Inspection Results (IRR)

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- 88971 (1,935) (187)

Inspection Results Report (ALL Non-Empty Results) - Scp_PK 88971 (1,935)

Row	Assets	Result	Sub-Group	Qst #	Question ID	References	Question Text
1.	(and 1 other asset)	Sat	AR.CDA	1.	AR.CDA.CDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate CDA assessment results meet appropriate training, experience, and qualification criteria?
2.	(and 1 other asset)	Sat	AR.CDA	2.	AR.CDA.CDAREVQUAL.R	192.947(h) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?
3.	(and 1 other asset)	NA	AR.CDA	3.	AR.CDA.CDAREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?
4.	(and 1 other asset)	Sat	AR.CDA	4.	AR.CDA.CDAPLAN.P	192.931(a) (192.931(b), 192.931(c), 192.931(d))	Is an adequate Confirmatory Direct Assessment Plan in place?
5.	(and 1 other asset)	Sat	AR.CDA	5.	AR.CDA.CDAEXTCORR.R	192.947(h) (192.931(b))	Do records indicate that the external corrosion plan was properly implemented?
6.	(and 1 other asset)	NA	AR.CDA	6.	AR.CDA.CDAINTCORR.R	192.947(h) (192.931(c))	Do records demonstrate that the internal corrosion plan was properly implemented?
7.	(and 1 other asset)	Sat	AR.CDA	7.	AR.CDA.CDAINDICATION.R	192.947(h) (192.931(d))	Do records demonstrate that the next assessment should have been accelerated?
8.	(and 1 other asset)	Sat	AR.CDA	8.	AR.CDA.CDACORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?
9.	(and 1 other asset)	NA	AR.CDA	9.	AR.CDA.CDACORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats identified by CDA as required?
10.	(and 1 other asset)	Sat	AR.EC	1.	AR.EC.ECDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?

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11.	(and 1 other asset)	Sat	AR.EC	2.	AR.EC.ECDAPREASSESS.R	192.947(g) (192.925(b)(1))	Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?
12.	(and 1 other asset)	Sat	AR.EC	3.	AR.EC.ECDAREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?
13.	(and 1 other asset)	NA	AR.EC	4.	AR.EC.ECDAREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?
14.	(and 1 other asset)	Sat	AR.EC	5.	AR.EC.ECDAPLAN.P	192.925(a) (192.925(b))	Is an adequate ECDA plan and process in place for conducting ECDA?
15.	(and 1 other asset)	Sat	AR.EC	6.	AR.EC.ECDAINTEGRATION.P	192.917(b) (ASME B31.8S-2004 Section 4.5)	Is the process for integrating ECDA results with other information adequate?
16.	(and 1 other asset)	Sat	AR.EC	7.	AR.EC.ECDAINTEGRATION.R	192.947(g) (192.917(b))	Do records demonstrate that the operator integrated other data/information when evaluating data/results?
17.	(and 1 other asset)	Sat	AR.EC	8.	AR.EC.ECDAREGION.R	192.947(g) (192.925(b)(1))	Do records demonstrate that the operator identified ECDA Regions?
18.	(and 1 other asset)	Sat	AR.EC	9.	AR.EC.ECDAINDIRECT.R	192.947(g) (192.925(b)(2))	Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?
19.	(and 1 other asset)	Sat	AR.EC	10.	AR.EC.ECDADIRECT.R	192.947(g) (192.925(b)(3))	Do records demonstrate that excavations, direct examinations, and data collection were performed in accordance with NACE SP 0502-2010, Sections 5 and 6.4.2 and ASME B31.8S-2004, Section 6.4?
20.	(and 1 other asset)	NA	AR.EC	14.	AR.EC.ECDAPLANMOC.R	192.947(g) (192.925(b)(3)(iii))	Do records demonstrate that changes in the ECDA plan have been implemented and documented?
21.	(and 1 other asset)	Sat	AR.EC	15.	AR.EC.ECDAPOSTASSESS.R	192.947(g) (192.925(b)(4))	Do records demonstrate that the requirements for post-assessment were met?
22.	(and 1 other asset)	NA	AR.EC	16.	AR.EC.ECDAMAOP.R	192.947(g) (192.620(d)(9)(iii), 192.620(d)(10)(i), 192.620(d)(10)(iii))	If ECDA was performed on segments (as allowed by 192.620(d)(9)(iii)), were all ECDA assessment requirements completed?
23.	(and 1 other asset)	NA	AR.EC	17.	AR.EC.ECDAMAOP.O	192.620(d)(9)(iii) (192.620(d)(10)(i), 192.620(d)(10)(iii))	If ECDA was performed on segments (as allowed by 192.620(d)(9)(iii)), were all ECDA assessment requirements completed?

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24.	(and 1 other asset)	Sat	AR.EC	18.	AR.EC.ECCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant external corrosion threats?
25.	(and 1 other asset)	Sat	AR.EC	19.	AR.EC.ECCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant external corrosion threats as required?
26.	(and 1 other asset)	Sat	AR.IC	1.	AR.IC.ICDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?
27.	(and 1 other asset)	NA	AR.IC	2.	AR.IC.ICDAREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ICDA assessments or review and analyze assessment results, are qualified for the tasks they perform?
28.	(and 1 other asset)	NA	AR.IC	3.	AR.IC.ICDAREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?
29.	(and 1 other asset)	Sat	AR.IC	4.	AR.IC.ICDAPLAN.P	192.927(c) (192.927(a), 192.927(b))	Is an ICDA plan and process in place for conducting ICDA?
30.	(and 1 other asset)	NA	AR.IC	5.	AR.IC.ICDAPREASSESS.R	192.927(c)(1) (192.947(g))	Do records demonstrate that the requirements for an ICDA pre-assessment were met?
31.	(and 1 other asset)	Sat	AR.IC	6.	AR.IC.ICDAINTEGRATION.P	192.917(b)	Is the process for integrating ICDA results with other information adequate?
32.	(and 1 other asset)	NA	AR.IC	7.	AR.IC.ICDAINTEGRATION.R	192.917(b) (192.947(g))	Do records demonstrate that other data/information was integrated when evaluating data/results?
33.	(and 1 other asset)	NA	AR.IC	8.	AR.IC.ICDAREGION.R	192.947(g) (192.927(c)(2), 192.927(c)(5))	Do records demonstrate that ICDA Regions were adequately identified?
34.	(and 1 other asset)	NA	AR.IC	10.	AR.IC.ICDAPOSTASSESS.R	192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.477)	Do records demonstrate that the operator assessed the effectiveness of the ICDA process?
35.	(and 1 other asset)	NA	AR.IC	12.	AR.IC.ICDAMAOP.R	192.947(g) (192.620(d)(9), 192.620(d)(10), 192.927)	If the pipeline is operated using an alternative maximum allowable operating pressure per 192.620 (80% SMYS Rule) were required ICDA assessments performed?
36.	(and 1 other asset)	Sat	AR.IC	13.	AR.IC.ICCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant internal corrosion threats related to internal corrosion?

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37.	(and 1 other asset)	NA	AR.IC	14.	AR.IC.ICCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant internal corrosion threats as required?
38.	(and 1 other asset)	Sat	AR.IL	1.	AR.IL.ILIREVIEWQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria?
39.	(and 1 other asset)	NA	AR.IL	2.	AR.IL.ILIREVIEWQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?
40.	(and 1 other asset)	NA	AR.IL	3.	AR.IL.ILIREVIEWQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?
41.	(and 1 other asset)	NA	AR.IL	4.	AR.IL.ILISPECS.P	192.921(a)(1) (192.933(b))	Does the process assure complete and adequate vendor ILI specifications?
42.	(and 1 other asset)	NA	AR.IL	5.	AR.IL.ILISPECS.R	192.947(g) (192.933(b))	Do records demonstrate that the ILI specifications were complete and adequate?
43.	(and 1 other asset)	NA	AR.IL	6.	AR.IL.ASSESSMETHOD.P	192.919(b) (192.921(a), 192.937(c))	Does the process specify the assessment methods that are appropriate for the pipeline specific integrity threats?
44.	(and 1 other asset)	NA	AR.IL	7.	AR.IL.ASSESSMETHOD.R	192.947(g) (192.919(b), 192.921(a), 192.937(c))	Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?
45.	(and 1 other asset)	NA	AR.IL	8.	AR.IL.ILIVALIDATE.P	192.921(a)(1) (192.937(c))	Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?
46.	(and 1 other asset)	NA	AR.IL	9.	AR.IL.ILIVALIDATE.R	192.947(g) (192.921(a)(1))	Do records demonstrate that the operator has validated ILI assessment results per their process?
47.	(and 1 other asset)	NA	AR.IL	10.	AR.IL.ILIVALIDATE.O	192.921(a)(1)	From observation of field activities, do the employees and vendors validate ILI assessment results per their process?
48.	(and 1 other asset)	NA	AR.IL	11.	AR.IL.ILIINTEGRATION.P	192.917(b)	Is the process for integrating ILI results with other information adequate?
49.	(and 1 other asset)	NA	AR.IL	12.	AR.IL.ILIINTEGRATION.R	192.947(g) (192.917(b))	Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?

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50.	(and 1 other asset)	NA	AR.IL	13.	AR.IL.ILIACCEPCRITERIA.P	192.921(a)	Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?
51.	(and 1 other asset)	NA	AR.IL	14.	AR.IL.ILIACCEPCRITERIA.R	192.947(g) (192.921(a))	Do records indicate adequate implementation of the process for ILI survey acceptance?
52.	(and 1 other asset)	NA	AR.IL	15.	AR.IL.ILIDELAY.R	192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341, 192.18)	Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?
53.	(and 1 other asset)	NA	AR.IL	18.	AR.IL.ILIIMPLEMENT.O	192.921(a)(1) (192.620(d), 192.605(b))	Are O&M and IMP procedural requirements for the performance of ILI assessments followed?
54.	(and 1 other asset)	NA	AR.IL	19.	AR.IL.ILCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?
55.	(and 1 other asset)	NA	AR.IL	20.	AR.IL.ILCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?
56.	(and 1 other asset)	NA	AR.LSR	1.	AR.LSR.LSRPLAN.P	192.941(a) (192.941(b), 192.941(c))	Is the process for performing low stress reassessment adequate?
57.	(and 1 other asset)	NA	AR.LSR	2.	AR.LSR.LSRBA.R	192.947(d) (192.919(c), 192.921(d), 192.941(a))	Do records demonstrate that a baseline assessment meeting the requirements of 192.919 and 192.921 was performed prior to performing a low stress reassessment?
58.	(and 1 other asset)	NA	AR.LSR	3.	AR.LSR.LSREXTCORR.R	192.947(d) (192.941(b))	Do records demonstrate that the requirements of 192.941(b) were implemented when performing low stress reassessment for external corrosion?
59.	(and 1 other asset)	NA	AR.LSR	4.	AR.LSR.LSRINTCORR.R	192.947(d) (192.941(c))	Do records demonstrate that the requirements of 192.941(c) were implemented when performing low stress reassessment for internal corrosion?
60.	(and 1 other asset)	NA	AR.LSR	5.	AR.LSR.LSRCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats following a LSR?
61.	(and 1 other asset)	NA	AR.LSR	6.	AR.LSR.LSRCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following a LSR?
62.	(and 1 other asset)	Sat	AR.OT	1.	AR.OT.OTPLAN.P	192.921(a)(4)	Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?

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63.	(and 1 other asset)	NA	AR.OT	2.	AR.OT.OTPLAN.R	192.947(d) (192.921(a)(4), 192.933(b))	Do records demonstrate that the assessments were performed in accordance with the process and vendor recommendations and that defects were identified and categorized within 180 days, if applicable?
64.	(and 1 other asset)	Sat	AR.OT	3.	AR.OT.OTREVQUAL.P	192.915(a) (192.915(b), 192.921(a)(4))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?
65.	(and 1 other asset)	NA	AR.OT	4.	AR.OT.OTREVQUAL.R	192.947(d) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?
66.	(and 1 other asset)	NA	AR.OT	5.	AR.OT.OTREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?
67.	(and 1 other asset)	NA	AR.OT	6.	AR.OT.OTPLAN.O	192.921(a)(4)	Were assessments conducted using "other technology" adequately performed in accordance with the OT process?
68.	(and 1 other asset)	Sat	AR.OT	7.	AR.OT.OTCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats identified using Other Technology?
69.	(and 1 other asset)	NA	AR.OT	8.	AR.OT.OTCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following the use of Other Technology?
70.	(and 1 other asset)	Sat	AR.PTI	1.	AR.PTI.PRESSTESTREVQUAL.P	192.915(a) (192.915(b) 192.921(a)(4))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate pressure test assessment results meet appropriate training, experience, and qualification criteria?
71.	(and 1 other asset)	NA	AR.PTI	2.	AR.PTI.PRESSTESTREVQUAL.R	192.947(g) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?
72.	(and 1 other asset)	NA	AR.PTI	3.	AR.PTI.PRESSTESTACCEP.P	192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b),	Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?

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						192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.921(a)(2))	
73.	(and 1 other asset)	NA	AR.PTI	4.	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))	Do the test records validate the pressure test?
74.	(and 1 other asset)	NA	AR.PTI	5.	AR.PTI.PRESSTESTAMAOP.R	192.517(a) (192.505(a), 192.517(b), 192.620(c)(4), 192.620(d)(9), 192.620(d)(10))	If the pipeline operates using an alternative maximum allowable operating pressure per 192.620 (80% SMYS Rule), from a review of selected records, were required pressure test assessments performed?
75.	(and 1 other asset)	NA	AR.PTI	6.	AR.PTI.PRESSTESTCOMPLETE.O	192.503(a) (192.503(b), 192.503(c), 192.503(d), 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))	From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?
76.	(and 1 other asset)	NA	AR.PTI	7.	AR.PTI.PTICORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats?
77.	(and 1 other asset)	NA	AR.PTI	8.	AR.PTI.PTICORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required?
78.	(and 1 other asset)	Sat	AR.RC	2.	AR.RC.DISCOVERY.P	192.933(b)	Does the integrity assessment process properly define discovery and the required time frame?
79.	(and 1 other asset)	NA	AR.RC	3.	AR.RC.DISCOVERY.R	192.947(f) (192.933(b))	Do records demonstrate that discovery was declared in the required time frame or justification was documented?
80.	(and 1 other asset)	Sat	AR.RC	4.	AR.RC.IMPRC.P	192.933(a) (192.933(c), 192.933(d))	Does the Integrity Management Plan and/or maintenance processes include all of the actions that must be taken to address integrity issues in accordance with 192.933?
81.	(and 1 other asset)	NA	AR.RC	5.	AR.RC.PRESSREDUCE.R	192.947(f) (192.933(a)(1))	Do records demonstrate that an acceptable pressure reduction was promptly taken for each immediate repair condition or when a repair schedule could not be met?
82.	(and 1 other asset)	Sat	AR.RC	8.	AR.RC.CRITERIA.P	192.711(b) (192.703(a), 192.703(b), 192.703(c), 192.713(a), 192.713(b))	Does the repair process cover all of the elements for making repairs in covered segments?
83.	(and 1 other asset)	NA	AR.RC	9.	AR.RC.SCHEDULEIMPL.R	192.947(f) (192.933(d))	Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or

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							notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?
84.	(and 1 other asset)	NA	AR.RC	10.	AR.RC.REMEDIATION.O	192.933(c) (192.933(a), 192.933(d))	Is anomaly remediation adequate for the covered segments being observed?
85.	(and 1 other asset)	Sat	AR.RC	11.	AR.RC.LOOKBEYOND.P	192.917(e)(5)	Does the process require an evaluation of all pipeline segments with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?
86.	(and 1 other asset)	NA	AR.RC	12.	AR.RC.LOOKBEYOND.R	192.947(b) (192.917(e)(5), 192.459)	From the review of the results of integrity assessments, were all pipeline segments evaluated with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?
87.	(and 1 other asset)	NA	AR.RMP	26.	AR.RMP.CRACKNDT.P	192.929(b) (ASME B31.8S-2004 Appendix A3.4)	Does the process require that when a pipeline segment that meets the conditions for cracking and/or possible SCC is exposed (i.e., the coating is removed), an NDE method (e.g., MPI, UT) is employed to evaluate for cracking?
88.	(and 1 other asset)	NA	AR.RMP	27.	AR.RMP.CRACKNDT.R	192.947(g) (192.929(b))	From the review of records, when a pipeline segment that meets the conditions of possible cracking and/or SCC is exposed (i.e., the coating is removed), was an NDE method (e.g., MPI, UT) employed to evaluate for cracking and/or SCC?
89.	(and 1 other asset)	Sat	AR.SCC	1.	AR.SCC.SCCDAREVQUAL.P	192.915(a) (192.915(b))	Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?
90.	(and 1 other asset)	NA	AR.SCC	2.	AR.SCC.SCCDAREVQUAL.R	192.947(e) (192.915(a), 192.915(b))	Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?
91.	(and 1 other asset)	NA	AR.SCC	3.	AR.SCC.SCCDAREVQUAL.O	192.915(a) (192.915(b))	From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?

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92.	(and 1 other asset)	NA	AR.SCC	4.	AR.SCC.SCCDAPLAN.P	192.929(b)	Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?
93.	(and 1 other asset)	NA	AR.SCC	5.	AR.SCC.SCCDADATA.R	192.947(g) (192.929(b)(1))	Do records demonstrate that data was collected and evaluated?
94.	(and 1 other asset)	NA	AR.SCC	6.	AR.SCC.SCCDAMETHOD.R	192.947(g) (192.929(b)(2))	Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?
95.	(and 1 other asset)	NA	AR.SCC	7.	AR.SCC.SCCDAMETHOD.O	192.929	From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?
96.	(and 1 other asset)	NA	AR.SCC	8.	AR.SCC.SCCDANEARNEUTRAL.R	192.947(g) (192.929(b)(2))	From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?
97.	(and 1 other asset)	NA	AR.SCC	9.	AR.SCC.SCCDAREASSESSINTRVL.R	192.947(d) (192.939(a)(3))	From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?
98.	(and 1 other asset)	NA	AR.SCC	10.	AR.SCC.SCCDAAMAOP.R	192.620(d) (192.620(d)(9), 192.620(d)(10))	If the pipeline operates using an alternative maximum allowable operating pressure per 192.620 (80% SMYS Rule), from a review of selected records, were required SCCDA assessments performed?
99.	(and 1 other asset)	NA	AR.SCC	11.	AR.SCC.SCCCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats found following SCCDA?
100.	(and 1 other asset)	NA	AR.SCC	12.	AR.SCC.SCCCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required following SCCDA?
101.	(and 1 other asset)	Sat	IM.BA	1.	IM.BA.BAENVIRON.P	192.911(o) (192.919(e))	Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?
102.	(and 1 other asset)	NA	IM.BA	2.	IM.BA.BAENVIRON.R	192.947(d) (192.911(o), 192.919(e))	Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?
103.	(and 1 other asset)	Sat	IM.BA	3.	IM.BA.BAMETHODS.P	192.919(b) (192.921(a), 192.921(c), 192.921(h))	Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?
104.	(and 1 other asset)	NA	IM.BA	4.	IM.BA.BAMETHODS.R	192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))	Do records demonstrate that the assessment method(s) specified is best suited for

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							identifying anomalies associated with specific threats identified for the covered segment?
105.	(and 1 other asset)	Sat	IM.BA	5.	IM.BA.BANEW.P	192.911(p) (192.905(c), 192.921(f), 192.921(g))	Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?
106.	(and 1 other asset)	NA	IM.BA	6.	IM.BA.BANEW.R	192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)	Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?
107.	(and 1 other asset)	Sat	IM.BA	7.	IM.BA.BASCHEDULE.P	192.917(c) (192.919(c), 192.921(b))	Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?
108.	(and 1 other asset)	NA	IM.BA	8.	IM.BA.BASCHEDULE.R	192.947(c) (192.921(d))	Do records demonstrate that all BAP required assessments were completed as scheduled?
109.	(and 1 other asset)	NA	IM.BA	9.	IM.BA.BAENVIRON.O	192.911(o) (192.919(e))	From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?
110.	(and 1 other asset)	NA	IM.CA	1.	IM.CA.LOWSTRESSREASSESS.P	192.941(a) (192.941(b), 192.941(c))	Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?
111.	(and 1 other asset)	Sat	IM.CA	2.	IM.CA.REASSESSINTERVAL.P	192.937(a) (192.939(a), 192.939(b), 192.913(c))	Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?
112.	(and 1 other asset)	NA	IM.CA	3.	IM.CA.LOWSTRESSREASSESS.R	192.947(d) (192.941(a), 192.941(b), 192.941(c))	Do records demonstrate that the implementation of "low stress reassessment" method to address threats of external and/or internal corrosion is adequate and being performed as required?
113.	(and 1 other asset)	Sat	IM.CA	4.	IM.CA.PERIODICEVAL.P	192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))	Does the process include requirements for a periodic evaluation of pipeline integrity based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?
114.	(and 1 other asset)	Sat	IM.CA	5.	IM.CA.PERIODICEVAL.R	192.947(d) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e), 192.937(b))	Do records demonstrate that periodic evaluations of pipeline integrity have been performed based on data integration and risk assessment to identify the threats specific to each covered segment and the risk represented by these threats?

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115.	(and 1 other asset)	Sat	IM.CA	6.	IM.CA.REASSESSINTERVAL.R	192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))	Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?
116.	(and 1 other asset)	Sat	IM.CA	7.	IM.CA.REASSESSMETHOD.P	192.937(c) (192.931)	Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?
117.	(and 1 other asset)	Sat	IM.CA	8.	IM.CA.REASSESSMETHOD.R	192.947(d) (192.937(c))	Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?
118.	(and 1 other asset)	Sat	IM.CA	9.	IM.CA.REASSESSWAIVER.P	192.943(a) (192.943(b))	Does the process include requirements for reassessment interval waivers (special permit per 190.341)?
119.	(and 1 other asset)	NA	IM.CA	10.	IM.CA.REASSESSWAIVER.R	192.947(d) (192.943(a), 192.943(b))	Do records demonstrate that reassessment interval waivers (special permit per 190.341) have been adequately implemented, if applicable?
120.	(and 1 other asset)	Sat	IM.CA	11.	IM.CA.REASSESSEXCPERF.P	192.913(a) (192.913(b), 192.913(c))	Does the process include requirements for deviations from reassessment requirements based on exceptional performance?
121.	(and 1 other asset)	NA	IM.CA	12.	IM.CA.REASSESSEXCPERF.R	192.947(d) (192.913(a), 192.913(b), 192.913(c))	Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?
122.	(and 1 other asset)	Sat	IM.HC	1.	IM.HC.HCAID.P	192.905(a)	Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?
123.	(and 1 other asset)	Sat	IM.HC	2.	IM.HC.HCAID.R	192.947(d) (192.905(a), 192.907(a), 192.911(a))	Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?
124.	(and 1 other asset)	Sat	IM.HC	3.	IM.HC.HCAMETHOD1.P	192.903(1)(i) (192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))	Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?
125.	(and 1 other asset)	Sat	IM.HC	4.	IM.HC.HCAMETHOD2.P	192.903(2)(i) (192.903(2)(ii))	Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?
126.	(and 1 other asset)	Sat	IM.HC	5.	IM.HC.HCANEW.P	192.905(c)	Does the process include a requirement for evaluation of new information that impacts,

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							or creates a new, high consequence area?
127.	(and 1 other asset)	Sat	IM.HC	6.	IM.HC.HCANEW.R	192.947(d) (192.905(c))	Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?
128.	(and 1 other asset)	Sat	IM.HC	7.	IM.HC.HCAPIR.P	192.903 (192.905(a))	Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?
129.	(and 1 other asset)	Sat	IM.HC	8.	IM.HC.HCAPIR.R	192.947(d) (192.903, 192.905(a))	Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?
130.	(and 1 other asset)	Sat	IM.HC	9.	IM.HC.HCASITES.P	192.903 (192.905(b))	Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?
131.	(and 1 other asset)	Sat	IM.HC	10.	IM.HC.HCASITES.R	192.947(d) (192.903, 192.905(b))	Do records indicate identification of identified sites being performed as required?
132.	(and 1 other asset)	Sat	IM.HC	11.	IM.HC.HCAMETHOD1.R	192.947(d) (192.903 (1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))	Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?
133.	(and 1 other asset)	Sat	IM.HC	12.	IM.HC.HCAMETHOD2.R	192.947(d) (192.905(a), 192.903(2)(ii))	Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?
134.	(and 1 other asset)	Sat	IM.HC	13.	IM.HC.HCADATA.O	192.905(c)	Are HCAs correctly identified per up-to-date information?
135.	(and 1 other asset)	Sat	IM.PM	1.	IM.PM.PMMGENERAL.P	192.935(a)	Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?
136.	(and 1 other asset)	Sat	IM.PM	2.	IM.PM.PMMGENERAL.R	192.947(d) (192.935(a))	Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?
137.	(and 1 other asset)	Sat	IM.PM	3.	IM.PM.PMMTPD.P	192.917(e)(1) (192.935(b)(1), 192.935(e))	Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?

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138.	(and 1 other asset)	Sat	IM.PM	4.	IM.PM.PMMTPD.R	192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))	Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?
139.	(and 1 other asset)	Sat	IM.PM	5.	IM.PM.PMMREVQUAL.P	192.915(c)	Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?
140.	(and 1 other asset)	Sat	IM.PM	6.	IM.PM.PMMREVQUAL.R	192.947(e) (192.915(c))	Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?
141.	(and 1 other asset)	NA	IM.PM	7.	IM.PM.PMMTPDSMYS.P	192.935(d) (192.935(e), 192 Appendix E Table E.II.1)	Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?
142.	(and 1 other asset)	NA	IM.PM	8.	IM.PM.PMMTPDSMYS.R	192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)	Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?
143.	(and 1 other asset)	Sat	IM.PM	9.	IM.PM.PMMOF.P	192.935(b)(2)	Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?
144.	(and 1 other asset)	Sat	IM.PM	10.	IM.PM.PMMOF.R	192.947(d) (192.935(b)(2))	Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?
145.	(and 1 other asset)	Sat	IM.PM	11.	IM.PM.PMMASORCV.P	192.935(c)	Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?
146.	(and 1 other asset)	Sat	IM.PM	12.	IM.PM.PMMASORCV.R	192.947(d) (192.935(c))	Do records demonstrate that the operator has determined, based on risk, whether automatic shut-off valves or remote control valves should be added to protect high consequence areas?
147.	(and 1 other asset)	Sat	IM.PM	13.	IM.PM.PMMIMPLEMENT.O	192.935(a)	Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?
148.	(and 1 other asset)	Sat	IM.PM	14.	IM.PM.PMCORR.P	192.933 (192.917(e)(5))	Does the process adequately account for taking required actions to address significant corrosion threats?

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149.	(and 1 other asset)	Sat	IM.PM	15.	IM.PM.PMCORR.R	192.933 (192.917(e)(5))	Do records demonstrate that required actions are being taken to address significant corrosion threats as required?
150.	(and 1 other asset)	Sat	IM.QA	1.	IM.QA.QARM.P	192.911(l)	Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?
151.	(and 1 other asset)	Sat	IM.QA	2.	IM.QA.IMNONMANDT.P	192.7(a)	Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?
152.	(and 1 other asset)	Sat	IM.QA	5.	IM.QA.QARM.R	192.947(d) (192.911(l))	Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?
153.	(and 1 other asset)	Sat	IM.QA	6.	IM.QA.RECORDS.P	192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))	Is the process adequate to assure that required records are maintained for the useful life of the pipeline?
154.	(and 1 other asset)	Sat	IM.QA	7.	IM.QA.IMMOC.P	192.911(k) (192.909(a), 192.909(b))	Is the process for management of changes that may impact pipeline integrity adequate?
155.	(and 1 other asset)	Sat	IM.QA	8.	IM.QA.IMMOC.R	192.947(d) (192.909(a), 192.909(b), 192.911(k))	Do records demonstrate that changes that may impact pipeline integrity are being managed as required?
156.	(and 1 other asset)	Sat	IM.QA	9.	IM.QA.IMPERFEFECTIVE.P	192.945(a) (192.913(b), 192.951)	Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?
157.	(and 1 other asset)	Sat	IM.QA	10.	IM.QA.IMPERFEFECTIVE.R	192.947(d) (192.913(b), 192.945(a), 192.951)	Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?
158.	(and 1 other asset)	Sat	IM.QA	11.	IM.QA.IMPERFMETRIC.P	192.945(a) (192.913(b), 192.951)	Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?
159.	(and 1 other asset)	Sat	IM.QA	12.	IM.QA.IMPERFMETRIC.R	192.947(d) (192.913(b), 192.945(a), 192.951)	Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?

Row	Assets	Result	Sub-Group	Qst #	Question ID	References	Question Text
160.	(and 1 other asset)	Sat	IM.QA	13.	IM.QA.RECORDS.R	192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))	Are required records being maintained for the life of the pipeline?
161.	(and 1 other asset)	Sat	IM.RA	1.	IM.RA.RADATA.P	192.917(b) (192.917(e)(1), 192.911(k))	Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?
162.	(and 1 other asset)	Sat	IM.RA	2.	IM.RA.RAMETHOD.P	192.917(c) (192.917(d))	Does the process include requirements for a risk assessment that follows ASME B31.8S-2004, Section 5, and that considers the identified threats for each covered segment?
163.	(and 1 other asset)	Sat	IM.RA	3.	IM.RA.THREATID.R	192.947(b) (192.917(a), 192.917(e), 192.913(b)(1))	Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?
164.	(and 1 other asset)	Sat	IM.RA	4.	IM.RA.RADATA.R	192.947(b) (192.917(b), 192.917(e)(1), 192.911(k))	Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?
165.	(and 1 other asset)	Sat	IM.RA	5.	IM.RA.THREATID.P	192.917(a) (192.917(e), 192.913(b)(1))	Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?
166.	(and 1 other asset)	Sat	IM.RA	6.	IM.RA.RAMETHOD.R	192.947(b) (192.917(c), 192.917(d))	Do records demonstrate that the risk assessment follows ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?
167.	(and 1 other asset)	Sat	IM.RA	7.	IM.RA.RAFACTORS.P	192.917(c)	Does the process include requirements for factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?
168.	(and 1 other asset)	Sat	IM.RA	8.	IM.RA.RAFACTORS.R	192.947(b) (192.917(c))	Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?
169.	(and 1 other asset)	Sat	IM.RA	9.	IM.RA.RAMOC.P	192.917(c)	Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?
170.	(and 1 other asset)	Sat	IM.RA	10.	IM.RA.RAMOC.R	192.947(b) (192.917(c))	Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?

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171.	(and 1 other asset)	Sat	IM.RA	11.	IM.RA.RAMOC.O	192.917(c)	Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?
172.	(and 1 other asset)	Sat	PD.DP	8.	PD.DP.DPINFOGATHER.P	192.917(b) (192.935(b)(1)(ii))	Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?
173.	(and 1 other asset)	Sat	PD.DP	9.	PD.DP.DPINFOGATHER.R	192.947(b) (192.917(b), 192.935(b)(1)(ii))	Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?
174.	(and 1 other asset)	Sat	RPT.NR	14.	RPT.NR.NOTIFYIMCHANGE.P	192.909(b) (192.921(a)(7), 192.937(c)(7), 192.18)	Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?
175.	(and 1 other asset)	NA	RPT.NR	15.	RPT.NR.NOTIFYIMCHANGE.R	192.947(i) (192.909(b), 192.921(a)(7), 192.937(c)(7))	Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?
176.	(and 1 other asset)	Sat	RPT.NR	16.	RPT.NR.NOTIFYIMPRESS.P	192.933(a)(1)	Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?
177.	(and 1 other asset)	NA	RPT.NR	17.	RPT.NR.NOTIFYIMPRESS.R	192.947(i) (192.933(a)(1))	Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?
178.	(and 1 other asset)	NA	RPT.NR	18.	RPT.NR.IMDEVIATERPT.P	192.913(b)(1)(vii)	Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?
179.	(and 1 other asset)	NA	RPT.NR	19.	RPT.NR.IMDEVIATERPT.R	192.947(i) (192.913(b)(1)(vii))	Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP

Row	Assets	Result	Sub-Group	Qst #	Question ID	References	Question Text
							requirements (exceptional performance)?
180.	(and 1 other asset)	Sat	RPT.NR	20.	RPT.NR.IMPERFRPT.P	192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)	Is there a process for annual reporting of integrity management performance data?
181.	(and 1 other asset)	Sat	RPT.NR	21.	RPT.NR.IMPERFRPT.R	192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)	Do annual reports demonstrate that integrity management performance data were reported?
182.	(and 1 other asset)	NA	TD.SCC	1.	TD.SCC.SCCIM.P	192.911(c) (192.917(a)(1))	Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?
183.	(and 1 other asset)	NA	TD.SCC	2.	TD.SCC.SCCIM.R	192.947(d) (192.917(a)(1))	Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?
184.	(and 1 other asset)	NA	TD.SCC	3.	TD.SCC.SCCREPAIR.R	192.709(a) (192.703(b))	Do records document that the operator has properly remediated any occurrences of SCC?
185.	(and 1 other asset)	Sat	TQ.QUIM	1.	TQ.QUIM.IMREVIEWQUAL.P	192.915(a) (192.915(b), 192.915(c), 192.935(b))	Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?
186.	(and 1 other asset)	Sat	TQ.QUIM	2.	TQ.QUIM.IMREVIEWQUAL.R	192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))	Do records indicate adequate qualification of integrity management personnel?
187.	(and 1 other asset)	Sat	TQ.QUIM	3.	TQ.QUIM.IMQC.P	192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))	Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?

Report Parameters: All non-empty Results

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.