

Inspection Output (IOR)

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Inspection Information

Inspection Name	NWN DIMP 8058	Operator(s)	NORTHWEST NATURAL GAS CO (13840)	Plan Submitted	11/21/2019
Status	PLANNED	Lead	Scott Rukke	Plan Approval	01/03/2020 by Joe Subsits
Start Year	2020	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity Start	02/24/2020
System Type	GD	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	02/28/2020
Protocol Set ID	GD.2019.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Compliance contact for this inspection:

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This is a Northwest Natural Gas Headquarters distribution Integrity management plan inspection.

The majority of this inspection will be conducted remotely through electronic records review due to Covid-19 concerns.

Start date for the gathering of electronic records was 3/18/2020.

Any field requirements were met by random crew and facility inspections due to Covid-19 concerns.

5/14/2020 NWN provided electronic records for review. These would normally be reviewed in their office. The remaining records are scheduled for a skype review on June 4, 2020.

6/3/2020 the remaining electronic records that would normally be reviewed in the operators office were reviewed electronically.

6/4/2020 Electronic records reviewed through a Skype meeting. Records reviewed would have normally been reviewed in NWN's office.

All electronic records reviews were records normally reviewed in the operators office. Due to Covid-19 concerns they were reviewed electronically.

The exit interview was conducted through email on 6/5/2020.

No issues or concerns were noted.

Documents submitted 6/5/2020

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	NWN DIMP 8058	Northwest Natural Headquarters	unit	88965	--	84	84	84	84	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.	NWN DIMP 8058	n/a	GDIM.RR, GDIM.IMPL, GDIM.TH, GDIM.KN, GDIM.EV, GDIM.PE, GDIM.PM, GDIM.RC, GDIM.MF, GDIM.RP, GDIM.RA.SOURCES.P	P, R, O, S	Detail

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s)	Planne d	Require d	Inspecte d	Total	Required % Complet e
1	NWN DIMP 8058	--	02/24/2020	02/28/2020	n/a	all planned questions	all assets	all types	84	84	84	84	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	NWN DIMP 8058 Meeting/Records review	COMPLETED	06/05/2020	NWN DIMP 8058	NWN DIMP 8058

Results (all values, 84 results)

85 (instead of 84) results are listed due to re-presentation of questions in more than one sub-group.

PRR.REPORT: Reporting

1. Question Result, ID, References [Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 \(191.12\)](#) (also presented in: [GDIM.IMPL](#))

Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*

Assets Covered [NWN DIMP 8058](#)

Result Notes [NWN only had two mechanical fittings fail in the time period between 2016 and 2019. They were both in 2018 and were perfection couplings with seal leaks.](#)

GDIM.IM: Plan Implementation

2. 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 **NWN DIMP 8058**

Result Notes **Sections 6 and 7 details sources to characterize threats.**

NWN uses their GIS system broken down into segments that store individual data sets.

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 **NWN DIMP 8058**

Result Notes **Section 5.**

NWN also runs their GIS to determine segments with missing data that can be gathered over time through O&M and other work.

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 **NWN DIMP 8058**

Result Notes **Yes, section 5.**

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 **NWN DIMP 8058**

Result Notes **Yes, section 5.**

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 **NWN DIMP 8058**

Result Notes **Yes, section 5.**

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 **NWN DIMP 8058**

Result Notes **Yes. Section 5.0 and 5.4. Appendix A**

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 **NWN DIMP 8058**

Result Notes **Yes, sections 5 and 6.**

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 **NWN DIMP 8058**

Result Notes **Yes, sections 5.0, 5.1.6, 5.2.**

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 **NWN DIMP 8058**
Result Notes **Yes. All elements of their knowledge of the system are present in their DIMP model.**

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 **NWN DIMP 8058**
Result Notes **Yes section 6 identifies the 8 threat categories and NWN has incorporated them into their DIMP model.**
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 **NWN DIMP 8058**
Result Notes **Yes, NWN uses a variety of SME's, internal information along with external information that is available.**
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 **NWN DIMP 8058**
Result Notes **Yes, both internal and external information.**
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 **NWN DIMP 8058**
Result Notes **Yes, section 6.0 lists external sources of information.**
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 **NWN DIMP 8058**
Result Notes **Section 6.0, identification of threats.**

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 **NWN DIMP 8058**
Result Notes **Yes, section 7. Evaluate and Rank Risk**
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 **NWN DIMP 8058**
Result Notes **NW Natural reviews information gathered for Section 5.0 that is reasonably available and uses it to identify existing and potential threats.**
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 **NWN DIMP 8058**
Result Notes **Yes. Section 7.**

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 **NWN DIMP 8058**

Result Notes **Yes. Per section 9.0 NWN reviews the performance measures and baseline measurements for completeness to ensure that all threats and risk are monitored. Any potential threats are evaluated at this time.**

20. Question Result, ID, References **NA, 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 **NWN DIMP 8058**

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

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 **NWN DIMP 8058**

Result Notes **Yes. NWN's model ranks third party damage as the number one threat. Supporting documentation and leak history also validates this as the number one threat for NWN.**

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 **NWN DIMP 8058**

Result Notes **Yes. Section 7.4. NWN uses a combination of SME's and past leak history to validate their risk model.**

NW Natural's Integrity team evaluates the Risk Model annually. As new threats arise, system knowledge evolves, or as potential improvements are identified, the Risk Model is updated. Changes to the Risk Model are documented in Appendix C.

Annual reviews provided by NWN were reviewed by Skype on 6/4/2020. No copies were provided by the operator.

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 **NWN DIMP 8058**

Result Notes **Yes. Section 7. Mentioned in section 2.**

Based on 2019 program and data.

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 **NWN DIMP 8058**

Result Notes **Section 8.1, A/A Actions.**

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 **NWN DIMP 8058**
 Result Notes **Yes. Table D-1 lists the associated risks identified and the accelerated actions implemented to minimize or alleviate the risks. The table identifies how the measures are selected, how they are implemented and what risks are being addressed. NWN has completed a replacement of all known bare pipe in WA State. NWN has completed replacement of all known ABS plastic pipe in WA State.**
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 **NWN DIMP 8058**
 Result Notes **Yes, in section 8.2 Leak Management Program. Also found in their O&M manual sections 707 and 709.**
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 **NWN DIMP 8058**
 Result Notes **Yes.**

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 **NWN DIMP 8058**
 Result Notes **Yes, section 9.0 MEASUREMENT OF PERFORMANCE, MONITORING RESULTS, AND EVALUATING EFFECTIVENESS**
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 **NWN DIMP 8058**
 Result Notes **Baselines are shown in Appendix E-1**
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 **NWN DIMP 8058**
 Result Notes **Yes, section 9.0 MEASUREMENT OF PERFORMANCE, MONITORING RESULTS, AND EVALUATING EFFECTIVENESS**
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 **NWN DIMP 8058**
 Result Notes **Section 9.0. Also baselines for each performance measure and A/A Action are documented in Appendix E.**
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 **NWN DIMP 8058**
 Result Notes **Section 9.0. Also baselines for each performance measure and A/A Action are documented in Appendix E.**
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 **NWN DIMP 8058**

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 **NWN DIMP 8058**

Result Notes **Section 10.0. A review of the DIMP plan is outlined in Figure 10-0 and is to be performed once per calendar year. The process analyzes all aspects of the DIMP program. A complete program re-evaluation will be completed at least every 5 years or sooner if required.**

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 **NWN DIMP 8058**

Result Notes **Yes. NWN conducts annual reviews and documents the results. Appendix F-1 documents all reviews and defines changes.**

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 **NWN DIMP 8058**

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 **NWN DIMP 8058**

Result Notes **Reports for 2016 to 2019 were 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 **NWN DIMP 8058**

Result Notes **Section 11. NWN only had two fitting failures in 2018 since the last inspection.**

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 **NWN DIMP 8058**

Result Notes **Section 12.**

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 **NWN DIMP 8058**
Result Notes **Section 12.0**

41. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011**
Question Text *Has the operator maintained the required records?*
Assets Covered **NWN DIMP 8058**

GDIM.IMPL: GDIM Implementation

42. Question Result, ID, References **NA, GDIM.QA.ISSUESIMPL.R, 192.1005**
Question Text *Have all issues raised in previous DIMP inspections been satisfactorily addressed?*
Assets Covered **NWN DIMP 8058**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
43. Question Result, ID, References **Sat, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)**
Question Text *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?*
Assets Covered **NWN DIMP 8058**
44. Question Result, ID, References **NA, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)**
Question Text *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?*
Assets Covered **NWN DIMP 8058**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
45. Question Result, ID, References **Sat, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)**
Question Text *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?*
Assets Covered **NWN DIMP 8058**
Result Notes **Yes. A sampling of records such as exposed pipe reports and other documents were reviewed. Any issues noted were followed up on and the records were reviewed. These included missing data, red line drawings requiring GIS changes etc. All records reviewed had proper followup documentation. Appendix A3 shows a GIS query on the entire distribution system for missing data. NWN continuously updates data as records are found through scanning of paper documents or field work where missing info is found or verified. Figure 5.0 illustrates the procedure to confirm system knowledge. Pragma CAD is used to collect data from field activity, Section 5.1.5.**
46. Question Result, ID, References **Sat, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)**
Question Text *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?*
Assets Covered **NWN DIMP 8058**
Result Notes **Yes. Redline changes captured by field work maintenance activities were reviewed. GIS changes were made as necessary.**
47. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)**
Question Text *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?*
Assets Covered **NWN DIMP 8058**
48. Question Result, ID, References **Sat, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)**

Question Text *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?*

Assets Covered **NWN DIMP 8058**

Result Notes **All documents reviewed that captured DIMP data were complete. Exposed pipe reports that were reviewed and that noted issues were well documented. Reviewed exposed pipe reports, AA forms and the Annual report baseline report.**

49. Question Result, ID, References **NA, GDIM.RA.SMEIMPL.R, 192.1007(a)**

Question Text *If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?*

Assets Covered **NWN DIMP 8058**

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

No new SME data has been added to the Plan. The plan has so far been driven by electronic data collection.

50. Question Result, ID, References **Sat, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)**

Question Text *Do operator personnel in the field understand their responsibilities under the DIMP plan?*

Assets Covered **NWN DIMP 8058**

Result Notes **During random crew inspections personnel were aware of DIMP requirements and data that is required to be recorded for DIMP records purposes such as pipe type, year, size.**

Records reviewed indicated that field personnel were using the appropriate forms to capture red line issues such as incorrect type of pipe size or coatings found during field O&M work.

51. Question Result, ID, References **NA, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)**

Question Text *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?*

Assets Covered **NWN DIMP 8058**

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

52. Question Result, ID, References **NA, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)**

Question Text *Have any changes occurred that require re-evaluation of threats and risks?*

Assets Covered **NWN DIMP 8058**

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

No changes since the bare steel and vintage PE pipe has been replaced in WA. This was prior to the last DIMP inspection.

53. Question Result, ID, References **NA, GDIM.RA.IMPLEMENTTHUPDATEIMPL.R, 192.1007(c)**

Question Text *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge?*

Assets Covered **NWN DIMP 8058**

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

No changes since the bare steel and vintage PE pipe has been replaced in WA. This was prior to the last DIMP inspection.

54. Question Result, ID, References **NA, GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R, 192.1007(c)**

Question Text *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*

Assets Covered **NWN DIMP 8058**

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

No changes since the bare steel and vintage PE pipe has been replaced in WA. This was prior to the last DIMP inspection.

55. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)**
Question Text *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?*
Assets Covered **NWN DIMP 8058**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

NWN does not subdivide the system in WA State.

56. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)**
Question Text *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?*
Assets Covered **NWN DIMP 8058**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

NWN does not subdivide the system in WA State.

57. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)**
Question Text *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?*
Assets Covered **NWN DIMP 8058**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

NWN does not subdivide the system in WA State.

58. Question Result, ID, References **NA, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)**
Question Text *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?*
Assets Covered **NWN DIMP 8058**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

NWN does not subdivide the system in WA State.

59. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)**
Question Text *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?*
Assets Covered **NWN DIMP 8058**
Result Notes **Yes. NWN has completed two major programs through their DIMP plan. Vintage PE replacement and bare steel replacement.**

Appendix E-10 shows the bare steel replacement plan.

60. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)**
Question Text *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)?*
Assets Covered **NWN DIMP 8058**
Result Notes **Yes. NWN has completed two major programs through their DIMP plan. Vintage PE replacement and bare steel replacement.**

61. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)**
Question Text *If answering "Satisfactory/Yes" to previous question implementation question GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, have risks (192.1007(c)) been re-evaluated and ranked*

because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?

Assets Covered **NWN DIMP 8058**

Result Notes **Elimination of cast iron and bare steel did not impact the ranking of the risks in WA State. The vintage PE replacement program was recently completed and does not affect the current risk ranking.**

62. Question Result, ID, References **Sat, GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R, 192.1007(d)**

Question Text *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?*

Assets Covered **NWN DIMP 8058**

Result Notes **Yes, Section 8.0 – Appendix D-1 identifies the associated A/A's for each specific risk.**

63. Question Result, ID, References **Sat, GDIM.PM.LEAKMANAGEMENTIMPL.R, 192.1007(d)**

Question Text *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?*

Assets Covered **NWN DIMP 8058**

Result Notes **Leak management programs and documentation are thoroughly reviewed and evaluated during various unit inspections of NWN's system.**

64. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVDATAIMPL.R, 192.1007(e)**

Question Text *Is data being collected for the required performance measures in 192.1007(e)?*

Assets Covered **NWN DIMP 8058**

Result Notes **Yes.**

65. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R, 192.1007(e)**

Question Text *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?*

Assets Covered **NWN DIMP 8058**

Result Notes **Yes. Appendix E-5 shows data that is being collected and reported.**

66. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEVBASELINEIMPL.R, 192.1007(e)**

Question Text *Is each performance measure being monitored from an established baseline?*

Assets Covered **NWN DIMP 8058**

Result Notes **Yes.**

The baseline is based on data submitted in the annual report. Appendix E-1 shows the baseline measurements.

Documents reviewed indicated that in 2016 and 2017 damages were increasing from the baseline measurements. NWN reviewed the data and implemented additional measures. In 2018 and 2019 damages per 1000 locates trended downward to 2.6 per thousand from 3.2.

67. Question Result, ID, References **NA, GDIM.QA.IMPLEMENTEVRISKIMPL.R, 192.1007(e)**

Question Text *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?*

Assets Covered **NWN DIMP 8058**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No new performance measures have been added since the DIMP plan was last updated.**

68. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVALFREQIMPL.R, 192.1007(f)**

Question Text *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]*

Assets Covered **NWN DIMP 8058**

- Result Notes NWN's DIMP plan has been reviewed annually. Documentation was reviewed. Appendix F-1 details the revision log of changes made along with the dates.
69. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)
 Question Text *Did the periodic evaluation include all required elements?*
 Assets Covered NWN DIMP 8058
 Result Notes YES. The revision log in F-1 tracks all changes. The revision log was reviewed up to 4/2018.
70. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))
 Question Text *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?*
 Assets Covered NWN DIMP 8058
 Result Notes Yes. An example is the upward trend of excavation damages in 2016 and 2017. NWN implemented additional measures to bring the trend downward in 2018 and 2019.
71. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)
 Question Text *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?*
 Assets Covered NWN DIMP 8058
 Result Notes Accelerated actions are created in response to 8 primary threats and industry identified threats such as sewer cross bores. If measures are not effective NWN reviews information and implements new accelerated actions. The change log in F-1 details any changes made in response to risk trends not meeting performance measures.
72. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)
 Question Text *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?*
 Assets Covered NWN DIMP 8058
 Result Notes The change log in Appendix F-1 shows how Performance Measures have been modified in response to the annual review of the plan.
73. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)
 Question Text *Were procedures followed in conducting periodic evaluations and program improvements?*
 Assets Covered NWN DIMP 8058
 Result Notes According to documentation reviewed, yes.
74. Question Result, ID, References Sat, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)
 Question Text *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?*
 Assets Covered NWN DIMP 8058
 Result Notes Annual reports were reviewed for 2016 to 2019.
75. Question Result, ID, References Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12) (also presented in: PRR.REPORT)
 Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*
 Assets Covered NWN DIMP 8058
 Result Notes NWN only had two mechanical fittings fail in the time period between 2016 and 2019. They were both in 2018 and were perfection couplings with seal leaks.
76. Question Result, ID, References Sat, GDIM.RR.MECHANICALFITTINGRPTIMPL.R, 192.1009 (191.12)
 Question Text *Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year,*

and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?

Assets Covered NWN DIMP 8058

Result Notes There were only 2 mechanical fitting failures in 2018.

77. Question Result, ID, References Sat, GDIM.RR.MECHANICALFITTINGDIMPIMPL.O, 192.1009 (191.12)

Question Text Were procedure(s) followed for collecting the appropriate information and submitting PHMSA Form F-7100.1-2?

Assets Covered NWN DIMP 8058

Result Notes Annual reports and fitting failure reports were reviewed for 2016 to 2019. No issues noted.

78. Question Result, ID, References Sat, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011

Question Text Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?

Assets Covered NWN DIMP 8058

Result Notes Records were reviewed from the beginning of NWN's DIMP plan indicating they are meeting the record keeping requirements.

79. Question Result, ID, References Sat, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011

Question Text Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?

Assets Covered NWN DIMP 8058

Result Notes Yes. Records were reviewed from the beginning of NWN's DIMP plan indicating they are meeting the record keeping requirements.

80. Question Result, ID, References Sat, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011

Question Text Were DIMP procedures followed as applicable to records retention?

Assets Covered NWN DIMP 8058

Result Notes Records reviewed indicate that NWN is meeting record keeping requirements.

81. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)

Question Text Has approval been received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark questions 40-44 "N/A".]

Assets Covered NWN DIMP 8058

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

No alternative schedules were requested.

82. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)

Question Text Have the periodic inspections been conducted at the specified alternate intervals?

Assets Covered NWN DIMP 8058

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

83. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)

Question Text Have all conditions been complied with that were required as part of the alternate inspection interval approval?

Assets Covered NWN DIMP 8058

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

84. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)

Question Text Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?

Assets Covered NWN DIMP 8058

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

85. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVACTIONIMPL.R, 192.1013(c)**

Question Text *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*

Assets Covered **NWN DIMP 8058**

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

Report Parameters: Results: all

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