

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			
Inspection ID/Docket number	7240		
Inspector Name & Submit Date	Derek Norwood (Lead), Joe Subsits (Staff Assist)/June 2, 2017		
Chief Eng Name & Review Date	Joe Subsits, 6/5/2017		
Operator Information			
Name of Operator:	Northwest Natural Gas Company	OP ID #:	13840
Name of Unit(s):	Transmission		
Records Location:	Portland, OR (NWN HQ)		
Date(s) of Last (unit) Inspection:	06/19/2014	Inspection Date(s):	April 27-28, 2017

<p>Inspection Summary:</p> <p>This inspection included a records review and field inspection. Records review included an inspection of the Felida Gate Station pressure test. The field inspection included casing isolation inspections, cathodic protection readings, valve inspections and an odorant sniff test.</p> <p>The Transmission Unit consist of 3.4 miles of 8-inch 0.188 w.t. Grade B pipe in Camas, Felida Gate Station and North Vancouver Gate Station.</p> <p>There are no violations found during the inspection but there is one area of concern. NWN has two sections of pipeline which are not currently classified as transmission pipelines but should be classified as such in accordance with 49 CFR 192.3.</p>
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HQ Address: 220 NW Second Avenue Portland, OR 97209	System/Unit Name & Address: Camas Transmission Line – P04 Felida Gate Station North Vancouver Gate Station	
Co. Official: Grant M. Yoshihara Phone No.: 503-226-4211 x2374 Fax No.: 503-273-4822 Emergency Phone No.: 503-226-4211 x4613	Phone No.: Fax No.: Emergency Phone No.:	
Persons Interviewed	Title	Phone No.
Samantha Burt	Compliance Specialist	503-226-4211 x4366
Ryan Truair	Engineering Manager, System Integrity	503-226-4211 x4361
Margaret Locke	Compliance Engineer	503-226-4211 x4306
Jaimie Lemke	Compliance Specialist	503-226-4211 x4316
Greg Bronson	Corrosion Supervisor	503-226-4211 x2968
Scott Gallegos	Damage Prevention Supervisor	503-226-4211 x4320
Halli Chesser	Business Development & Engineering	503-226-4211 x4394
Cory Beck	Senior Manager, External Comm & Digital Strategy	503-220-2576

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UTC staff conducted abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection.
 (check one below and enter appropriate date)

<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
x	Other UTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	August 31, 2017

GAS SYSTEM OPERATIONS			
Gas Supplier		Northwest Pipeline LLC	
Number of reportable safety related conditions last year		0	Number of deferred leaks in system
Number of <u>non-reportable</u> safety related conditions last year		0	Number of third party hits last year
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas)		3.4	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	335 psig	400 psig	330 Psig
Town:			
Other:			
Does the operator have any transmission pipelines?		Yes	
Compressor stations? Use Attachment 4.		None in unit	
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: Annual reports were consistent year-to-year. No significant changes or extraordinary data.			

Pipe Specifications:			
Year Installed (Range)	1956, 2013 (Felida)	Pipe Diameters (Range)	8 inch, 6 inch (Felida)
Material Type	Steel, X42	Line Pipe Specification Used	
Mileage	3.4	SMYS %	26%, 22.8% (Felida)
Supply Company		Class Locations	3 (1.4 miles in HCA)

Integrity Management Field Validation

Important: 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 <http://primis.phmsa.dot.gov/gasimp/home.gim> **Date Uploaded:**

PART 199 DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES		S	U	NA	NC
Subparts A - C	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.	X			

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PART 192 Implement Applicable Control Room Management Procedures		S	U	NA	NC
.605(b)(12)	Implementing the applicable control room management procedures required by 192.631. (Amdt. 192- 112, 74 FR 63310, December 3, 2009, eff. 2/1/2010). CRM Inspection done in 2016	X			

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b) ADB-08-07	Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NPMS: Operators are required to make update submissions every 12 months if any system modifications have occurred. Go to http://www.npms.phmsa.dot.gov/submission/ 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. Feb 9, 2017 Response	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? Feb 6, 2017 Contact with Rey Dejos, updated centerline data and regulator location	X			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at http://www.nrc.uscg.mil/nrchp.html , and additional report if significant new information becomes available. **No incidents			X	
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) submitted electronically to PHMSA at http://portal.phmsa.dot.gov/pipeline unless an alternative reporting method is authorized IAW with paragraph (d) of this section. 3/15/16, 3/10/17, 2/25/15	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? **No incidents**			X	
6.	191.15(c)	Do records indicate accurate supplemental incident reports were filed and within the required timeframe? **No incidents**			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).	X			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at http://portal.phmsa.dot.gov/pipeline July 2012, initial	X			
9.	191.23	Have complete and accurate Annual Reports been submitted?	X			
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. Note: 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 on or before the fifth day 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"> • 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. • The name, job title, and business telephone number of the person who determined the condition exists. • The date the condition was discovered and the date the condition was first determined to exist. • 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. 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. **No SRCs**			X	
11.	191.27(a), (b)	Do records indicate reports were submitted within 60 days of completing inspections of underwater pipelines? **No SRCs**			X	

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REPORTING RECORDS			S	U	N/A	N/C
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? **No abandoned pipelines**			X	
13.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which (regardless of cause);				
14.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization; **No incidents**			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; Note: Report all damages regardless if claim was filed with pipeline company or not. **No incidents**			X	
16.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas; **No incidents**			X	
17.	480-93-200(1)(d)	Results in the unintentional ignition of gas; **No incidents**			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; **No incidents**			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; **No incidents**			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 **No incidents**			X	
21.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for; **No incidents**			X	
22.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; **No incidents**			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; **No incidents**			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 **No incidents**			X	
25.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP **No incidents**			X	

Comments:

26.	480-93-200(5)	Written incident reports (within 30 days) including the following; **No incidents**	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; **No incidents**			X	
28.	480-93-200(4)(b)	The extent of injuries and damage; **No incidents**			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; **No incidents**			X	
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; **No incidents**			X	
31.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident; **No incidents**			X	
32.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site; **No incidents**			X	
33.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe; **No incidents**			X	
34.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made; **No incidents**			X	

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35.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company; **No incidents**			X	
36.	480-93-200(4)(j)	Line type; **No incidents**			X	
37.	480-93-200(4)(k)	City and county of incident; and **No incidents**			X	
38.	480-93-200(4)(l)	Any other information deemed necessary by the commission. **No incidents**			X	
39.	480-93-200(5)	Submit a supplemental report if required information becomes available **No incidents**			X	
40.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure **No construction defects or material failures**			X	

Comments:	
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41.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission’s Virtual DIRT system or on-line damage reporting form)				
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) **No damages**			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? **No damages**			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? Note: Records maintained for two years and made available to the commission upon request. **No damages**			X	
45.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities? **No damages**				
46.	480-93-200(8)(a)	<ul style="list-style-type: none"> Notification requirements for excavators under RCW 19.122.050(1) 			X	
47.	480-93-200(8)(b)	<ul style="list-style-type: none"> A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and 			X	
48.	480-93-200(8)(c)	<ul style="list-style-type: none"> 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. 			X	
49.	480-93-200(9)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities... <ul style="list-style-type: none"> 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) A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) **No known events** 			X	
50.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission’s Virtual DIRT system or on-line damage reporting form) **No damages**			X	
51.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year. (NOTE: PHMSA extension to June 15, 2013 for the year 2012.)	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	X			

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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. **No construction defects and 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 **PA Inspection performed on 04/25/2017, ID 7268**				X
55.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. No construction on transmission line since 2014			X	
56.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required March 2015, 2016, 2017	X			

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
57.	192.225	Do records indicate weld procedures are being qualified in accordance with §192.225?	X			
58.	192.227	Do records indicate adequate qualification of welders? Ben Stiles Arc Welding 01/06/2016, Looked at weld test	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)? **No welding performed in unit since last inspection**			X	
60.	192.243(b)(2)	Do records indicate the qualification of nondestructive testing personnel? **No NDT performed in unit since last inspection**			X	
61.	192.243(c)	Do records indicate that NDT implementation is adequate? **No NDT performed in unit since last inspection**			X	
62.	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? **Not performed since last inspection**			X	
63.	192.243(f)	Number of Welds Inspected by NDT **Not performed since last inspection**			X	
64.	192.243(f)	Number of Welds Rejected **Not performed since last inspection**			X	
65.	192.243(f)	Disposition of each Weld Rejected **Not performed since last inspection**			X	
66.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables **No welding performed in transmission unit during this inspection period**			X	
67.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 None installed after 1992			X	
68.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main Built in 1956, Pre code			X	
69.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services No services in transmission unit			X	
70.	192.303	Construction Specifications	X			
71.	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? **Camas Line is pre-code, Felida and North Vancouver lines are above ground**			X	
72.	192.327	Amount, Location, Cover of each size of pipe installed **Camas Line is pre-code, Felida and North Vancouver lines are above ground**			X	

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CONSTRUCTION RECORDS			S	U	N/A	N/C
73.	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"> • Quality assurance • Girth welds • Depth of cover • Initial strength testing, and; • Interference currents? **NWN does not use alternative MAOP** 			X	
74.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length None			X	
75.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelines **Record attached**	X			
76.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule) **Record attached**	X			
77.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig **Not performed**			X	
78.	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? **No pipe installed underground after 1971**			X	

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
79.	192.10	Do records indicate specific point(s) at which operating responsibility transfers to a producing operator, as applicable? **No OCS Pipelines**			X	
80.	192.14	Conversion To Service Performance and Records **No pipe converted to service**				
81.	192.14(a)(2)	Visual inspection of right of way, aboveground and selected underground segments			X	
82.	192.14(a)(3)	Correction of unsafe defects and conditions			X	
83.	192.14(a)(4)	Pipeline testing in accordance with Subpart J			X	
84.	192.14(b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline)			X	
85.	192.16	Customer Notification (Verification – 90 days – and Elements) **None**			X	
86.	192.603(b)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) .605(a) Note: Including review of OQ procedures as suggested by PHMSA - ADB-09-03 dated 2/7/09 **Reviewed record from NWN**	X			
87.	192.603(b)	Did personnel respond to indications of abnormal operations as required by procedures? .605(c) (1) **No AOCs**			X	
88.	192.603(b)	Availability of construction records, maps, operating history to operating personnel .605(b)(3) **Verified in field**	X			
89.	192.603(b)	Periodic review of personnel work – effectiveness of normal O&M procedures .605(b)(8) QA Program does random inspections, May 11, 2016 in Vancouver	X			
90.	192.603(b)	Periodic review of personnel work – effectiveness of abnormal operation procedures .605(c)(4) **No AOCs to review**			X	
91.	192.603(b)	Do records indicate systematic and routine testing and inspection of pipe-type or bottle-type holders? .605(b)(10) **None**			X	
92.	Damage Prevention Program					
93.	192.603(b)	List of Current Excavators .614 (c)(1) Checked list for WA, ~6,000 excavators	X			
94.	192.603(b)	Notification of Public/Excavators .614 (c)(2) 27511 NE 9th St, Checked if mailer sent out	X			
95.	192.603(b)	Notifications of planned excavations. (One -Call Records) .614 (c)(3) Dig Ticket WA16194150, 16399129	X			

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96.		Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:				
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? **No events occurred**			X	
98.		2. In the case of blasting, does the inspection include leakage surveys? (required) **No events occurred**			X	
99.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample. 16194150 6/22/16, locate done 6/23/16	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? Glenn Nord DOQ-13702 (Locating) 3/4/15-6/3/18	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, Best Practice 4-18. Recommended only, not required) Part of QA Program	X			
102.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? Contractors do not locate transmission line, only NWN employees			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? Contractors do not locate transmission line, only NWN employees			X	
104.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? Annually along with O&M	X			
105.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. FOM 1200 – Locating and Marking	X			
106.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	X			
107.		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			
108.	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)) **No events occurred**			X	
109.	192.605(a)	Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08. .611 **Not performed**			X	
110.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response **No emergencies**			X	
111.	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) No actions taken, Procedure in place (SPW 631) **No emergencies**			X	
112.	192.603(b)	Location Specific Emergency Plan .615(b)(1) All manuals available to all employees	X			
113.	192.603(b)	Emergency Procedure training, verify effectiveness of training .615(b)(2) Dave Holliman Initial 7/2/11, refresher 8/14/14, Rusty Grable 9/21/2010 initial, 7/6/16 refresher	X			
114.	192.603(b)	Employee Emergency activity review, determine if procedures were followed. .615(b)(3) No emergencies			X	
115.	192.603(b)	Liaison Program with Public Officials .615(c) Checked during PA Inspection (ID 7268)	X			

Comments:

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192.603(b)	Public Awareness Program .616 PA Inspection completed on 04/25/2017, ID 7268		S	U	N/A	N/C												
	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.																	
	API RP 1162 Baseline* Recommended Message Deliveries																	
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 50%;">Stakeholder Audience (Natural Gas Transmission Line Operators)</th> <th style="width: 50%;">Baseline Message Frequency (starting from effective date of Plan)</th> </tr> </thead> <tbody> <tr> <td>Residents Along Right-of-Way and Places of Congregation</td> <td>2 years</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> <td>One-Call Centers</td> <td>As required of One-Call Center</td> </tr> </tbody> </table>						Stakeholder Audience (Natural Gas Transmission Line Operators)	Baseline Message Frequency (starting from effective date of Plan)	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
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* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																		
116.	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).				X													
117. 118.	192.603(b) 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)				X													
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)				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)				X													
121.	Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage (PHMSA area of emphasis)				X													

Comments:
Items 116-121 – PA Inspection completed on 04/25/2017, ID 7268

122.	192.517	From the review of the results of pressure tests, do the test records validate the pressure test?	X			
123.	.553(b)	Do records indicate the pressure uprating process was implemented per the requirements of 192.553? No uprate			X	
124.	192.709	Maximum Allowable Operating Pressure (MAOP)				
125.	.709	Note: If the operator is operating at 80% SMYS with waivers, the inspector needs to review the special conditions of the waiver.				

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126.		MAOP cannot exceed the lowest of the following: .619															
127.		Design pressure of the weakest element, .619(a)(1) ANSI 300 fittings, 0.180wt Grade B pipe	X														
128.		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. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment. .619(a)(3)	X														
		<table border="1" style="width: 100%;"> <thead> <tr> <th>Pipeline segment</th> <th>Pressure date</th> <th>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			
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Offshore gathering lines	July 1, 1976	July 1, 1971															
All other pipelines	July 1, 1970	July 1, 1965															
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. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.	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"> • General standards • Fracture control • Plate and seam quality • Mill hydrostatic testing • Coating • Fittings and flanges • Compressor stations Final rule pub. 10/17/08, eff. 12/22/08 **NWN does not use Alternative MAOP** 			X												
131.	480-93-015(1)	Odorization of Gas – Concentrations adequate? Record attached (WUTC Transmission – Odorometer Test Site ID 10115 2014-2017)	X														
132.	480-93-015(2)	Monthly Odorant Sniff Testing Record attached (WUTC Transmission – Odorometer Test Site ID 10115 2014-2017)	X														
133.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements **No low reads**			X												
134.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) Unit 699 Calibrated 11/7/14 and 12/8/16, used 11/12/14 and 1/12/17; Unit 1068 Calibrated 3/18/15 and 2/11/16, used 4/7/15 and 3/8/16	X														
135.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr (15 months) Reviewed records	X														
136.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? No markers replaced since last inspection			X												

Comments:

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137.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained **No leaks**			X													
138.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained **None**			X													
139.	480-93-187	Gas Leak records – Content **No leaks**			X													
140.	480-93-188(1)	Gas Leak surveys – Coverage **Record attached**	X															
141.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days) FIU-1021 Calibrated 4/25/16, Used 5/9/16	X															
142.	480-93-188(3)	Leak survey frequency (Refer to Table Below) **Record attached** Annual Leak Survey 2014-2017	X															
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143.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs **None**			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 **None**			X													
145.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected **None**			X													
146.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions **None**			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. **None**			X													
148.	480-93-188(5)	Gas survey records: Retention/Content	X															
149.	480-93-188(6)	Leak Survey Program/Self Audits **Record reviewed in office**	X															
150.	192.709	Patrolling (Refer to Table Below) .705 Reviewed records, Semi-annual patrols and railroad crossings	X															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Class Location</th> <th style="width: 33%;">At Highway and Railroad Crossings</th> <th style="width: 33%;">At All Other Places</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1 and 2</td> <td style="text-align: center;">2/yr (7½ months)</td> <td style="text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">4/yr (4½ months)</td> <td style="text-align: center;">2/yr (7½ months)</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">4/yr (4½ months)</td> <td style="text-align: center;">4/yr (4½ months)</td> </tr> </tbody> </table>							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)
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151.	192.709	Leak Surveys (Refer to Table Below) .706	X															
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3	2/yr	7½ months																
4	4/yr	4½ months																
152.	192.605(b)	Abandoned Pipelines; Underwater Facility Reports .727(g) **None**			X													
153.	192.709	Compressor Station Relief Devices – Inspection and Testing (1 per yr/15 months) .731(a) **No compressor station in unit**			X													
154.	192.709	Compressor Station Emergency Shutdown (1 per yr/15 months) .731(c) **No compressor station in unit**			X													
155.	192.709	Compressor Stations – Detection and Alarms (Performance Test) .736(c) **No compressor station in unit**			X													

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156.	192.709	Pressure Limiting and Regulating Stations – Inspection and Testing intervals (1 per yr/15 months) .739 Williams performs inspections Camas P04: 11/8/16, 4/18/16, 4/23/15, 4/16/14 North Vancouver: 2/3/16, 11/3/15, 2/19/15, 2/18/14	X			
157.	192.709	Pressure Limiting and Regulator Stations – <u>Capacity Testing or Review</u> (1 per yr/15 months) .743 **Reg and Relief Audit Report 2014, 2015 and 2016**	X			

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? (1 per yr/15 months) .745 Reviewed records, Annual Transmission Valves 2014-2017	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? (1 per yr/15 months) .749 **No vaults over 200 m3**			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 SPW 751	X			
161.	192.603(b)	Welding – Procedures .225(b) **No welding performed**			X	
162.	192.603(b)	Welding – Welder Qualification .227/.229 **No welding performed**			X	
163.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) **No NDT performed**			X	
164.	192.709	NDT Records (Pipeline Life) .243(f)	X			
165.	192.709	Repair: pipe (Pipeline Life); Other than pipe (5 years) Re-wrapped pipe with wax wrap, 12/15/2011	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)	X			
167.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) Done along with quarterly patrol, HCA Change Notification Form	X			

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
168.	192.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel.	X			
169.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) **Pipeline installed in 1956**			X	
170.	192.491(c)	Do records document that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971 , has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)? **No pipeline converted to service**			X	

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CORROSION CONTROL RECORDS			S	U	N/A	N/C
171.	192.491	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) .465(a) Checked record for 2015 and 2016, not yet performed in 2017	X			
172.	192.491	Do records indicate the location of all items listed in 192.491(a)? Looked at maps,	X			
173.	192.491	Examination of Buried Pipe when Exposed .459 11/11/16 South of Lake Rd	X			
174.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed No pipe exposed/coating removed during inspection period			X	
175.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Reviewed records, Rectifier Inspections 2014-2017	X			
176.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) No Bonds			X	
177.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) No Bonds			X	
178.	192.491	Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion? (1 per 3 cal yr/39 months) .465(e) All pipelines have CP			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? (Including Casings) .467 Reviewed records, Casing Inspection 2014-2017	X			
180.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) No remedial action taken			X	
181.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched) Fluke Meter 90520025 Used 3/4/2015, Calibrated 5/23/2014	X			
182.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months Reviewed records, Casing Inspection 2014-2017	X			
183.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods No casings without test leads			X	
184.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days No shorted conditions			X	
185.	480-93-110(5)(c)	Casing shorts cleared when practical No shorted conditions			X	
186.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months No shorted conditions			X	
187.	192.491	Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I? (192.471; 192.469)	X			
188.	192.491	Do records document that the operator has minimized the detrimental effects of stray currents when found? .473	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) Non-corrosive gas			X	
190.	192.491	Internal corrosion; Internal surface inspection; Pipe replacement .475(b) Inspection performed on 10/05/2000	X			
191.	192.491	Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems . (192.476(b); 192.476(c))	X			
192.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 No coupons			X	
193.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 “Gate Station” “Regional Station”	X			
194.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions, Records adequate? .483/.485 No repairs			X	

Comments:

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Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
Notes in Form R						
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	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 (Markings and Inventory) (192.719(a), (b)) No pipe installed during inspection period			X	
210.	192.739	Pressure Limiting and Regulating Devices (Mechanical) (spot-check field installed equipment vs. inspection records) (192.739(a), (b); 192.743)	X			
211.	192.743	Pressure Limiting and Regulating Devices (Capacities) (spot-check field installed equipment vs. inspection records) No pressure relief operated by NWN on transmission system			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>Important: Per PHMSA, the OQ Field Inspection Protocol Form 15 (Rev 6-2012) 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 Form Completed/Uploaded?: 06/02/2017</p>

Comments:

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COMPRESSOR STATIONS INSPECTION **No compressor stations in this unit**		S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”) If not located on a platform check here and skip 192.167(c) X					
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 National Electric Code, ANSI/NFPA 70?			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 (c)	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 NEC Class 1, Group D 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	
(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	

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COMPRESSOR STATIONS INSPECTION **No compressor stations in this unit**		S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”) If not located on a platform check here and skip 192.167(c) 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 NFPA standard No. 30?			X	
.736(a), (b)	Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?			X	

Comments:

Alternative Maximum Allowable Operating Pressure

For additional guidance refer to <http://primis.phmsa.dot.gov/maop/faqs.htm>
 For Additional guidance see the FAQs at <http://primis.phmsa.dot.gov/maop/faqs.htm>

Alternative MAOP Procedures and Verifications		S	U	N/A	N/C								
NWN has no Alternative MAOP pipelines													
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;"> <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)												
1	0.80												
2	0.67												
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									
.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									
	(1) PHMSA notified 180 days before operating at alternative MAOP			X									

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		S	U	N/A/N/C
192.620	Alternative MAOP Procedures and Verifications **NWN has no Alternative MAOP pipelines**			
	(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
620(d)	(8) Class location change anomaly remediations			X
	(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 ₂ , H ₂ 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
	(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	

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		S	U	N/A	N/C
192.620	Alternative MAOP Procedures and Verifications **NWN has no Alternative MAOP pipelines**				
	(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	

Comments:

