

Inspection Output (IOR)

Generated on 2019.October.30 17:15

Inspection Information

Inspection Name	Avista DIMP 7781	Operator(s)	AVISTA CORP (31232)	Plan Submitted	01/11/2019
Status	PLANNED	Lead	Scott Rukke	Plan Approval	01/18/2019 by Joe Submits
Start Year	2019	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Kali Wraspir, Darren Tinnerstet	All Activity Start	10/28/2019
System Type	GD	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	11/01/2019
Protocol Set ID	GD.2018.02	Supervisor	Joe Submits	Inspection Submitted	09/03/2019
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

This is a headquarters system wide DIMP inspection. Oregon and Idaho were invited to participate in this inspection, only Idaho accepted and was present on 10/29 in Avista's office.

Randy Bareither is the contact person for this inspection.

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Inspection schedule:

Avista Spokane 7781

IA inspection sent to Joe Submits on 1/11/2019 for approval.

Staff has reviewed Avista's material defect reports for 2015, 2016, 2017 and 2018.

Staff has reviewed Avista's annual reports for 2015, 2016, 2017 and 2018.

Drove to Spokane on October 28, 2019

October 29, 2019 in Avista's office.

Inspection lasted one day. The Idaho PUC participated.

Avista has a good DIMP program which appears to be well funded and well managed.

It appears to meet all of the code requirements. Two high risk types of facilities are currently under replacement - vintage Aldyl-A and small diameter Aldyl-A to steel service connections. The service connection replacement program is near completion. Both of these facilities have been replaced under the UTC's high risk pipeline replacement program. Avista also has an on-going cathodic protection system program that was mandated under order and settlement agreement known as Isolated steel. This program is on track for a 2020 completion date.

No issues were noted.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	Headquarters	Headquarters	other	Headquarters	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Abandoned	41	41	41	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1.	Headquarters	GDIM (Form 22)	PRO, PRR, FR, ATT1PRO, ATT1FR, ATT1PRR, GDIM, MMLPGIM, MISCTOPICS, GENERIC	P, R, O, S	Detail

Plan Implementations

Activity #	Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroup s	Qst Assets	Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Office Records	--	10/28/2019	11/01/2019	n/a	all planned questions	all assets	all types	41	41	41	100.0%

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

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

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Attendance	COMPLETED	10/30/2019	Office Records	Headquarters

Results (all values, 41 results)

GDIM.IM: Plan Implementation

- Question Result, ID, References: Sat, GDIM.QA.PLANIMPLEMENT.P, 192.1005
 Question Text: Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?
 Assets Covered: Headquarters
 Result Notes: Implemented 7/28/2018. The DIMP plan has been revised and is due for release at any time.
- Question Result, ID, References: Sat, GDIM.RA.SOURCES.P, 192.1007(a)(1)

Question Text *Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?*

Assets Covered **Headquarters**

Result Notes **Section 5.3 of their PLAN dated July 20, 2018. Revision 7.**

The Appendices reference the actual required data and required collection methods.

GDIM.KN: Knowledge of the System

3. Question Result, ID, References **Sat, GDIM.RA.GAPS.P, 192.1007(a)(3)**

Question Text *Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered **Headquarters**

Result Notes **No issues.**

4. Question Result, ID, References **Sat, GDIM.RA.INFORMATION.P, 192.1007(a)(2)**

Question Text *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?*

Assets Covered **Headquarters**

Result Notes

Crossbores, hard surface, meter protection, regulator type and make.

Tables 5.4.1 and 5.5.1 starting on A-31

5. Question Result, ID, References **Sat, GDIM.RA.INFONEEDS.P, 192.1007(a)(3)**

Question Text *Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?*

Assets Covered **Headquarters**

Result Notes **Section 5.5 addresses exposed pipe data to capture. 6.3 has ongoing review of threats. Section 10 has accelerated/additional actions to be taken.**

6. Question Result, ID, References **Sat, GDIM.RA.INFONEEDS.R, 192.1007(a)(3)**

Question Text *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered **Headquarters**

Result Notes **Table 5.4.1 starts**

7. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEDATA.P, 192.1007(a)(5)**

Question Text *Do the procedures require the capture and retention of data on any new pipeline installed?*

Assets Covered **Headquarters**

Result Notes **Yes. 5.5**

Exposed pipe reports have a data list.

General guidelines in the gas standards.

They capture soil, make, manufacture, sand, etc. (PE)

Soil, coating, make, smys,

8. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEDATA.R, 192.1007(a)(5)**

Question Text *Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?*

Assets Covered Headquarters

Result Notes Reviewed as built records for random jobs with captured data. 1005121253 was one

All materials and data required to be captured were on the forms.

9. Question Result, ID, References Sat, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007(a)

Question Text *Do records demonstrate implementation of the element "Knowledge of the System"?*

Assets Covered Headquarters

Result Notes No issues. Avista has good system knowledge with most necessary data having been captured and utilized.

10. Question Result, ID, References Sat, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)

Question Text *Has the operator demonstrated an adequate understanding of the system?*

Assets Covered Headquarters

Result Notes 5.0 - knowledge of facilities. Good

Appendix A

GDIM.TH: Identify Threats

11. Question Result, ID, References Sat, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)

Question Text *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?*

Assets Covered Headquarters

Result Notes Section 6 lists the threat categories.

Appendix B

12. Question Result, ID, References Sat, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)

Question Text *Did the operator consider the information that was reasonably available to identify existing and potential threats?*

Assets Covered Headquarters

Result Notes Appendix F.
Reviewed Appendix D and E

13. Question Result, ID, References Sat, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)

Question Text *In identifying threats did the information considered include all of the required data and information sources?*

Assets Covered Headquarters

Result Notes Appendix A and B

No data was determined to be left out. Avista does a good job in identifying data and incorporating information into their threat categories.

14. Question Result, ID, References Sat, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)

Question Text *Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?*

Assets Covered Headquarters

15. Question Result, ID, References [Sat, GDIM.RA.IMPLEMENTTH.R, 192.1007\(b\)](#)
Question Text *Do records demonstrate implementation of the element "Identify Threats"?*
Assets Covered [Headquarters](#)
Result Notes [Table 6.1](#)

GDIM.RR: Evaluate and Rank Risk

16. Question Result, ID, References [Sat, GDIM.RA.RISKRANKING.P, 192.1007\(c\)](#)
Question Text *Do the procedures contain the method(s) used to determine the relative importance of each threat and estimate and rank the risks posed?*
Assets Covered [Headquarters](#)
Result Notes [Reviewed Table 7.4-1](#)

[Reviewed components of the Pipe Replacement program.](#)

[Reviewed Appendix F](#)
17. Question Result, ID, References [Sat, GDIM.RA.THREATSCONSIDERED.P, 192.1007\(c\)](#)
Question Text *Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*
Assets Covered [Headquarters](#)
Result Notes [Reviewed risk rankings and results.](#)
18. Question Result, ID, References [Sat, GDIM.RA.LIKELIHOOD.P, 192.1007\(c\)](#)
Question Text *Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?*
Assets Covered [Headquarters](#)
Result Notes [No issues. Reviewed their new model which will be implemented within a month or so.](#)
19. Question Result, ID, References [Sat, GDIM.RA.CONSEQUENCE.P, 192.1007\(c\)](#)
Question Text *Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*
Assets Covered [Headquarters](#)
Result Notes [Reviewed their new Consequence Model. Severity ratings are incorporated.](#)
20. Question Result, ID, References [Sat, GDIM.RA.SUBDIVIDE.R, 192.1007\(c\)](#)
Question Text *If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?*
Assets Covered [Headquarters](#)
Result Notes [Section 7.0 Avista's systems are divided into Rasters which are 50' geographical systems in their GIS.](#)
21. Question Result, ID, References [Sat, GDIM.RA.RESULTS.R, 192.1007\(c\)](#)
Question Text *Are the results of the risk ranking supported by the risk evaluation model/method?*
Assets Covered [Headquarters](#)
Result Notes [Section 7. Reviewed 7.4 also.](#)
22. Question Result, ID, References [Sat, GDIM.RA.RESULTSVALIDATION.R, 192.1007\(c\)](#)

Question Text *Did the operator validate the results generated by the risk evaluation model/method?*

Assets Covered Headquarters

Result Notes Reviewed change of management records which are broken down into each threat category. . Appendix C.

23. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)

Question Text *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?*

Assets Covered Headquarters

Result Notes Section 7.4. Primary threats and subthreats are ranked. Table 7.4-1 and 2

Washington rankings are on Table 7.4-5 in B-14.

Material was number 1 when this table was ran.

GDIM.PM: Preventive and Mitigative Actions

24. Question Result, ID, References Sat, GDIM.PM.IDENTIFYMEASURES.P, 192.1007(d)

Question Text *Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?*

Assets Covered Headquarters

Result Notes Baseline created for each 5 year history.

Section 8 - Identification and Implementation of Measures to Address Threat.

Appendix E and F

25. Question Result, ID, References Sat, GDIM.PM.IDENTIFYMEASURES.R, 192.1007(d)

Question Text *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?*

Assets Covered Headquarters

Result Notes Section 8

Appendix C

26. Question Result, ID, References Sat, GDIM.PM.LEAKMANAGEMENT.P, 192.1007(d)

Question Text *Does the plan include an effective leak management program (unless all leaks are repaired when found)?*

Assets Covered Headquarters

Result Notes Section 8.1 and all of Appendix D is leak management.

Avista has a good leak management system.

27. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPM.R, 192.1007(d)

Question Text *Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?*

Assets Covered Headquarters

Result Notes Appendix C

GDIM.EV: Measure Performance and Evaluate Effectiveness

28. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.P, 192.1007(e)

Question Text *Does the plan contain procedures for how the operator established a baseline for each performance measure?*

Assets Covered Headquarters

Result Notes Where possible, Avista uses 5 year average to establish the baseline and reestablished its baseline in 2015.

Section 9.1

29. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.R, 192.1007(e)

Question Text *Does the plan establish a baseline for each performance measure?*

Assets Covered Headquarters

Result Notes Yes it has baselines for each measure in section 9.1

Appendix shows performance measures.

Damage trends are higher than the national average for Avista (F11)

30. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREDATA.P, 192.1007(e)

Question Text *Does the operator have procedures to collect the data for each performance measure?*

Assets Covered Headquarters

Result Notes Section 9.7 page 37

31. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREMONITOR.P, 192.1007(e)

Question Text *Do the procedures require the operator to monitor each performance measure?*

Assets Covered Headquarters

Result Notes Appendix F

Section 9.0.

All performance measures are monitored for changes and Appendix E deals with changes outside the norm.

32. Question Result, ID, References Sat, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)

Question Text *When measures are required to reduce risk, do the procedures provide how their effectiveness will be measured?*

Assets Covered Headquarters

Result Notes This is in section 10, specifically 10.2, and Appendix G is the historical tracking of Appendix E. When the baseline is exceeded by 5% (8.2.1), there is a review performed and they will make a change as necessary.

33. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEV.R, 192.1007(e)

Question Text *Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?*

Assets Covered Headquarters

Result Notes

- No issues.

GDIM.PE: Periodic Evaluation

34. Question Result, ID, References Sat, GDIM.CA.PERIODICEVAL.P, 192.1007(f)

Question Text *Do the procedures for periodic evaluation include all of the requirements of 192.1007(f)?*

Assets Covered Headquarters

Result Notes Section 10, table 10.1 Appendix G

35. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVAL.R, 192.1007(f)**
Question Text *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?*
Assets Covered **Headquarters**
Result Notes **Looked at review history in Table 10.1-1**

GDIM.RP: Reporting

36. Question Result, ID, References **Sat, GDIM.RR.ANNUALREPORT.P, 192.1007(g)**
Question Text *Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?*
Assets Covered **Headquarters**
Result Notes **Section 11.1.**

37. Question Result, ID, References **Sat, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)**
Question Text *Has the operator submitted the required reports?*
Assets Covered **Headquarters**
Result Notes **All reports were submitted and reviewed.**

GDIM.MF: Report Mechanical Fitting Failures

38. Question Result, ID, References **Sat, GDIM.RR.MECHANICALFITTING.P, 192.1009**
Question Text *Are there procedures to collect information necessary to comply with the reporting requirements of 192.1009?*
Assets Covered **Headquarters**
Result Notes **Reports were submitted and reviewed.**

11.2

GDIM.RC: Records Required to be Kept

39. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.P, 192.1011**
Question Text *Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?*
Assets Covered **Headquarters**
Result Notes **Procedures require records to be maintained.**
40. Question Result, ID, References **Sat, GDIM.QA.PLANRETENTION.P, 192.1011**
Question Text *Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?*
Assets Covered **Headquarters**
Result Notes **Listed in Section 12.**
41. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011**
Question Text *Has the operator maintained the required records?*
Assets Covered **Headquarters**
Result Notes **Reviewed folders containing records back to plan implementation in 2011**

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