Name of Operator:	Weyerhaeuser – Longview WA	Insp. ID # 6183
OPID No. 22515		**Unit ID No.**
HQ Address:		**System/Unit Name & Address:**
3401 Industrial Way PO Box 188 Longview, WA 98632		3401 Industrial Way PO Box 188 Longview, WA 98632
Operator Official: Tim Haynes **Title:** Vice President/Mill Manager Longview **Phone:** 360-636-6812 **Emergency Phone/Cell:** 360-636-6500		**Address:** **City:** **State:** **Zip Code:**

Persons Interviewed	Title	Phone No.
Robert L. Cosentino	President & CEO, Cosentino Consulting Inc.	360.200.4959

State Representative(s): **Dennis Ritter, Derek Norwood**	**Inspection Date(s) June 15-16, 2015**
Records Location:	Weyerhaeuser Longview Mill, Longview, WA

Unit Description:

The Weyerhaeuser-Ostrander Pipeline is comprised of 4 and 12-inch diameter (1000 ft and 9.1 miles respectively), API 5L, X-42 ERW steel pipe with the 12 inch diameter sections having a nominal wall thickness of 0.25 inches for below ground sections and 0.5 nominal wall thickness for above ground sections. The company operates the natural gas transmission pipeline in Cowlitz County, Washington beginning at the Williams Pipeline gate station slightly north east of the City of Kelso and ending at the Longview Mill. Weyerhaeuser purchased CNG's district regular station and uses it to control the gas to NorPac. The 4 inch line branches before the 12-inch line enters the Longview mill sending gas to Solvay.

Cosentino Consulting, Inc (CCI) is contracted to perform regulatory management services for Weyerhaeuser including the Integrity Management Manual.

Portion of Unit Inspected:

Entire unit for Integrity Management. Records were reviewed at the Weyerhaeuser Longview Mill, Longview WA. Weyerhaeuser contracts the preparation and management of its integrity management program with Cosentino Consulting, Inc. (CCI). Robert Cosentino prepared the IM manual and administers the program under Weyerhaeuser's tutelage. The following issues were noted during the review of the IM program.

6. IM High Consequence Areas - Identified Sites (detail) *Do records indicate identification of identified sites being performed as required?* (IM.HC.HCASITES.R) (detail)

192.903 (192.905(b))

Weyerhaeuser keeps a listing of identified sites as part of its Public Awareness plan (PAP). This listing is not kept in the IMP. A cross reference or simply placing the list in the IMP would be a good idea given the overarching nature of the IMP. This is a suggestion and there is no violation.

8. P&M Measures - Outside Force Damage (detail) *Are significant threats due to outside force (e.g., earth*

movement, floods, unstable suspension bridge) being adequately addressed? (IM.PM.PMMOF.R) (detail)
192.935(b)(2)
During field recon, noticed cracks/overlay in areas where road is "sliding" and where pipeline is in road right-of-way. Slides are not listing as a threat in the IMP. Weyerhaeuser should evaluate this condition and determine if a threat exists. **Area of Concern**

2. Quality Assurance (detail) *Do records indicate the quality assurance processes for risk management applications meet the requirements of ASME B31.8S-2004, Section 12 and are the processes being performed as required?* (IM.QA.QARM.R) (detail)
192.911(l)
IM plan Section 12.2.1 requires an independent audit of the IMP within 12 months of initial release and 24 months thereafter. Records, however, do not indicate a reviews have been completed as required and no record was available in Appendix J as required by 12.3 of the IMP. **Probable Violation**

5. Invoking Non-Mandatory Statements in Standards (detail) *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 RP0502-2002) be addressed by an appropriate approach?* (IM.QA.IMNONMANDT.P) (detail)
192.7(a)
IM plan Section 12 does not include the "should" statements from ASME B31.8S-2004, 12.2.2(b). It would appear that the IM Plan does contain these elements however, they should be identified in the IMP. **Area of concern**

7. Management of Change (detail) *Are changes to the IMP and management of changes to IMP-related processes being performed as required?* (IM.QA.IMMOC.R) (detail) 192.917(a) (192.917(e); 192.913(b)(1); ASME B31.8S-2004, Section 2.2 and Section 5.10)
IM plan Section 11 requires the Pipeline Manager to update the IMP based on a variety of potential changes. Section 11.3 then requires the Manager to approve the changes by completed the revision history log in the title page of the IMP. The revision history log of the Pipeline Manager's IMP (control document) has many "stick tabs" and written notes which indicate a review has occurred. The last entry in the revision history log was April, 2012. This indicates multiple reviews have occurred yet the IMP has not been revised since its initial implementation in 2007. The inspection revealed there have also been multiple threat affecting initiatives which Weyerhaeuser has conducted and not been reflected in the IMP--2009 hydrotest assessment, EFRD analysis and McNeely creek armoring. This is a violation of 192.13(c) which states
"Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part." **Probable Violation**

11. Risk Analysis - Validation and Updates (detail) *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?* (IM.RA.RAMOC.R) (detail)
192.917(c) (ASME B31.8S-2004, Section 5.4, 5.7, 5.11, **5.12**)
Weyerhaeuser indicates there has been no change in the pipeline or its surroundings since implementation of the plan and the entire pipeline is an HCA. As a result there has not been a IM plan revision (still on Rev 0). However there have been IM related activities which need to be documented in the IM plan per ASME B31.8S 5.12—2009 hydro test for IM assessment; EFRD analysis, McCreedy Creek armoring. Additionally the official Weyerhaeuser copy of the IMP had many notations and comments from previous reviews. These comments need to be addressed per the MOC and the IMP updated. **Probable violation**

Sat+ - Exceeds requirements/exemplary performance
Sat – Meets requirements
Con – "Concern" meets requirements, but is an area of recommendation and/or area that if not addressed may lead to non-compliance
Unsat – Does not meet requirements
N/A – Not Applicable
N/C – Not Checked

Assessment and Repair - Confirmatory Direct Assessment

4. CDA Plan (detail) *Is an adequate Confirmatory Direct Assessment Plan in place?* (AR.CDA.CDAPLAN.P) (detail)

192.931 (192.931(a); 192.931(b); 192.931(c); 192.931(d))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use CDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

5. External Corrosion Plan (detail) *From the review of the results of selected integrity assessments, was the external corrosion plan properly implemented?* (AR.CDA.CDAEXTCORR.R) (detail)

192.931(b)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use CDA, and does not have a specific plan for external corrosion beyond what is required by 192 Subpart I. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

6. Internal Corrosion Plan (detail) *From the review of the results of selected integrity assessments, was the internal corrosion plan properly implemented?* (AR.CDA.CDAINTCORR.R) (detail)

192.931(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
This pipeline does have an ICDA Plan. See IM Manual Appendix M.

7. Remediation of Indications (detail) *From the review of the results of selected integrity assessments, was the need to accelerate the next assessment evaluated?* (AR.CDA.CDAINDICATION.R) (detail)

192.931(d)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
Entire pipeline was hydro tested on July 23, 2009. Indications would be manifested as a leak or blowout. None occurred, therefore no remediation was necessary. If remediation was required, then the repair requirements of the O&M manual would apply.

Assessment and Repair - External Corrosion Direct Assessment (ECDA)

3. ECDA Plan (detail) *Is an adequate ECDA plan and process in place for conducting ECDA?* (AR.EC.ECDAPLAN.P) (detail)

192.925(a) (192.925(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

4. ECDA Pre-Assessment (detail) *From the review of the results of selected integrity assessments, does the ECDA pre-assessment process comply with NACE SP0502-2008 Section 3 and §192.925(b)(1)?* (AR.EC.ECDAPREASSESS.R) (detail)

192.925(b)(1) (NACE SP-0502-2008, Section 3.2)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

5. Integration of ECDA Results with other Information (detail) *Is the process for integrating ECDA results with other information adequate?* (AR.EC.ECDAINTEGRATION.P) (detail)

192.917(b) (B31.8S Section 4.5)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

6. Integration of ECDA Results with other Information (detail) *From a review of records, did the operator integrate other data/information when evaluating data/results?* (AR.EC.ECDAINTEGRATION.R) (detail)

192.917(b) (B31.8S Section 4.5)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

7. ECDA Region Identification (detail) *From the review of the results of selected integrity assessments, did the operator identify ECDA Regions?* (AR.EC.ECDAREGION.R) (detail)

192.925(b)(1) (NACE SP 0502 2008)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

8. ECDA Indirect Examination (detail) *From the review of the results of selected integrity assessments, does the ECDA indirect inspection process comply with NACE SP0502-2008 Section 4 and ASME B31.8S-2004, Section 6.4?* (AR.EC.ECDAINDIRECT.R) (detail)

192.925(b)(2) (NACE SP0502-2008, Section 4)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

9. ECDA Direct Examination (detail) *From the review of the results of selected integrity assessments, were excavations and data collection performed in accordance with NACE SP0502-2008, Sections 5 and 6.4.2 and ASME B31.8S, Section 6.4?* (AR.EC.ECDADIRECT.R) (detail)

192.925(b)(3) (NACE SP-0502-2008 Sections 5 and 6.4.2)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

10. Quality of ECDA Data Analysis (detail) *From the review of the results of integrity assessments, was analysis of the ECDA data and other information adequate to identify external corrosion threats to the pipeline?* (AR.EC.ECDAANALYSIS.R) (detail)

192.925(b)(4) (192.933(b); B31.8S Section 6.4)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

12. ECDA Post-Assessment (detail) *From the review of the results of selected integrity assessments, were requirements met for post assessment?* (AR.EC.ECDAPOSTASSESS.R) (detail)

192.925(b)(4) (NACE SP-0502-2002 Section 6.2)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes
This pipeline does not use ECDA. Entire pipeline was hydro tested on July 23, 2009. A WUTC representative was in attendance. See IM Manual Appendix F for a full discussion.

Assessment and Repair - Internal Corrosion Direct Assessment

3. ICDA Plan (detail) *Is an adequate ICDA plan and process in place for conducting ICDA?* (AR.IC.ICDAPLAN.P) (detail)

192.927(c) (192.927(a); 192.927(b); ASME B31.8S, Section 6.4 and Appendix B2)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes
This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

4. Pre-Assessment (detail) *From the review of the results of selected integrity assessments, were the requirements met for an ICDA pre-assessment?* (AR.IC.ICDAPREASSESS.R) (detail)

192.927(c)(1) (B31.8S Appendix A2)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

5. Integration of ICDA Results with other Information (detail) *Is the process for integrating ICDA results with other information adequate?* (AR.IC.ICDAINTEGRATION.P) (detail)

192.917(b) (B31.8S Section 4.5)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

6. Integration of ICDA Results with Other Information (detail) *From a review of records, were other data/information integrated when evaluating data/results?* (AR.IC.ICDAINTEGRATION.R) (detail)

192.917(b) (B31.8S Section 4.5)	Sat+	Sat	Concern	Unsat	NA	NC
		X			X	

This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

7. ICDA Region Identification (detail) *From the review of the results of selected integrity assessments, were ICDA Regions adequately identified?* (AR.IC.ICDAREGION.R) (detail)

192.927(c)(2) (192.927(c)(5))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

8. Identification of Locations for Excavation and Direct Examination (detail) *From the review of the results of selected integrity assessments, were sites identified where internal corrosion may be present?* (AR.IC.ICDADIRECT.R) (detail)

192.927(c)(3) (192.927(c)(5))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

10. Post-Assessment Evaluation and Monitoring (detail) *From the review of the results of selected integrity assessments, did the operator assess the effectiveness of the ICDA process?* (AR.IC.ICDAPOSTASSESS.R) (detail)

192.927(c)(4)(i) (192.927(c)(4)(ii))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

11. Quality of ICDA Data Analysis (detail) *From the review of the results of integrity assessments, was analysis of the ICDA data and other information adequate to identify internal corrosion threats to the pipeline?* (AR.IC.ICDAANALYSIS.R) (detail)

192.927 (192.933(b); B31.8S Section 6.4, Appendix A2 and Appendix B2)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

This pipeline does not have an ICDA Plan. The IM plan has a rational (see Appendix M) for why an ICDA is not necessary.

Assessment and Repair - Repair Criteria

1. Definition of Discovery (detail) *Does the integrity assessment process properly define discovery and the required time frame?* (AR.RC.DISCOVERY.P) (detail)

192.933(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
See IM plan section 7.2

2. Inclusion of All IM Repair Criteria (detail) *Do the operator's Integrity Management Plan and/or maintenance processes include all of the §192.933 repair criteria?* (AR.RC.IMPRC.P) (detail)

192.911(e) (192.933(c); 192.933(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
See IM plan section 7.3 7.4

3. Categorization of Defects (detail) *From the review of the results of integrity assessments, were all defects properly categorized or discovered?* (AR.RC.DEFECTCAT.R) (detail)

192.933(d) (192.933(b); 192.933(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No defects were found during hydrotesting.

4. Pressure Reductions Taken in Response to Remediation of Conditions (detail) *From the review of the results of integrity assessments, was an acceptable pressure reduction promptly taken for each Immediate Repair condition or when a repair schedule could not be met?* (AR.RC.PRESSREDUCE.R) (detail)

192.933(a)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A No repair conditions were found.

5. Prioritized Schedule (detail) *From the review of the results of integrity assessments, did the operator develop a prioritized schedule?* (AR.RC.SCHEDULE.R) (detail)

192.933(c) (ASME B31.8S, Section 7)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A No repair conditions were found.

6. Adequacy of Remediation (detail) *From the review of the results of integrity assessments, is the remediation specified in the prioritized schedule adequate to ensure the integrity of the pipeline until the next scheduled reassessment?* (AR.RC.METHOD.R) (detail)

192.933(a)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A No repair conditions were found.

7. Repair Criteria in Covered Segments (detail) *Does the repair process cover all of the elements for making repairs in covered segments?* (AR.RC.CRITERIA.P) (detail)

192.933(c)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A No repair conditions were found.

8. Timely Remediation (detail) *From the review of the results of integrity assessments, were defects in segments that could affect an HCA remediated or dispositioned (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?* (AR.RC.SCHEDULEIMPL.R) (detail)

192.933(d) (ASME B31.8S Section 7)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A No repair conditions were found.

Assessment and Repair - Stress Corrosion Cracking

2. SCCDA Plan (detail) *Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?* (AR.SCC.SCCDAPLAN.P) (detail)

192.929(b) (B31.8S Appendix A3)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A Conditions for SCC are not present.

3. Collect and Evaluate Data (detail) *From the review of the results of selected integrity assessments, were data collected and evaluated?* (AR.SCC.SCCDADATA.R) (detail)

192.929(b)(1) (B31.8S Appendix A3.2)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A Conditions for SCC are not present.

4. Assessment Method (High pH SCC) (detail) *From the review of the results of selected integrity assessments, did the operator perform an assessment using one of the methods specified in B31.8S Appendix A3?* (AR.SCC.SCCDAMETHOD.R) (detail)

192.929(b)(2) (B31.8S Appendix A3)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A Conditions for SCC are not present.

5. Assessing for Near Neutral SCC (detail) *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?* (AR.SCC.SCCDANEARNEUTRAL.R) (detail)

192.929(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A Conditions for SCC are not present.

6. Reassessment Interval (detail) *From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?* (AR.SCC.SCCDAREASSESSINTRVL.R) (detail)

192.939(a)(3)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A Conditions for SCC are not present.

Integrity Management - Baseline Assessments

1. IM Baseline Assessments - Methods (detail) *Does the process include requirements for specifying an assessment method(s) for each covered segment that is best suited for identifying anomalies associated with specific threats identified for the segment?* (IM.BA.BAMETHODS.P) (detail)

192.919(b) (192.921(a); 192.921(c); 192.921(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
The IM plan allows four different inspection options, Section 6.2, Hydrotesting the entire pipeline was selected since it replicates the initial construction qualification hydro.

2. IM Baseline Assessments - Methods (detail) *Was an assessment method(s) specified for each covered segment that is best suited for identifying anomalies associated with specific threats identified for the segment?* (IM.BA.BAMETHODS.R) (detail)

192.919(b) (192.921(a); 192.921(c); 192.921(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
The IM plan allows four different inspection options, Section 6.2, Hydrotesting the entire pipeline was selected since it replicates the initial construction qualification hydro.

3. IM Baseline Assessments - Prioritized Schedule (detail) *Does 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?* (IM.BA.BASCHEDULE.P) (detail)

192.917(c), (192.919(c); 192.921(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 6.3

4. IM Baseline Assessments - Prioritized Schedule (detail) *Does the BAP contain a schedule for completing the assessment activities for all covered segments that appropriately considered the applicable risk factors in the prioritization of the schedule as required by the process?* (IM.BA.BASCHEDULE.R) (detail)

192.917(c) (192.919(c); 192.921)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 6.3

5. IM Baseline Assessments - Prior Assessments (detail) *Does the process require that prior assessment methods meet the requirements of §192.921(a) and associated remedial actions to have been carried out to address conditions listed in §192.933?* (IM.BA.BAPRIOR.P) (detail)

192.921(e)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No, IM plan assumes no prior assessments

6. IM Baseline Assessments - Prior Assessments (detail) *From a review of selected records, have prior assessment methods met the requirements of §192.921(a) and associated remedial actions to have been carried out to address conditions listed in §192.933?* (IM.BA.BAPRIOR.R) (detail)

192.921(e)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No, IM plan assumes no prior assessments

7. IM Baseline Assessments - New HCAs/Newly Installed Pipe (detail) *Does the process include requirements for updating the baseline assessment plan for new HCAs and newly installed pipe?* (IM.BA.BANEW.P) (detail)

192.905(c) (192.921(f); 192.921(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 11.2.6

8. IM Baseline Assessments - New HCAs/Newly Installed Pipe (detail) *Has the BAP been adequately updated for new HCAs and newly installed pipe?* (IM.BA.BANEW.R) (detail)

192.905(c), (192.921(f); 192.921(g))

Sat+	Sat	Concern	Unsat	NA	NC
	x				

Notes
IM plan section 11.2.6 No new HCA's have been discovered and no new pipe has been installed.

9. IM Baseline Assessments - Environmental & Safety Risks (detail) *Does the process include requirements for conducting integrity assessments (baseline and reassessment) in a manner that minimizes environmental and safety risks?* (IM.BA.BAENVIRON.P) (detail)

192.911(m) (192.911(o); 192.919(e); ASME B31.8S-2004, Section 11)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 6.1 and 6.2

10. IM Baseline Assessments - Environmental & Safety Risks (detail) *From a review of selected records, have integrity assessments (baseline and reassessment) been conducted in a manner that minimizes environmental and safety risks?* (IM.BA.BAENVIRON.R) (detail)

192.911(m) (192.11(o); 192.919(e); ASME B31.8S-2004, Section 11)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
No new assessments have been conducted since hydro test in 2009. Hydro test OK no ruptures or other indication.

Integrity Management - Continual Evaluation and Assessment

1. Periodic Evaluations (detail) *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?* (IM.CA.PERIODICEVAL.P) (detail)

192.937(b) (192.917(a); 192.917(b); 192.917(c); 192.917(d); 192.917(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 8

2. Periodic Evaluations (detail) *Have periodic evaluations of pipeline integrity 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?* (IM.CA.PERIODICEVAL.R) (detail)

192.937(b) (192.917(a); 192.917(b); 192.917(c); 192.917(d); 192.917(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Basline assessment was performed in 2009--hydrotest of entire line. A CDA is scheduled for 2016 (7 years) as operator has determined a 10-yr reassessment interval per B31.8S. A full DCVG survey is scheduled to be completed in the next 12 months as well as a CIS. The basis for choosing this methodology is based on the highest risk to this pipeline is identified as third party damage. A DCVG survey will identify coating damage which is an indicator of third party damage,

3. IM Continual Assessments - Methods (detail) *Is the approach for establishing reassessment method(s) consistent with the requirements in §192.937(c)?* (IM.CA.REASSESSMETHOD.P) (detail)

192.937(c) (192.931)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 8.2 which meets the requirements of 192.937.C.2 (see 2 above)

4. IM Continual Assessments - Methods (detail) *Has the approach for establishing the reassessment method been performed in a manner consistent with the requirements in §192.937(c) and as required?* (IM.CA.REASSESSMETHOD.R) (detail)

192.937(c) (192.931)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
A full DCVG survey is scheduled to be completed in the next 12 months as well as a CIS. The basis for choosing this methodology is based on the highest risk to this pipeline is identified as third party damage. A DCVG survey will identify coating damage which is an indicator of third party damage,

5. Low Stress Reassessments (detail) *Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating at below 30% SMYS.* (IM.CA.LOWSTRESSREASSESS.P) (detail)

192.941(a) (192.941(b); 192.941(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, pipeline operates above 30%SMYS

6. Low Stress Reassessments (detail) *Is the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion adequate and being performed as required?* (IM.CA.LOWSTRESSREASSESS.R) (detail)

192.941(a) (192.941(b); 192.941(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, pipeline operates above 30%SMYS

7. Reassessment Intervals (detail) *Is the process for establishing the reassessment intervals consistent with §192.939 and ASME B31.8S-2004?* (IM.CA.REASSESSINTERVAL.P) (detail)

192.937(a) (192.939(a); 192.939(b); 192.913(c); ASME B31.8S-2004, Section 5, Table 3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 8.2. Established a 10-yr interval per B31.8S. Using CDA at 7 years per 192.939(a)

8. Reassessment Intervals (detail) *Have reassessment intervals been established in a manner consistent with §192.939 and ASME B31.8S-2004 as required?* (IM.CA.REASSESSINTERVAL.R) (detail)

192.937(a) (192.939(a); 192.939(b); 192.913(c); ASME B31.8S-2004, Section 5, Table 3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 8.2. Established a 10-yr interval per B31.8S. Using CDA at 7 years per 192.939(a)

9. Waiver from Reassessment Interval in Limited Situations (detail) *Does the process include requirements for reassessment interval waivers?* (IM.CA.REASSESSWAIVER.P) (detail)

192.943(a) (192.943(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, no waivers requested.

10. Waiver from Reassessment Interval in Limited Situations (detail) *Have reassessment interval waivers been adequately implemented, if applicable?* (IM.CA.REASSESSWAIVER.R) (detail)

192.943(a) (192.943(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, no waivers requested.

11. Deviation from Reassessment Requirements based on Exceptional Performance (detail)
Does the process include requirements for deviations from reassessment requirements based on exceptional performance? (IM.CA.REASSESSEXCPERF.P) (detail)

192.913(a) (192.913(b); 192.913(c); ASME B31.8S-2004)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, no deviations requested.

12. Deviation from Reassessment Requirements based on Exceptional Performance (detail)

Have deviations from reassessment requirements based on exceptional performance been adequately handled, if applicable? (IM.CA.REASSESSEXCPERF.R) (detail)

192.913(a) (192.913(b); 192.913(c); ASME B31.8S-2004)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, no deviations requested.

Integrity Management - High Consequence Areas

1. IM High Consequence Areas - HCA Identification (detail)

Does the process include the methods defined in §192.903 High Consequence Area (1) and/or §192.903 High Consequence Area (2) to be applied to each pipeline for the identification of high consequence areas? (IM.HC.HCAID.P) (detail)

192.905(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 2.2

2. IM High Consequence Areas - HCA Identification (detail)

Was the identification of pipeline segments in high consequence areas completed by December 17, 2004 in accordance with process requirements? (IM.HC.HCAID.R) (detail)

192.905(a) (192.907(a); 192.911(a))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
Weyerhaeuser is not sure when this took place as previous Pipeline Manager retired and the records do not indicate a date. Cosentino Consulting was hired after this date (2005) to prepare the current IMP. Weyco submitted this IMP to WUTC 12/2007. Given this is the second integrity management audit and the entire pipeline is considered an HCA, this information does not appear to be relevant to satisfactorily implementing the program (as it is overall satisfactory).

3. IM High Consequence Areas - Potential Impact Radius (detail)

Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of §192.903? (IM.HC.HCAPIR.P) (detail)

192.903 (192.905(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 2.2

4. IM High Consequence Areas - Potential Impact Radius (detail)

Do records indicate use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of §192.903? (IM.HC.HCAPIR.R) (detail)

192.903 (192.905(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 2.2 Appendix B, however, Weyerhaeuser has categorized the entire pipeline as a HCA, not just PIR areas.

5. IM High Consequence Areas - Identified Sites (detail) *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?* (IM.HC.HCASITES.P) (detail)

192.903 (192.905(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
IM plan section 2.2.d

6. IM High Consequence Areas - Identified Sites (detail) *Do records indicate identification of identified sites being performed as required?* (IM.HC.HCASITES.R) (detail)

192.903 (192.905(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
IM plan Appendix B show the maps. PA plan has list of identified sites. May want to cross reference PA plan or add list to IMP. FYI.

7. IM High Consequence Areas - Identification Method 1 (Class Locations) (detail) *Is the integrity management process adequate for application of §192.903 High Consequence Area definition (1) for identification of HCAs?* (IM.HC.HCAMETHOD1.P) (detail)

192.903(1)(i) (192.903(1)(ii); 192.903(1)(iii); 192.903(1)(iv))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes
N/A method 2 is used

8. IM High Consequence Areas - Identification Method 1 (Class Locations) (detail) *Do records indicate adequate application of the §192.903 High Consequence Area definition (1) for the identification of HCAs?* (IM.HC.HCAMETHOD1.R) (detail)

192.903 (1)(i) (192.903(1)(ii); 192.903(1)(iii); 192.903(1)(iv))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes
N/A method 2 is used

9. IM High Consequence Areas - Identification Method 2 (Potential Impact Radius) (detail) *Is the integrity management process adequate for application of §192.903 High Consequence Area definition (2) for identification of HCAs?* (IM.HC.HCAMETHOD2.P) (detail)

192.903(2)(i) (192.903(2)(ii))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

IM plan section 2.2 Appendix B. Weyerhaeuser has categorized the entire pipeline as a HCA, not just PIR areas.

10. IM High Consequence Areas - Identification Method 2 (Potential Impact Radius) (detail) *Do records indicate adequate application of §192.903 High Consequence Area definition (2) for identification of HCAs?* (IM.HC.HCAMETHOD2.R) (detail)

192.903(2)(i) (192.903(2)(ii))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

IM plan section 2.2 Appendix B. Weyerhaeuser has categorized the entire pipeline as a HCA, not just PIR areas.

11. IM High Consequence Areas - Newly Identified HCAs (detail) *Does the process include a requirement for evaluation of new information that may show that a pipeline segment impacts a high consequence area?* (IM.HC.HCANEW.P) (detail)

192.905(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 11. As entire pipeline is HCA, this is primarily for newly identified sites.

12. IM High Consequence Areas - Newly Identified HCAs (detail) *Are evaluations of new information that may show that a pipeline segment impacts a high consequence area being performed as required?* (IM.HC.HCANEW.R) (detail)

192.905(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 11 and ROW patrol reports.

Integrity Management - Preventive and Mitigative Measures

1. P&M Measures - General Requirements (detail) *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?* (IM.PM.PMMGENERAL.P) (detail)

192.935(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 9.

2. P&M Measures - General Requirements (detail) *Have additional measures 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?* (IM.PM.PMMGENERAL.R) (detail)

192.935(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 9. Weyerhaeuser has performed a study for the installation of ASV's. Installation is on hold pending PHMSA rulemaking.

3. P&M Measures - Third Party Damage (detail) *Does the preventive and mitigative process include requirements that threats due to third party damage be addressed? (Note: A subset of these enhancements are required for pipelines operating below 30% SMYS - See IM.PM.PMMTPDSMYS.P)* (IM.PM.PMMTPD.P) (detail)

192.917(e)(1) (192.935(b)(1); 192.935(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 9.2.3

4. P&M Measures - Third Party Damage (detail) *Has P&MM been implemented regarding threats due to third party damage as required by the process?* (IM.PM.PMMTPD.R) (detail)

192.917(e)(1) (192.935(b)(1); 192.935(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
There has been no third party damage. They had a contractor using a vactor truck nick the top of the coating while potholing the pipeline.

5. P&M Measures - Third Party Damage (Special Cases) (detail) *Does the process include requirements for preventive and mitigative requirements for pipelines operating below 30% SMYS?* (IM.PM.PMMTPDSMYS.P) (detail)

192.935(d) (192.935(e); 192 Table E.II.1)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, pipeline operates above 30%SMYS

6. P&M Measures - Third Party Damage (Special Cases) (detail) *Are preventive and mitigative requirements for pipelines operating below 30% SMYS being performed as required?* (IM.PM.PMMTPDSMYS.R) (detail)

192.935(d) (192.935(e); 192 Table E.II.1)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
N/A, pipeline operates above 30%SMYS

7. P&M Measures - Outside Force Damage (detail) *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?* (IM.PM.PMMOF.P) (detail)

192.935(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 9.2.4

8. P&M Measures - Outside Force Damage (detail) *Are significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) being adequately addressed?* (IM.PM.PMMOF.R) (detail)

192.935(b)(2)

Sat+	Sat	Concern	Unsat	NA	NC
		X			

Notes
McGreedy Creek work was discussed where Weyerhaeuser added additional riprap around the pipeline as it comes above ground and hangs on the bridge. . During field recon, noticed cracks/overlay in areas where road is "sliding" and where pipeline is in road right-of-way. Weyerhaeuser will evaluate this threat.

9. P&M Measures - Corrosion (detail) *Does the process adequately account for taking required actions to address significant corrosion threats?* (IM.PM.PMMCORR.P) (detail)

192.917(e)(5)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Appendix C. This pipeline has no history of corrosion issues. In the next 12 months, a DCVG and CIS survey will be conducted on the entire line to confirm protection and coating health.

10. P&M Measures - Corrosion (detail) *Are required actions being taken to address significant corrosion threats as required?* (IM.PM.PMMCORR.R) (detail)

192.917(e)(5)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Appendix C and system corrosion records (no history of corrosion). In the next 12 months, a DCVG and CIS survey will be conducted on the entire line to confirm protection and coating health.

11. P&M Measures - Automatic Shut-Off Valves or Remote Control Valves (detail) *Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?* (IM.PM.PMMASORCV.P) (detail)

192.935(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 9.5, Weyerhaeuser has performed a study for the installation of ASV's. Installation is on hold pending PHMSA rulemaking.

12. P&M Measures - Automatic Shut-Off Valves or Remote Control Valves (detail) *Has an adequate determination been made to determine if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?* (IM.PM.PMMASORCV.R) (detail)

192.935(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 9.5. Weyerhaeuser has performed a study for the installation of ASV's. Installation is on hold pending PHMSA rulemaking.

Integrity Management - Quality Assurance

1. Quality Assurance (detail) *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?* (IM.QA.QARM.P) (detail)

192.911(l)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan section 12

2. Quality Assurance (detail) *Do records indicate the quality assurance processes for risk management applications meet the requirements of ASME B31.8S-2004, Section 12 and are the processes being performed as required?* (IM.QA.QARM.R) (detail)

192.911(l)

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes
IM plan Section 12.2.1 requires an independent audit of the IMP within 12 months of initial release and 24 months thereafter. Records, however, do not indicate a reviews have been completed as required and no record was available in Appendix J as required by 12.3 of the IMP

3. Personnel Qualification and Training Requirements (detail) *Does the process include requirements to assure personnel involved in the integrity management program are qualified for their assigned responsibilities?* (IM.QA.IMPERSONNEL.P) (detail)

192.911(l) (192.915; ASME B31.8S-2004, Section 12(b)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Appendix K and section 5.2

4. Personnel Qualification and Training Requirements (detail) *Are personnel involved in the integrity management program qualified for their assigned responsibilities?* (IM.QA.IMPERSONNEL.R) (detail)

192.911(l) (192.915(a); 192.915(b); 192.915(c); ASME B31.8S-2004, Section 12(b)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Appendix K

5. Invoking Non-Mandatory Statements in Standards (detail) *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 RP0502-2002) be addressed by an appropriate approach?* (IM.QA.IMNONMANDT.P) (detail)

192.7(a)

Sat+	Sat	Concern	Unsat	NA	NC
		X			

Notes
IM plan Section 12 needs to include language from ASME B31.8S-2004, 12.2.2(b). (note ASME B31.8S-2010 requires this language be in IM plan).

6. Management of Change (detail) *Are the processes for management of changes to the IMP and management of change of associated procedures and processes adequate?* (IM.QA.IMMOC.P) (detail)

192.909(a) (192.909(b); 192.911(k))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

7. Management of Change (detail) *Are changes to the IMP and management of changes to IMP-related processes being performed as required?* (IM.QA.IMMOC.R) (detail)

192.909(a) (192.909(b); 192.911(k))

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes
IM plan Section 11 requires the Pipeline Manager to update the IMP based on a variety of potential changes. Section 11.3 then requires the Manager to approve the changes by completed the revision history log in the title page of the IMP. The revision history log of the Pipeline Manager's IMP (control document) has many "stick tabs" and written notes which indicate a review has occurred. The last entry in the revision history log was April, 2012. This indicates multiple reviews have occurred yet the IMP has not been revised since its initial implementation in 2007. The inspection revealed there have also been multiple threat affecting initiatives which Weyerhaeuser has conducted and not been reflected in the IMP--2009 hydrotest assessment, EFRD analysis and McNeely creek armoring. This is a violation of 192.13(c) which states
"Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part." **Probable Violation.**

8. Performance Measures (detail) *Does the process include requirements for measuring and reporting integrity management program effectiveness?* (IM.QA.IMPERFMEAS.P) (detail)

192.945(a) (192.913(b); 192.951; ASME B31.8S-2004 Section 12(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 10 (these are obsolete requirements, now done via annual report.)

9. Performance Measures (detail) *Has the IMP effectiveness been adequately measured and reported, as applicable, to PHMSA?* (IM.QA.IMPERFMEAS.R) (detail)

192.945(a) (192.913(b); 192.951; ASME B31.8S-2004 Section 12(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 10 (these are obsolete requirements, now done via annual report.)

10. Record Keeping (detail) *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?* (IM.QA.RECORDS.P) (detail)

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); 192.911(n); ASME B31.8S-2004 Sections 12.1, 12.2(b)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 15

11. Record Keeping (detail) *Are required records being maintained for the useful life of the pipeline?* (IM.QA.RECORDS.R) (detail)

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); ASME B31.8S-2004 Sections 12.1, 12.2(b)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 15, and records file

Integrity Management - Risk Analysis

1. Threat Identification (detail) *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?* (IM.RA.THREATID.P) (detail)

192.917(a) (192.917(e); 192.913(b)(1); ASME B31.8S-2004, Section 2.2 and Section 5.10)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 5.2

2. Threat Identification (detail) *Do records indicate that all potential threats to each covered pipeline segment have been identified and evaluated?* (IM.RA.THREATID.R) (detail)

192.917(a) (192.917(e); 192.913(b)(1); ASME B31.8S-2004, Section 2.2 and Section 5.10)

Sat+	Sat	Concern	Unsat	NA	NC
		X			

Notes
Need to evaluate landslides/earth movement-as a threat was noticed during field review on Ostrander Road. Weyco should evaluate this as a threat.

3. Data Gathering (detail) *Does the process include requirements to gather existing data and information on the entire pipeline that could be relevant to covered segments?* (IM.RA.RADATA.P) (detail)

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 5 and Appendix B & C

4. Data Gathering (detail) *Is existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered?* (IM.RA.RADATA.R) (detail)

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 5 and Appendix B & C

5. Data Integration (detail) *Does the process include requirements to integrate existing data and information on the entire pipeline that could be relevant to covered segments?* (IM.RA.RAINTEGRATE.P) (detail)

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
The entire pipeline is considered an HCA. New data is evaluated against existing.

6. Data Integration (detail) *Is existing data and information on the entire pipeline that could be relevant to covered segments being adequately integrated?* (IM.RA.RAINTEGRATE.R) (detail)

192.917(b) (192.917(e)(1); 192.911(k); ASME B31.8S-2004, Sections 4, 5.7(e), 11(a), 11(d), Appendix A)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 5 and Appendix C & D

7. Risk Analysis - Methodology (detail) *Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment?* (IM.RA.RAMETHOD.P) (detail)

192.917(c) (192.917(d); ASME B31.8S-2004, Section 5.3, Section 5.4, Section 5.5, Section 5.12)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 5.2 and Appendix C & D

8. Risk Analysis - Determination of Risk (detail) *Does the process include requirements that factors that could affect the likelihood of a release, and 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?* (IM.RA.RAFACTORS.P) (detail)

192.917(c) (ASME B31.8S-2004, Section 3.1, Section 3.3, Section 5.2, Section 5.3, and Section 5.7)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 5.2 and Appendix C & D

9. Risk Analysis - Determination of Risk (detail) *Is risk analysis data combined in an appropriate manner to produce a risk value for each pipeline segment?* (IM.RA.RAFACTORS.R) (detail)

192.917(c) (ASME B31.8S-2004, Section 3.1, Section 3.3, Section 5.2, Section 5.3, and Section 5.7)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 5.2 and Appendix C & D & E

10. Risk Analysis - Validation and Updates (detail) *Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?* (IM.RA.RAMOC.P) (detail)

192.917(c) (ASME B31.8S-2004, Section 5.4, 5.7, 5.11, 5.12)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
IM plan Section 8.1.5

11. Risk Analysis - Validation and Updates (detail) *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?* (IM.RA.RAMOC.R) (detail)

192.917(c) (ASME B31.8S-2004, Section 5.4, 5.7, 5.11, 5.12)

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes
No new information since the baseline assessment. See IM plan Section 8.1.5

Need to revise and include results from 2009 hydrotest assessment, EFRD analysis and McNeely creek armoring. See Quality Assurance No. 2 above.

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