

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	8585 CNGC TIMP - WA Intrastate	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	--
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2023	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, Tom Green, Jason Hoxit	All Activity Start	10/24/2023
System Type	GT	Observer(s)	John Trier, Marina Rathbun	All Activity End	10/25/2023
Protocol Set ID	GT.2023.02	Supervisor	Dennis Ritter	Inspection Submitted	--
		Director	Scott Rukke	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

The inspection conducted was Transmission Integrity Management Program inspection. The inspection included review of Cascade Natural Gas procedures and associated records from 2020 through October 2023. Procedures reviewed were OPS 900 and all appendices, ECDA Manual, ICDA Manual and ILI Manual.

Facilities visited and Total AFOD

Inspection conducted remotely via MS Teams on Oct 24-25, 2023

2 AFODs

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no probable violations or areas of concern as a result of this inspection.

Primary Operator contacts and/or participants

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Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88963 (1,877)	Cascade Natural Gas-TRANSMISSION	unit	88963	Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron	182	182	182	100.0%

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required %
					Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP					

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88963 (1,877)	GT IM Implementation, GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R, O, S	Detail	--

Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required %
1.	TIMP	--	10/24/2023	10/25/2023	--	all planned questions	all assets	all types	182	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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	TIMP	COMPLETED	11/21/2023	TIMP	88963 (1,877)

Results (all values, 182 results)

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: **88963 (1,877)**

Result Notes: **OPS 900**

Table 1.2 Responsibilities and Qualifications
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: **88963 (1,877)**

Result Notes: **Reviewed Training and Experience worksheet for TIMP Team**
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 88963 (1,877)

Result Notes No such activity/condition was observed during the inspection.

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 88963 (1,877)

Result Notes OP 900 Step 6.4.3 (pg. 49), Table 6.3.

Appendix E references Sytem Integrity Sharepoint

Appendix A ECDA Plan

Section 7 ICDA Plan

5. Question Result, ID, References NA, 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 88963 (1,877)

Result Notes No CDA performed during this inspection period

6. Question Result, ID, References NA, 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 88963 (1,877)

Result Notes No CDA performed during this inspection period

7. Question Result, ID, References NA, 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 88963 (1,877)

Result Notes No CDA performed during this inspection period

8. Question Result, ID, References Sat, 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 88963 (1,877)

Result Notes ECDA Manual Section 5.3

ICDA Manual Section 5.7

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 88963 (1,877)

Result Notes No CDA performed during this inspection period

AR.EC: External Corrosion Direct Assessment (ECDA)

10. Question Result, ID, References Sat, 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 88963 (1,877)

Result Notes Table 1 ECDA Plan

OPS 900 Table 1.2

11. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes 16" North Whatcom Line

Assessment Date 3/12/20

Direct Assessment Pre-Assessment Report

CNG 535

Selected Soil Resistivity, PCM, DCVG and CIS
12. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes Reviewed Training and Experience worksheet for TIMP Team
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 88963 (1,877)
Result Notes No such activity/condition was observed during the inspection.
14. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes ECDA Plan Section 1.2
15. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes ECDA Plan Section 6.5 and 6.6
16. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes Other Data Intergrated during pre-assessment

Includes construction data, soil resistivity, hydrology, pressure test, maintenance records, etc.
17. Question Result, ID, References Sat, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))
Question Text *Do records demonstrate that the operator identified ECDA Regions?*
Assets Covered 88963 (1,877)
Result Notes Section 3.5 ECDA Manual

Reviewed to Dig List to verify regions on the pipeline

Pre-Assessment for Bremerton identified two regions due to Install date and pipe diameter

18. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes 18 Locations identified based on assessment data

Report completed by Mears
19. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes Dig locations were prioritized, Reviewed Direct Assessment Dig Report for Mt Vernon, corrosion found and pit depth measured, ~5 mils

Remaining Life calculated to be >28 years and no remaining strength calc performed since no wall loss >10%

All other indications were categorized as "monitored" with no corrosion found
20. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes Reviewed revision log for ECDA

Incorporated 1/5/22

Rev 0.1 1/19/22

Rev 1.0 1/6/23
21. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes Reviewed 2020 ECDA Post Assessment Report

All lines have an interval of 7 years for the next CDA
22. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes ECDA Manual Section 4.8

Section 5.2.5 and 5.2.6

Section 5.3
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 88963 (1,877)

Result Notes No significant external corrosion was found during this inspection interval

AR.IC: Internal Corrosion Direct Assessment (ICDA)

24. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes OPS 900
- Table 1.2 Responsibilities and Qualifications
- ICDA Plan Section 2.5 Roles and Responsibilities
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 88963 (1,877)
Result Notes No ICDA performed during this inspection interval
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 88963 (1,877)
Result Notes No such activity/condition was observed during the inspection.
27. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes ICDA Plan
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 88963 (1,877)
Result Notes No ICDA performed during this inspection interval
29. Question Result, ID, References Sat, AR.IC.ICDAINTEGRATION.P, 192.917(b)
Question Text *Is the process for integrating ICDA results with other information adequate?*
Assets Covered 88963 (1,877)
Result Notes OPS 900 Table 3.2
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 88963 (1,877)
Result Notes No ICDA performed during this inspection interval
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 88963 (1,877)
Result Notes No ICDA performed during this inspection interval

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 **88963 (1,877)**
 Result Notes **No ICDA performed during this inspection interval**
33. Question Result, ID, References **Sat, 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 8**
- Table 8.2**
- ICDA Plan**
- Section 5.6.2**
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 **88963 (1,877)**
 Result Notes **No ICDA performed during this inspection interval**

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

35. 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 **88963 (1,877)**
 Result Notes **No indications of SCC so CNG does not use SCCDA**
36. 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 **88963 (1,877)**
 Result Notes **SCC not identified as a threat to CNG pipelines**
37. 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 **88963 (1,877)**
 Result Notes **No such activity/condition was observed during the inspection.**
38. 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 **88963 (1,877)**
 Result Notes **No indications of SCC so CNG does not use SCCDA**
39. 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 **88963 (1,877)**

Result Notes SCC not identified as a threat to CNG pipelines

40. 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 88963 (1,877)
Result Notes SCC not identified as a threat to CNG pipelines
41. 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 88963 (1,877)
Result Notes SCC not identified as a threat to CNG pipelines
42. 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 88963 (1,877)
Result Notes SCC not identified as a threat to CNG pipelines
43. 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 88963 (1,877)
Result Notes SCC not identified as a threat to CNG pipelines
44. 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 88963 (1,877)
Result Notes No indications of SCC so CNG does not use SCCDA
45. 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 88963 (1,877)
Result Notes SCC not identified as a threat to CNG pipelines

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

46. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 192.915(a) (192.915(b), 192.493)
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 88963 (1,877)
Result Notes Need to see ILI Procedure

ILI Procedure Section 3.3

ILI in 2022 on Fredonia Line
47. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.R, 192.947(g) (192.915(a), 192.915(b), 192.493)
Question Text *Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?*
Assets Covered 88963 (1,877)

Result Notes Intero Brad Tang and Francine Gracias

API 1163 and ANSI/ASNT-PQ-2005 Level III

Axial MFL and Geometry Inspection Data

Brad Tang Jan 2022

Francine Gracias July 2022

Reviewed Training and Experience worksheet for TIMP Team for MDU Employees

48. Question Result, ID, References NA, AR.IL.ILIREVIEWQUAL.O, 192.915(a) (192.915(b), 192.493)

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 88963 (1,877)

Result Notes No such activity/condition was observed during the inspection.

49. Question Result, ID, References Sat, AR.IL.ILISPECS.P, 192.921(a)(1) (192.933(b), 192.493, 192.18)

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

Assets Covered 88963 (1,877)

Result Notes ILI Procedure 4.8, Section 7, Section 8

ILI Procedure Appendix A

ILI Analysis Profile

50. Question Result, ID, References Sat, AR.IL.ILISPECS.R, 192.947(g) (192.933(b), 192.493)

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

Assets Covered 88963 (1,877)

Result Notes Reviewed ILI Report from Intero, no anomalies found for 4400 feet of 16" Fredonia Line

Laser Deformation sensor 99.46% coverage

99.96% coverage for MFL

Run validated using know length of pipe with 8 deformations, tool identified anomalies within tool tolerance

51. Question Result, ID, References Sat, AR.IL.ASSESSMETHOD.P, 192.919(b) (192.921(a), 192.937(c), 192.917, 192.493, 192.506)

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

Assets Covered 88963 (1,877)

Result Notes OPS 900 Section 6.5

Table 6.1 Integrity Assessment Methods by Threat

ILI Procedure Section 4.8

Table 1

52. Question Result, ID, References Sat, AR.IL.ASSESSMETHOD.R, 192.947 (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 88963 (1,877)

Result Notes Reviewed HCA Assessment Schedule which identifies the threat and the type of assessment to be completed

53. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.P, 192.921(a)(1) (192.937(c), 192.493)
Question Text *Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?*
Assets Covered 88963 (1,877)
Result Notes ILI Plan Section 8.3
54. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.R, 192.947 (192.921(a)(1), 192.493)
Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*
Assets Covered 88963 (1,877)
Result Notes ILI Run with robotic pig in 2020 on 16" Fredonia line

Run validated using know length of pipe with 8 deformations, tool identified anomalies within tool tolerance
55. Question Result, ID, References NA, AR.IL.ILIVALIDATE.O, 192.921(a)(1) (192.493)
Question Text *From observation of field activities, do the employees and vendors validate ILI assessment results per their process?*
Assets Covered 88963 (1,877)
Result Notes No such activity/condition was observed during the inspection.
56. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.P, 192.917(b) (192.493)
Question Text *Is the process for integrating ILI results with other information adequate?*
Assets Covered 88963 (1,877)
Result Notes ILI Plan Section 10.3
57. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.R, 192.947 (192.917(b), 192.493)
Question Text *Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?*
Assets Covered 88963 (1,877)
Result Notes Reviewed Feature List cross referenced with construction data to validate run and identify anomaly types
58. Question Result, ID, References Sat, AR.IL.ILIACCEPCRITERIA.P, 192.921(a) (192.493)
Question Text *Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?*
Assets Covered 88963 (1,877)
Result Notes ILI Plan Section 6.6
59. Question Result, ID, References Sat, AR.IL.ILIACCEPCRITERIA.R, 192.947 (192.921(a), 192.493)
Question Text *Do records indicate adequate implementation of the process for ILI survey acceptance?*
Assets Covered 88963 (1,877)
Result Notes ILI Run with robotic pig in 2020 on 16" Fredonia line

Run validated using know length of pipe with 8 deformations, tool identified anomalies within tool tolerance

Laser Deformation sensor 99.46% coverage

99.96% coverage for MFL
60. 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, 192.18)
Question Text *Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?*
Assets Covered 88963 (1,877)

Result Notes No assessments have been delayed

61. Question Result, ID, References NA, AR.IL.ILIIMPLEMENT.O, 192.921(a)(1) (192.620(d), 192.605(b), 192.493)
Question Text *Are O&M and IMP procedural requirements for the performance of ILI assessments followed?*
Assets Covered 88963 (1,877)
Result Notes No such activity/condition was observed during the inspection.

62. 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 88963 (1,877)
Result Notes OPS 900 Section 7.4

Remediation Process

ILI Plan Section 8.0

63. 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 88963 (1,877)
Result Notes No significant corrosion threats identified as a result of ILI

AR.LSR: Low Stress Reassessment

64. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes ECDA Plan Appendix B

OPS 900 Section 6.7.2

65. Question Result, ID, References NA, AR.LSR.LSRBA.R, 192.947(d) (192.919(c), 192.921(d), 192.941(a), 192.506)
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 88963 (1,877)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

66. 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 88963 (1,877)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

67. 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 88963 (1,877)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

68. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes ECDA Plan Section 11.4.4

Section 6.2 and 6.3

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

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

Assets Covered 88963 (1,877)
Result Notes No such activity/condition was observed during the inspection.

AR.PTI: Integrity Assessment Via Pressure Test

70. Question Result, ID, Sat, AR.PTI.PRESSTESTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(4))
References

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 88963 (1,877)
Result Notes OPS 900 Table 1.2 Responsibilities and Qualifications

OPS 505 Pressure Testing

Section 1 and Section 8.1

71. Question Result, ID, Sat, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))
References

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 88963 (1,877)
Result Notes Reviewed Training and Experience worksheet for TIMP Team

72. Question Result, ID, Sat, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a),
References 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 88963 (1,877)
Result Notes OPS 505 Pressure Testing

Section 8.1

Section 2.4.5

73. Question Result, ID, Sat, 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 88963 (1,877)
Result Notes 10/26/2020

8" Anacortes from R072 to Bayview-Edison Rd

Existing MAOP 360 psig

Certification Pressure 400 psig

Minim Pressure during test 660.0 psig

10 hour

74. 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 **88963 (1,877)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
75. Question Result, ID, References **Sat, 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 6.4.2**
76. 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 **88963 (1,877)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.OT: Other Technology

77. Question Result, ID, References **NA, AR.OT.OTPLAN.P, 192.921(a)(4) (192.18)**
 Question Text *Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?*
 Assets Covered **88963 (1,877)**
 Result Notes **CNG has not used other technology for their assessments**
78. 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 **88963 (1,877)**
 Result Notes **CNG has not used other technology for their assessments**
79. Question Result, ID, References **NA, AR.OT.OTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(7), 192.493)**
 Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?*
 Assets Covered **88963 (1,877)**
 Result Notes **CNG has not used other technology for their assessments**
80. Question Result, ID, References **NA, AR.OT.OTREVQUAL.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 **88963 (1,877)**
 Result Notes **CNG has not used other technology for their assessments**
81. Question Result, ID, References **NA, AR.OT.OTREVQUAL.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 **88963 (1,877)**
 Result Notes **No such activity/condition was observed during the inspection.**
82. 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 88963 (1,877)

Result Notes No such activity/condition was observed during the inspection.

83. 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 88963 (1,877)

Result Notes No such activity/condition was observed during the inspection.

84. 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 88963 (1,877)

Result Notes No such activity/condition was observed during the inspection.

AR.RC: Repair Criteria (HCA)

85. 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 88963 (1,877)

Result Notes OPS 900 Section 15

Discovery Date

OPS 900 Table 7.1

Section 7.5.2

86. 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 88963 (1,877)

Result Notes No conditions that present a potential threat to the integrity of the pipeline were identified based on integrity assessments

87. Question Result, ID, References Sat, AR.RC.IMPRC.P, 192.933(a) (192.933(c), 192.933(d), 192.18)

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 88963 (1,877)

Result Notes OPS 900 Table 7.1

88. Question Result, ID, References NA, AR.RC.PRESSREDUCE.R, 192.947(f) (192.933(a)(1), 192.18)

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 88963 (1,877)

Result Notes No pressure reductions due to the need for an immediate repair

89. 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 88963 (1,877)

Result Notes OPS 327 Section 9

OPS 900 Section 15

90. 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 **88963 (1,877)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
91. 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 **88963 (1,877)**
Result Notes **No such activity/condition was observed during the inspection.**
92. Question Result, ID, References **Sat, 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 **88963 (1,877)**
Result Notes **OPS 900 Section 7.6 and 8.4**
93. 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 **88963 (1,877)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.RMP: Repair Methods and Practices

94. Question Result, ID, References **Sat, 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 **88963 (1,877)**
Result Notes **OPS 900 Table 3.5**
95. 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 **88963 (1,877)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

IM.HC: High Consequence Areas

96. 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 **88963 (1,877)**
Result Notes **OPS 900 Section 2.4**

Method 2

97. Question Result, ID, References **Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a))**
 Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*
 Assets Covered **88963 (1,877)**
 Result Notes **Reviewed Annual HCA Memo sent to district managers and Annual HCA Survey Summaries**
98. Question Result, ID, References **NA, 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 **88963 (1,877)**
 Result Notes **MDU uses Method 2**
99. Question Result, ID, References **Sat, 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 2.4**
OPS 900 Section 2.3.4
100. 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 2.5**
101. Question Result, ID, References **Sat, 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 **88963 (1,877)**
 Result Notes **Reviewed HCA Surveys completed annually for each district**
102. 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 2.3.4**
103. 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 **88963 (1,877)**
 Result Notes **PIR has been established for all Transmission lines**
Districts use the PIR to determine identified sites and building count
104. 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 2.5**

105. 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 **88963 (1,877)**
 Result Notes **List of Identified Sites shown in Appendix A spreadsheet**
106. 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 **88963 (1,877)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
107. 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 **88963 (1,877)**
 Result Notes **Reviewed process, records and maps. Maps appear accurate based on the records provided**
108. Question Result, ID, References **Sat, IM.HC.HCADATA.O, 192.905(c)**
 Question Text *Are HCAs correctly identified per up-to-date information?*
 Assets Covered **88963 (1,877)**
 Result Notes **Drove the pipeline during Transmission Unit inspection**

Maps appear consistent with what was seen in the field

IM.RA: Risk Analysis

109. 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 4.3**
110. 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 considers all of the identified threats for each covered segment, including the requirements of ASME B31.8S-2004 (Section 5) and the need to address potential risk of a compromised operations control system (e.g., cyber-attack)?*
 Assets Covered **88963 (1,877)**
 Result Notes **OPS 900 Section 4.4**
111. Question Result, ID, References **Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1), 192.632)**
 Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*
 Assets Covered **88963 (1,877)**
 Result Notes **CNG uses RiskPro (Excel based risk ranking) to rank the relative risk of each segment, threats are identified on Appendix A spreadsheet and new threats are identified or removed annually using Threat Review Documentation Table (RA-1)**
112. Question Result, ID, References **Sat, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(e)(1), 192.911(k), 192.607)**
 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 **88963 (1,877)**
 Result Notes **All Data is collected and input into RiskPro and updated annually**

113. 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 3.5**

Tables 3.1-3.12
114. 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 **88963 (1,877)**
 Result Notes **Data gathered and assessed for all applicable threats and subthreats from ASME B31.8S**
115. 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 4.5**
116. 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 **88963 (1,877)**
 Result Notes **RiskPro outputs a total relative risk score for the segment and for each threat**
117. 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 4.8**
118. 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 **88963 (1,877)**
 Result Notes **Threat Review Documentation Table (Form RA-1) completed annually NTE 18 months**

Reviewed records for 2020, 2021 and 2022
119. 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 **88963 (1,877)**
 Result Notes **Drove ROW during GT Standard Inspection, conditions on the pipeline seem to reflect risk assessment data**

IM.BA: Baseline Assessments

120. Question Result, ID, References **Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e), 192.750)**
 Question Text *Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?*

Assets Covered 88963 (1,877)
Result Notes OPS 900 Section 1.1

OPS 900 Section 6

OPS 900 Section 7.3

121. Question Result, ID, References Sat, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o), 192.919(e), 192.750)

Question Text *Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?*

Assets Covered 88963 (1,877)

Result Notes Reviewed JIRA discussion board to review comments from all teams based on safety, environmental, etc.

EPQR completed by engineering and QMS

When completing ILI at Fredonia used cross-compression to move gas to another line rather than blowing down

122. Question Result, ID, References Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a), 192.921(c), 192.921(h), 192.937(c), Part 192 - Appendix F)

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 88963 (1,877)

Result Notes OPS 900 Section 6.4 and 6.5

Table 6.1

123. Question Result, ID, References Sat, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h), 192.947(d), 192.937(c), Part 192 - Appendix F)

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 88963 (1,877)

Result Notes Reviewed the HCA assessment schedule which identifies the threat and the assessment type used to address that threat

124. 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 88963 (1,877)

Result Notes OPS 900 Section 5.1 and 5.2

125. 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 88963 (1,877)

Result Notes No new HCAs since 2017

126. Question Result, ID, References Sat, 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 88963 (1,877)

Result Notes OPS 900 Section 5

127. Question Result, ID, References NA, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d), 192.947(d))

Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*

Assets Covered 88963 (1,877)

Result Notes No Baseline Assessments Plans completed since 2012

128. Question Result, ID, References **NA, IM.BA.BAENVIRON.O, 192.911(o) (192.919(e), 192.750)**
Question Text *From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?*
Assets Covered **88963 (1,877)**
Result Notes **No such activity/condition was observed during the inspection.**

IM.CA: Continual Evaluation and Assessment

129. Question Result, ID, References **Sat, 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 **88963 (1,877)**
Result Notes **OPS 900 Section 6.7.2**
130. Question Result, ID, References **Sat, 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 **88963 (1,877)**
Result Notes **OPS 900 Table 6.3**
131. Question Result, ID, References **NA, IM.CA.LOWSTRESSREASSESS.R, 192.947 (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 **88963 (1,877)**
Result Notes **LSR completed in 2019 on Fredonia line but none have occurred during this inspection period**
132. 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 **88963 (1,877)**
Result Notes **OPS 900 Section 4.8 and Section 6.8**
133. Question Result, ID, References **Sat, 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 **88963 (1,877)**
Result Notes **CNG uses RiskPro (Excel based risk ranking) to rank the relative risk of each segment, threats are identified on Appendix A spreadsheet and new threats are identified or removed annually using Threat Review Documentation Table (RA-1)**
134. 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 **88963 (1,877)**
Result Notes **Table 6.3 outlines reassessment intervals and all line have a schedule in accordance with that table**
135. Question Result, ID, References **Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931, 192.937(d), 192.493, 192.506)**
Question Text *Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?*
Assets Covered **88963 (1,877)**
Result Notes **OPS 900 Section 6.5**

Table 6.1

136. Question Result, ID, References **Sat, IM.CA.REASSESMETHOD.R, 192.947(d) (192.937(c), 192.937(d), 192.506, 192.493)**
Question Text *Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?*
Assets Covered **88963 (1,877)**
Result Notes **Assessment methods determined by threat types, MDU was able to explain the rationale for assessment selection**

e.g. pipe with casing can't use ECDA and pipe with section underwater is not piggable and can't use ECDA so they pressure tested
137. 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 **88963 (1,877)**
Result Notes **OPS 900 Section 13.7.6 and Section 14**
138. 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 **88963 (1,877)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
139. Question Result, ID, References **Sat, 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 **88963 (1,877)**
Result Notes **OPS 900 Section 14**
140. Question Result, ID, References **NA, IM.CA.REASSESEXCPERF.R, 192.947 (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 **88963 (1,877)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

IM.PM: Preventive and Mitigative Measures

141. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.P, 192.935(a)**
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 **88963 (1,877)**
Result Notes **OPS 900 Section 8 and Section 8.4**

Table 8.2

142. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.R, 192.947 (192.935(a))**
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 **88963 (1,877)**
Result Notes **Reviewed P&M-1 Form for a selection of HCA segments**

Every segment has a P&M-1 form which identifies what P&M measures are required and implemented

143. Question Result, ID, References **Sat, IM.PM.PMTPD.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 **88963 (1,877)**
 Result Notes **OPS 900 Table 8.2**
- Lines 8-16
144. Question Result, ID, References **Sat, IM.PM.PMTPD.R, 192.947 (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 **88963 (1,877)**
 Result Notes **Reviewed P&M-1 Form for a selection of HCA segments**
- Every segment has a P&M-1 form which identifies what P&M measures are required and implemented
- Lines 8-16 were completed for each segment
145. 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 **88963 (1,877)**
 Result Notes **OPS 900 Table 8.2**
- Line 8
- OPS900 Table 1.2
146. 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 **88963 (1,877)**
 Result Notes **Reviewed P&M-1 Form for a selection of HCA segments**
- Every segment has a P&M-1 form which identifies what P&M measures are required and implemented
- Line 8 was completed for each segment
147. Question Result, ID, References **Sat, IM.PM.PMTPD SMYS.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 **88963 (1,877)**
 Result Notes **OPS 900 Table 8.2**
- Lines 13-15
148. Question Result, ID, References **Sat, IM.PM.PMTPD SMYS.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 **88963 (1,877)**
 Result Notes **Reviewed P&M-1 Form for a selection of HCA segments**
- Every segment has a P&M-1 form which identifies what P&M measures are required and implemented

Lines 13-15 were completed for each segment

149. 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 88963 (1,877)
Result Notes OPS 900 Table 8.2

Line 17

150. 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 88963 (1,877)
Result Notes Reviewed P&M-1 Form for a selection of HCA segments

Every segment has a P&M-1 form which identifies what P&M measures are required and implemented

Lines 17 were completed for each segment

Valves located on both sides of railroad to mitigate outside force risk

151. Question Result, ID, References Sat, IM.PM.PMMRMV.P, 192.935(c)
Question Text *Does the process include requirements to decide if RMVs or AETs represent an efficient means of adding protection to potentially affected HCAs?*
Assets Covered 88963 (1,877)
Result Notes OPS 900 Table 8.2

Lines 3-4

OPS 900 Section 8.6

152. Question Result, ID, References Sat, IM.PM.PMMRMV.R, 192.947(d) (192.935(c))
Question Text *Do records demonstrate that the operator has determined, based on risk, whether RMVs or AETs should be added to protect high consequence areas?*
Assets Covered 88963 (1,877)
Result Notes Rupture Mitigation Valve Review (P&M-2) completed annually

Only completed for 2022 at this point

2023 is upcoming

No segments identified as needing RMVs

153. 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 88963 (1,877)
Result Notes Drove ROW during GT Standard Inspection, records for P&M measures align with observations in the field

154. Question Result, ID, References Sat, IM.PM.PMCCORR.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 88963 (1,877)
Result Notes OPS 900 Table 8.2

Lines 15, 19-21

155. Question Result, ID, References Sat, 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 88963 (1,877)
Result Notes Reviewed P&M-1 Form for a selection of HCA segments
- Every segment has a P&M-1 form which identifies what P&M measures are required and implemented
- Lines 15, 19-21 were completed for each segment

IM.QA: Quality Assurance

156. 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 88963 (1,877)
Result Notes OPS 900 Section 12
- Table 12.1
157. 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 88963 (1,877)
Result Notes SP0502 3.4.1.2 "should select complementary ITTs" ? MDUG ECDA 3.4.2 (pg. 28) requires it
- SP0502 4.2.1 "boundaries should be marked before inspection" ? MDUG ECDA 4.3.3 (pg. 32) requires it
- SP0502 4.3.2.3 "classification criteria should be stringent for first time ECDAs" ? MDUG ECDA 4.6.1 (pg. 34) requires this
- SP0502 5.6.1 "remaining strength should be calculated where corrosion is found" ? MDUG ECDA 5.3.1 and 5.3.2 (pg. 48) require it
158. 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 88963 (1,877)
Result Notes QC department reviews records, forms and procedure to ensure compliance with procedures and codes
- Reviewed 2022 review with recommendations. All recommendations appear to have been completed
- Review completed annually
159. 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), 192.517(a))
Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*
Assets Covered 88963 (1,877)
Result Notes OPS 900 Section 10
- Table 10.1
160. 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 88963 (1,877)

Result Notes OPS 900 Section 11

161. 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 88963 (1,877)

Result Notes Reviewed MOC log and JIRA page to view MOC process in action

Current MOC in place for mega rule and RMV rule

162. 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 88963 (1,877)

Result Notes OPS 900 Section 9.4

Table 9.1

163. 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 88963 (1,877)

Result Notes Performance Metric Review (PRR-1 Form) completed annually with opportunities for improvement identified

Reviewed records for 2020, 2021 and 2022

164. 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 88963 (1,877)

Result Notes OPS 900 Section 9.4

Table 9.1

165. 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 88963 (1,877)

Result Notes Performance Metric Review (PRR-1 Form) completed annually with opportunities for improvement identified

Reviewed records for 2020, 2021 and 2022

166. Question Result, ID, References Sat, IM.QA.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), 192.517(a))

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

Assets Covered 88963 (1,877)

Result Notes Reviewed 8" Kitsap Pre-Assessment from 2011

PD.DP: Damage Prevention

167. 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 88963 (1,877)

Result Notes OPS 900 Section 3.13

Table 3.8

OPS 327 Section 3.14

Pipeline Condition Reports

168. 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 88963 (1,877)

Result Notes Reviewed patrolling and leak survey records

Integrity assessments collect data regarding 3rd party damage as well

RPT.NR: Notices and Reporting

169. Question Result, ID, References Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b) (192.921(a)(7), 192.937(c)(7), 192.18)

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

Assets Covered 88963 (1,877)

Result Notes OPS 900 Section 13.7

170. Question Result, ID, References Sat, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b), 192.921(a)(7), 192.937(c)(7))

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 88963 (1,877)

Result Notes Notified UTC of consolidation of TIMP Plans across MDU companies

171. 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 88963 (1,877)

Result Notes OPS 900 Section 13.7.3

172. 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 88963 (1,877)

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

173. Question Result, ID, References Sat, 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 88963 (1,877)

Result Notes OPS 900 Section 14

174. 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 **88963 (1,877)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
175. Question Result, ID, References **Sat, 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 **88963 (1,877)**
 Result Notes **OPS 900 Section 9.3**
176. 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 **88963 (1,877)**
 Result Notes **Annual reports submitted for 2020, 2021 and 2022**

All data appeared complete and accurate

TD.SCC: Stress Corrosion Cracking

177. Question Result, ID, References **NA, TD.SCC.SCCIM.P, 192.911(c) (192.917(a)(1), 192.917(e))**
 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 **88963 (1,877)**
 Result Notes **CNG has not identified any SCC in their system and does not fall into a high risk category so has not implemented SCCDA**

OPS 900 Section 6.4.3 and Section 3.9.3
178. Question Result, ID, References **NA, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1), 192.917(e))**
 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 **88963 (1,877)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
179. Question Result, ID, References **NA, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b))**
 Question Text *Do records document that the operator has properly remediated any occurrences of SCC?*
 Assets Covered **88963 (1,877)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

180. Question Result, ID, References **Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b), 192.493)**
 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 **88963 (1,877)**
 Result Notes **OPS 900 Table 1.2**
181. Question Result, ID, References **Sat, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d), 192.493)**
 Question Text *Do records indicate adequate qualification of integrity management personnel?*
 Assets Covered **88963 (1,877)**

Result Notes [Reviewed Training and Experience worksheet for TIMP Team](#)

182. Question Result, ID, [Sat, TQ.QUIM.IMQC.P, 192.805\(b\) \(ASME B31.8S-2004, Section 12.2\(b\)\(4\), 192.935\(b\)\(1\)\(i\), 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 [88963 \(1,877\)](#)

Result Notes [Ops 900 Section 12.2](#)

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