

# Inspection Output (IOR)

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## Inspection Information

|                                    |   |   |
|------------------------------------|---|---|
| Inspection Name <b>Nippon TIMP</b> | Operator(s) <b>NIPPON DYNAWAVE PACKAGING CO., LLC (22515)</b> | Plan Submitted <b>02/08/2018</b>                        |
| Status <b>PLANNED</b>              | Lead <b>David Cullom</b>                                      | Plan Approval <b>02/09/2018</b><br>by <b>Joe Subits</b> |
| Start Year <b>2018</b>             | Team Members <b>Scott Anderson</b>                            | All Activity Start <b>03/07/2018</b>                    |
| System Type <b>GT</b>              | Observer(s) <b>Denise Crawford</b>                            | All Activity End <b>03/07/2018</b>                      |
| Protocol Set ID <b>GT.2017.01</b>  | Supervisor <b>Joe Subits</b>                                  | Inspection Submitted <b>--</b>                          |
|                                    | Director <b>Sean Mayo</b>                                     | Inspection Approval <b>--</b>                           |

## Inspection Summary

This inspection consisted of a Integrity Management Program Plan and Procedure Review. The inspection included procedures, records review, and field observations. Previous UTC inspection findings were reviewed. Additionally, a geotechnical study that was conducted due to the resulting findings of the previous IMP program inspection was also reviewed.

No probable violations or items of concern were noted as a result of this inspection. Pressure testing is the assessment method and the main threat currently is third party damage.

The Nippon Dynawave-Ostrander Pipeline is comprised of 4 (NPS-4) (~1000ft) and 12-inch diameter (NPS-12) (~9miles), API 5L, X-42 ERW steel pipe with the 12 inch diameter sections having a nominal wall thickness of 0.25 inches for below ground sections and 0.5 nominal wall thickness for above ground sections. The company operates the natural gas transmission pipeline in Cowlitz County, Washington beginning at the Williams Pipeline Interconnection slightly north east of the City of Kelso and ending at the Longview Facility. Weyerhaeuser (now Nippon Dynawave) purchased CNG's district regular station and uses it to control the gas to NorPac. The 4 inch line also can send gas to Solvay. On March 1, 2010, Weyerhaeuser became part of Cosentino Consultant Corp's Total Care Program. This means that the consultant will visit site every 90 days; has review plan for each visit to ensure all requirements are met and appropriate forms filled out. Also, he will be emailed about every gas function, etc. Nippon Dynawave also has the designs for automatic shutoff valves done and other measures for mitigation in response to PHMSA's ANPRM Docket 2011-0023.

## Scope (Assets)

| #  | Short Label     | Long Label      | Asset Type | Asset IDs | Excluded Topics  | Planned | Required | Total Inspected | Required % Complete |
|----|-----------------|-----------------|------------|-----------|--|---------|----------|-----------------|---------------------|
| 1. | Nippon Dynawave | Nippon Dynawave | other      | 1935      | Bottle/Pipe - Holders<br>Compressor Stations<br>Storage Fields<br>Service Line<br>Offshore<br>Cast or Ductile Iron<br>Copper Pipe<br>Aluminum pipe<br>Plastic pipe<br>AMAOP<br>Abandoned<br>GOM<br>OCS | 174     | 174      | 82              | 47.1%               |

a. Percent completion excludes unanswered questions planned as "always observe".

## Plans

| #  | Plan Assets     | Focus Directives | Involved Groups/Subgroups | Qst Type(s) | Extent | Notes |
|----|-----------------|------------------|---------------------------|-------------|--------|-------|
| 1. | Nippon Dynawave | n/a              | IM                        | P, R, O     | Detail |       |
| 2. | Nippon Dynawave | n/a              | AR.RCOM.NONCOVERED.P      | P, R, O, S  | Detail |       |
| 3. | Nippon Dynawave | n/a              | AR.RCOM.NONCOVERED.R      | P, R, O, S  | Detail |       |
| 4. | Nippon Dynawave | n/a              | AR.RCOM.REMEDIATIONOM.O   | P, R, O, S  | Detail |       |
| 5. | Nippon Dynawave | n/a              | AR.RCOM.RCAMAOP.P         | P, R, O, S  | Detail |       |
| 6. | Nippon Dynawave | n/a              | AR.RCOM.RCAMAOP.R         | P, R, O, S  | Detail |       |
| 7. | Nippon Dynawave | n/a              | RPT                       | P, R, O, S  | Detail |       |
| 8. | Nippon Dynawave | n/a              | TD                        | P, R, O, S  | Detail |       |

## Plan Implementations

| # | Activity Name      | SMAR T Act# | Start Date | Focus Directives     | Involved Groups/Subgroups                                 | Assets          | Qst Type(s) | Planned | Required | Total Inspected | Required % Complete |
|---|--------------------|-------------|------------|----------------------|---|-----------------|-------------|---------|----------|-----------------|---------------------|
| 1 | On Site Inspection | --          | 03/07/2018 | GT IM Implementation | AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, GENERIC | Nippon Dynawave | P, R, O     | 82      | 82       | 82              | 100.0%              |

a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

b. Percent completion excludes unanswered questions planned as "always observe".

## Forms

This inspection has no Form data entry.

## Results (all values, 82 results)

98 (instead of 82) results are listed due to re-presentation of questions in more than one sub-group.

### AR.CDA: Confirmatory Direct Assessment

- Question Result, ID, [Sat, AR.IL.ILCORR.R, 192.933 \(192.917\(e\)\(5\)\)](#) (also presented in: AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, References AR.PTI, AR.SCC, IM.PM)

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered [Nippon Dynawave](#)

Result Notes [This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.](#)

- Question Result, ID, [Sat, AR.IL.ILCORR.P, 192.933 \(192.917\(e\)\(5\)\)](#) (also presented in: AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, References AR.PTI, AR.SCC, IM.PM)

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*

Assets Covered [Nippon Dynawave](#)

Result Notes [This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.](#)

## AR.EC: External Corrosion Direct Assessment (ECDA)

3. Question Result, ID, **Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.IC, AR.IL, AR.LSR, AR.OT, References AR.PTI, AR.SCC, IM.PM)  
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*  
Assets Covered **Nippon Dynawave**  
Result Notes **This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.**
4. Question Result, ID, **Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.IC, AR.IL, AR.LSR, AR.OT, References AR.PTI, AR.SCC, IM.PM)  
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*  
Assets Covered **Nippon Dynawave**  
Result Notes **This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.**

## AR.IC: Internal Corrosion Direct Assessment (ICDA)

5. Question Result, ID, **Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.EC, AR.IL, AR.LSR, References AR.OT, AR.PTI, AR.SCC, IM.PM)  
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*  
Assets Covered **Nippon Dynawave**  
Result Notes **This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.**
6. Question Result, ID, **Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.EC, AR.IL, AR.LSR, References AR.OT, AR.PTI, AR.SCC, IM.PM)  
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*  
Assets Covered **Nippon Dynawave**  
Result Notes **This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.**

## AR.IL: In-Line Inspection (Smart Pigs)

7. Question Result, ID, **Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.EC, AR.IC, AR.LSR, References AR.OT, AR.PTI, AR.SCC, IM.PM)  
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*  
Assets Covered **Nippon Dynawave**  
Result Notes **This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.**
8. Question Result, ID, **Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.EC, AR.IC, AR.LSR, References AR.OT, AR.PTI, AR.SCC, IM.PM)  
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*  
Assets Covered **Nippon Dynawave**  
Result Notes **This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.**

## AR.LSR: Low Stress Reassessment

9. Question Result, ID, **Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.OT, References AR.PTI, AR.SCC, IM.PM)

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered Nippon Dynawave

Result Notes This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.

10. Question Result, ID, Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.OT, References AR.PTI, AR.SCC, IM.PM)

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*

Assets Covered Nippon Dynawave

Result Notes This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.

## AR.OT: Other Technology

11. Question Result, ID, Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, References AR.PTI, AR.SCC, IM.PM)

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered Nippon Dynawave

Result Notes This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.

12. Question Result, ID, Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, References AR.PTI, AR.SCC, IM.PM)

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*

Assets Covered Nippon Dynawave

Result Notes This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.

## AR.PTI: Integrity Assessment Via Pressure Test

13. Question Result, ID, Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, References AR.OT, AR.SCC, IM.PM)

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered Nippon Dynawave

Result Notes This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.

14. Question Result, ID, Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, References AR.OT, AR.SCC, IM.PM)

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*

Assets Covered Nippon Dynawave

Result Notes This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.

## AR.SCC: Stress Corrosion Cracking Direct Assessment (SCCDA)

15. Question Result, ID, Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, References AR.OT, AR.PTI, IM.PM)

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*

Assets Covered Nippon Dynawave

Result Notes This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.

16. Question Result, ID, References **Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, AR.PTI, IM.PM)  
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*  
Assets Covered **Nippon Dynawave**  
Result Notes **This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.**

## IM.BA: Baseline Assessments

17. Question Result, ID, References **Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e))**  
Question Text *Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?*  
Assets Covered **Nippon Dynawave**  
Result Notes **O&M manual Section 11.5.7.5 contains this. They drain all hydrotest water back to containment and properly process in the de-sump.**
18. Question Result, ID, References **Sat, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o), 192.919(e))**  
Question Text *Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?*  
Assets Covered **Nippon Dynawave**  
Result Notes **We reviewed photos of the process for dewatering.**
19. Question Result, ID, References **Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a), 192.921(c), 192.921(h))**  
Question Text *Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?*  
Assets Covered **Nippon Dynawave**  
Result Notes **See IM Manual section 6 for selection method. They chose based on threat identified in section 3. Segments are identified in section 2.**
20. Question Result, ID, References **Sat, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))**  
Question Text *Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?*  
Assets Covered **Nippon Dynawave**  
Result Notes **Excavation damage is the biggest threat. They conducted a soil stability analysis following UTC 2015 audit findings. We followed up on the findings and reviewed the report.**  
  
**Appendix D contains the listing and ranking. Excavation damage is the only threat listed.**
21. Question Result, ID, References **Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))**  
Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*  
Assets Covered **Nippon Dynawave**  
Result Notes **IM manual in Section 11.1 contains the MOC portion of identifying potential changes.**
22. Question Result, ID, References **Sat, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)**  
Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*  
Assets Covered **Nippon Dynawave**  
Result Notes **We reviewed aerial photography. Most of the line (75%+) is Class III.**
23. Question Result, ID, References **Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))**  
Question Text *Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?*  
Assets Covered **Nippon Dynawave**

Result Notes This is in Section 6.3. 50% of covered segments were completed by Dec 17, 2008 and all segments were completed by 2013. The risk analysis worksheet is on Appendix D.

24. Question Result, ID, References Sat, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d))

Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*

Assets Covered Nippon Dynawave

Result Notes The first baseline assessment has been completed. The first IM hydrotest was 7/23/09. That covered 100% of the pipeline system.

25. Question Result, ID, References NC, IM.BA.BAENVIRON.O, 192.911(o) (192.919(e))

Question Text *From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?*

Assets Covered Nippon Dynawave

Result Notes No test was observed during this inspection.

## IM.CA: Continual Evaluation and Assessment

26. Question Result, ID, References NA, IM.CA.LOWSTRESSREASSESS.P, 192.941(a) (192.941(b), 192.941(c))

Question Text *Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?*

Assets Covered Nippon Dynawave

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

27. Question Result, ID, References NA, IM.CA.LOWSTRESSREASSESS.R, 192.947(d) (192.941(a), 192.941(b), 192.941(c))

Question Text *Do records demonstrate that the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion is adequate and being performed as required?*

Assets Covered Nippon Dynawave

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

28. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.P, 192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))

Question Text *Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*

Assets Covered Nippon Dynawave

Result Notes Section 8 of the IM manual contains this:

### 8.1 Methodology, Re-evaluations

.1 The Pipeline Manager will conduct integrity re-evaluations of the Pipeline Facility as frequently as needed to address changing facility threat conditions as they become evident. Changes to the threats identified in Section 3 or events identified in Section 11 of this manual could trigger a re-evaluation.

29. Question Result, ID, References Sat, IM.CA.PERIODICEVAL.R, 192.947(d) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e), 192.937(b))

Question Text *Do records demonstrate that periodic evaluations of pipeline integrity have been performed based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?*

Assets Covered Nippon Dynawave

- Result Notes They performed the last hydrotest in 2009 and the next hydrotest is in July 2019. The Pipeline Manager reviews the current damage prevention program and reviews damage data when submitting the Annual Report to identify enhanced practices and policies to prevent third party damage.
30. Question Result, ID, References Sat, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a), 192.939(b), 192.913(c))  
 Question Text *Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?*  
 Assets Covered Nippon Dynawave  
 Result Notes This is in Page 35 of 61 of the IM Manual Section 8. We verified that the 2004 ASME B31.8S Section 5 Table 3 is being used and is the correct version.
31. Question Result, ID, References Sat, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))  
 Question Text *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*  
 Assets Covered Nippon Dynawave  
 Result Notes Yes, The next reassessment is scheduled for July, 2019.
32. Question Result, ID, References Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931)  
 Question Text *Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?*  
 Assets Covered Nippon Dynawave  
 Result Notes Yes, We reviewed this. They used a pressure test conducted in accordance with subpart J. The operator must use the test pressures specified in Table 3 of section 5 of ASME/ANSI B31.8S, to justify an extended reassessment interval in accordance with §192.939 of 10 years.
33. Question Result, ID, References Sat, IM.CA.REASSESSMETHOD.R, 192.947(d) (192.937(c))  
 Question Text *Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?*  
 Assets Covered Nippon Dynawave  
 Result Notes A pressure test was conducted in accordance with Subpart J.
34. Question Result, ID, References NA, IM.CA.REASSESSWAIVER.P, 192.943(a) (192.943(b))  
 Question Text *Does the process include requirements for reassessment interval waivers (special permit per 190.341)?*  
 Assets Covered Nippon Dynawave  
 Result Notes They have this process in Section 8.3 of the IM manual. No such event occurred, or condition existed, in the scope of inspection review.
35. Question Result, ID, References NA, IM.CA.REASSESSWAIVER.R, 192.947(d) (192.943(a), 192.943(b))  
 Question Text *Do records demonstrate that reassessment interval waivers (special permit per 190.341) have been adequately implemented, if applicable?*  
 Assets Covered Nippon Dynawave  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
36. Question Result, ID, References NA, IM.CA.REASSESEXCPERF.P, 192.913(a) (192.913(b), 192.913(c))  
 Question Text *Does the process include requirements for deviations from reassessment requirements based on exceptional performance?*  
 Assets Covered Nippon Dynawave  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.
37. Question Result, ID, References NA, IM.CA.REASSESEXCPERF.R, 192.947(d) (192.913(a), 192.913(b), 192.913(c))  
 Question Text *Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?*  
 Assets Covered Nippon Dynawave  
 Result Notes No such event occurred, or condition existed, in the scope of inspection review.

## IM.HC: High Consequence Areas

38. Question Result, ID, References **Sat, IM.HC.HCAID.P, 192.905(a)**  
Question Text *Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?*  
Assets Covered **Nippon Dynawave**  
Result Notes **Section 2 of the IMP manual contains a detailed a step by step process.**
39. Question Result, ID, References **Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a))**  
Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*  
Assets Covered **Nippon Dynawave**  
Result Notes **There is one segment. The risk analysis is in Appendix B. The most recent HCA survey was on 7/18/07. They currently look at ROW surveys for change detection.**
40. Question Result, ID, References **NA, IM.HC.HCAMETHOD1.P, 192.903(1)(i) (192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))**  
Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?*  
Assets Covered **Nippon Dynawave**  
Result Notes **No such activity/condition was observed during the inspection. The entire pipeline is considered class 3. See IM section 2.2.**
41. Question Result, ID, References **Sat, IM.HC.HCAMETHOD2.P, 192.903(2)(i) (192.903(2)(ii))**  
Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?*  
Assets Covered **Nippon Dynawave**  
Result Notes **Yes it is adequate. The HCA maps were created in 2007 and the operator has been monitoring for changes using ROW surveys and patrols.**
42. Question Result, ID, References **Sat, IM.HC.HCANEW.P, 192.905(c)**  
Question Text *Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?*  
Assets Covered **Nippon Dynawave**  
Result Notes **Section 11.2 contains this. They look at ROW surveys for change detection. They have 180 days in their work flow for evaluation of new information that creates changes in HCAs.**
43. Question Result, ID, References **NA, IM.HC.HCANEW.R, 192.947(d) (192.905(c))**  
Question Text *Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?*  
Assets Covered **Nippon Dynawave**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
44. Question Result, ID, References **Sat, IM.HC.HCAPIR.P, 192.903 (192.905(a))**  
Question Text *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?*  
Assets Covered **Nippon Dynawave**  
Result Notes **Section 2.2. We looked at the formula as derived from B31.8s**
45. Question Result, ID, References **Sat, IM.HC.HCAPIR.R, 192.947(d) (192.903, 192.905(a))**  
Question Text *Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?*  
Assets Covered **Nippon Dynawave**  
Result Notes **Section 2.2. We looked at the formula as derived from B31.8s. We reviewed the HCA map.**



46. Question Result, ID, References **Sat, IM.HC.HCASITES.P, 192.903 (192.905(b))**  
 Question Text *Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **See IM Manual section 11.1.2 d, e for this information. Section 1.11 has the definition of an identified site.**
47. Question Result, ID, References **Sat, IM.HC.HCASITES.R, 192.947(d) (192.903, 192.905(b))**  
 Question Text *Do records indicate identification of identified sites being performed as required?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **Pipeline patrols reviewed were:**  
  
**March 14-23, 2017. No patrols have been done for 2018 at the time of this inspection.**
48. Question Result, ID, References **NA, IM.HC.HCAMETHOD1.R, 192.947(d) (192.903 (1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))**  
 Question Text *Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **No such activity/condition was observed during the inspection. Method 1 is not used.**
49. Question Result, ID, References **Sat, IM.HC.HCAMETHOD2.R, 192.947(d) (192.905(a), 192.903(2)(ii))**  
 Question Text *Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **The use of method 2 is acceptable.**
50. Question Result, ID, References **Sat, IM.HC.HCADATA.O, 192.905(c)**  
 Question Text *Are HCAs correctly identified per up-to-date information?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **Patrols are done to keep the HCAs up to date and the pipeline route is highly unlikely to go from a Class III to Class IV**

## IM.PM: Preventive and Mitigative Measures

51. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.P, 192.935(a)**  
 Question Text *Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **IM manual Section 9 has additional P&MMs. This information is on page 37 of 61. They did the pre-engineering on the possible future installation of an ASV. The third party damage prevention measure is a yearly mailing to excavators and they have a drawing for a gift certificate if they fill out the public awareness card and return it.**
52. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a))**  
 Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **They did the pre-engineering on the installation of a ASV.**
53. Question Result, ID, References **Sat, IM.PM.PMMTPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))**

- Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*
- Assets Covered **Nippon Dynawave**
- Result Notes **O&M Section 5.2**
54. Question Result, ID, References **Sat, IM.PM.PMMPD.R, 192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))**
- Question Text *Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?*
- Assets Covered **Nippon Dynawave**
- Result Notes **2016 Paradigm mailings were reviewed. No damages have occurred. Potential damages are reviewed when Annual Reports are filed. Third party damage has not been a problem on this system.**
55. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.P, 192.915(c)**
- Question Text *Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?*
- Assets Covered **Nippon Dynawave**
- Result Notes **See IM Appendix K for subject matter expert qualifications. Excavation is a covered task in OQ and O&M. This is a requirement of the pipeline contractor.**
56. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.R, 192.947(e) (192.915(c))**
- Question Text *Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?*
- Assets Covered **Nippon Dynawave**
- Result Notes **They use contractors. OQ records were reviewed for the Beacon Hill job that was on September, 2017. CTS 192-0801 KNT Locating Pipelines 1/1/2017 CFR-192-0804 KNT Damage Prevention During Excavation. 12/18/2016**
57. Question Result, ID, References **Sat, AR.IL.ILCORR.R, 192.933 (192.917(e)(5)) (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, AR.PTI, AR.SCC)**
- Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
- Assets Covered **Nippon Dynawave**
- Result Notes **This is in the facility record form F-6 and F-7. We looked at records that Jeremy Hailey did in 2016 for CIS and DCVG. Every year he does an instant off survey.**
58. Question Result, ID, References **NA, IM.PM.PMMPDMSMYS.P, 192.935(d) (192.935(e), 192 Appendix E Table E.II.1)**
- Question Text *Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*
- Assets Covered **Nippon Dynawave**
- Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- They operate above 30% SMYS**
59. Question Result, ID, References **NA, IM.PM.PMMPDMSMYS.R, 192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)**
- Question Text *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?*
- Assets Covered **Nippon Dynawave**
- Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
60. Question Result, ID, References **Sat, IM.PM.PMMPD.P, 192.935(b)(2)**
- Question Text *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?*
- Assets Covered **Nippon Dynawave**
- Result Notes **This is in O&M Section 3.2.9 (Methodology, Weather Related, Outside force) & Section 4.2.9 & 9.2.4, Appendix B**

61. Question Result, ID, References **Sat, IM.PM.PMMOF.R, 192.947(d) (192.935(b)(2))**  
 Question Text *Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **We reviewed the Cornforth soil stability report dated January 2016. The report said to review every 3-5 years, but that there was no slide threat.**
62. Question Result, ID, References **Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))** (also presented in: AR.CDA, AR.EC, AR.IC, AR.IL, AR.LSR, AR.OT, AR.PTI, AR.SCC)  
 Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **This is in O&M Manual Section 4 for overall plan and specifically Section 4.8 for remedial measures. We reviewed this manual and it has the procedure for using RSTRENG or 31G. Section 10 discusses integrity repairs.**
63. Question Result, ID, References **Sat, IM.PM.PMMASORCV.P, 192.935(c)**  
 Question Text *Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **This is in Section 9 of the IMP manual**
64. Question Result, ID, References **Sat, IM.PM.PMMASORCV.R, 192.947(d) (192.935(c))**  
 Question Text *Do records demonstrate that the operator has determined, based on risk, whether automatic shut-off valves or remote control valves should be added to protect high consequence areas?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **Study and evaluation has been done by Mr. Chu of Cosentino Consulting. Not implemented at this time.**
65. Question Result, ID, References **Sat, IM.PM.PMMIMPLEMENT.O, 192.935(a)**  
 Question Text *Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **UTC inspectors visited this pipeline and it is well marked to help prevent third party damage.**

## IM.QA: Quality Assurance

66. Question Result, ID, References **Sat, IM.QA.QARM.P, 192.911(l)**  
 Question Text *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **.Section 12 Quality Assurance. An independent audit is done of the plan not to exceed 24 months by Cosentino Consulting**
67. Question Result, ID, References **Sat, IM.QA.IMNONMANDT.P, 192.7(a)**  
 Question Text *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?*  
 Assets Covered **Nippon Dynawave**  
 Result Notes **IM Manual Section 1.6**
68. Question Result, ID, References **Sat, IM.QA.QARM.R, 192.947(d) (192.911(l))**

- Question Text *Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?*
- Assets Covered **Nippon Dynawave**
- Result Notes **Every year when the PHMSA Annual Report is done Cosentino Consulting does a QA/QC check of the plan.**
69. Question Result, ID, References **Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))**
- Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*
- Assets Covered **Nippon Dynawave**
- Result Notes **1.11.3 in the O&M. The Nippon pipeline manager is responsible for this task. Records such as leaks, repairs, odorization, annual patrols, regulatory agency reports, moving or lowering, corrosion**
70. Question Result, ID, References **Sat, IM.QA.IMMOC.P, 192.911(k) (192.909(a), 192.909(b))**
- Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*
- Assets Covered **Nippon Dynawave**
- Result Notes **Section 11.1 has the MOC. For system parameter changes such as changes in building use. It also covers communication of changes, approval, .etc.**
71. Question Result, ID, References **Sat, IM.QA.IMMOC.R, 192.947(d) (192.909(a), 192.909(b), 192.911(k))**
- Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*
- Assets Covered **Nippon Dynawave**
- Result Notes **June 22, 2015 The plan was updated due to previous inspection findings, but not a significant change was made.**
72. Question Result, ID, References **Sat, IM.QA.IMPERFEFFECTIVE.P, 192.945(a) (192.913(b), 192.951)**
- Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*
- Assets Covered **Nippon Dynawave**
- Result Notes **Section 10. Data elements are included in the Annual Report.**
73. Question Result, ID, References **Sat, IM.QA.IMPERFEFFECTIVE.R, 192.947(d) (192.913(b), 192.945(a), 192.951)**
- Question Text *Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*
- Assets Covered **Nippon Dynawave**
- Result Notes **I reviewed the Annual Reports for 2016 (submitted 2017) The Annual Report contains the data, and is reviewed by Cosentino Consulting for Nippon for data changes that need to be added to the risk model. There has not been any leading indicators that currently would necessitate the need for risk model modification.**
74. Question Result, ID, References **Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b), 192.951)**
- Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*
- Assets Covered **Nippon Dynawave**
- Result Notes **Program effectiveness is difficult to quantify given no significant data to analyze. Damages have remained at 0.**
75. Question Result, ID, References **Sat, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b), 192.945(a), 192.951)**
- Question Text *Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?*
- Assets Covered **Nippon Dynawave**
- Result Notes **We reviewed the 2016 (submitted 2017) Annual Report. They mention conducting DCVG for 9 miles of pipe, but quantitative metrics are difficult to develop given many values of "0"**
76. Question Result, ID, References **Sat, IM.QA.RECORDS.R, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))**

Question Text *Are required records being maintained for the life of the pipeline?*

Assets Covered **Nippon Dynawave**

Result Notes **Records are maintained by Nippon Dynawave and Cosentino Consulting for corrosion, pressure tests, material, .etc.**

## IM.RA: Risk Analysis

77. Question Result, ID, References **Sat, IM.RA.RADATA.P, 192.917(b) (192.917(e)(1), 192.911(k))**

Question Text *Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?*

Assets Covered **Nippon Dynawave**

Result Notes **They keep leak reports, repair records, leak detection, odorization, annual line patrols, regulatory agency reports, training records, moving/lowering, corrosion and public awareness.**

78. Question Result, ID, References **Sat, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(e)(1), 192.911(k))**

Question Text *Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?*

Assets Covered **Nippon Dynawave**

Result Notes **We reviewed a soil stability report, annual corrosion survey, and OQ records.**

79. Question Result, ID, References **Sat, IM.RA.RAMETHOD.P, 192.917(c) (192.917(d))**

Question Text *Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment?*

Assets Covered **Nippon Dynawave**

Result Notes **They use the ASME model.**

80. Question Result, ID, References **Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e), 192.913(b)(1))**

Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*

Assets Covered **Nippon Dynawave**

Result Notes **It is in Section 3 of the IMP. They use ASME Section 2 to identify time dependant, stable/static, and human error threats.**

81. Question Result, ID, References **Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))**

Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*

Assets Covered **Nippon Dynawave**

Result Notes **Third Party Damage is the biggest threat, but they have not had a problem with the line being damaged by this threat.**

**SCC has been evaluated to determine if it is a potential threat as recommended by ADB-2003-05, Stress Corrosion Cracking Threat to Gas and Hazardous Liquid Pipelines. FBE coating is used, and per the ASME guidance, SCC is not a threat**

82. Question Result, ID, References **Sat, IM.RA.RAMETHOD.R, 192.947(b) (192.917(c), 192.917(d))**

Question Text *Do records demonstrate that the risk assessment follows ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?*

Assets Covered **Nippon Dynawave**

Result Notes We reviewed the Annual Report. We also looked at Public Awareness mailing information from Paradigm for 2016.

83. Question Result, ID, References Sat, IM.RA.RAFACTORS.P, 192.917(c)

Question Text Does the process include requirements for factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?

Assets Covered Nippon Dynawave

Result Notes Section 5 has the risk analysis portion.

84. Question Result, ID, References Sat, IM.RA.RAFACTORS.R, 192.947(b) (192.917(c))

Question Text Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?

Assets Covered Nippon Dynawave

Result Notes There is one segment. We reviewed in Appendix D and E where is where the algorithm is computed.

85. Question Result, ID, References Sat, IM.RA.RAMOC.P, 192.917(c)

Question Text Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?

Assets Covered Nippon Dynawave

Result Notes This is in Section 11. It is the MOC.

86. Question Result, ID, References NA, IM.RA.RAMOC.R, 192.947(b) (192.917(c))

Question Text Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?

Assets Covered Nippon Dynawave

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

87. Question Result, ID, References Sat, IM.RA.RAMOC.O, 192.917(c)

Question Text Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?

Assets Covered Nippon Dynawave

Result Notes We looked at the route via maps and physical observation.

## RPT.NR: Notices and Reporting

88. Question Result, ID, References Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b)

Question Text Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?

Assets Covered Nippon Dynawave

Result Notes This is in Section 11.4.3 in the IM manual.

89. Question Result, ID, References NA, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b))

Question Text Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?

Assets Covered Nippon Dynawave

Result Notes No such activity/condition was observed during the inspection. No significant changes have occurred.

90. Question Result, ID, References Sat, RPT.NR.NOTIFYIMPRESS.P, 192.933(a)(1)

Question Text Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?

Assets Covered Nippon Dynawave

Result Notes This is in IM Section 7.3.4 and 7.3.5. They use 31G or RSTRENG if they have wall loss to determine the potential reduction pressure.

91. Question Result, ID, References NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))  
Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*  
Assets Covered Nippon Dynawave  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
92. Question Result, ID, References Sat, RPT.NR.IMDEVIATERPT.P, 192.913(b)(1)(vii)  
Question Text *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*  
Assets Covered Nippon Dynawave  
Result Notes This is in Section 8.3 of the IMP
93. Question Result, ID, References NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii))  
Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*  
Assets Covered Nippon Dynawave  
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
94. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.P, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)  
Question Text *Is there a process for annual reporting of integrity management performance data?*  
Assets Covered Nippon Dynawave  
Result Notes IM Section 14. Annual survey was submitted 1/24/2017.
95. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)  
Question Text *Do annual reports demonstrate that integrity management performance data were reported?*  
Assets Covered Nippon Dynawave  
Result Notes Annual report that was submitted 1/24/17 reported DCVG for the total length of the pipeline as IM performance data.

## TD.SCC: Stress Corrosion Cracking

96. Question Result, ID, References Sat, TD.SCC.SCCIM.P, 192.911(c) (192.917(a)(1))  
Question Text *Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*  
Assets Covered Nippon Dynawave  
Result Notes SCC has been evaluated to determine if it is a potential threat as recommended by ADB-2003-05, Stress Corrosion Cracking Threat to Gas and Hazardous Liquid Pipelines. FBE coating is used, and per the ASME guidance, SCC is not a threat
97. Question Result, ID, References Sat, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1))  
Question Text *Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*  
Assets Covered Nippon Dynawave  
Result Notes SCC has been evaluated to determine if it is a potential threat as recommended by ADB-2003-05, Stress Corrosion Cracking Threat to Gas and Hazardous Liquid Pipelines. FBE coating is used, and per the ASME guidance, SCC is not a threat
98. Question Result, ID, References Sat, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b))  
Question Text *Do records document that the operator has properly remediated any occurrences of SCC?*

Assets Covered **Nippon Dynawave**

Result Notes **SCC has been evaluated to determine if it is a potential threat as recommended by ADB-2003-05, Stress Corrosion Cracking Threat to Gas and Hazardous Liquid Pipelines. FBE coating is used, and per the ASME guidance, SCC is not a threat.**

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*Report Parameters: Results: all*

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