Inspection Output (IOR)

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Inspection Information

Inspection Name	8291 PSE Transmission Standard Comprehensive	Operator(s)	PUGET SOUND ENERGY (22189)	Plan Submitted	02/23/2021
		Lead	Darren Tinnerstet	Plan Approval	02/23/2021 by Joe Subsits
Status	PLANNED	Observer(s)	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson	All Activity Start	04/26/2021
Start Year	2021	Supervisor	Joe Subsits	All Activity End	04/30/2021
System Type	GT	Director	Sean Mayo	Inspection Submitted	--
Protocol Set ID	GT.2021.01			Inspection Approval	--

Inspection Summary

Inspection Scope and Summary:

This inspection was a standard transmission inspection and included a review of all operations and maintenance records since the last inspection in 2018. Records were reviewed for 2018, 2019 and 2020 and included cathodic protection, leak surveys, reporting, regulator inspections, valve inspection, patrolling, odorization, etc. During the field portion of the visit, we checked CP, odorization, markers, reliefs and valves.

Facilities visited and Total AFOD:

Records were reviewed remotely with PSE on the following days due to COVID restriction protocols: April 26th, April 27th, April 30th

Total AFOD: 2 days

Field observations were conducted on April 28th and April 29th at the following locations:

Olympia

Cedar Hills

South Seattle

North Midway

Green Lake / Lynnwood

Summary of Significant Findings:

No probable violations or areas of concern were discovered during this inspection.

Primary Operator contacts and/or participants:

Danielle Troupe
Senior Regulatory Compliance Analyst

Vidushi Rainia
Compliance Program Manager

Operator executive contact and mailing address for any official correspondence:

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Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88986 (1878)	Puget Sound Energy-TRANSMISSION	unit	88986	Compressor Stations Bottle/Pipe - Holders Storage Fields Vault Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Plastic Pipe AMAOP Abandoned	72	72	72	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.	88986 (1878)	Baseline Records (Form 1), Baseline Pipeline Field Inspection (Form 1)	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, GENERIC	P, R, O, S	Detail

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	PSE Transmission	--	04/26/2021 04/30/2021	n/a	all planned questions	all assets	all types	72	72	72	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	PSE Transmission	COMPLETED	05/10/2021	PSE Transmission	88986 (1878)

Results (all values, 72 results)

80 (instead of 72) results are listed due to re-presentation of questions in more than one sub-group.

AR.PTI: Integrity Assessment Via Pressure Test

1. Question Result, ID, References: NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))
   - Question Text: *Do the test records validate the pressure test?*
   - Assets Covered: 88986 (1878)
   - Result Notes: Does not currently use Pressure Testing.

     Appendix I TIMP Plan - Section 6 is Pressure Testing Plan if need

     Use direct assessment and inline assessment only

     Will add pressure testing plan as needed in future

AR.RMP: Repair Methods and Practices

2. Question Result, ID, References: Sat, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))
   - Question Text: *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*
   - Assets Covered: 88986 (1878)

3. Question Result, ID, References: Sat, AR.RMP.WELDTEST.O, 192.719(a) (192.719(b))
   - Question Text: *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*
   - Assets Covered: 88986 (1878)
   - Result Notes: Reviewed records for 2019 North Midway replacement project.

DC.CO: Construction

4. Question Result, ID, References: Sat, DC.CO.CLEAR.R, 192.325(a) (192.325(b), 192.325(c), 192.325(d))
   - Question Text: *Do records indicate that transmission lines or mains are installed with clearances specified in 192.325, and (if plastic) installed as to prevent heat damage to the pipe?*
   - Assets Covered: 88986 (1878)
   - Result Notes: reviewed GOS 2525.1700 Section 6.10 underground clearance

     Fitter sign off on as-builts for adherance to GOP standards.

5. Question Result, ID, References: Sat, DC.CO.COVERONSHORE.R, 192.327(a) (192.327(b), 192.327(c), 192.327(d), 192.327(e))
   - Question Text: *Is onshore piping minimum cover provided as specified in 192.327?*
   - Assets Covered: 88986 (1878)
   - Result Notes: GOP 2525.1700 Section 7.4

     Fitters sign off on as-builts that adherence to GOP standards is attained.

DC.WELDINSP: Construction Weld Inspection

6. Question Result, ID, References: Sat, DC.WELDINSP.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)
   - Question Text: *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operatorâ€™s specifications or procedures?*

Assets Covered 88986 (1878)

Result Notes Reviewed Mag Particle report for 2019 North Midway project - Atelya Edwards 9/16/2020 (Sam Hicks was QA Inspector)

Radiographic Examination report -Robert Madden 10/14/2019

7. Question Result, ID, References Sat, DC.WELDINSP.WELDNDT.R, 192.243

Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*

Assets Covered 88986 (1878)

Result Notes Reviewed Mag Particle report for 2019 North Midway project - Atelya Edwards 9/16/2020

Radiographic Examination report -Robert Madden 10/14/2019

DC.WELDPROCEDURE: Construction Welding Procedures

8. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225

Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*

Assets Covered 88986 (1878)

Result Notes Reviewed qualification of welding procedures. Updated Welding manual procedures submitted to UTC on 5/3/2021.

DC.DPC: Design of Pipe Components

9. Question Result, ID, References Sat, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))

Question Text *Are transmission line valves being installed as required by 192.179?*

Assets Covered 88986 (1878)

Result Notes Reviewed as-built plans and GIS maps with valve locations.

10. Question Result, ID, References NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))

Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*

Assets Covered 88986 (1878)

Result Notes Have not had any changes or additions to pipe during audit scope period.

11. Question Result, ID, References NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))

Question Text *Does the transmission project's design and construction comply with 192.476?*

Assets Covered 88986 (1878)

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

DC.MO: Maintenance and Operations

12. Question Result, ID, References NA, DC.MO.MAOPLIMIT.O, 192.605(b)(5)

Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*

Assets Covered 88986 (1878)

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

EP.ERG: Emergency Response

13. Question Result, ID, References NA, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered 88986 (1878)

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

Each group supervisor reviews each 1284 form.

Reviewed Gas Event Review Form (GERF) - internal monitoring report for operator personnel

14. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 88986 (1878)

Result Notes Reviewed notifications for 2018-2020

King County public officials - Cedar Hills / Lynnwood / North Midway

Thurston County - Olympia

Reviewed records for notifications to Emergency Officials for 2018-2020

PAPA

ERT (Emergency Responder Training's) - significantly less trainings in 2020 due to Covid related restrictions.

MO.GC: Conversion to Service

15. Question Result, ID, References NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b))

Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*

Assets Covered 88986 (1878)

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

MO.GOABNORMAL: Gas Pipeline Abnormal Operations

16. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))

Question Text *Did personnel respond to indications of abnormal operations as required by the process?*

Assets Covered 88986 (1878)

Result Notes No abnormal operating conditions during audit scope.

Reviewed procedures for discovering and reporting AOC's (TIMP Plan)

Over pressure events are main risk historically.

17. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered 88986 (1878)

Result Notes Have not had any AOC's in audit scope period.

Reviewed processes (Blue Card Process - AOC reporting Card)

GOS 2575.2700 - section 7 Remediation

MO.GOCLASS: Gas Pipeline Class Location

18. Question Result, ID, References NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered 88986 (1878)

Result Notes No class changes - built to class 4 standards.

JP does one each year.

19. Question Result, ID, References Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: MO.GO)

Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered 88986 (1878)

MO.GOMAOP: Gas Pipeline MAOP

20. Question Result, ID, References Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b))

Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*

Assets Covered 88986 (1878)

Result Notes Reviewed North Midway 16" HP main:

System MAOP 250 psig - components used rated higher by design.

16" stopple fitting 600 psig

2" save-a-valve 1440 psig

16" .375 wall X56 Grade FBE 1050 psi

ISO ANSI 600 API with design pressure of 569 psig.

MO.GM: Gas Pipeline Maintenance

21. Question Result, ID, References Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GMOPP)

Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered 88986 (1878)

Result Notes Leak Survey Maps reviewed (also patrol records):

Cedars Hills 2020

Lynnwood 2019

North Midway 2018 - 2020

South Seattle 2020

Olympia 2018 - 2020

Reviewed repair records for 2019 North Midway project.

22. Question Result, ID, References: Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))

Question Text: *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed operator procedures for minimizing accidental ignitions.

23. Question Result, ID, References: Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))

Question Text: *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed valve maintenance records for 2018-2020 for the following locations:

Olympia

Lynnwood

Cedar Hills

North Midway

24. Question Result, ID, References: Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))

Question Text: *Are field inspection and partial operation of transmission line valves adequate?*

Assets Covered: 88986 (1878)

Result Notes: Select valves partially operated during field audit. See Form R for detailed description.

MO.GOODOR: Gas Pipeline Odorization

25. Question Result, ID, References: Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text: *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed gas odorization records for 2018-2020 - no readings above .8 LEL for audit scope period.

Also reviewed Ordorizer maintenance records for 2018-2020

MO.GO: Gas Pipeline Operations

26. Question Result, ID, References: Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c)) (also presented in: MO.GOCLASS)

Question Text: *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*

Assets Covered: 88986 (1878)

27. Question Result, ID, References: Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)

Question Text: *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*

Assets Covered 88986 (1878)

Result Notes GOS 2425.1000 - Section 4 Manual Review

Reviewed GOS 2425.2100 (2020) Main Replacements

Reviewed annual reviews conducted for 2018-2020.

28. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))

Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*

Assets Covered 88986 (1878)

Result Notes GOS 2425.1000 Section 3 General Requirements

Reviewed IFS QC Effectiveness Study (2020)

Reviewed ELM QC Effectiveness Study (2019)

29. Question Result, ID, References Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))

Question Text *Are construction records, maps, and operating history available to appropriate operating personnel?*

Assets Covered 88986 (1878)

Result Notes GIS Maps available to field personnel.

Image Site - Internal document searching program (as-builts, D-4, work orders)

30. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)

Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*

Assets Covered 88986 (1878)

Result Notes Pressure control tech provided as-builts while onsite at RS-1340 (North Seattle).

CP Tech Scott Salazar was able to bring up pipe installation history in the field during audit.

31. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))

Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*

Assets Covered 88986 (1878)

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

MO.GMOPP: Gas Pipeline Overpressure Protection

32. Question Result, ID, References Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*

Assets Covered 88986 (1878)

Result Notes Reviewed pressure relief records for 2018-2020 for the following locations:

Olympia - reviewed pressure relief review records (annually)

Lynnwood - monitor station

Cedar hills - reviewed pressure relief review records (annually)

North Midway

33. Question Result, ID, References: Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) (also presented in: MO.GM)

Question Text: *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*

Assets Covered: 88986 (1878)

Result Notes: Leak Survey Maps reviewed (also patrol records):

Cedars Hills 2020

Lynnwood 2019

North Midway 2018 - 2020

South Seattle 2020

Olympia 2018 - 2020

Reviewed repair records for 2019 North Midway project.

34. Question Result, ID, References: Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text: *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed OQ records for the following Pressure Control Tech's:

Rick Ferder - expires 12/31/2023

Steve Thomas - expires 12/31/2023

Also reviewed test records for regulator stations for 2018-2020.

35. Question Result, ID, References: Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)

Question Text: *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*

Assets Covered: 88986 (1878)

Result Notes: Select regulator stations inspected during field audit. See Form R for detailed description.

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

36. Question Result, ID, References: Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)

Question Text: *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed Atmospheric and Exposed pipe patrols for 2018-2020 - Green River Crossing

Reviewed follow-up for 3/21/2019 notification - satisfactory follow up.

Reviewed pipeline marker patrol records for 2018-2020

Markers are replaced or repaired at time of patrol which eliminates the need to track the 45-day requirement.

37. Question Result, ID, References: Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: PD.RW)

Question Text: *Are line markers placed and maintained as required?*

Assets Covered: 88986 (1878)

Result Notes: Observed adequate line markers during field audit.

38. Question Result, ID, References: Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: PD.RW)

Question Text: *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered: 88986 (1878)

Result Notes: ROW conditions were clear and acceptable during field visits.

39. Question Result, ID, References: Sat, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))

Question Text: *Do records indicate leakage surveys conducted as required?*

Assets Covered: 88986 (1878)

Result Notes: Leak Survey Maps reviewed (also patrol records):

Cedars Hills 2020

Lynnwood 2019

North Midway 2018 - 2020

South Seattle 2020

Olympia 2018 - 2020

PD.DP: Damage Prevention

40. Question Result, ID, References: Sat, PD.DP.PDPROGRAM.R, 192.614(c)

Question Text: *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed 2020 Damage Prevention Program Plan

High Profile tickets require a Public Improvement Inspector (PI) to be notified and appear onsite

PD.PA: Public Awareness

41. Question Result, ID, References: Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: EP.ERG)

Question Text: *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed notifications for 2018-2020

King County public officials - Cedar Hills / Lynnwood / North Midway

Thurston County - Olympia

Reviewed records for notifications to Emergency Officials for 2018-2020

PAPA

ERT (Emergency Responder Training's) - significantly less trainings in 2020 due to Covid related restrictions.

42. Question Result, ID, References: Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text: *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed 6.3.3 section of Damage Prevention plan

Do not meet requirement of multi-lingual County definition of 15% population speaking a certain language.

Still provide notifications in 11 different languages.

Reviewed "No what's below" publication, which is produced in Spanish as well.

PD.RW: ROW Markers, Patrols, Monitoring

43. Question Result, ID, References: Sat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: MO.RW)

Question Text: *Do records indicate that ROW surface conditions have been patrolled as required?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed Atmospheric and Exposed pipe patrols for 2018-2020 - Green River Crossing

Reviewed follow-up for 3/21/2019 notification - satisfactory follow up.

Reviewed pipeline marker patrol records for 2018-2020

Markers are replaced or repaired at time of patrol which eliminates the need to track the 45-day requirement.

44. Question Result, ID, References: Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d)) (also presented in: MO.RW)

Question Text: *Are line markers placed and maintained as required?*

Assets Covered: 88986 (1878)

Result Notes: Observed adequate line markers during field audit.

45. Question Result, ID, References: Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c)) (also presented in: MO.RW)

Question Text: *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered: 88986 (1878)

Result Notes: ROW conditions were clear and acceptable during field visits.

RPT.RR: Regulatory Reporting (Traditional)

46. Question Result, ID, References: Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)

Question Text: *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*

Assets Covered: 88986 (1878)

Result Notes: 2020 submitted 3/12/2021

2019 submitted 3/9/2020

2018 submitted 3/12/2019

Operator is aware of upcoming changes for 2022, working on final form.

47. Question Result, ID, References: NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))

Question Text: *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*

Assets Covered: 88986 (1878)

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

48. Question Result, ID, References: NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2))

Question Text: *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*

Assets Covered: 88986 (1878)

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

49. Question Result, ID, References: NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)

Question Text: *Do records indicate accurate supplemental incident reports were filed and within the required timeframe using the most recent Form?*

Assets Covered: 88986 (1878)

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

50. Question Result, ID, References: NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b), 191.25(c))

Question Text: *Do records indicate safety-related condition reports were filed as required?*

Assets Covered: 88986 (1878)

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

51. Question Result, ID, References: Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))

Question Text: *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*

Assets Covered: 88986 (1878)

Result Notes: 2020 submitted on 2/19/2021

2019 submitted on 3/6/2020

2018 submitted on 2/15/2019

52. Question Result, ID, References: Sat, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))

Question Text: *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed PHMSA portal for operator units and company information.

TD.ATM: Atmospheric Corrosion

53. Question Result, ID, References: Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Question Text: *Do records document inspection of aboveground pipe for atmospheric corrosion?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed 2020 Atmospheric corrosion patrol for Green River Bridge Crossing.

54. Question Result, ID, References: Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

Question Text: *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered 88986 (1878)

Result Notes Observed exposed pipeline under bridge on North Midway lpipeine. Wrap was sufficient and no areas of concern were noted.

TD.CPMONITOR: External Corrosion - CP Monitoring

55. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered 88986 (1878)

Result Notes Reviewed rectifier inspections 2018 / 2019/ 2020

Olympia (1)

South Seattle (1)

Cedar Hills (Galvanic)

Lynnwood (2)

8/20/2019 Short - cleared a water short (closed 11/14/2019)

Reviewed repair notes and records.

North Midway (2)

11/5/2019 - Short - Shorting of pipe on bridge. Repairing bridge supports with FR shields in 2021.

56. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a))

Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*

Assets Covered 88986 (1878)

Result Notes Obtained CP readings from select sites during field audit. See Form R for detailed description.

***Note** – During inspection IC system was down on the Olympia line and all PSP reads were below -850 mV. Once system was repaired new PSP readings were obtained on 5/18/2021and provided to Staff

57. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))

Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered 88986 (1878)

Result Notes Review CP records for 2018 /2019 / 2020

Olympia (4) No low reads

South Seattle (5) No low reads

Cedar Hills (2) No low reads

Lynnwood (2)

7/22/2020 low reading -666 mV. - reviewed follow up records of diagnosis and repair.

North Midway (5)

12/28/2019 low reading -610 mV - part of bridge shorting issue (to be remediated in 2021)

4/22/2020 low reading -642 mV - part of bridge issue

58. Question Result, ID, References: Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)

Question Text: *Are impressed current sources properly maintained and are they functioning properly?*

Assets Covered: 88986 (1878)

Result Notes: Inspected several rectifiers during field audit. See Form R for detailed description.

***Note** – During inspection IC system was down on the Olympia line and all PSP reads were below -850 mV. Once system was repaired new PSP readings were obtained on 5/18/21 and provided to Staff

59. Question Result, ID, References: NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))

Question Text: *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*

Assets Covered: 88986 (1878)

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

60. Question Result, ID, References: Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))

Question Text: *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed remediation records (see question #6, Cathodic Protection Monitoring).

61. Question Result, ID, References: Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))

Question Text: *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*

Assets Covered: 88986 (1878)

Result Notes: Added test leads to replaced pipe

Reviewed as-built's for North Midway project in 2019.

Corrosion Control is involved in the design and implementation of new or replacement projects

62. Question Result, ID, References: Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))

Question Text: *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*

Assets Covered: 88986 (1878)

Result Notes: No records of stray current issues.

Reviewed 4515.1205 - PS and AOC procedures

63. Question Result, ID, References: Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text: *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered: 88986 (1878)

Result Notes Reviewed GIS maps of CP Impressed systems

Also reviewed GIS maps for Galvanic system (Cedar Hills)

TD.CP: External Corrosion - Cathodic Protection

64. Question Result, ID, References Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b))

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*

Assets Covered 88986 (1878)

Result Notes Reviewed Cedar Hills commissioning records (2009)

Also reviewed records for North Midway and South Seattle.

Olympia does not fall under this requirement, installed pre 1971.

65. Question Result, ID, References NA, TD.CP.PRE1971.O, 192.457(b)

Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?*

Assets Covered 88986 (1878)

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

66. Question Result, ID, References NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))

Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*

Assets Covered 88986 (1878)

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

67. Question Result, ID, References Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 88986 (1878)

Result Notes Reviewed 2018-2020 casing records for North Midway and Olympia

Monolithic insulators

68. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)

Question Text *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered 88986 (1878)

Result Notes Reviewed GIS maps of CP Impressed systems

Also reviewed GIS maps for Galvanic system (Cedar Hills)

TD.COAT: External Corrosion - Coatings

69. Question Result, ID, References Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a))

Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*

Assets Covered 88986 (1878)

TD.CPEXPOSED: External Corrosion - Exposed Pipe

70. Question Result, ID, References: Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)

Question Text: *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed 2018-2020 EPCR (Exposed Pipeline Condition Report)

3 required remediation - reviewed repair records and condition reports.

71. Question Result, ID, References: Sat, TD.CP.RECORDS.R, 192.491(a) (also presented in: TD.CPMONITOR, TD.CP)

Question Text: *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed GIS maps of CP Impressed systems

Also reviewed GIS maps for Galvanic system (Cedar Hills)

TD.ICP: Internal Corrosion - Preventive Measures

72. Question Result, ID, References: Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))

Question Text: *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed 2018-2020 Exposed Pipe Condition Reports (EPCR)

73. Question Result, ID, References: NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))

Question Text: *Do records document adequate evaluation of internally corroded pipe?*

Assets Covered: 88986 (1878)

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

74. Question Result, ID, References: NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))

Question Text: *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*

Assets Covered: 88986 (1878)

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

TQ.OQ: Operator Qualification

75. Question Result, ID, References: Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text: *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed OQ records for contractor personnel working on 2019 North Midway pipeline dent repair and iso install.

Craig Kraft (IFS) - Foreman, checked welding OQ's and IFS

Pat Johnson (IFS) - IFS OQ's only

Verified records are maintained for 5 years.

76. Question Result, ID, References: Sat, TQ.OQ.RECORDS.R, 192.807

Question Text: *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed Welding Qualification Test Report for 2018

Reviewed Qualification standards of private OQ contractor training program provided by Midwest Gas Association (MEA)

TQ.QU: Qualification of Personnel - Specific Requirements

77. Question Result, ID, References: Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text: *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed OQ's Michelle Gallardo - Corrosion Engineer in Gas System Integrity.

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

78. Question Result, ID, References: Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

Question Text: *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered: 88986 (1878)

Result Notes: 2019 North Midway repair project NDT

Nicholas Rossiello - reviewed OQ's

79. Question Result, ID, References: Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text: *Do records indicate that welders are adequately qualified?*

Assets Covered: 88986 (1878)

Result Notes: Reviewed Welding OQ record for Craig Kraft on 2019 North Midway repair.

TQ.TR: Training of Personnel

80. Question Result, ID, References: Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text: *Is training for emergency response personnel documented?*

Assets Covered: 88986 (1878)

Result Notes: GFR are all trained gas first responders.

Reviewed training scenarios document that GFR take

GOP 2425.2300 - Emergency Plans

Report Parameters: Results: all

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