

Results and Notes Review

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DC.CO: Construction

Question ID, References	DC.CO.FIELD BEND.P , 195.202 (195.212(a); 195.212(b); 195.212(c))
Question Text	Does the construction process meet the requirements of §195.212 for bending pipe?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will send a draft Construction Specification for review. The Draft will have to go through the Tesoro MOC process prior to implementation. Tesoro to notify when implementation is complete.
Result Notes	Tesoro construction specification 7.2.1 . Operator did not address 192. 212(c) Each circumferential weld which is located where the stress during bending causes a permanent deformation in the pipe must be nondestructively tested either before or after the bending process.

DC.DN: Design

Question ID, References	DC.DN.FITTING.P , 195.118(a) (195.118(b); 195.118(c))
Question Text	Does the process require that selected material specifications for pipe fittings meet the requirements of §195.118?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will send a draft Construction Specification for review. The Draft will have to go through the Tesoro MOC process prior to implementation. Tesoro to notify when implementation is complete.
Result Notes	Operator did not address 192.118

Question ID, References	DC.DN.CLOSURE.P , 195.124
Question Text	Does the process require closures comply with the ASME Boiler and Pressure Vessel Code, Section VIII, Pressure Vessels, Division 1 and have pressure and temperature ratings at least equal to those of the pipe to which the closure is attached?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will send a draft Construction Specification for review. The Draft will have to go through the Tesoro MOC process prior to implementation. Tesoro to notify when implementation is complete.
Result Notes	Operator did not address 195.124

FS.TSAPIINSPECT: Tanks and Storage - Inspection

Question ID, References	FS.TSAPIINSPECT.BOINTINS.P , 195.402(c)(3) (195.432(b))
Question Text	Does the process describe the interval and method for performing formal internal inspections of breakout tanks that are steel (atmospheric or low pressure) tanks?

Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will implement a change to specifically state which Specific Gravity is to be used during API 653 inspections. The changes to the LOM will go through the MOC process prior to implementation. Tesoro to notify when changes are implemented.
Result Notes	TLS-DOT-LOM-1217, Breakout Tank Inspection and Maintenance, Section 4.4 require that intervals for internal inspections be determined in accordance with API 653. NOTE: As API 653 is wholly incorporated by reference into the regulations, the methods for determining inspection intervals is referenced, but not repeated in this standard. Recommend adding to the procedure a statement that Tesoro will provide all tank data like SG of liquid etc to tank inspectors for consistency in inspection reports.

IM.HC: High Consequence Areas

Question ID, References	IM.HC.HCALLOCATION.P , 195.452(f)(1) (195.452(a); 195.452(d)(3))
Question Text	Does the process that requires identification of HCA-affecting segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will make changes and notify when implementation is completed.
Result Notes	Hector will see if there is a regional procedure for SMEs to search for new HCAs. Validation of information is in 4.1 of LIM10 but focuses on pipeline centerline validation which they say will include reports of an HCA.

Question ID, References	IM.HC.HCAAIRDISP.P , 195.452(f)(1) (195.452(a))
Question Text	Does the process include a technically adequate analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will make changes and notify when implementation is completed.
Result Notes	Tesoro acquired HVL assets in December 2014. Tesoro is in the process of merging the HCA air dispersion modeling procedures for those assets. Review the new plan TBD in early 2016.

Question ID, References	IM.HC.HCACAT3.P , 195.452(f)(1) (195.452(b)(2))
Question Text	Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will make changes and notify when implementation is completed.
Result Notes	HCA Identification LIM010 Sec1.3 does not clearly indicate that pipelines constructed or converted after May 29, 2001 must identify and complete baseline assessments prior to the pipeline beginning operations.

IM.QA: Quality Assurance

Question ID, References	IM.QA.IMPERFEFFECTIVE.P , 195.452(f)(7) (195.452(k))
Question Text	Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will revise the LIM 110. The LIM will move through the Tesoro MOC process. Tesoro to notify PHMSA when implementation is completed.
Result Notes	LIM110 The IMP does not well describe how the various meetings are documented. Lots of meetings are held but the IMP does not require the meeting minutes or conclusions to be documented or how decisions are made in the meetings.
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Question ID, References	IM.QA.IMPERFMETRIC.P , 195.452(f)(7) (195.452(k))
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?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will revise the LIM 080. The LIM will move through the Tesoro MOC process. Tesoro to notify PHMSA when implementation is completed.
Result Notes	LIM 080 Appx C DOT required metrics for annual report as well as example metrics which may be employed. Tesoro is currently deciding which metrics are to be used.
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Question ID, References	IM.QA.RECORDS.P , 195.452(l) (195.404(c)(1); 195.452(c)(2))
Question Text	Is the process adequate to assure that the records required for integrity management program applications are maintained?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will revise the LIM 110. The LIM will move through the Tesoro MOC process. Tesoro will make changes and notify when implementation is completed.
Result Notes	LIM110 The IMP does not well describe how the various meetings are documented. Lots of meetings are held but the IMP does not require the meeting minutes or conclusions to be documented or how decisions are made in the meetings.

MO.LO: Liquid Pipeline Operations

Question ID, References	MO.LO.OMEFFECTREVIEW.P , 195.402(a) (195.402(c)(13))
Question Text	Does the process include procedures for periodically reviewing the work done by the operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	Tesoro will define periodic. To be address during annual review and defined in first quarter 2016.

Result Notes Operator does not define "periodically". They need to even though they effectively do this annually. Given new business units have been purchased, this needs to be a HQ required process to ensure uniformity.

MO.LOOPER: Liquid Pipeline Startup and Shutdown Operations

Question ID, References	MO.LOOPER.PRESSURELIMIT.P , 195.402(a) (195.402(c)(7))
Question Text	Does the process include procedures for starting up and shutting down any part of the pipeline system in a manner designed to assure operation within the limits prescribed by §195.406?
Result	Concern
Assets Covered	OPID: 30735 - All Units, OPID: 31570 - All Units, OPID: 39029 - All Units, OPID: 31583 - All Units, OPID: 39228 - All Units
Summary	(none)
Result Notes	Recommended that Tesoro amend TLS-DOT-LOM-1201 to reference the control room procedures to be followed for start up and shut down. TLS-DOT-LOM-1201, Startup and Shutdown, outlines the requirements for starting up and shutting down any part of the pipeline system in a manner designed to assure operation within the operating limits of the system. NOTE: The Control Center maintains specific procedures for each segment.

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