

**Utilities and Transportation Commission**  
**Standard Inspection Report for Intrastate Gas Distribution Systems**  
**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, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Inspection ID/Docket Number	7228		
Inspector Name & Submit Date	Dave Cullom 6/12/2017		
Chief Eng Name & Review/Date	Joe Subsits received and reviewed on 6/21/17		
Operator Information			
Name of Operator:	Puget Sound Energy	OP ID #:	22189
Name of Unit(s):	Thurston/Lewis		
Records Location:	Georgetown (Seattle)		
Date(s) of Last (unit) Inspection:	7/22/2014	Inspection Date(s):	April 3-6, May 8-10, May 16-17, and June 5, 2017

**Inspection Summary:**

There are (2) probable violations for the Thurston/Lewis inspection unit.

This standard audit consisted of a joint records review for multiple inspection units (Pierce, Thurston/Lewis, and Kittitas)

The records verification of PSE’s facilities for the Thurston County unit included but was not limited to: Leak survey records, leak work orders, cathodic protection (CP) test and remediation records, valve inspections, bridge and slide patrols, odorant checks, equipment calibrations, pressure control records, operator qualification (OQ) records, new construction records, and additional compliance records for drug and alcohol, damage prevention, and public awareness were reviewed.

The UTC also performed spot field checks for one week in the field for operator qualification verification and to verify records reviewed in PSE’s offices through field data collection. The field portion included: pipe to soil readings, isolation testing, rectifier inspections, pressure regulator and over pressure operation, emergency block valve operation, and odorant concentration testing.

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The following probable violations of Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2017 inspection of the Puget Sound Energy – Thurston/Lewis County service area.

**PROBABLE VIOLATIONS**

1.     **49 CFR §192.481 Atmospheric corrosion control: Monitoring**

(c)     *If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479.*

**Finding(s):**

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**Inspection Summary:**

Records indicate there was a service at 3716 Oxford Loop in Lacey that was rated a 4 by PSE’s service provider, Surveys and Analysis (S & A), in September of 2015 during an atmospheric corrosion survey. This generated a work order, and PSE followed up and visited the site to perform the remediation in December 2015.

The remediation work was postponed due to inclement weather. An error was made in closing out the work order and it was closed out completely as opposed to a secondary work order being created. The corroded riser subsequently leaked in April 2016. The leak number is N0118704.

The service at 3716 Oxford did not have adequate protection or remediation and resulted in an above ground leak.

Staff reviewed three other above ground leaks (N0117647, N0117676, and N0115744) that were found during this inspection. Discussion with PSE staff indicate that the grading of these services did not prevent atmospheric corrosion leaks. However, these leaks have been previously resolved by PSE’s atmospheric corrosion grading retraining efforts in 2015.

These examples may indicate of lack of proper oversight of PSE contractor activities. Please respond with a description of your plan to resolve this issue.

2. **WAC 480-93-180 Plans and procedures**

*(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

**Finding(s):**

Records indicate there was a service at 3716 Oxford Loop in Lacey that was rated a 4 by PSE’s service provider, S&A, in September of 2015 during an atmospheric corrosion survey. This generated a work order, and PSE followed up and visited the site to perform the remediation in December 2015.

The remediation work was postponed due to weather. An error was made in closing out the work order and it was closed out completely as opposed to a secondary work order being created. The corroded riser subsequently leaked in April 2016. The leak number is N0118704.

PSE’s Gas Operating Standard (GOS) “Remedial Measures for Corrosion Control” 2600.1900 Section 7.1 states:

“Atmospheric corrosion having a rating of “4” and “4 SAI” as determined in accordance with Field Procedure 4515.1220 should be remediated within 90 days. Except as provided in Section 7.1.1, the

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remediation time frame shall not exceed 180 days.”

This instance exceeded the 90 day time frame for remediation.

Please update your procedure to address the work order management gap found during our evaluation.

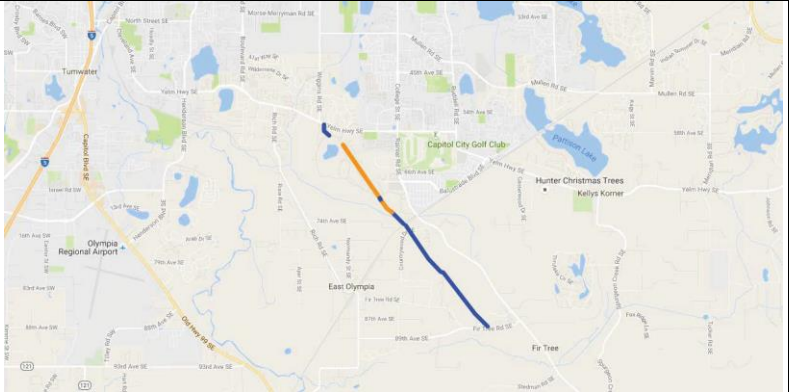
<b>HQ Address:</b> PO Box 97034 M/S: PSE-12N Bellevue, WA 98009-9734		<b>System/Unit Name &amp; Address:</b> Thurston/Lewis Office 2711 Pacific Ave SE, Olympia, WA	
<b>Co. Official:</b>	Booga K. Gilbertson, Sr. VP Operations	<b>Phone:</b>	509-201-3037
<b>Phone No.:</b>	425-462-3843	<b>Fax No.:</b>	
<b>Fax No.:</b>	425-456-2724	<b>Emergency Phone No.:</b>	800-552-7171
<b>Emergency Phone No.:</b>	800-552-7171		
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>	
Tony Lupo	Gas Contract Manager	206-517-3431	
Angela Wingate	Quality Control Project Manager	206-716-2627	
Gary Swanson	Maintenance Program Coordinator	260-716-2632	
Dave Wooten	Pressure Control Supervisor	425-505-3442	
Heidi Brewer	Pressure Control Resource Coordinator	253-476-6224	
Brett Conrad	Interim Super Supervisor Contractor Management	425-398-6165	
Signe Lippert	Supervisor of Maintenance Programs	206-716-2630	
Stephanie Silva	Gas Compliance Program Manager	425-462-3923	
Lee Maxwell	Sr. Regulatory Compliance Analyst	425-462-3575	
Monica Ferguson	Regulatory Compliance Analyst	425-462-3087	
Dave Moffett	Supervisor of Corrosion South	253-476-6216	
Scott Salazar	Corrosion Control Technician	Contact supervisor for phone calls	
Edd Osborn	CFS Technician	Contact supervisor for phone calls	
Paul Bench	Pressure Control Technician	Contact supervisor for phone calls	
Richard Federer	Pressure Control Technician	Contact supervisor for phone calls	

<b>WUTC staff conducted an 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>	N/A
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	<b>Date:</b>	10/29/2015
<input checked="" type="checkbox"/>	OQ Program Review (PHMSA Form 14)	<b>Date:</b>	11/12/2014

<b>GAS SYSTEM OPERATIONS</b>	
<b>Gas Supplier</b>	Williams
<b>Services:</b> Residential 55275 Commercial 11076 Industrial 352 Other	

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<b>GAS SYSTEM OPERATIONS</b>			
Number of reportable safety related conditions last year 0		Number of deferred leaks in system 16 Lewis - 55 Thurston	
Number of <u>non-reportable</u> safety related conditions last year 0		Number of third party hits last year 55 Thurston/Lewis combined	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 0, 0 Thurston/Lewis 3.184 - 2017 Yes, 3.23 (2.23 in Thurston, 1 mile in Lewis) per PSE		Miles of main within inspection unit (total miles and miles in class 3 & 4 areas)  Not separated by class 3 or 4 locations.  Thurston County Total Main Footage (mi) 964.55	
Olympia Transmission Line Main ID 31B-1 Install Year 1961 Length 16,812 ft. Pipe Size 6 in. Pipe Wall Thickness 0.188 in. Pipe Grade Gr. B System NOP 400 psig % SMYS at System NOP 20.2			
<b>Operating Pressure(s):</b>		<b>MAOP (Within last year) (psig)</b>	<b>Actual Operating Pressure (psig) (At time of Inspection)</b>
Feeder:	Please see field data collection form for visited site information	Please see field data collection form for visited site information	Please see field data collection form for visited site information
Town:	Please see field data collection form for visited site information	Please see field data collection form for visited site information	Please see field data collection form for visited site information
Other:	Please see field data collection form for visited site information	Please see field data collection form for visited site information	Please see field data collection form for visited site information
Does the operator have any transmission pipelines?		Yes, 3.184 in this unit	
Compressor stations? Use Attachment 1.		N/A	
Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues?    Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Comments: I reviewed the annual report for this operator and will also be cross referencing the information in the annual report with DIMP and TIMP program audits later this year			

<b>Pipe Specifications:</b>			
Year Installed (Range)	1923 - 2017	Pipe Diameters (Range)	5/8" to 20"
Material Type	PE, Steel	Line Pipe Specification Used	API 5L ASTM D2513
Mileage (Main)	964.55mi	SMYS %	<20% (except transmission portions of 20.2 in Thurston and the 25.5% Chehalis Gate station (between Williams and first pressure cut as noted by DRitter in his 2014 inspection))

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**Operator Qualification Field Validation**

**Important:** Per OPS, the OQ Field Inspection Protocol Form (Rev 4, May 2007) 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 <http://primis.phmsa.dot.gov/oqdb/home.oq> **Date Completed/Uploaded** \*\*\*Notes – This will be uploaded once the inspection is finalized\*\*\*

**Integrity Management Field Validation**

**Important:** Per PHMSA, IMP Field Verification Form (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 <http://primis.phmsa.dot.gov/gasimp/home.gim> **Date Completed/Uploaded:** N/A – Not a transmission inspection

**PART 199 Drug and Alcohol Testing Regulations and Procedures**

		S	U	NA	NC
<b>Subparts A - C</b>	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. ***Notes – The checklist is stored in the Pierce County 2017 inspection***	X			

**REPORTING RECORDS**

			S	U	N/A	N/C
<b>1.</b>	<b>49 U.S.C. 60132, Subsection (b)</b>	<b>For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002</b> Updates to NPMS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to <a href="mailto:opsgis@rspa.dot.gov">opsgis@rspa.dot.gov</a> stating that fact.</u> Include operator contact information with all updates. ***Notes – An email was sent March 1, 2017 for this year’s submission***	X			
<b>2.</b>	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?	X			
<b>3.</b>	191.5	Immediate Notice of certain incidents to <b>NRC (800) 424-8802</b> , or electronically at <a href="http://www.nrc.uscg.mil/nrchp.html">http://www.nrc.uscg.mil/nrchp.html</a> , and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. ***Notes – The operator has a written procedure for calculating lost gas during an incident that the RPE uses***	X			
<b>4.</b>	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at <a href="http://portal.phmsa.dot.gov/pipeline">http://portal.phmsa.dot.gov/pipeline</a> at unless an alternative reporting method is authorized IAW with paragraph (d) of this section.	X			
<b>5.</b>	191.15(a)	30-day follow-up written reports to PHMSA ( <b>Form F7100.2</b> ) Submittal must be electronically to <a href="http://pipelineonlinereporting.phmsa.dot.gov">http://pipelineonlinereporting.phmsa.dot.gov</a>	X			
<b>6.</b>	191.15(c)	Supplemental report (to 30-day follow-up)	X			
<b>7.</b>	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, 2011 for the year 2010).	X			
<b>8.</b>	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>	X			
<b>9.</b>	191.23	Filing the <b>Safety Related Condition Report (SRCR)</b>	X			

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REPORTING RECORDS			S	U	N/A	N/C
10.	191.25  49 U.S.C. 60139, Subsection (b)(2)	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.  The report should be titled “Gas Transmission MAOP Exceedance” and provide the following information: <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> <li>• 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. ****Notes - <b>This does not apply. This is not a transmission unit audit.</b>****</li> </ul>			X	
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential <b>Safety Related Conditions</b>	X			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
14.	480-93-200(1)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9144</b> (Within <b>2 hours</b> ) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	X			
18.	480-93-200(1)(d)	The unintentional ignition of gas; ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	X			
20.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
21.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
22.	480-93-200(2)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146</b> (Within <b>24 hours</b> ) for;				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;	X			
24.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or ****Notes – <b>This condition does not apply for this inspection time period.</b> ****			X	

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REPORTING RECORDS			S	U	N/A	N/C
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	X			
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; <b>****Notes – This condition does not apply for this inspection time period.****</b>			X	
29.	480-93-200(4)(b)	The extent of injuries and damage; <b>****Notes – This condition does not apply for this inspection time period.****</b>			X	
30.	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;	X			
31.	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;	X			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	X			
33.	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site;	X			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	X			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	X			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	X			
37.	480-93-200(4)(j)	Line type;	X			
38.	480-93-200(4)(k)	City and county of incident; and	X			
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	X			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	X			
41.	480-93-200(6)	Written report within 5 days of receiving the <b>failure analysis</b> of any incident or hazardous condition due to <b>construction defects or material failure</b>	X			
42.	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>****Notes - Some PSE provided damage metrics for the last three years are:</b>  <b>2014 is 5.1 (damages) per 1000</b> <b>2015 is 2.8 (damages) per 1000</b> <b>2016 is 5.26 (damages) per 1000****</b>				
43.	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)	X			
44.	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?	X			
45.	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>****Notes - They keep them for 3 years.****</b>	X			
46.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities? <b>****Notes - They hand out dig books and send letters when needed****</b>				
47.	480-93-200(8)(a)	<ul style="list-style-type: none"> <li>Notification requirements for excavators under RCW 19.122.050(1)</li> </ul>	X			
48.	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</li> </ul>	X			
49.	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.</li> </ul>	X			

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50.	480-93-200(9)	<b>Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities...</b> <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)    <b>***Notes – No instances during the last three years***</b></li> </ul>			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				
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	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.	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	X			
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	X			
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	X			

**Comments:**

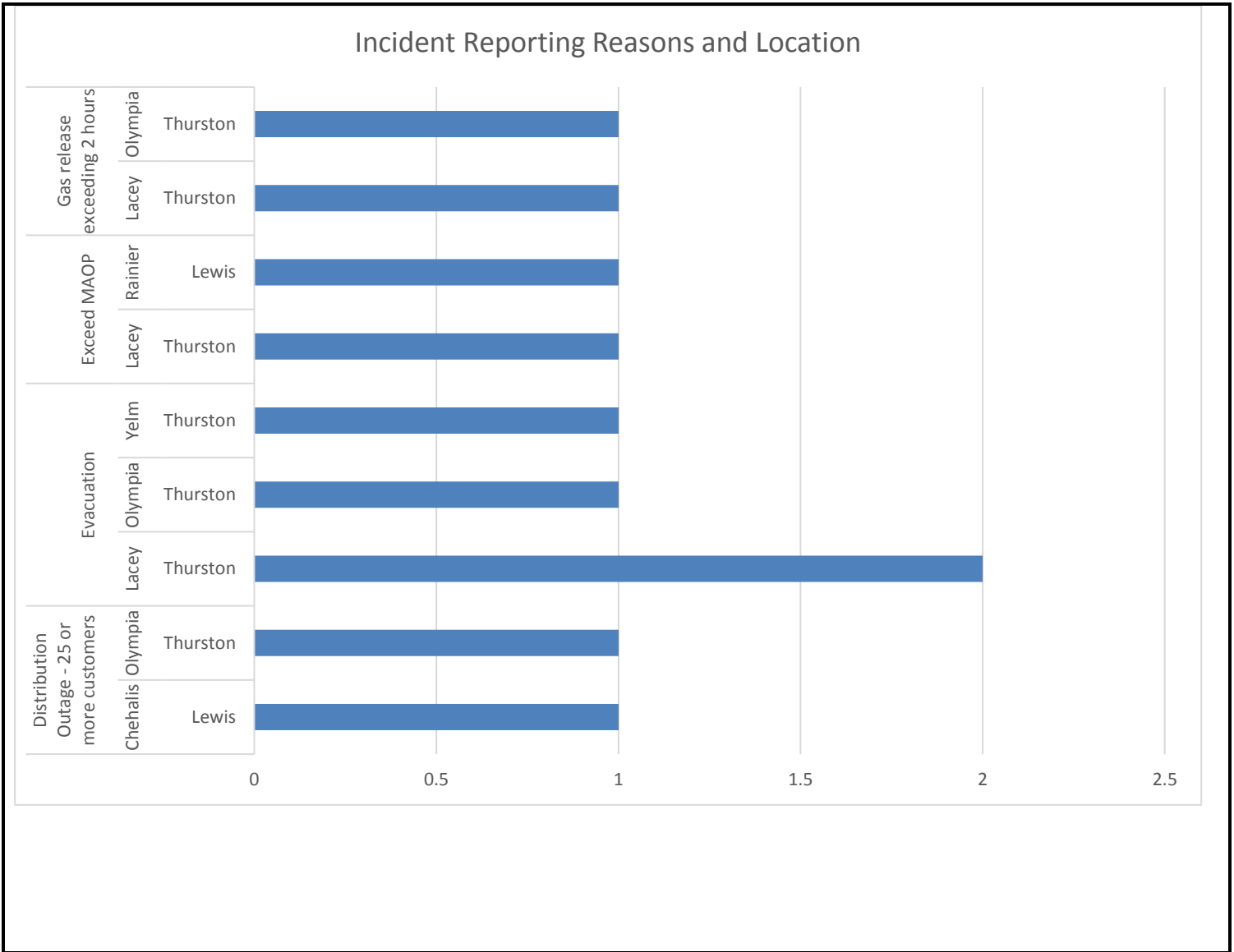
**#14-41**

**These were the reportable incidents for Thurston/Lewis since 2014 in our incident database and are as follows:**



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CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
57.	192.16	<b>Customer notification</b> - Customers notified, within <b>90 days</b> , of their responsibility for those service lines not maintained by the operator	X			
58.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	X			
59.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate?	X			

**Comments:**

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CONSTRUCTION RECORDS			S	U	N/A	N/C
60.	480-93-013	OQ records for personnel performing New Construction covered tasks	X			
61.	192.225	Test Results to Qualify Welding Procedures	X			
62.	192.227	Welder Qualification	X			
63.	480-93-080(1)(b)	Appendix C Welders re-qualified <b>2/Yr (7.5Months)</b>	X			
64.	480-93-080(2)	Plastic pipe joiners re-qualified <b>1/Yr (15 Months) ***Notes – PSE requalifies annually***</b>	X			
65.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period <b>***Notes – PSE requalifies annually***</b>			X	
66.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners <b>1/Yr (12Months) ***Notes – PSE requalifies annually***</b>			X	
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 <b>***Notes – No casings installed without test leads****</b>			X	
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains	X			
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services <b>***Notes – this is observed during our design, construction, and testing, (DTC) audits throughout the year.****</b>	X			
70.	192.241(a)	Visual Weld Inspector Training/Experience	X			
71.	192.243(b)(2)	Nondestructive Technician Qualification	X			
72.	192.243(c)	NDT procedures	X			
73.	192.243(f)	Total Number of Girth Welds	X			
74.	192.243(f)	Number of Welds Inspected by NDT	X			
75.	192.243(f)	Number of Welds Rejected	X			
76.	192.243(f)	Disposition of each Weld Rejected	X			
77.	.273/.283	Qualified Joining Procedures Including Test Results	X			
78.	192.303	Construction Specifications	X			
79.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	X			
80.	192.327	Amount, location, cover of each size of pipe installed	X			
81.	480-93-160(1)	Report filed <b>45 days</b> prior to construction or replacement of transmission pipelines <b>≥ 100 feet in length ***Notes - No transmission construction in this unit.***</b>			X	
82.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: <b>***Notes - No transmission construction in this unit.***</b>			X	
83.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; <b>***Notes - No transmission construction in this unit.***</b>			X	
84.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. <b>***Notes - No transmission construction in this unit.***</b>			X	
85.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed <b>***Notes - No transmission construction in this unit.***</b>			X	
86.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; <b>***Notes - No transmission construction in this unit.***</b>			X	
87.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. <b>***Notes - No transmission construction in this unit.***</b>			X	
88.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; <b>***Notes - No transmission construction in this unit.***</b>			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
89.	480-93-160(2)(g)	Welding specifications; and***Notes - No transmission construction in this unit.***			X	
90.	480-93-160(2)(h)	Bending procedures to be followed if needed. ***Notes - No transmission construction in this unit.***			X	
91.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress $\geq 20\%$ SMYS? ***Notes - No transmission construction in this unit.***			X	
92.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h)	X			
93.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed?	X			
94.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) ***Notes - Checked gauges and MAOP info for Thorne Ln job for Pierce County as part of the records portion of the joint unit audit. Checked gauges for jobs 107049447 and 107047690. Gauges are routinely checked during DTC audits and during the field portions of our inspections. Gauges were also checked during the field portion of this inspection. See field data collection notes.***	X			
95.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines $> 60$ psig ***Notes – This condition did not occur during this inspection time period***			X	
96.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines $\leq 60$ psig ***Notes – This condition did not occur during this inspection time period***			X	

**Comments:**

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
97.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline	X			
98.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	X			
99.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09	X			
100.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel	X			
101.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? ****Notes – The 21 construction job samples were reviewed for mapping updates and all met the time frame****	X			
102.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures	X			
103.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures	X			
104.	192.609	Class Location Study (If applicable) ***Notes – This is a distribution inspection. This condition does not apply***			X	
105.	192.611	Confirmation or revision of MAOP	X			
106.	192.614	Damage Prevention (Operator Internal Performance Measures)				

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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>	<p>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, Best Practice 4-18. Recommended only, not required)</p> <p><b>****Notes – ELM is the vendor used for locates in this unit.</b></p> <p><b>ELM uses the 1 in 1000 criteria. They are going to start the metric at 1:2000. Last year’s metric was .52 or 80861 and 31 at fault damages. PSE performs locate damage investigations. Each month they get a report from ELM that discusses at fault or not at fault.</b></p> <p><b>The operator does not conduct field audits in Contract Management, but Quality Management may monitor the locating contract in the future. There are currently no PSE staff field monitoring locates as they are being performed in the field.*****</b></p>	X			
<b>108.</b>	<p>Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?</p> <p><b>Notes – The operator did not provide incentives in the past, but now they are setting action thresholds to allow tracking so contract management can implement incentives and penalties. In the past the incentive was simply retention.</b></p>	X			
<b>109.</b>	<p>Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?</p>	X			
<b>110.</b>	<p>Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? <b>***Notes - They reviewed OQ records recently per PSE***</b></p>	X			
<b>111.</b>	<p>Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.</p>	X			
<b>112.</b>	<p>Are locates are being made within the timeframes required by state law and regulations? Examine record sample.</p> <p><b>***Notes - 6/5/2014, 2015 and 2016 (Reviewed tickets still open beyond two days – aka “Extended Tickets”)**</b></p>	X			
<b>113.</b>	<p>Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements?</p> <p><b>****Notes - Quality Management reviewed this in 1/13/17 is when they received the report. The audit was completed 12/19/16.****</b></p>	X			
<b>114.</b>	<p>Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6)</p> <p>1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline?</p> <p>2. In the case of blasting, does the inspection include leakage surveys?</p>	X			

**Comments:**

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115.		<b>Emergency Response Plans</b>	S	U	N/A	N/C																										
116.	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	X																													
117.	192.615(b)(1)	Location Specific Emergency Plan	X																													
118.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training. <b>***Notes – This is done on a two year cycle***</b>	X																													
119.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	X																													
120.	192.615(c)	Liaison Program with Public Officials	X																													
121.	192.616	<b>Public Awareness Program</b>																														
122.	192.616(e&f)	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.). See table below:	X																													
123.		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.																														
124.		<b>API RP 1162 Baseline* Recommended Message Deliveries</b>																														
125.		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Stakeholder Audience (LDC’s)</th> <th style="text-align: center;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residence Along Local Distribution System</td> <td>Annual</td> </tr> <tr> <td>LDC Customers</td> <td>Twice annually</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> <tr> <th style="text-align: center;">Stakeholder Audience (Transmission line operators)</th> <th style="text-align: center;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> <tr> <td>Residence Along Local Distribution System</td> <td>2 years</td> </tr> <tr> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> <tr> <td>Emergency Officials</td> <td>Annual</td> </tr> <tr> <td>Public Officials</td> <td>3 years</td> </tr> <tr> <td>Excavator and Contractors</td> <td>Annual</td> </tr> </tbody> </table>	Stakeholder Audience (LDC’s)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	Annual	LDC Customers	Twice annually	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual	Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)	Residence Along Local Distribution System	2 years	One-Call Centers	As required of One-Call Center	Emergency Officials	Annual	Public Officials	3 years	Excavator and Contractors	Annual				
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126.		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																														
127.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. <b>***Notes - The operator tracks calls that come into the call center to check the predominant languages used in their service areas.    The operator has scratch and sniff cards in 11 languages.***</b>	X																													
128.	.616(h)	IAW API RP 1162, the operator’s program should be reviewed for effectiveness within four years of the date the operator’s program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than <b>June 20, 2010</b> . .616(h) <b>***Notes - The last one was done in 2013 and the study is going to be completed this year.***</b>	X																													

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129.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. <b>***Notes – This is not a Master Meter system***</b>	X			
130.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 <b>Note:</b> Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10)	X			

**Comments:**

**#122-#127 The operator has mailers that are customized to the system. I reviewed public notice content for LDC transmission residents and fire/police response employees near the Olympia transmission pipelines as examples. The operator sends bill stuffers. For paperless billing, the operator is using hyperlinks to direct the customer to the correct web site.**

131.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)	X			
132.	480-93-015(1)	Odorization of Gas – Concentrations adequate <b>***Notes – The operator uses .8% Gas/Air as the high level for detecting properly odorized gas given the current gas chemistry/supply to meet the 1/5<sup>th</sup> of the LEL detection criteria.***</b>	X			
133.	480-93-015(2)	Monthly Odorant Sniff Testing	X			
134.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements <b>***Notes – This condition did not exist in this unit for this inspection time period (2016-2014)****</b>			X	
135.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation)	X			
136.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? <b>1/yr(15 months)</b> <b>***Notes - 10 late actual sites out of 2567 total sites for all three units inspected this year. PSE had comments detailing justification for the delayed inspections that were deemed adequate at the time of this inspection***</b>	X			
137.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b>	X			
138.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on. <b>***Notes- This is done with a manometer when a meter is set during turn-on.***</b>	X			
139.	480-93-155(1)	Up-rating of system MAOP to <b>&gt;60 psig?</b> Procedures and specifications submitted <b>45 days</b> prior?	X			
140.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?	X			
141.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and;	X			
142.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained?	X			
143.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within <b>30 days</b> of a leak repair? <b>***Notes – I reviewed randomly selection leak evaluations that included all three units inspected this year and the sites requiring a 30 day follow-up met the time allowance for follow-up.***0</b>	X			

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144.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	X			
145.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	X			
146.	480-93-188(1)	Gas leak surveys	X			
147.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) <b>***Notes - GFR GMI Units were reviewed during the combined 3 unit records portion during this inspection containing records from Thurston/Lewis, Kittitas, and Pierce Counties***</b> <b>6/18/2014 GDI 611212 Calibrated 5/30/2014 - OK</b> <b>4/8/2016 GDI 611135 Calibrated 4/7/2016 - OK</b> <b>5/17/2016 GDI 611188 Calibrated 5/12/2016 – OK***</b>	X			
148.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

Business Districts (implement by 6/02/07)	1/yr (15 months)
High Occupancy Structures	1/yr (15 months)
Pipelines Operating ≥ 250 psig	1/yr (15 months)
Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)

149.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs	X			
150.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred <b>***Notes – There were no records to review or reason to believe damage has occurred during the combined 3 unit records portion during this inspection containing records from Thurston/Lewis, Kittitas, and Pierce Counties per the operator.***</b>			X	
151.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected <b>***Notes – This condition did not occur for this inspection time period.***</b>			X	
152.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions. <b>***Notes – This condition did not occur for this inspection time period.***</b>			X	
153.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings. <b>***Notes – I reviewed some special leak surveys for services that were damaged by third-party excavation.***</b>	X			
154.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f)	X			
155.	480-93-188(6)	Leak program - Self Audits	X			
156.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 <b>***Notes – Not a transmission inspection***</b>			X	

Class Location	At Highway and Railroad Crossings	At All Other Places
1 and 2	2/yr (7½ months)	1/yr (15 months)
3	4/yr (4½ months)	2/yr (7½ months)
4	4/yr (4½ months)	4/yr (4½ months)

157.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 <b>***Notes – Not a transmission inspection***</b>			X	
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Class Location	Required	Not Exceed
1 and 2	1/yr	15 months
3	2/yr	7½ months
4	4/yr	4½ months

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158.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1)	X			
159.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	X			
160.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192.723(b)(1)	X			
161.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> <li>• Outside Business District (5 years)</li> <li>• Cathodically unprotected distribution lines (3 years)</li> </ul>	X			
162.	192.603(b)	Tests for Reinstating Service Lines 192.725	X			
163.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727***Notes – None in this inspection unit***			X	
164.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 ***Notes – The last three years records were looked at and all stations met the requirements***	X			
165.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 ***Notes – I reviewed the relief capacity calculations and the change log showing that nothing had changed, for example, from the last capacity review.***	X			
166.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 ***Notes – This is covered in the transmission inspection.***			X	
167.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 ***Notes- We looked at HOS valves (Service valves, emergency section valves for the last 3 years.***	X			
168.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) ***Notes - We looked at HOS valves (Service valves for the last three years and 8147 and 4 short exceedances were noted, but have been resolved)****	X			
169.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 ***Notes – No vaults that meet this volume***			X	
170.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 ***Notes – No hot work permits are used at PSE***			X	
171.	192.603(b)	Welding – Procedure 192.225(b)	X			
172.	192.603(b)	Welding – Welder Qualification 192.227/.229	X			
173.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2)**	X			
174.	192.709	NDT Records (pipeline life) .243(f) ***Notes – This is covered in the transmission inspection. PSE elects to NDT some jobs as required by their operating procedures that exceed the requirements of NDT testing of a pipeline not at the %SMYS required for NDT testing under the CFR.***			X	
175.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	X			
176.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) ***Notes – This is covered in the transmission inspection.***			X	

**Comments:**

<b>CORROSION CONTROL RECORDS</b>			S	U	N/A	N/C
177.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
178.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71)	X			
179.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)	X			
180.	192.491	Test Lead Maintenance .471	X			



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<b>CORROSION CONTROL RECORDS</b>			<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
<b>181.</b>	192.491	Maps or Records .491(a)	X			
<b>182.</b>	192.491	Examination of Buried Pipe when exposed .459	X			
<b>183.</b>	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	X			
<b>184.</b>	192.491	Annual Pipe-to-soil monitoring ( <b>1 per yr/15 months</b> ) .465(a)	X			
<b>185.</b>	192.491	Rectifier Monitoring ( <b>6 per yr/2½ months</b> ) .465(b)	X			
<b>186.</b>	192.491	Interference Bond Monitoring – Critical ( <b>6 per yr/2½ months</b> ) .465(c) <b>***Notes – None identified for Pierce, Thurston/Lewis, or Kittitas this inspection cycle.***</b>			X	
<b>187.</b>	192.491	Interference Bond Monitoring – Non-critical ( <b>1 per yr/15 months</b> ) .465(c) <b>***Notes – None identified for Pierce, Thurston/Lewis, or Kittitas this inspection cycle.***</b>			X	
<b>188.</b>	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	X			
<b>189.</b>	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation.	X			
<b>190.</b>	192.491	Unprotected Pipeline Surveys, CP active corrosion areas ( <b>1 per 3 cal yr/39 months</b> ) .465(e) <b>***Notes – No active corrosion areas***</b>			X	
<b>191.</b>	192.491	Electrical Isolation ( <b>Including Casings</b> ) .467	X			
<b>192.</b>	480-93-110(5)	Casings inspected/tested annually not to exceed <b>fifteen months</b>	X			
<b>193.</b>	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods <b>***Notes – None found in this unit***</b>			X	
<b>194.</b>	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within <b>90 days</b> <b>***Notes – No noted shorted casings from records review or field observation***</b>			X	
<b>195.</b>	480-93-110(5)(c)	Casing shorts cleared when practical <b>***Notes – No noted shorted casings from records review or field observation***</b>			X	
<b>196.</b>	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. <b>Twice annually/7.5 months</b> <b>***Notes – No noted shorted casings from records review or field observation***</b>			X	
<b>197.</b>	192.491	Interference Currents .473 <b>***Notes – The operator was asked about interference currents and the operator said they have not experienced any stray AC (or DC) that has impacted their CP system in Thurston/Lewis***</b>			X	
<b>198.</b>	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) <b>***Notes – No corrosive gas found in this unit. No digesters or other biogas sources are active or planned in this unit that would be a gas source.***</b>			X	
<b>199.</b>	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) <b>***Notes – This is done as part of the EPCRs during service or main replacement.***</b>	X			
<b>200.</b>	192.491	Internal Corrosion Control Coupon Monitoring ( <b>2 per yr/7½ months</b> ) .477 <b>***Notes – No internal coupons***</b>			X	

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
201.	192.491	<p>Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 *** Notes - Records indicate there was a service at 3716 Oxford Loop in Lacey that was rated a 4 by PSE's service provider, S&amp;A, in September of 2015 during an atmospheric corrosion survey. This generated a work order, and PSE followed up and visited the site to perform the remediation in December 2015.</p> <p>The remediation work was postponed due to weather. An error was made in closing out the work order and it was closed out completely as opposed to a secondary work order being created. The corroded riser subsequently leaked in April 2016. The leak number is N0118704.</p> <p>Three other above ground leaks reviewed N0117647, N0117676, and N0115744 that were discussed during this inspection with PSE's staff but have previously been resolved by PSE's atmospheric corrosion grading retraining efforts in 2015.</p> <p>The service at 3716 Oxford not have adequate protection or remediation and resulted in an aboveground leak.***</p>	■	X	■	■
202.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485	X			

**Comments:**

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
203.	192.161	Supports and anchors	X			
204.	480-93-080(1)(d)	Welding procedures located on site where welding is performed? ***Notes – Did not observe construction being performed during the field portion of this inspection***				X
205.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables ***Notes – Did not observe construction being performed during the field portion of this inspection***				X
206.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed? ***Notes – Did not observe construction being performed during the field portion of this inspection***				X
207.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed.	X			
208.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified?	X			
209.	480-93-015(1)	Odorization	X			
210.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	X			
211.	192.179	Valve Protection from Tampering or Damage	X			
212.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	X			
213.	192.463	Levels of cathodic protection	X			
214.	192.465	Rectifiers	X			
215.	192.467	CP - Electrical Isolation	X			
216.	192.476	Systems designed to reduce internal corrosion	X			
217.	192.479	Pipeline Components exposed to the atmosphere	X			

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PIPELINE INSPECTION (Field)			S	U	N/A	N/C
218.	192.481	Atmospheric Corrosion: monitoring	X			
219.	192.491	Test Stations – Sufficient Number .469	X			
220.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	X			
221.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	X			
222.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	X			
223.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	X			
224.	192.605	Knowledge of Operating Personnel	X			
225.	480-93-124	Pipeline markers	X			
226.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b>	X			
227.	192.719	Pre-pressure Tested Pipe ( <b>Markings and Inventory</b> )	X			
228.	192.195	Overpressure protection designed and installed where required?	X			
229.	192.739/743	Pressure Limiting and Regulating Devices ( <b>Mechanical/Capacities</b> )	X			
230.	192.741	Telemetry, Recording Gauges	X			
231.	192.751	Warning Signs	X			
232.	192.355	Customer meters and regulators. Protection from damage	X			
233.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	X			
234.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	X			
235.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	X			
236.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	X			
237.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards	X			
238.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? <b>Yes    No X</b>				
239.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? <b>***Notes – No facilities installed***</b>			X	
240.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? <b>***Notes – No facilities installed***</b>			X	
241.	192.745	Valve Maintenance (Transmission) <b>***Notes – This is a separate unit – transmission is looked at during the transmission audit***</b>			X	
242.	192.747	Valve Maintenance (Distribution)	X			

**Facility Sites Visited:**

Facility Type	Facility ID Number	Location
Please see field notes for site documentation	Please see field notes for site documentation	Please see field notes for site documentation

**Comments:**

After the field portion of the inspection was completed PSE went out and performed additional testing to ensure they had adequate protection.

The CP department went out and confirmed that all of the test sites found with low reads during the Thurston/Lewis field audit had a differential greater than 100mV when tested using the 100mV shift criteria. Please see below for the 100mV shift reads for each site

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**Comments:**  
below.

1.        IC-039399 (for the 3 test sites below) – Instant OFF -0.780V, OFF PSP on 05/17/2017 -0.589V = 191mV – G2-1776122 / G3-1776123  
Test Sites:  
TS-075845– Instant OFF -0.561V, OFF PSP on 05/18/2017 -0.384V = 177mV – M5-11307760-----11307754

TS-075855– Instant OFF -0.721V, OFF PSP on 05/18/2017 -0.593V = 128mV – M5-11307760  
TS075856 – Instant OFF -0.752V, OFF PSP on 05/18/2017 -0.526V = 226 mV – M5-11307759

2.        IC-037015 (for 1 power source)  
Power Source:  
PS-0212– Instant OFF -0.752V, OFF PSP on 05/17/2017 -0.589V = 163 mV – M5-11307752

3.        IC-037034 (for 1 power source and 1 test site)  
Power Source:  
PS-0231– Instant OFF -0.809V, OFF PSP on 05/17/2017 -0.575V = 234mV – M5-11307758  
Test Site:  
TS-034358– Instant OFF -0.706V, OFF PSP on 05/17/2017 -0.583V = 123 mV – M5-11307753

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

<u>Number</u>	<u>Date</u>	<u>Subject</u>
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
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

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ADB-11-05    Sep 1, 11    Potential for Damage to Pipeline Facilities Caused by the Passage of Hurricanes

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

# Attachment 1

## Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked  
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		<b>COMPRESSOR STATION PROCEDURES</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
243.	.605(b)					
244.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
245.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			X	
246.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices ( <b>1 per yr/15 months</b> ), prompt repair or replacement			X	
247.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
248.		(b) Tank must be protected according to <b>NFPA #30</b>			X	
249.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems ( <b>must be performance tested</b> ), unless:			X	
250.		• <b>50% of the upright side areas</b> are permanently open, or			X	
251.		• It is an unattended field compressor station of <b>1000 hp or less</b>			X	

**Comments:**  
#243-251 No Compressors in this unit.

		<b>COMPRESSOR STATION O&amp;M PERFORMANCE AND RECORDS</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
252.	.709	.731(a) Compressor Station Relief Devices ( <b>1 per yr/15 months</b> )			X	
253.		.731(c) Compressor Station Emergency Shutdown ( <b>1 per yr/15 months</b> )			X	
254.		.736(c) Compressor Stations – Detection and Alarms ( <b>Performance Test</b> )			X	

**Comments:**  
#252-254 No Compressors in this unit.

		<b>COMPRESSOR STATIONS INSPECTION (Field)</b>	<b>S</b>	<b>U</b>	<b>N/A</b>	<b>N/C</b>
		(Note: Facilities may be “Grandfathered”)				
255.	.163	(c) Main operating floor must have (at least) two (2) separate and unobstructed exits			X	
256.		Door latch must open from inside without a key			X	
257.		Doors must swing outward			X	
258.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			X	
259.		Each gate located within 200 ft of any compressor plant building must open outward			X	
260.		When occupied, the door must be opened from the inside without a key			X	
261.		(e) Does the equipment and wiring within compressor stations conform to the <b>National Electric Code, ANSI/NFPA 70?</b>			X	
262.	.165	(a) If applicable, are there liquid separator(s) on the intake to the compressors?			X	
263.		(b) Do the liquid separators have a manual means of removing liquids?			X	

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
264.		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	
265.	.167	(a) ESD system must:				
266.		- Discharge blowdown gas to a safe location			X	
267.		- Block and blow down the gas in the station			X	
268.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
269.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
270.		ESD system must be operable from at least two locations, each of which is:				
271.	.167	- Outside the gas area of the station			X	
272.		- Not more than 500 feet from the limits of the station			X	
273.		- ESD switches near emergency exits?			X	
274.		(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	
275.		(c) Are ESDs on platforms designed to actuate automatically by...				
276.		- For unattended compressor stations, when:				
277.		▪ The gas pressure equals MAOP plus 15%?			X	
278.		▪ An uncontrolled fire occurs on the platform?			X	
279.		- For compressor station in a building, when				
280.		▪ An uncontrolled fire occurs in the building?			X	
281.		▪ 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	
282.	.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	
283.		(b) Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
284.		(c) Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
285.		(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	
286.		(e) Are the mufflers equipped with vents to vent any trapped gas?			X	
287.	.173	Is each compressor station building adequately ventilated?			X	
288.	.457	Is all buried piping cathodically protected?			X	
289.	.481	Atmospheric corrosion of aboveground facilities			X	
290.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
291.		Are facility maps current/up-to-date?			X	
292.	.615	Emergency Plan for the station on site?			X	
293.	.619	Review pressure recording charts and/or SCADA			X	
294.	.707	Markers			X	
295.	.731	Overpressure protection – relief’s or shutdowns			X	
296.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
297.		Is aboveground oil or gasoline storage tanks protected in accordance with <b>NFPA standard No. 30?</b>			X	

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## Distribution Operator Compressor Station Inspection

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COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
298.	.736	Gas detection – location			X	

**Comments:**  
 #255-298 No Compressors in this unit.