

**Utilities and Transportation Commission**  
**Standard Inspection Report for Intrastate Gas Transmission Pipelines**  
**Form D - Records Review and Field Inspection**

S – Satisfactory    U – Unsatisfactory    N/A – Not Applicable    N/C – Not Checked  
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

Inspection Report			
<b>Inspection ID/Docket number</b>	6192		
<b>Inspector Name &amp; Submit Date</b>	Lex Vinsel, 8/30/2015		
<b>Chief Eng Name &amp; Review Date</b>	Joe Subsits, 9/1/2015		
Operator Information			
<b>Name of Operator:</b>	Avista Utilities Corporation	<b>OP ID #:</b>	31232
<b>Name of Unit(s):</b>	Transmission		
<b>Records Location:</b>	Spokane WA		
<b>Date(s) of Last (unit) Inspection:</b>	October 22, 2012	<b>Inspection Date(s):</b>	June 2-4, July 22, 2015

<p><b>Inspection Summary:</b></p> <p>Avista has no transmission facilities with HCA's in WA State. They are not required to have an IM program.</p> <p>This intrastate transmission inspection consists of a review of compliance records and a field inspection for the Kettle Falls Transmission line for the years 2013-2014. The Kettle Falls Transmission line is the only pipeline that Avista considers to be transmission. The Kettle Falls line consists of 60.505 miles of 8-inch, 0.188 w.t., X-42, 12.09 miles of 6-inch, 0.156 w.t. and 0.135 miles of 4-inch. Approximately 2 miles are located within a class 3 location.</p> <p>There are no HCA's on this transmission line. Avista has a policy of eliminating HCA's through the replacement of pipe within an HCA with heavier wall pipe and lowering the percentage of SMYS to below 20%.</p>
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<b>HQ Address:</b> 1411 East Mission PO Box 3727 Spokane, WA 99220-3727	<b>System/Unit Name &amp; Address:</b> Headquarters Same	
<b>Co. Official:</b> Don Kopczyndki, VP Energy Delivery <b>Phone No.:</b> 509-495-4877 <b>Fax No.:</b> <b>Emergency Phone No.:</b>	<b>Phone No.:</b> <b>Fax No.:</b> <b>Emergency Phone No.:</b>	
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>
Randy Bareither	Pipeline Safety Engineer	509-495-8716
Linda Burger	Integrity Program Manager	509-495-4423
Jodie Lamb	LS/AC/IS Program Manager	509-495-2660
Tim Mair	Spokane Gas Manager	509-495-8946
Bob Larson	Cathodic Protection Tech II	509-981-4748
Steve Winters	Cathodic Protection Tech	509-990-8908
Gary Douglas	Cathodic Protection Foreman	509-495-4198
Karen Terpak	Gas Compliance Manager	509-495-2856
Pan Bennett	Compliance Technician	509-495-2050

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Sonia Johnson	Sr. Compliance Technician	509-495-4959
Brandon Beierle	LS Administrator	509-495-4711

<b>UTC staff conducted abbreviated procedures inspection on 192 O&amp;M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.</b>			
(check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	<b>Date:</b>	
<input checked="" type="checkbox"/>	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	<b>Date:</b>	April 11-12, 2015

GAS SYSTEM OPERATIONS			
<b>Gas Supplier</b>	Williams		
Number of reportable safety related conditions last year	<b>None</b>	Number of deferred leaks in system	<b>None</b>
Number of <u>non-reportable</u> safety related conditions last year	<b>None</b>	Number of third party hits last year	<b>None</b>
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)	72.67 (2)		
<b>Operating Pressure(s):</b>		<b>MAOP (Within last year)</b>	<b>Actual Operating Pressure (At time of Inspection)</b>
Feeder:	485	500	
Town:			
Other:			
Does the operator have any transmission pipelines?	Yes		
Compressor stations? Use Attachment 4.	None		

Pipe Specifications:			
Year Installed (Range)	<b>1966 to present</b>	Pipe Diameters (Range)	<b>6 and 8-inch</b>
Material Type	<b>Steel</b>	Line Pipe Specification Used	<b>API 5L</b>
Mileage	<b>72.67</b>	SMYS %	<b>27.3% SYMS Max</b>
Supply Company	<b>Williams</b>	Class Locations	<b>1, 2 and 3</b>

Integrity Management Field Validation
<b>Important:</b> Per PHMSA, IMP Field Verification Form 16 (Rev 6/18/2012) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <a href="http://primis.phmsa.dot.gov/gasimp/home.gim">http://primis.phmsa.dot.gov/gasimp/home.gim</a> <b>Date Uploaded:</b> N/A - <b>No high consequence areas in Washington so no Integrity Management in WA.</b>

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES	S	U	NA	NC
<b>Subparts A - C</b>	X			
Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection. <b>Submitted on 8/28/2015</b>				

PART 192 Implement Applicable Control Room Management Procedures	S	U	NA	NC
.605(b)(12)	X			
Implementing the applicable control room management procedures required by 192.631. (Amdt. 192- 112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). <b>October 7-8, 2014 CRM inspection.</b>				

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REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)  ADB-08-07	<p><b>Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 - Submitted on March 31, 2015 reviewed submittals for years 2012-2014.</b></p> <p>Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to <a href="http://www.npms.phmsa.dot.gov/submission/">http://www.npms.phmsa.dot.gov/submission/</a> to review existing data on record. Also report no modifications if none have occurred since the last complete submission. Include operator contact information with all updates. <b>Avista did send the file yearly because there were changes in updates every year, in Oregon if not WA.</b></p>	X			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? <b>Submitted in 2010 and nothing has changed in those systems.</b>	X			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at <a href="http://www.nrc.uscg.mil/nrchip.html">http://www.nrc.uscg.mil/nrchip.html</a> , and additional report if significant new information becomes available. <b>No federal reportable events during time frame.</b>			X	
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) submitted electronically to PHMSA at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> unless an alternative reporting method is authorized IAW with paragraph (d) of this section. <b>No SRCR during time frame.</b>			X	
5.	191.15(a)	Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe? <b>No federal reportable events during time frame.</b>			X	
6.	191.15(c)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe? <b>No federal reportable events during time frame.</b>			X	
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2013 for the year 2012). <b>Submitted 3-3-2015</b>	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> . <b>OPID validated on April 17, 2012.</b>	X			
9.	191.23	Have complete and accurate Annual Reports been submitted? <b>Annual Reports appear to be complete.</b>	X			
10.	191.25  49 U.S.C. 60139, Subsection (b)(2)	<p>Filing the SRCR within 5 days of determination, but not later than 10 days after discovery. <b>Note:</b> Operators of gas transmission pipelines that if the pipeline pressure exceeds maximum allowable operating pressure (MAOP) plus the build-up, owner/operator must report the exceedance to PHMSA <b>on or before the fifth day</b> following the date on which the exceedance occurs.</p> <p>The report should be titled "Gas Transmission MAOP Exceedance" and provide the following information:</p> <ul style="list-style-type: none"> <li>• The name and principal address of the operator, date of the report, name, job title, and business telephone number of the person submitting the report.</li> <li>• The name, job title, and business telephone number of the person who determined the condition exists.</li> <li>• The date the condition was discovered and the date the condition was first determined to exist.</li> <li>• The location of the condition, with reference to the town/city/county and state or offshore site, and as appropriate, nearest street address, offshore platform, survey station number, milepost, landmark, and the name of the commodity transported or stored.</li> </ul> <p>The corrective action taken before the report was submitted and the planned follow-up or future corrective action, including the anticipated schedule for starting and concluding such action. <b>No SRCR during this time period.</b></p>	X			
11.	191.27(a), (b)	Do records indicate reports were submitted within 60 days of completing inspections of underwater pipelines? <b>No Gulf of Mexico underwater pipelines in system.</b>			X	
12.	192.727(g)	Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway? <b>No such pipeline have been abandoned.</b>			X	

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REPORTING RECORDS			S	U	N/A	N/C
13.	480-93-200(1)	Telephonic Reports to UTC <b>Pipeline Safety Incident Notification 1-888-321-9144</b> (Within <b>2 hours</b> ) for events which ( <b>regardless of cause</b> ); <b>No state reportable incidents for Transmission during this time period.</b>				
14.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization; <b>No state reportable incidents for Transmission during this time period.</b>			X	
15.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars; <b>Note:</b> Report all damages regardless if claim was filed with pipeline company or not. <b>No state reportable incidents for Transmission during this time period.</b>			X	
16.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas; <b>No state reportable incidents for Transmission during this time period.</b>			X	
17.	480-93-200(1)(d)	Results in the unintentional ignition of gas; <b>No state reportable incidents for Transmission during this time period.</b>			X	
18.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; <b>No state reportable incidents for Transmission during this time period.</b>			X	
19.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; <b>No state reportable incidents for Transmission during this time period.</b>			X	
20.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or <b>No state reportable incidents for Transmission during this time period.</b>			X	
21.	480-93-200(2)	Telephonic Reports to UTC <b>Pipeline Safety Incident Notification 1-888-321-9146</b> (Within <b>24 hours</b> ) for; <b>No state reportable incidents for Transmission during this time period.</b>			X	
22.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; <b>No state reportable incidents for Transmission during this time period.</b>			X	
23.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service; <b>No state reportable incidents for Transmission during this time period.</b>			X	
24.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or <b>No state reportable incidents for Transmission during this time period.</b>			X	
25.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP <b>No state reportable incidents for Transmission during this time period.</b>			X	

**Comments:**

26.	480-93-200(5)	Written incident reports (within 30 days) including the following; <b>No state reportable incidents for Transmission during this time period.</b>	S	U	N/A	N/C
27.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; <b>No state reportable incidents for Transmission during this time period.</b>			X	
28.	480-93-200(4)(b)	The extent of injuries and damage; <b>No state reportable incidents for Transmission during this time period.</b>			X	
29.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; <b>No state reportable incidents for Transmission during this time period.</b>			X	

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30.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; <b>No state reportable incidents for Transmission during this time period.</b>			X	
31.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; <b>No state reportable incidents for Transmission during this time period.</b>			X	
32.	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site; <b>No state reportable incidents for Transmission during this time period.</b>			X	
33.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; <b>No state reportable incidents for Transmission during this time period.</b>			X	
34.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; <b>No state reportable incidents for Transmission during this time period.</b>			X	
35.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; <b>No state reportable incidents for Transmission during this time period.</b>			X	
36.	480-93-200(4)(j)	Line type; <b>No state reportable incidents for Transmission during this time period.</b>			X	
37.	480-93-200(4)(k)	City and county of incident; and <b>No state reportable incidents for Transmission during this time period.</b>			X	
38.	480-93-200(4)(l)	Any other information deemed necessary by the commission. <b>No state reportable incidents for Transmission during this time period.</b>			X	
39.	480-93-200(5)	Submit a supplemental report if required information becomes available <b>No state reportable incidents for Transmission during this time period.</b>			X	
40.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any <b>incident or hazardous condition</b> due to <b>construction defects or material failure</b> <b>No state reportable incidents for Transmission during this time period.</b>			X	

**Comments:**  
 Items 13-40 All are NA - **No state reportable incidents for Transmission during this time period.**

41.	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form) <b>Updates monthly by 10<sup>th</sup> of month, but no reports related to transmission this time period.</b>				
42.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) <b>Updates monthly by 10<sup>th</sup> of month, but no reports related to transmission this time period.</b>			X	
43.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted <u>without facility locates</u> first being completed? <b>Updates monthly by 10<sup>th</sup> of month, but no reports related to transmission this time period.</b>			X	
44.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed? <b>Note:</b> Records maintained for two years and made available to the commission upon request. <b>Updates monthly by 10<sup>th</sup> of month, but no reports related to transmission this time period.</b>			X	
45.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities? <b>No transmission hits during time period, reviewed sample letter for Avista.</b>				
46.	480-93-200(8)(a)	<ul style="list-style-type: none"> <li>Notification requirements for excavators under RCW 19.122.050(1) <b>No transmission hits during time period, reviewed sample letter for Avista.</b></li> </ul>	X			
47.	480-93-200(8)(b)	<ul style="list-style-type: none"> <li>A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and <b>No transmission hits during time period, reviewed sample letter for Avista.</b></li> </ul>	X			

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48.	480-93-200(8)(c)	<ul style="list-style-type: none"> <li>Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee. <b>No transmission hits during time period, reviewed sample letter for Avista.</b></li> </ul>	X			
49.	480-93-200(9)	<p><b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b></p> <ul style="list-style-type: none"> <li>An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; 200(9)(a)</li> <li>A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b)</li> </ul> <p><b>Reviewed gas patrolling report and Standard Spec 4.13 page 7 and 8 covering reporting of activity within 35 feet of transmission.</b></p>	X			
50.	480-93-200(7)	<b>Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013)</b> (Via the commission's Virtual DIRT system or on-line damage reporting form) <b>Updates monthly by 10<sup>th</sup> of month, but no reports related to transmission this time period.</b>			X	
51.	480-93-200(10)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> for the proceeding calendar year. ( <i>NOTE: PHMSA extension to June 15, 2013 for the year 2012.</i> ) <b>Submitted 3-5-15 with the commission.</b>	S	U	N/A	N/C
52.	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety <b>Sent to Commission 3-5-2015</b>	X			
53.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. <b>None related to Transmission Line</b>			X	
54.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities – <b>Contact information provided.</b>	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. <b>Have reviewed copy of crew sheets.</b>	X			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required <b>Submitted 3-5-2015 to PHMSA</b>	X			

<b>Comments:</b>
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<b>CONSTRUCTION RECORDS</b>			S	U	N/A	N/C
57.	192.225	Do records indicate weld procedures are being qualified in accordance with §192.225? <b>Welders qualified to API 1104 per Standards Section 3.22 sheet 1.</b>	X			
58.	192.227	Do records indicate adequate qualification of welders? <b>Weld tests for qualification reviewed during welding procedure review.</b>	X			
59.	192.241(a)	Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)? <b>OQ Visual inspection of weld Task #221.130.005 and all welders are qualified to visually inspect welding..</b>	X			
60.	192.243(b)(2)	Do records indicate the qualification of nondestructive testing personnel? <b>Reviewed Qualification of Carlos Roderos, Acuren Inspection Inc., Everett WA</b>	X			
61.	192.243(c)	Do records indicate that NDT implementation is adequate? <b>See Acuren Inspections dated 6/18/14 Two stopple fittings (MT-2) inspected and one SAV Fitting (mT-2). Two 8-inch weld caps inspected as well (RT-3)</b>	X			



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<b>CONSTRUCTION RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>62.</b>	192.243(f)	Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test? <b>They keep NDT for the life of the pipe.</b>	X			
<b>63.</b>	192.243(f)	Number of Welds Inspected by NDT - <b>Total 5, 3 mag and 2 radiographic</b>	X			
<b>64.</b>	192.243(f)	Number of Welds Rejected <b>One weld rejected</b>	X			
<b>65.</b>	192.243(f)	Disposition of each Weld Rejected <b>Weld cut out and rewelded, second weld was radiographed and found acceptable.</b>	X			
<b>66.</b>	480-93-080(1)(b)	Use of testing equipment to record and document essential variables <b>Testing equipment used during qualification.</b>	X			
<b>67.</b>	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 <b>All casing on transmission have test leads or vent pipes.</b>	X			
<b>68.</b>	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main <b>Standards Spec 3.42 Sheet 4 Link seals at each end of casings.</b>	X			
<b>69.</b>	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services <b>No services on transmission Standards Section 3.16 sheet 8.</b>	X			
<b>70.</b>	192.303	Construction Specifications <b>Construction standards are attested to on the pressure test form.</b>	X			
<b>71.</b>	192.325	Do records indicate pipe is installed with clearances in accordance with §192.325, and (if plastic) installed as to prevent heat damage to the pipe? <b>The clearances are greater than the specification requirements, and Construction Spec is attested to on the pressure test form.</b>	X			
<b>72.</b>	192.327	Amount, Location, Cover of each size of pipe installed <b>Recorded on construction records.</b>	X			
<b>73.</b>	192.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) does it meet the additional construction requirements for: <ul style="list-style-type: none"> <li>• Quality assurance</li> <li>• Girth welds</li> <li>• Depth of cover</li> <li>• Initial strength testing, and;</li> <li>• Interference currents? <b>No alternate MAOP pipelines.</b></li> </ul>			X	
<b>74.</b>	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length <b>Notice of pipe install for June 15, 2015 notified on April 30, 2015.</b>	X			
<b>75.</b>	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines <b>Reviewed Pipe test for segment that will be replaced this year.</b>	X			
<b>76.</b>	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule) <b>Spec 5.21 Both available test boxes were calibrated for the time period of the test. This tested pipe was removed from the system. Scott R witnessed the pipe repair.</b>	X			
<b>77.</b>	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig <b>No Transmission pipe lowered in last 3 years.</b>			X	
<b>78.</b>	192.455	Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering? <b>Pipeline installed in 1966-67, CP installed in 1968.</b>			X	

**Comments:**

<b>OPERATIONS and MAINTENANCE RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>79.</b>	192.10	Do records indicate specific point(s) at which operating responsibility transfers to a producing operator, as applicable? <b>No pipeline in outer continental shelf.</b>	X			
<b>80.</b>	192.14	<b>Conversion To Service Performance and Records</b>				

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<b>OPERATIONS and MAINTENANCE RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
81.	192.14(a)(2)	Visual inspection of right of way, aboveground and selected underground segments <b>No conversion to service.</b>			X	
82.	192.14(a)(3)	Correction of unsafe defects and conditions <b>No conversion to service.</b>			X	
83.	192.14(a)(4)	Pipeline testing in accordance with Subpart J <b>No conversion to service.</b>			X	
84.	192.14(b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline) <b>No conversion to service.</b>			X	
85.	192.16	Customer Notification ( <b>Verification – 90 days – and Elements</b> ) <b>Reviewed mailing package detailing owner responsibility of downstream gas lines.</b>	X			
86.	192.603(b)	Procedural Manual Review – Operations and Maintenance ( <b>1 per yr/15 months</b> ) .605(a) <b>Note:</b> Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09 <b>Procedures are reviewed annually.</b>	X			
87.	192.603(b)	Did personnel respond to indications of abnormal operations as required by procedures? .605(c) (1) <b>Interstate transmission only</b>			X	
88.	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3) <b>Maps and records are available to personnel.</b>	X			
89.	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8) <b>QA/QC Program</b>	X			
90.	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4) <b>This is specific to Interstate Transmission</b>			X	
91.	192.603(b)	Do records indicate systematic and routine testing and inspection of pipe-type or bottle-type holders? .605(b)(10) <b>None</b>			X	
92.	<b>Damage Prevention Program</b>					
93.	192.603(b)	List of Current Excavators .614 (c)(1) – <b>Participation in One Call Satisfies this requirement. See 49 CFR 192.614(b)</b>	X			
94.	192.603(b)	Notification of Public/Excavators .614 (c)(2) <b>Participation in One Call Satisfies this requirement. See 49 CFR 192.614(b)</b>	X			
95.	192.603(b)	Notifications of planned excavations. (One -Call Records) .614 (c)(3) <b>Participation in One Call Satisfies this requirement. See 49 CFR 192.614(b)</b>	X			
96.		Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities: <b>Standards Spec 4.13 Sheet 5.</b>				
97.	.614(c)(6)	1. Is the inspection done as frequently as necessary during and after the activities to verify the integrity of the pipeline? <b>Same as above</b>	X			
98.		2. In the case of blasting, does the inspection include leakage surveys? (required) <b>Same as above.</b>	X			
99.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample. <b>Reviewed sample.</b>	X			
100.	195.507(b)	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? <b>Reviewed records for locate and excavation personnel.</b>	X			
101.	PHMSA – State Program Evaluation Questions	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) Have a QA/QC Program. <b>Locating is evaluated periodically, and for cause.</b>	X			
102.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? <b>Pay is dependent on satisfactory performance and will graded.</b>	X			
103.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? <b>They have a 4 strike policy of escalating discipline.</b>	X			
104.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? <b>Yes, reviewed 4 different changes.</b>	X			
105.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. <b>Location Spec 4.13 – Excavation - Spec 3.15</b>	X			
106.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. <b>Reviewed Sample</b>	X			



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<b>OPERATIONS and MAINTENANCE RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>107.</b>		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements?	X			
<b>108.</b>	192.709	Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location? 192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f)) <b>Everything is designed to class 4 and pressure tested to 1.5 times MAOP.</b>	X			
<b>109.</b>	192.605(a)	Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08. .611 <b>Everything is designed to class 4 and pressure tested to 1.5 times MAOP.</b>	X			
<b>110.</b>	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response <b>No accidents or emergencies during time period.</b>			X	
<b>111.</b>	192.615	Actions required to be taken by a controller during an emergency in accordance with 192.631. (Amdt. 192-112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). .615(a)(11) <b>Control room audit performed 2014 for Spokane Headquarters.</b>	X			
<b>112.</b>	192.603(b)	Location Specific Emergency Plan .615(b)(1) <b>Reviewed Location Specific Emergency plan for Spokane district.</b>	X			
<b>113.</b>	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2) <b>Mock drill in April 2011 on Kettle Falls line and then a debrief in 2014. Also do tabletop exercises each year.</b>	X			
<b>114.</b>	192.603(b)	Employee Emergency activity review, determine if procedures were followed. .615(b)(3) <b>Manager reviews all trouble orders.</b>	X			
<b>115.</b>	192.603(b)	Liaison Program with Public Officials .615(c) <b>Reviewed public training for first responders. Last year sent maps to the fire districts showing the transmission line in relation to their fire district.</b>	X			

**Comments:**

192.603(b)	<b>Public Awareness Program .616</b>		<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
	Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.					
	<b>API RP 1162 Baseline* Recommended Message Deliveries</b>					
	<b>Stakeholder Audience (Natural Gas Transmission Line Operators)</b>		<b>Baseline Message Frequency (starting from effective date of Plan)</b>			
	Residents Along Right-of-Way and Places of Congregation		2 years			
	Emergency Officials		Annual			
	Public Officials		3 years			
	Excavator and Contractors		Annual			
	One-Call Centers		As required of One-Call Center			
	* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.					

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116.	192.603(b)	The operator’s program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on: .616(d) (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with the unintended release from a gas pipeline facility (3) Physical indications of a possible release; (4) Steps to be taken for public safety on the event of a gas pipeline release; and (5) Procedures to report such an event (to the operator). <b>PA Inspections 2012, 2013, 2014.</b>	X			
117.		Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). .616 (e) & (f) <b>PA Inspections 2012, 2013, 2014.</b>	X			
118.						
119.		The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. .616(g) <b>PA Brochures are available in other languages or you can call an 800 number.</b>	X			
120.		Do records indicate implementation of a program evaluation process implemented and continuous improvements based on the findings? 192.616(i) (192.616(h); API RP 1162, Section 2.7 Step 11; API RP 1162, Section 8) <b>PA Inspections 2012, 2013, 2014</b>	X			
121.	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 <b>Note:</b> Including excavation damage (PHMSA area of emphasis) <b>Reviewed failure Analysis of pipe failure due to lack of fusion on long seam.</b>	X				

**Comments:**  
 No evidence of SCC was found.

122.	192.517	From the review of the results of pressure tests, do the test records validate the pressure test? <b>Chart validates pressure test.</b>	X			
123.	.553(b)	Do records indicate the pressure uprating process was implemented per the requirements of 192.553? <b>No uprates on transmission system.</b>			X	
124.	192.709	<b>Maximum Allowable Operating Pressure (MAOP)</b>				
125.	.709	<b>Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.</b>				
126.		MAOP cannot exceed the lowest of the following: .619 <b>Spec 4.15</b>				
127.		Design pressure of the weakest element, .619(a)(1) <b>Spec 4.15</b>	X			

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128.		<p>The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in the second column, unless the segment was tested in accordance to .619(a)(2) after the applicable date in the third column or the segment was updated according to subpart K. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. <b>For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.</b> .619(a)(3) <b>See Spec 4.15</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Pipeline segment</th> <th style="width: 20%;">Pressure date</th> <th style="width: 30%;">Test date</th> </tr> </thead> <tbody> <tr> <td>-Onshore gathering line that first became subject to this part (other than §192.612) after April 13, 2006.</td> <td>March 15, 2006, or date line becomes subject to this part, whichever is later.</td> <td>5 years preceding applicable date in second column.</td> </tr> <tr> <td>Offshore gathering lines</td> <td>July 1, 1976</td> <td>July 1, 1971</td> </tr> <tr> <td>All other pipelines</td> <td>July 1, 1970</td> <td>July 1, 1965</td> </tr> </tbody> </table>	Pipeline segment	Pressure date	Test date	-Onshore gathering line that first became subject to this part (other than §192.612) after April 13, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.	Offshore gathering lines	July 1, 1976	July 1, 1971	All other pipelines	July 1, 1970	July 1, 1965	X			
Pipeline segment	Pressure date	Test date																
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129.	.709	.619(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with §192.611. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. <b>For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.</b> <b>See Spec 4.15</b>	X															
130.		.620 If the pipeline is designed to the alternative MAOP standard in 192.620 does it meet the additional design requirements for: <ul style="list-style-type: none"> <li>• General standards</li> <li>• Fracture control</li> <li>• Plate and seam quality</li> <li>• Mill hydrostatic testing</li> <li>• Coating</li> <li>• Fittings and flanges</li> <li>• Compressor stations    Final rule pub. 10/17/08, eff. 12/22/08 <b>No alternate MAOP's</b></li> </ul>			X													
131.	480-93-015(1)	Odorization of Gas – Concentrations adequate? <b>Spec 4.18 sheet one – odorized to .4% in gas in air, twice the standard.</b>	X															
132.	480-93-015(2)	Monthly Odorant Sniff Testing – <b>Odorant concentrations appear adequate.</b>	X															
133.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements <b>Yes, reviewed response to low odorant read.</b>	X															
134.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Reviewed calibration for Chart <b>Recorders available for the time period would all be calibrated.</b>	X															
135.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? <b>1/yr(15 months) no bridges</b>			X													
136.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days? Reviewed line patrol where markers were missing and remediation action taken.</b>	X															

**Comments:**

137.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained <b>Two leaks on transmission system during time frame.</b>	X			
138.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained – <b>No leaks from foreign source.</b>			X	
139.	480-93-187	Gas Leak records – Content - <b>Leak records contain required information.</b>	X			

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140.	480-93-188(1)	Gas Leak surveys – Coverage – <b>Sec 5.11 – sheet 4 transmission almost completely class 1</b>	X															
141.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) <b>Flame ionization instruments reviewed 3 leak locations and confirmed that leak instrument was tested every day.</b>	X															
142.	480-93-188(3)	Leak survey frequency (Refer to Table Below) <b>High consequence are around kettle falls is done twice per year and the entire line is surveyed once per year.</b>	X															
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"><b>Business Districts (By 6/02/07)</b></td> <td style="width: 50%;"><b>1/yr (15 months)</b></td> </tr> <tr> <td><b>High Occupancy Structures</b></td> <td><b>1/yr (15 months)</b></td> </tr> <tr> <td><b>Pipelines Operating ≥ 250 psig</b></td> <td><b>1/yr (15 months)</b></td> </tr> <tr> <td><b>Other Mains: CI, WI, copper, unprotected steel</b></td> <td><b>2/yr (7.5 months)</b></td> </tr> </table>							<b>Business Districts (By 6/02/07)</b>	<b>1/yr (15 months)</b>	<b>High Occupancy Structures</b>	<b>1/yr (15 months)</b>	<b>Pipelines Operating ≥ 250 psig</b>	<b>1/yr (15 months)</b>	<b>Other Mains: CI, WI, copper, unprotected steel</b>	<b>2/yr (7.5 months)</b>				
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143.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs <b>No special leak surveys during time period.</b>			X													
144.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred <b>No special leak surveys during time period.</b>			X													
145.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected <b>No special leak surveys during time period.</b>			X													
146.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions <b>No special leak surveys during time period.</b>			X													
147.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. <b>No special leak surveys during time period.</b>			X													
148.	480-93-188(5)	Gas survey records: Retention/Content <b>Keep records for life of the pipeline. Section 5.11 sheet 19.</b>	X															
149.	480-93-188(6)	Leak Survey Program/Self Audits <b>Leak Survey Program Audits are done annually. Reviewed 2014 and 2013.</b>	X															
150.	192.709	Patrolling (Refer to Table Below) <b>.705 Annual flyover and then anything that needs to be checked twice per year they walk. Reviewed records for 2012-2014.</b>	X															
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151.	192.709	Leak Surveys (Refer to Table Below) <b>.706 See item 142 above.</b>	X															
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152.	192.605(b)	Abandoned Pipelines; Underwater Facility Reports <b>.727(g) None for this pipeline.</b>			X													
153.	192.709	Compressor Station Relief Devices – Inspection and Testing <b>(1 per yr/15 months) .731(a) None for this pipeline.</b>			X													
154.	192.709	Compressor Station Emergency Shutdown <b>(1 per yr/15 months) .731(c) None for this pipeline.</b>			X													
155.	192.709	Compressor Stations – Detection and Alarms <b>(Performance Test) .736(c) None for this pipeline.</b>			X													
156.	192.709	Pressure Limiting and Regulating Stations – Inspection and Testing intervals <b>(1 per yr/15 months) .739 One regulator on system reviewed annual inspection.</b>	X															
157.	192.709	Pressure Limiting and Regulator Stations – <b>Capacity Testing or Review (1 per yr/15 months) .743 Done during the annual review.</b>	X															

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**Comments:**

158.	192.709	Do records indicate proper inspection and partial operation of transmission line <u>valves</u> that may be required during an emergency as required and prompt remedial actions taken if necessary? <b>(1 per yr/15 months)</b> .745 <b>Reviewed inspections for eight valves on the transmission line.</b>	X			
159.	192.709	Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment? <b>(1 per yr/15 months)</b> .749 <b>None on transmission.</b>			X	
160.	192.603(b)	Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion? .751 <b>Section 3.17 sheet 1 and 2.</b>	X			
161.	192.603(b)	Welding – Procedures .225(b) <b>Reviewed Welding Procedures</b>	X			
162.	192.603(b)	Welding – Welder Qualification .227/.229 <b>Reviewed welding qualifications for 2012-2014</b>	X			
163.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) <b>Reviewed Carlos Roderos qualification.</b>	X			
164.	192.709	NDT Records ( <b>Pipeline Life</b> ) .243(f) <b>Spec 3.12 sheet 3</b>	X			
165.	192.709	Repair: pipe ( <b>Pipeline Life</b> ); Other than pipe ( <b>5 years</b> ) <b>Spec 3.32 sheet 5 Repair of damaged pipelines.</b>	X			
166.	.807(b)	Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? (Including new construction activities - WAC 480-93-013) <b>Qualifications for employees are recorded on Avista Learning Network (ALN) and the larger contractors are members of Verforce which uses the same tests with Verforce certified evaluator. Reviewed sample of employees.</b>	X			
167.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) <b>Covered on patrol form.</b>	X			

**Comments:**

<b>CORROSION CONTROL RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
168.	192.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel. <b>Reviewed Gary Douglas documentation for Cathodic Protection specialist certified level expires on May 31, 2017.</b>	X			
169.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) <b>Transmission line installed 1967 and CP protection installed Oct 1968, installation was precode.</b>	X			
170.	192.491(c)	Do records document that each buried or submerged pipeline that <b>has been converted to gas service and was installed after July 31, 1971</b> , has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? <b>No pipeline converted to service.</b>			X	
171.	192.491	Annual Pipe-to-soil Monitoring <b>(1 per yr/15 months)</b> for short sections <b>(10% per year; all in 10 years)</b> .465(a) <b>Reviewed annual reads for 2012-2014 and checked Records 5433, 5127</b>	X			

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<b>CORROSION CONTROL RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
172.	192.491	Do records indicate the location of all items listed in 192.491(a)? <b>Reviewed CP system maps and they appear adequate.</b>	X			
173.	192.491	Examination of Buried Pipe when Exposed .459 <b>Reviewed exposed pipe reports 5 out of 5 Section 3.44.</b>	X			
174.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed. <b>None where coating was removed during this time period.</b>	X			
175.	192.491	Rectifier Monitoring ( <b>6 per yr/2½ months</b> ) .465(b) <b>Reviewed readings for 2012-2014</b>	X			
176.	192.491	Interference Bond Monitoring – Critical ( <b>6 per yr/2½ months</b> ) .465(c) <b>None on Transmission Line</b>			X	
177.	192.491	Interference Bond Monitoring – Non-critical ( <b>1 per yr/15 months</b> ) .465(c) <b>None on Transmission Line</b>			X	
178.	192.491	Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? ( <b>1 per 3 cal yr/39 months</b> ) .465(e) <b>All transmission pipe is cathodically protected.</b>			X	
179.	192.491	Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit? ( <b>Including Casings</b> ) .467 <b>Reviewed annual reading of casing on Kettle Falls transmission line.</b>	X			
180.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) <b>Reviewed random sample and all were remediated within 90 days.</b>	X			
181.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) <b>Section 5.14 page 6 and 7. All instruments are repaired and calibrated every year during December.</b>	X			
182.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months <b>Reviewed annual reading of casing on Kettle Falls transmission line.</b>	X			
183.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods <b>All casings have test leads.</b>			X	
184.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days <b>Section 5.14 – Sheets 4,5,8. All previous shorted conditions were repaired prior to 90 days.</b>	X			
185.	480-93-110(5)(c)	Casing shorts cleared when practical <b>Historically Avista has cleared casing when possible.</b>			X	
186.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months <b>No shorted conditions during time frame.</b>			X	
187.	192.491	Do records document that pipelines with cathodic protection have <b>electrical test leads installed</b> in accordance with requirements of Subpart I? (192.471; 192.469) <b>Installation is confirmed every time you read the casing.</b>	X			
188.	192.491	Do records document that the operator has minimized the detrimental effects of stray currents when found? .473 <b>Reviewed documents related to 9 mile interference with anode drains.</b>	X			
189.	192.491	Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion? .475(a) <b>No corrosive gas by contract with pipelines.</b>			X	
190.	192.491	Internal corrosion; Internal surface inspection; Pipe replacement .475(b) <b>Reviewed records for repair of pipe at 395 and Agar</b>	X			
191.	192.491	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems . (192.476(b); 192.476(c)) <b>Spec 2.12 pages 3 and 4 require consideration, no recent pipeline work.</b>	X			
192.	192.491	Internal Corrosion Control Coupon Monitoring ( <b>2 per yr/7½ months</b> ) .477 <b>No corrosion coupons in system.</b>			X	
193.	192.491	Atmospheric Corrosion Control Monitoring ( <b>1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore</b> ) .481	X			
194.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions, Records adequate? .483/.485 <b>Pipeline will be remediated to fix pigging issue.</b>	X			



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<b>Comments:</b>          
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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
195.	192.161	Supports and anchors	X			
196.	192.179	Valves installed as required? (Proper spacing, Readily accessible, Properly supported, Protection from Tampering/Damage, Blowdown-Discharge/Capacity)	X			
197.	480-93-015(1)	Odorization levels	X			
198.	192.463(a)	Levels of Cathodic Protection	X			
199.	192.465(b)	Rectifiers	X			
200.	192.467	CP - Electrical Isolation (192.467(a), (b), (c))	X			
201.	192.469	Test Stations (Sufficient Number)	X			
202.	192.476	Systems designed to reduce internal corrosion <b>System does not transport corrosive gas.</b>			X	
203.	192.479	Pipeline Components Exposed to the Atmosphere (192.479(a), (b), (c))	X			
204.	192.481	Atmospheric Corrosion – monitoring (192.481(b), (c))	X			
205.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992)	X			
206.	192.605	Knowledge of Operating Personnel	X			
207.	192.613; .703	Pipeline condition, unsatisfactory conditions, hazards, etc. captured and addressed? (192.613(a), (b); 192.703(a), (b), (c))	X			
208.	480-93-124	Pipeline Markers: Placed and maintained at above/below ground facilities. Road and railroad crossings (192.707(a))	X			
209.	192.719	Pre-pressure Tested Pipe ( <b>Markings and Inventory</b> ) (192.719(a), (b)) <b>Pre-pressure tested pipe located in Spokane yard. Not visited this inspection. (See Comments)</b>				X
210.	192.739	Pressure Limiting and Regulating Devices ( <b>Mechanical</b> ) (spot-check field installed equipment vs. inspection records) (192.739(a), (b); 192.743) <b>9 mile gate station (Regulator 8009) maintenance records reviewed for 2012-2014. (See Comments)</b>				X
211.	192.743	Pressure Limiting and Regulating Devices ( <b>Capacities</b> ) (spot-check field installed equipment vs. inspection records) <b>Capacity of Regulator Relief checked for 9 mile gate station Regulator (Regulator 8009), (See Comments)</b>				X
212.	192.745	Valve Maintenance: Field Inspection and partial operation (192.745(a), (b))	X			
213.	192.751	Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition. 192.7(a), (b), (c))	X			
214.	192.801 - 192.809	Operator qualification questions – Refer to OQ Field Inspection Protocol Form	X			

Operator Qualification Field Validation
<p><b>Important:</b> Per PHMSA, the OQ Field Inspection Protocol Form 15 (<b>Rev 6-2012</b>) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at <a href="http://primis.phmsa.dot.gov/oqdb/home.oq">http://primis.phmsa.dot.gov/oqdb/home.oq</a>    <b>Date Form Completed/Uploaded?: 8/28/2015</b></p>

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Item 209 – During the Transmission inspection I asked a couple of times about the location of their pre-tested pipe for transmission and was told that they did not have any? My review of the rules did NOT find where pre-tested pipe was required, just what kind of records are required if you have any Pre-tested pipe. When we were in the Colville District inspection I was informed they had pre-tested pipe, but it was located in the Spokane yard. Spokane District yard not part of this inspection.  
 Items 210 & 211 – Upon arriving at the pressure control valve for the Transmission pipeline, I was informed that it was on bypass and the pressure was controlled from a distribution asset at 9 mile gate station. (about 1.5 hours south) Regulator 8009 which is a Spokane District asset and Spokane District is not part of this inspection.

<b>COMPRESSOR STATIONS INSPECTION</b>		S	U	N/A	N/C
N/A - No Compressors in System (Note: Facilities may be “Grandfathered”) If not located on a platform check here and skip 192.167(c)					
192.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
	Door latch must open from inside without a key			X	
	Doors must swing outward			X	
(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
	Each gate located within 200 ft of any compressor plant building must open outward			X	
	When occupied, the door must be opened from the inside without a key			X	
(e)	Does the equipment and wiring within compressor stations conform to the <b>National Electric Code, ANSI/NFPA 70?</b>			X	
.165(a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
.165(b)	Do the liquid separators have a manual means of removing liquids?			X	
	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
.167(a)	ESD system must:				
	- Discharge blowdown gas to a safe location			X	
	- Block and blowdown the gas in the station			X	
	- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
	- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
	ESD system must be operable from at least two locations, each of which is:				
.167 (b)	- Outside the gas area of the station			X	
	- Not more than 500 feet from the limits of the station			X	
	- ESD switches near emergency exits?			X	
.167 (b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
.167(c)	Are ESDs on platforms designed to actuate automatically by...				
	- For unattended compressor stations, when:				
	▪ The gas pressure equals MAOP plus 15%?			X	
	▪ An uncontrolled fire occurs on the platform?			X	
	- For compressor station in a building, when				
	▪ An uncontrolled fire occurs in the building?			X	
▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to <b>NEC Class 1, Group D</b> is not a source of ignition)?			X		
.171(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	

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<b>COMPRESSOR STATIONS INSPECTION</b>		S	U	N/A	N/C
<b>N/A - No Compressors in System</b> (Note: Facilities may be “Grandfathered”) If not located on a platform check here and skip 192.167(c)					
(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
.173	Is each compressor station building adequately ventilated?			X	
.457	Is all buried piping cathodically protected?			X	
.481	Atmospheric corrosion control of aboveground facilities 192.481(b), (c); 192.479(a), (b), (c)			X	
.605	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? 192.605(b)(5)			X	
	Are facility maps current/up-to-date? 192.605(b)(3)			X	
.616	Public Awareness Program effectiveness - Visit identified stakeholders as part of field inspection routine			X	
.605; .615(b)	Emergency Plan for the station on site?			X	
.707	Markers			X	
.199/.731	Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly? (192.199, 192.731(a), (b), (c))			X	
.735(a), (b)	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
	Are aboveground oil or gasoline storage tanks protected in accordance with <b>NFPA standard No. 30?</b>			X	
.736(a), (b)	Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?			X	

**Comments:**

**N/A - No Compressors in System**

**Alternative Maximum Allowable Operating Pressure**

**N/A - No Alternative MAOP Procedures or Verifications used in System.**

For additional guidance refer to <http://primis.phmsa.dot.gov/maop/faqs.htm>

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<b>Alternative MAOP Procedures and Verifications</b>		S	U	N/A	N/C								
192.620	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with:  <table style="margin-left: auto; margin-right: auto; border: none;"> <tr> <td style="padding-right: 20px;">Class Location</td> <td>Alternative Design Factor (F)</td> </tr> <tr> <td style="padding-right: 20px;">1</td> <td>0.80</td> </tr> <tr> <td style="padding-right: 20px;">2</td> <td>0.67</td> </tr> <tr> <td style="padding-right: 20px;">3</td> <td>0.56</td> </tr> </table>					Class Location	Alternative Design Factor (F)	1	0.80	2	0.67	3	0.56
Class Location	Alternative Design Factor (F)												
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3	0.56												
.620(a)	(1) Establish alternative MAOP commensurate with class location – no class 4			X									
	(2) MAOP cannot exceed the lowest of the following:												
	(i) Design pressure of the weakest element			X									
	(ii) Test pressure divided by applicable factor			X									

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1	0.80												
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.620(b)	(2) Pipeline constructed of steel pipe meeting additional requirements in §192.112.			X									
	(3) SCADA system with remote monitoring and control			X									
	(4) Additional construction requirements described in §192.328			X									
	(5) No mechanical couplings			X									
	(6) No failures indicative of systemic material fault – if previously operated at lower MAOP			X									
	(7) 95% of girth welds have NDT			X									
.620(c)	(1) PHMSA notified 180 days before operating at alternative MAOP			X									
	(2) Senior Executive signatures and copy to PHMSA			X									
	(4) Strength test per §192.505 or certify previous strength test			X									
	(6) Construction tasks treated as covered tasks for Operator Qualification			X									
	(7) Records maintained for life of system			X									
	(8) Class location change anomaly remediations			X									
620(d)	(1) Threat matrix developed consistent with §192.917			X									
	(2) Recalculate the potential impact circle per §192.903 and implement public education per §192.616			X									
	(3) Responding to an emergency in an HCA												
	(i) Identify HCAs using larger impact circle			X									
	(ii) Check personnel response times			X									
	(iii) Verify remote valve abilities			X									
	(iv) Verify line break valve control system			X									
	(4) Protect the right-of-way:												
	(i) ROW patrols 12 per year not to exceed 45 days			X									
	(ii) Plan to identify and mitigate unstable soil			X									
	(iii) Replace loss of cover if needed			X									
	(iv) Use line-of-sight markers per §192.707			X									
	(v) Review damage prevention program in light of national consensus practices			X									
	(vi) ROW management plan to protect against excavation activities			X									
	(5) Control Internal Corrosion:												
	(i) Program to monitor gas constituents			X									
(ii) Filter separators if needed			X										
(iii) Gas Monitoring equipment used			X										
(iv) Cleaning pigs, inhibitors, and sample accumulated liquids													
.620(d)	(v) Limit CO <sub>2</sub> , H <sub>2</sub> S, and water in the gas stream			X									
	(vi) Quarterly program review based on monitoring results			X									
	(6) (i) Control interference that can impact external corrosion			X									
	(ii) Survey to address interference currents and remedial actions			X									
	(7) Confirm external corrosion control through indirect assessment			X									

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192.620	<b>Alternative MAOP Procedures and Verifications</b>	S	U	N/A	N/C								
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1	0.80												
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	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months												
	(ii) Remediate damage with IR drop > 35%			X									
	(iii) Integrate internal inspection results with indirect assessment			X									
	(iv) Periodic assessments for HCAs			X									
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results												
	(8) Cathodic Protection			X									
	(i) Complete remediations within 6 months of failed reading												
	(ii) Confirm restoration by a close interval survey			X									
	(iii) Cathodic protection system operational within 12 months of construction completion			X									
	(9) Baseline assessment of integrity			X									
	(i)(A) Geometry tool run within 6 months of service												
	(i)(B) High resolution MFL tool run within 3 years of service			X									
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X									
	(iii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X									
	(10) Periodic integrity assessments			X									
	(i) Frequency for assessments determined as if all segments covered by Subpart O												
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X									
	(11) Repairs			X									
	(i)(A) Use of the most conservative calculation for anomaly remaining strength												
	(B) Tool tolerances taken into consideration			X									
	(ii) Immediate repairs for:			X									
	(A) Dents meeting 309(b) criteria												
	(B) Defects meeting immediate criteria in §192.933(d)			X									
	(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X									
	(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X									
	(iii) Repairs within 1 year for:			X									
	(A) Defects meeting 1 year criteria in 933(d)												
	(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X									
	(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X									
	(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X									
	(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X									
	(1) Provide overpressure protection to a max of 104% MAOP			X									
.620(e)	Does the AMAOP process include overpressure protection requirements?			X									
	Do records indicate that overpressure protection requirements were met?			X									

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**Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)**

<b><u>Number</u></b>	<b><u>Date</u></b>	<b><u>Subject</u></b>
ADB-2013-07	July 12, 13	Potential for Damage to Pipeline Facilities Caused by Flooding
ADB-2012-10	Dec 5, 12	Using Meaningful Metrics in Conducting Integrity Management Program Evaluations
ADB-2012-09	Oct 11, 12	Communication During Emergency Situations
ADB-2012-08	Jul 31, 12	Inspection and Protection of Pipeline Facilities After Railway Accidents



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ADB-12-07	Jun 11, 12	Mechanical Fitting Failure Reports
ADB-12-06	May 7, 12	Verification of Records establishing MAOP and MOP
ADB-12-05	Mar 23, 12	Cast Iron Pipe (Supplementary Advisory Bulletin)
ADB -12-04	Mar 21, 12	Implementation of the National Registry of Pipeline and Liquefied Natural Gas Operators
ADB-12-03	Mar 6, 12	Notice to Operators of Driscopipe 8000 High Density Polyethylene Pipe of the Potential for Material Degradation
ADB-11-05	Sep 1, 11	Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes
ADB-11-04	Jul 27, 11	Potential for damage to pipeline facilities caused by severe flooding.

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>

**Comments:**