docket

Question 35

Do odorization records demonstrate appropriate odorization levels, testing, instrumentation, calibration, and adherence to applicable intervals in accordance with WAC 480-93-015? Does the operator retain records of tests performed and equipment calibration for 5 years? Does the operator take prompt action to investigate and remediate odorant concentrations not meeting the minimum requirements (as applicable)?

Q35 Reference
WAC 480-93-015

Q35 Result
Satisfactory

Q35 Notes

Reviewed odorization records

Waiting for calibration records

▼ **RECORDS: SUMMARY OF REQUIRED COMMENTS**

RECORDS REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment

▼ **INTRASTATE GT: FIELD OBSERVATIONS**

Question 36

Is gas odorized at a concentration in air of at least one-fifth of the lower explosive limit (LEL) so that gas is readily detectable by a person with a normal sense of smell?

Q36 Reference
WAC 480-93-015

Q36 Result
Satisfactory

Q36 Notes

Obtained multiple odorant readings during field audit. See Form R for detailed description.

Question 37

Are pipeline markers in place and consistent with all requirements in WAC 480-93-124?

Q37 Reference

Q37 Result

Q37 Notes

Markers were visible and consistent when observed during field audit.

Question 38

Are installed casings consistent with the requirements in WAC 480-93-115? Are all casings bare steel? Are casings sealed? Do unvented casings have separate test leads for casing and pipe to ensure shorted conditions do not exist? Are adequate levels of CP being applied to the operator's pipe?

Q38 Reference

WAC 480-93-115

Q38 Result

Satisfactory

Q38 Notes

Obtained casing reads during field audit. See Form R for detailed description.

 **FIELD: SUMMARY OF REQUIRED COMMENTS**

FIELD OBSERVATIONS SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above and ensure you annotate the question number for each comment.
