PIPELINE SAFETY INSPECTION PROCESS: AN OVERVIEW

March 8, 2018
AGENDA

- WORKPLAN DEVELOPMENT
- SCHEDULING PROCESS
- PRE-INSPECTION ACTIVITIES
- INSPECTION DAY
- POST INSPECTION ACTIVITIES
- ENFORCEMENT (AS REQUIRED)
- CLOSE-OUT/REPORTING
WORKPLAN DEVELOPMENT

• **Risk-Based Prioritization**
  • Chief Engineer’s Risk Model (weighted approach)

• **Interstate**
  • PHMSA’s requirements/focus points
  • PHMSA takes our input

• **Intrastate**
  • Review trends, inform our Risk Model

• **Other Demands**
  • Pipeline Replacement Plans, Proximity Requests
  • Investigation, Incident response
  • Agency/State Government requirements

• **DRAFT DAY!**
SCHEDULING PROCESS

• Assignments issued in September/October

• Inspector’s “windows” and notice
  • Minimum of 2 “windows” and 90 days of notice
  • Prioritization based on individual schedule/availability

• Considerations
  • On-Call
  • Training/Professional Development
  • Pipeline Safety Program requirements
  • Agency/State Government requirements
PRE-INSPECTION ACTIVITIES

• RESEARCH/STUDY
  • Previous Inspections & History
  • Changes to the system since last visit
  • Incidents/anomalies since last visit

• PLANNING
  • Scoping/Approach
  • Focal points
  • Incidents/anomalies since last visit

• “PRE-FIELD” ACTIVITIES
  • Crews
  • Facilities
  • Other items
INSPECTION ACTIVITIES

• OPERATOR SMES
• DATA/DOCUMENTATION
• MANUALS/PROCEDURES
• PHYSICAL INSPECTIONS OF FACILITIES
• “SHOW ME...”
• IN-STRIDE DOCUMENTATION
• OUTBRIEF “EXIT INTERVIEW”
• PLANNED: OPERATOR SURVEY ON INSPECTOR
POST-INSPECTION ACTIVITIES

• MORE DATA/DOCUMENTATION

• FOLLOW-UPS

• REPORT PREPARATION

• 45-DAY REQUIREMENT

• NOTIFICATION LETTER PROCESS/RESPONSE

• INTRASTATE ACTIONS DIFFER SLIGHTLY
ENFORCEMENT

- GOAL: Get condition into tolerance as quickly as possible.

- Risk elimination/Public Safety drives our actions

- INTRASTATE OPERATORS: UTC Enforcement
  - Methodology
  - Tools ($, Actions, Training, SMS Audit...)

- INTERSTATE OPERATORS: PHMSA enforcement authority
CLOSE OUT/REPORTING

• DOCUMENTATION

• CLOSURE LETTER

• UPDATES TO OUR DATA
  • Chief engineer’s risk model/workplan builder
  • Operator Fact Sheets
  • Trends (internal & PHMSA databases)
  • Carryover notes
SUMMARY

WORKPLAN DEVELOPMENT

SCHEDULING

PRE INSPECTION ACTIVITIES

INSPECTION ACTIVITIES

POST INSPECTION ACTIVITIES

ENFORCEMENT

CLOSE OUT/REPORTING