Inspection Output (IOR)

Generated on 2021.August.04 12:31

Inspection Information

Inspection Name	8279 Nippon Dynawave TIMP	Operator(s)	NIPPON DYNAWAVE PACKAGING CO., LLC (22515)	Plan Submitted	08/04/2021
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2021	Team Members	Scott Rukke, David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Scott Anderson, Darren Tinnerstet	All Activity Start	07/20/2021
System Type	GT	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	07/28/2021
Protocol Set ID	WA.GT.2021.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

The inspection included a review of Nippon Dynawave's Integrity Management Manual and related records since the last Integrity Management Inspection conducted in 2018. Records and Procedures were inspected remotely via Microsoft Teams and ROW, marker and HCA inspections were conducted in-person.

Facilities visited and Total AFOD

Records and Procedures inspected remotely and drove the ROW for the field inspection. No IM tasks were performed during the inspection.

Total AFOD: 4

Summary of Significant Findings
(DO NOT Discuss Enforcement options)

There were no findings as a result of this inspection.

Primary Operator contacts and/or participants

Brian Wood
Director Support Services
BrianWood@NipponDynawave.com

Nick Kaiser
Purchasing Manager
NickKaiser@NipponDynawave.com

Johnny Lopez
Regulatory Compliance Specialist
The Compliance Group
JLopez@TheCompGroup.com

Operator executive contact and mailing address for any official correspondence

Brian Wood
Director Support Services
BrianWood@NipponDynawave.com
(360) 578-4580

Report Filters: Results: all

3401 Industrial Way
PO Box 188
Longview, WA 98632

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88971 (1,935)	Nippon Dynawave Packaging Company	unit	88971	--	187	187	187	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.	88971 (1,935)	GT IM Implementation, GT IM	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.	TIMP	--	07/20/2021 07/28/2021	n/a	all planned questions	all assets	all types	187	187	187	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	TIMP	COMPLETED	08/04/2021	TIMP	88971 (1,935)

Results (all values, 187 results)

AR.CDA: Confirmatory Direct Assessment

1. Question Result, ID, References: Sat, AR.CDA.CDAREVQUAL.P, 192.915(a) (192.915(b))
   - Question Text: *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate CDA assessment results meet appropriate training, experience, and qualification criteria?*
   - Assets Covered: 88971 (1,935)
   - Result Notes: IMP Section 12.2

2. Question Result, ID, References: Sat, AR.CDA.CDAREVQUAL.R, 192.947(h) (192.915(a), 192.915(b))
   - Question Text: *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*
   - Assets Covered: 88971 (1,935)
   - Result Notes: ECDA performed in 2019, manual calls out NACE level 3 coating inspector qualification. Jeremy Hailey conducted coating inspections, NACE Coating Inspection certification expires 10/31/21

3. Question Result, ID, References NA, AR.CDA.CDAREVQUAL.O, 192.915(a) (192.915(b))

Question Text *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?*

Assets Covered 88971 (1,935)

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

4. Question Result, ID, References Sat, AR.CDA.CDAPLAN.P, 192.931(a) (192.931(b), 192.931(c), 192.931(d))

Question Text *Is an adequate Confirmatory Direct Assessment Plan in place?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 7.1

5. Question Result, ID, References Sat, AR.CDA.CDAEXTCORR.R, 192.947(h) (192.931(b))

Question Text *Do records indicate that the external corrosion plan was properly implemented?*

Assets Covered 88971 (1,935)

Result Notes As a part of the ECDA, the consultant conducted CIS and DCVG. All anomalies were investigated and/or repaired

6. Question Result, ID, References NA, AR.CDA.CDAINTCORR.R, 192.947(h) (192.931(c))

Question Text *Do records demonstrate that the internal corrosion plan was properly implemented?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ICDA

7. Question Result, ID, References Sat, AR.CDA.CDAINDICATION.R, 192.947(h) (192.931(d))

Question Text *Do records demonstrate that the next assessment should have been accelerated?*

Assets Covered 88971 (1,935)

Result Notes Recommendations from ECDA suggest next evaluation be conducted in 7 years. There was no corrosion found and anomalies were repaired

8. Question Result, ID, References Sat, AR.CDA.CDACORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 7.1

9. Question Result, ID, References NA, AR.CDA.CDACORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Nippon has not found any corrosion

AR.EC: External Corrosion Direct Assessment (ECDA)

10. Question Result, ID, References Sat, AR.EC.ECDAREVQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.2

11. Question Result, ID, References Sat, AR.EC.ECDAPREASSESS.R, 192.947(g) (192.925(b)(1))

Question Text *Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?*

Assets Covered 88971 (1,935)

Result Notes Pre-assessment included records review and identification of tools to be used (CIS and DCVG). Located areas of concern (e.g. Columbia Heights test station)

12. Question Result, ID, References Sat, AR.EC.ECDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes ECDA performed by Jeremy Hailey in 2019 and 2020

NACE Coating Inspector Level 3 expires 10/31/21

NACE Corrosion Specialist expires 2/28/23

NACE CP4 expires 2/28/23

NACE Material Selection/Design Specialist expires 2/28/23

Professional Engineering License expires 2/28/23

13. Question Result, ID, References NA, AR.EC.ECDAREVQUAL.O, 192.915(a) (192.915(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes No such activity/condition was observed during the inspection.

14. Question Result, ID, References Sat, AR.EC.ECDAPLAN.P, 192.925(a) (192.925(b))

Question Text *Is an adequate ECDA plan and process in place for conducting ECDA?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 4.1-4.5

15. Question Result, ID, References Sat, AR.EC.ECDAINTEGRATION.P, 192.917(b) (ASME B31.8S-2004 Section 4.5)

Question Text *Is the process for integrating ECDA results with other information adequate?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 4.2

16. Question Result, ID, References Sat, AR.EC.ECDAINTEGRATION.R, 192.947(g) (192.917(b))

Question Text *Do records demonstrate that the operator integrated other data/information when evaluating data/results?*

Assets Covered 88971 (1,935)

Result Notes Site selections were made using historical CP surveys and operational history. Root-cause analysis conducted to evaluate findings

17. Question Result, ID, References Sat, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))

Question Text *Do records demonstrate that the operator identified ECDA Regions?*

Assets Covered 88971 (1,935)

Result Notes Nippon used information related to pipe operating history, location (e.g. river crossing)

18. Question Result, ID, References Sat, AR.EC.ECDAINDIRECT.R, 192.947(g) (192.925(b)(2))

Question Text *Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?*

Assets Covered 88971 (1,935)

Result Notes The indirect inspection methods identified 4 areas for further investigation. Indirect inspection methods were CIS and DCVG

19. Question Result, ID, References Sat, AR.EC.ECDADIRECT.R, 192.947(g) (192.925(b)(3))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Direct inspections were performed at Columbia Heights, East side of Cowlitz River and a depression at the meter yard. Coating repair of 2" by 1.25" holiday at columbia heights was done, coating repaired at Cowlitz river damage due to thrust block.

20. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.R, 192.947(g) (192.925(b)(3)(iii))

Question Text *Do records demonstrate that changes in the ECDA plan have been implemented and documented?*

Assets Covered 88971 (1,935)

Result Notes There have been no changes in the ECDA Plan

21. Question Result, ID, References Sat, AR.EC.ECDAPOSTASSESS.R, 192.947(g) (192.925(b)(4))

Question Text *Do records demonstrate that the requirements for post-assessment were met?*

Assets Covered 88971 (1,935)

Result Notes Results and findings were in line with the conditions that were found

22. Question Result, ID, References NA, AR.EC.ECDAMAOP.R, 192.947(g) (192.620(d)(9)(iii), 192.620(d)(10)(i), 192.620(d)(10)(iii))

Question Text *If ECDA was performed on segments (as allowed by 192.620(d)(9)(iii)), were all ECDA assessment requirements completed?*

Assets Covered 88971 (1,935)

Result Notes The entire pipeline is one segment

23. Question Result, ID, References NA, AR.EC.ECDAMAOP.O, 192.620(d)(9)(iii) (192.620(d)(10)(i), 192.620(d)(10)(iii))

Question Text *If ECDA was performed on segments (as allowed by 192.620(d)(9)(iii)), were all ECDA assessment requirements completed?*

Assets Covered 88971 (1,935)

Result Notes Nippon does not use AMAOP

24. Question Result, ID, References Sat, AR.EC.ECCORR.P, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 5.1

25. Question Result, ID, References Sat, AR.EC.ECCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes No corrosion was found but coating repairs were completed

AR.IC: Internal Corrosion Direct Assessment (ICDA)

26. Question Result, ID, References Sat, AR.IC.ICDAREVQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.2

27. Question Result, ID, References NA, AR.IC.ICDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ICDA

28. Question Result, ID, References NA, AR.IC.ICDAREVQUAL.O, 192.915(a) (192.915(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes ICDA not performed during the inspection

29. Question Result, ID, References Sat, AR.IC.ICDAPLAN.P, 192.927(c) (192.927(a), 192.927(b))

Question Text *Is an ICDA plan and process in place for conducting ICDA?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 4.6-4.10

30. Question Result, ID, References NA, AR.IC.ICDAPREASSESS.R, 192.927(c)(1) (192.947(g))

Question Text *Do records demonstrate that the requirements for an ICDA pre-assessment were met?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ICDA

31. Question Result, ID, References Sat, AR.IC.ICDAINTEGRATION.P, 192.917(b)

Question Text *Is the process for integrating ICDA results with other information adequate?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 4.6-4.10

32. Question Result, ID, References NA, AR.IC.ICDAINTEGRATION.R, 192.917(b) (192.947(g))

Question Text *Do records demonstrate that other data/information was integrated when evaluating data/results?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ICDA

33. Question Result, ID, References NA, AR.IC.ICDAREGION.R, 192.947(g) (192.927(c)(2), 192.927(c)(5))

Question Text *Do records demonstrate that ICDA Regions were adequately identified?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ICDA

34. Question Result, ID, References NA, AR.IC.ICDAPOSTASSESS.R, 192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.477)

Question Text *Do records demonstrate that the operator assessed the effectiveness of the ICDA process?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ICDA

35. Question Result, ID, References NA, AR.IC.ICDAMAOP.R, 192.947(g) (192.620(d)(9), 192.620(d)(10), 192.927)

Question Text *If the pipeline is operated using an alternative maximum allowable operating pressure per 192.620 (80% SMYS Rule) were required ICDA assessments performed?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ICDA

36. Question Result, ID, References Sat, AR.IC.ICCORR.P, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 4.6-4.10

37. Question Result, ID, References NA, AR.IC.ICCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes No internal corrosion threats have been identified

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

38. Question Result, ID, References Sat, AR.IL.ILIREVIEWQUAL.P, 192.915(a) (192.915(b))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ILI assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.2

39. Question Result, ID, References NA, AR.IL.ILIREVIEWQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?*

Assets Covered 88971 (1,935)

Result Notes Nippon 's pipeline is not piggable

40. Question Result, ID, References NA, AR.IL.ILIREVIEWQUAL.O, 192.915(a) (192.915(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes No ILI performed during the inspection

41. Question Result, ID, References NA, AR.IL.ILISPECS.P, 192.921(a)(1) (192.933(b))

Question Text *Does the process assure complete and adequate vendor ILI specifications?*

Assets Covered 88971 (1,935)

Result Notes Nippon's line is not piggable

42. Question Result, ID, References NA, AR.IL.ILISPECS.R, 192.947(g) (192.933(b))

Question Text *Do records demonstrate that the ILI specifications were complete and adequate?*

Assets Covered 88971 (1,935)

Result Notes Nippon's pipeline is not piggable

43. Question Result, ID, References NA, AR.IL.ASSESSMETHOD.P, 192.919(b) (192.921(a), 192.937(c))

Question Text *Does the process specify the assessment methods that are appropriate for the pipeline specific integrity threats?*

Assets Covered 88971 (1,935)

Result Notes Nippon's line is not piggable

44. Question Result, ID, References NA, AR.IL.ASSESSMETHOD.R, 192.947(g) (192.919(b), 192.921(a), 192.937(c))

Question Text *Do records demonstrate that the assessment methods shown in the baseline and/or continual assessment plan were appropriate for the pipeline specific integrity threats?*

Assets Covered 88971 (1,935)

Result Notes No inline inspections have been performed on this pipeline

45. Question Result, ID, References NA, AR.IL.ILIVALIDATE.P, 192.921(a)(1) (192.937(c))

Question Text *Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?*

Assets Covered 88971 (1,935)

Result Notes Nippon's line is not piggable

46. Question Result, ID, References NA, AR.IL.ILIVALIDATE.R, 192.947(g) (192.921(a)(1))

Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*

Assets Covered 88971 (1,935)

Result Notes Nippon's pipeline is not piggable

47. Question Result, ID, References NA, AR.IL.ILIVALIDATE.O, 192.921(a)(1)

Question Text *From observation of field activities, do the employees and vendors validate ILI assessment results per their process?*

Assets Covered 88971 (1,935)

Result Notes Nippon's pipeline is not piggable

48. Question Result, ID, References NA, AR.IL.ILIINTEGRATION.P, 192.917(b)

Question Text *Is the process for integrating ILI results with other information adequate?*

Assets Covered 88971 (1,935)

Result Notes Nippon's line is not piggable

49. Question Result, ID, References NA, AR.IL.ILIINTEGRATION.R, 192.947(g) (192.917(b))

Question Text *Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ILI

50. Question Result, ID, References NA, AR.IL.ILIACCEPCRITERIA.P, 192.921(a)

Question Text *Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?*

Assets Covered 88971 (1,935)

Result Notes Nippon's line is not piggable

51. Question Result, ID, References NA, AR.IL.ILIACCEPCRITERIA.R, 192.947(g) (192.921(a))

Question Text *Do records indicate adequate implementation of the process for ILI survey acceptance?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ILI

52. Question Result, ID, References NA, AR.IL.ILIDELAY.R, 192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341, 192.18)

Question Text *Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?*

Assets Covered 88971 (1,935)

Result Notes There have been no delays in integrity assessments

53. Question Result, ID, References NA, AR.IL.ILIIMPLEMENT.O, 192.921(a)(1) (192.620(d), 192.605(b))

Question Text *Are O&M and IMP procedural requirements for the performance of ILI assessments followed?*

Assets Covered 88971 (1,935)

Result Notes No ILI performed during the inspection

54. Question Result, ID, References NA, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))

Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?*

Assets Covered 88971 (1,935)

Result Notes Nippon's line is not piggable

55. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed ILI

AR.LSR: Low Stress Reassessment

56. Question Result, ID, References NA, AR.LSR.LSRPLAN.P, 192.941(a) (192.941(b), 192.941(c))

Question Text *Is the process for performing low stress reassessment adequate?*

Assets Covered 88971 (1,935)

Result Notes Nippon does not operate any low stress pipelines

57. Question Result, ID, References NA, AR.LSR.LSRBA.R, 192.947(d) (192.919(c), 192.921(d), 192.941(a))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed a low stress re-assessment

58. Question Result, ID, References NA, AR.LSR.LSREXTCORR.R, 192.947(d) (192.941(b))

Question Text *Do records demonstrate that the requirements of 192.941(b) were implemented when performing low stress reassessment for external corrosion?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed a low stress re-assessment

59. Question Result, ID, References NA, AR.LSR.LSRINTCORR.R, 192.947(d) (192.941(c))

Question Text *Do records demonstrate that the requirements of 192.941(c) were implemented when performing low stress reassessment for internal corrosion?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed a low stress re-assessment

60. Question Result, ID, References NA, AR.LSR.LSRCORR.P, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Nippon does not operate any low stress pipelines

61. Question Result, ID, References NA, AR.LSR.LSRCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed a low stress re-assessment

AR.OT: Other Technology

62. Question Result, ID, References Sat, AR.OT.OTPLAN.P, 192.921(a)(4)

Question Text *Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 2.1

63. Question Result, ID, References NA, AR.OT.OTPLAN.R, 192.947(d) (192.921(a)(4), 192.933(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not used other technology for integrity assessments

64. Question Result, ID, References Sat, AR.OT.OTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(4))

Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.2

65. Question Result, ID, References NA, AR.OT.OTREVQUAL.R, 192.947(d) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not used other technology for integrity assessments

66. Question Result, ID, References NA, AR.OT.OTREVQUAL.O, 192.915(a) (192.915(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes No IM tasks were performed during the inspection

67. Question Result, ID, References NA, AR.OT.OTPLAN.O, 192.921(a)(4)

Question Text *Were assessments conducted using "other technology" adequately performed in accordance with the OT process?*

Assets Covered 88971 (1,935)

Result Notes No IM tasks were performed during the inspection

68. Question Result, ID, References Sat, AR.OT.OTCORR.P, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Nippon has not used Other Technologies but has a general process in IMP Section 2,1

69. Question Result, ID, References NA, AR.OT.OTCORR.R, 192.933 (192.917(e)(5))

Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following the use of Other Technology?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not used other technology for integrity assessments

AR.PTI: Integrity Assessment Via Pressure Test

70. Question Result, ID, References Sat, AR.PTI.PRESSTESTREVQUAL.P, 192.915(a) (192.915(b) 192.921(a)(4))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.2

71. Question Result, ID, References NA, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*

Assets Covered 88971 (1,935)

Result Notes Nippon did not use a pressure test for integrity assessment during this inspection period

72. Question Result, ID, References NA, 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), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.921(a)(2))

Question Text *Were test acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not used pressure testing since 2009

73. 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 88971 (1,935)

Result Notes Nippon did not use a pressure test for integrity assessment during this inspection period

74. Question Result, ID, References NA, 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))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Nippon did not use a pressure test for integrity assessment during this inspection period

75. Question Result, ID, References NA, 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))

Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*

Assets Covered 88971 (1,935)

Result Notes No IM tasks were performed during the inspection

76. Question Result, ID, References NA, AR.PTI.PTICORR.P, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Nippon has not used pressure testing since 2009

77. Question Result, ID, References NA, AR.PTI.PTICORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Nippon did not use a pressure test for integrity assessment during this inspection period

AR.RC: Repair Criteria (HCA)

78. Question Result, ID, References Sat, AR.RC.DISCOVERY.P, 192.933(b)

Question Text *Does the integrity assessment process properly define discovery and the required time frame?*

Assets Covered 88971 (1,935)

79. Question Result, ID, References NA, AR.RC.DISCOVERY.R, 192.947(f) (192.933(b))

Question Text *Do records demonstrate that discovery was declared in the required time frame or justification was documented?*

Assets Covered 88971 (1,935)

Result Notes No conditions requiring remediation were discovered as a result of integrity assessments

80. Question Result, ID, References Sat, AR.RC.IMPRC.P, 192.933(a) (192.933(c), 192.933(d))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 5.1-5.5

81. Question Result, ID, References NA, AR.RC.PRESSREDUCE.R, 192.947(f) (192.933(a)(1))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes No conditions requiring remediation were discovered as a result of integrity assessments

82. Question Result, ID, References Sat, AR.RC.CRITERIA.P, 192.711(b) (192.703(a), 192.703(b), 192.703(c), 192.713(a), 192.713(b))

Question Text *Does the repair process cover all of the elements for making repairs in covered segments?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 5.3

83. Question Result, ID, References NA, AR.RC.SCHEDULEIMPL.R, 192.947(f) (192.933(d))

Question Text *Do records demonstrate that defects in covered segments were remediated (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 192.933(d)?*

Assets Covered 88971 (1,935)

Result Notes No conditions requiring remediation were discovered as a result of integrity assessments

84. Question Result, ID, References NA, AR.RC.REMEDIATION.O, 192.933(c) (192.933(a), 192.933(d))

Question Text *Is anomaly remediation adequate for the covered segments being observed?*

Assets Covered 88971 (1,935)

Result Notes No conditions requiring remediation were discovered as a result of integrity assessments

85. Question Result, ID, References Sat, AR.RC.LOOKBEYOND.P, 192.917(e)(5)

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 8.6

86. Question Result, ID, References NA, AR.RC.LOOKBEYOND.R, 192.947(b) (192.917(e)(5), 192.459)

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes No conditions requiring remediation were discovered as a result of integrity assessments

AR.RMP: Repair Methods and Practices

87. Question Result, ID, References NA, AR.RMP.CRACKNDT.P, 192.929(b) (ASME B31.8S-2004 Appendix A3.4)

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Based on operating conditions, the pipeline is not susceptible to SCC

88. Question Result, ID, References NA, AR.RMP.CRACKNDT.R, 192.947(g) (192.929(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Nippon does not meet criteria for SCC

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

89. Question Result, ID, References: Sat, AR.SCC.SCCDAREVQUAL.P, 192.915(a) (192.915(b))

Question Text: *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 4.10 and 4.11

90. Question Result, ID, References: NA, AR.SCC.SCCDAREVQUAL.R, 192.947(e) (192.915(a), 192.915(b))

Question Text: *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*

Assets Covered: 88971 (1,935)

Result Notes: Based on operating conditions, Nippon pipeline is not susceptible to SCC

91. Question Result, ID, References: NA, AR.SCC.SCCDAREVQUAL.O, 192.915(a) (192.915(b))

Question Text: *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?*

Assets Covered: 88971 (1,935)

Result Notes: Based on operating conditions, Nippon pipeline is not susceptible to SCC

92. Question Result, ID, References: NA, AR.SCC.SCCDAPLAN.P, 192.929(b)

Question Text: *Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?*

Assets Covered: 88971 (1,935)

Result Notes: Based on operating conditions, the pipeline is not susceptible to SCC

93. Question Result, ID, References: NA, AR.SCC.SCCDADATA.R, 192.947(g) (192.929(b)(1))

Question Text: *Do records demonstrate that data was collected and evaluated?*

Assets Covered: 88971 (1,935)

Result Notes: Based on operating conditions, Nippon pipeline is not susceptible to SCC

94. Question Result, ID, References: NA, AR.SCC.SCCDAMETHOD.R, 192.947(g) (192.929(b)(2))

Question Text: *Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?*

Assets Covered: 88971 (1,935)

Result Notes: Based on operating conditions, Nippon pipeline is not susceptible to SCC

95. Question Result, ID, References: NA, AR.SCC.SCCDAMETHOD.O, 192.929

Question Text: *From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?*

Assets Covered: 88971 (1,935)

Result Notes: Based on operating conditions, Nippon pipeline is not susceptible to SCC

96. Question Result, ID, References: NA, AR.SCC.SCCDANEARNEUTRAL.R, 192.947(g) (192.929(b)(2))

Question Text: *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?*

Assets Covered: 88971 (1,935)

Result Notes: Based on operating conditions, Nippon pipeline is not susceptible to SCC

97. Question Result, ID, References: NA, AR.SCC.SCCDAREASSESSINTRVL.R, 192.947(d) (192.939(a)(3))

Question Text: *From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?*

Assets Covered: 88971 (1,935)

Result Notes Based on operating conditions, Nippon pipeline is not susceptible to SCC

98. Question Result, ID, References NA, AR.SCC.SCCDAAMAOP.R, 192.620(d) (192.620(d)(9), 192.620(d)(10))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes Based on operating conditions, Nippon pipeline is not susceptible to SCC

99. Question Result, ID, References NA, AR.SCC.SCCCORR.P, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Based on operating conditions, the pipeline is not susceptible to SCC

100. Question Result, ID, References NA, AR.SCC.SCCCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Based on operating conditions, Nippon pipeline is not susceptible to SCC

IM.BA: Baseline Assessments

101. Question Result, ID, References Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e))

Question Text *Does the process include requirements for conducting integrity assessments in a manner that minimizes environmental and safety risks?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 2.7

102. Question Result, ID, References NA, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o), 192.919(e))

Question Text *Do records demonstrate that integrity assessments have been conducted in a manner that minimizes environmental and safety risks?*

Assets Covered 88971 (1,935)

Result Notes Nippon has the original baseline assessment from 2011 but now new baseline assessments have been performed

103. Question Result, ID, References Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a), 192.921(c), 192.921(h))

Question Text *Does the process include requirements for specifying an assessment method(s) that is best suited for identifying anomalies associated with specific threats identified for the covered segment?*

Assets Covered 88971 (1,935)

Result Notes IMP Figure 2.2

104. Question Result, ID, References NA, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h))

Question Text *Do records demonstrate that the assessment method(s) specified is best suited for identifying anomalies associated with specific threats identified for the covered segment?*

Assets Covered 88971 (1,935)

Result Notes Nippon has the original baseline assessment records from 2011 but now new baseline assessments have been performed

105. Question Result, ID, References Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))

Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 2.4

106. Question Result, ID, References NA, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)

Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*

Assets Covered 88971 (1,935)

Result Notes There have been no newly identified HCAs since the last inspection

107. Question Result, ID, References Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))

Question Text *Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?*

Assets Covered 88971 (1,935)

Result Notes IMP Secion I.2

Risk Assessment

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

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

Assets Covered 88971 (1,935)

Result Notes There have been no newly identified HCAs nor new pipelines installed since the last inspection

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

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

Assets Covered 88971 (1,935)

Result Notes No IM tasks were performed during the inspection

IM.CA: Continual Evaluation and Assessment

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

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

Assets Covered 88971 (1,935)

Result Notes Nippon does not operate any low stress pipelines

111. Question Result, ID, References Sat, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a), 192.939(b), 192.913(c))

Question Text *Is the process for establishing the reassessment intervals consistent with 192.939 and ASME B31.8S-2004?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 6.5

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

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

Assets Covered 88971 (1,935)

Result Notes Nippon has not performed a low stress re-assessment

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

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 6.1

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

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

Assets Covered: 88971 (1,935)

Result Notes: Nippon has set a 7-year reassessment interval. This is consistent with code requirements and conditions seen in the field

115. Question Result, ID, References: Sat, IM.CA.REASSESSINTERVAL.R, 192.947(d) (192.937(a), 192.939(a), 192.939(b), 192.913(c))

Question Text: *Do records demonstrate that reassessment intervals were established consistent with the requirements of the operator's processes?*

Assets Covered: 88971 (1,935)

Result Notes: Nippon has set a 7-year reassessment interval. This is consistent with code requirements and conditions seen in the field

116. Question Result, ID, References: Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931)

Question Text: *Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?*

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 6.2

117. Question Result, ID, References: Sat, IM.CA.REASSESSMETHOD.R, 192.947(d) (192.937(c))

Question Text: *Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?*

Assets Covered: 88971 (1,935)

Result Notes: Figures 2.2 and 2.3 in the IM Plan outline the process for selecting an assessment method

118. Question Result, ID, References: Sat, IM.CA.REASSESSWAIVER.P, 192.943(a) (192.943(b))

Question Text: *Does the process include requirements for reassessment interval waivers (special permit per 190.341)?*

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 6.7

119. Question Result, ID, References: NA, IM.CA.REASSESSWAIVER.R, 192.947(d) (192.943(a), 192.943(b))

Question Text: *Do records demonstrate that reassessment interval waivers (special permit per 190.341) have been adequately implemented, if applicable?*

Assets Covered: 88971 (1,935)

Result Notes: Nippon has not applied for any waivers

120. Question Result, ID, References: Sat, IM.CA.REASSESSEXCPERF.P, 192.913(a) (192.913(b), 192.913(c))

Question Text: *Does the process include requirements for deviations from reassessment requirements based on exceptional performance?*

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 6.6

121. Question Result, ID, References: NA, IM.CA.REASSESSEXCPERF.R, 192.947(d) (192.913(a), 192.913(b), 192.913(c))

Question Text: *Do records demonstrate that deviations from reassessment requirements are based on exceptional performance and have been adequately handled, if applicable?*

Assets Covered: 88971 (1,935)

Result Notes: Nippon has not deviated from reassessment requirements

IM.HC: High Consequence Areas

122. Question Result, ID, References: Sat, IM.HC.HCAID.P, 192.905(a)

Question Text *Does the process include the methods defined in 192.903 High Consequence Area (Method 1) and/or 192.903 High Consequence Area (Method 2) to be applied to each pipeline for the identification of high consequence areas?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 1.4 and 1.5

123. Question Result, ID, References Sat, IM.HC.HCAID.R, 192.947(d) (192.905(a), 192.907(a), 192.911(a))

Question Text *Do records demonstrate that the identification of pipeline segments in high consequence areas was completed in accordance with process requirements?*

Assets Covered 88971 (1,935)

Result Notes HCA Analysis & Class Location Study done June 30, 2021

The compliance group identified entire pipeline as Class 3 which results in entire pipeline being in an HCA based on Method 1

124. Question Result, ID, References Sat, IM.HC.HCAMETHOD1.P, 192.903(1)(i) (192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))

Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (1) for identification of HCAs?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 1

125. Question Result, ID, References Sat, IM.HC.HCAMETHOD2.P, 192.903(2)(i) (192.903(2)(ii))

Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 1

126. Question Result, ID, References Sat, IM.HC.HCANEW.P, 192.905(c)

Question Text *Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 1.6

127. Question Result, ID, References Sat, IM.HC.HCANEW.R, 192.947(d) (192.905(c))

Question Text *Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?*

Assets Covered 88971 (1,935)

Result Notes Entire pipeline is in an HCA so newly identified areas would not change HCAs

128. Question Result, ID, References Sat, IM.HC.HCAPIR.P, 192.903 (192.905(a))

Question Text *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 1.2

129. Question Result, ID, References Sat, IM.HC.HCAPIR.R, 192.947(d) (192.903, 192.905(a))

Question Text *Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?*

Assets Covered 88971 (1,935)

Result Notes PIR calculated as 222 feet

130. Question Result, ID, References Sat, IM.HC.HCASITES.P, 192.903 (192.905(b))

Question Text *Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 1.3

131. Question Result, ID, References Sat, IM.HC.HCASITES.R, 192.947(d) (192.903, 192.905(b))

Question Text *Do records indicate identification of identified sites being performed as required?*

Assets Covered 88971 (1,935)

Result Notes 61 identified sites

132. Question Result, ID, References Sat, IM.HC.HCAMETHOD1.R, 192.947(d) (192.903 (1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))

Question Text *Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?*

Assets Covered 88971 (1,935)

Result Notes Pipeline is in Class 3 so entire pipeline is in an HCA based on Method 1

133. Question Result, ID, References Sat, IM.HC.HCAMETHOD2.R, 192.947(d) (192.905(a), 192.903(2)(ii))

Question Text *Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?*

Assets Covered 88971 (1,935)

Result Notes PIR and Identified Sites discovered in Class Location Study

134. Question Result, ID, References Sat, IM.HC.HCADATA.O, 192.905(c)

Question Text *Are HCAs correctly identified per up-to-date information?*

Assets Covered 88971 (1,935)

Result Notes Drove the ROW and the majority of the pipeline looks to be in a Class 3 area which is how Nippon has identified the HCAs

IM.PM: Preventive and Mitigative Measures

135. Question Result, ID, References Sat, IM.PM.PMMGENERAL.P, 192.935(a)

Question Text *Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 8 and Appendix E

136. Question Result, ID, References Sat, IM.PM.PMMGENERAL.R, 192.947(d) (192.935(a))

Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*

Assets Covered 88971 (1,935)

Result Notes Nippon performs leak surveys and patrols 3x per year and performs rectifier inspections monthly. They also performed a line location verification in July 2020 for damage prevention purposes. Reviewed all these records.

137. Question Result, ID, References Sat, IM.PM.PMMTPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))

Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 8 and Appendix E

138. Question Result, ID, References Sat, IM.PM.PMMTPD.R, 192.947(d) (192.917(e)(1), 192.935(b)(1), 192.935(e))

Question Text *Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?*

Assets Covered 88971 (1,935)

Result Notes Line location verification done in July 2020 to ensure accurate mapping and line location

139. Question Result, ID, References: Sat, IM.PM.PMMREVQUAL.P, 192.915(c)

Question Text: *Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?*

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 12.2

140. Question Result, ID, References: Sat, IM.PM.PMMREVQUAL.R, 192.947(e) (192.915(c))

Question Text: *Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?*

Assets Covered: 88971 (1,935)

Result Notes: OQs for leak survey and patrolling available

141. Question Result, ID, References: NA, IM.PM.PMMTPDSMYS.P, 192.935(d) (192.935(e), 192 Appendix E Table E.II.1)

Question Text: *Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*

Assets Covered: 88971 (1,935)

Result Notes: Nippon Dynawave does not have an MAOP below 30%

142. Question Result, ID, References: NA, IM.PM.PMMTPDSMYS.R, 192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)

Question Text: *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?*

Assets Covered: 88971 (1,935)

Result Notes: Nippon's MAOP is above 30% SMYS

143. Question Result, ID, References: Sat, IM.PM.PMMOF.P, 192.935(b)(2)

Question Text: *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?*

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 8.5

Risk assessment identifies outside force (e.g land movement) as a threat and recommends extra patrols as a result

144. Question Result, ID, References: Sat, IM.PM.PMMOF.R, 192.947(d) (192.935(b)(2))

Question Text: *Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?*

Assets Covered: 88971 (1,935)

Result Notes: Patrolling form identifies land movement, flooding, erosion as areas to inspect. Patrol performed 3x per year

145. Question Result, ID, References: Sat, IM.PM.PMMASORCV.P, 192.935(c)

Question Text: *Does the process include requirements to decide if automatic shut-off valves or remote control valves represent an efficient means of adding protection to potentially affected high consequence areas?*

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 8.8

146. Question Result, ID, References: Sat, IM.PM.PMMASORCV.R, 192.947(d) (192.935(c))

Question Text: *Do records demonstrate that the operator has determined, based on risk, whether automatic shut-off valves or remote control valves should be added to protect high consequence areas?*

Assets Covered: 88971 (1,935)

Result Notes: Past review of the system by the operator identified that automation shutoff valves are not required

147. Question Result, ID, References: Sat, IM.PM.PMMIMPLEMENT.O, 192.935(a)

Question Text *Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?*

Assets Covered 88971 (1,935)

Result Notes The number of markers appears to be more than is required by code, extra patrols for land movement is necessary which is a current P&M measure implemented by Nippon

148. Question Result, ID, References Sat, IM.PM.PMCORR.P, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 8.6

149. Question Result, ID, References Sat, IM.PM.PMCORR.R, 192.933 (192.917(e)(5))

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

Assets Covered 88971 (1,935)

Result Notes Monthly rectifier inspections performed

IM.QA: Quality Assurance

150. Question Result, ID, References Sat, IM.QA.QARM.P, 192.911(l)

Question Text *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.1

151. Question Result, ID, References Sat, IM.QA.IMNONMANDT.P, 192.7(a)

Question Text *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.3

152. Question Result, ID, References Sat, IM.QA.QARM.R, 192.947(d) (192.911(l))

Question Text *Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?*

Assets Covered 88971 (1,935)

Result Notes All IMP inspections and activities are reviewed by The Compliance Group. Manuals are reviewed annually and effectiveness evaluations are performed quarterly

153. Question Result, ID, References Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))

Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 10.1

154. Question Result, ID, References Sat, IM.QA.IMMOC.P, 192.911(k) (192.909(a), 192.909(b))

Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 11.1 and 11.2

155. Question Result, ID, References Sat, IM.QA.IMMOC.R, 192.947(d) (192.909(a), 192.909(b), 192.911(k))

Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*

Assets Covered 88971 (1,935)

Result Notes HCA Analysis & Class Location Study done June 30, 2021

The compliance group identified entire pipeline as Class 3 which results in entire pipeline being in an HCA based on Method 1

156. Question Result, ID, References Sat, IM.QA.IMPERFEFECTIVE.P, 192.945(a) (192.913(b), 192.951)

Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.1

157. Question Result, ID, References Sat, IM.QA.IMPERFEFECTIVE.R, 192.947(d) (192.913(b), 192.945(a), 192.951)

Question Text *Do records demonstrate that the methods to measure Integrity Management Program effectiveness provide effective evaluation of program performance and result in program improvements where necessary?*

Assets Covered 88971 (1,935)

Result Notes Compliance Group performs quarterly effectiveness evaluations

Risk assessment done, identified areas to gather more data

158. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b), 192.951)

Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 12.1

159. Question Result, ID, References Sat, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b), 192.945(a), 192.951)

Question Text *Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?*

Assets Covered 88971 (1,935)

Result Notes Nippon measure number of miles inspected, P&M tasks performed, leaks, incidents

160. Question Result, ID, References Sat, IM.QA.RECORDS.R, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i))

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

Assets Covered 88971 (1,935)

Result Notes Reviewed original Baseline Assessment

IM.RA: Risk Analysis

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

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 3.2

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

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 3.3

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

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

Assets Covered 88971 (1,935)

Result Notes Risk analysis conducted in 2021 by the compliance group, identified threats and data needed to fully assess risks

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

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

Assets Covered 88971 (1,935)

Result Notes Risk analysis identified damage prevention data that needs to be collected, land movement areas, corrosion. Risk assessment utilized internal and external data

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

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 3.1

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

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

Assets Covered 88971 (1,935)

Result Notes Risk Assessment conducted in 2020 and will be performed annually, threats identified as described in ASME B31.8S

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

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

Assets Covered 88971 (1,935)

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

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

Assets Covered 88971 (1,935)

Result Notes All information was compiled to give each segment a risk ranking based on operating data and outside source data. A total score and risk ranking was also given for the pipeline. The score was 8.7 and a "Medium threat ranking"

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

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 3.1 and 3.3

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

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

Assets Covered 88971 (1,935)

Result Notes The risk assessment gave recommendations for P&M measures and new data to collect. Based on this new data the risk model will be updated in the following years

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

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

Assets Covered 88971 (1,935)

PD.DP: Damage Prevention

172. Question Result, ID, References: Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))

Question Text: *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*

Assets Covered: 88971 (1,935)

Result Notes: PA Plan

IMP Section 13.1

173. Question Result, ID, References: Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text: *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered: 88971 (1,935)

Result Notes: Patrolling and leak surveying have not identified any issues in regard to damage prevention. Extra patrols being conducted as part of P&M measures

RPT.NR: Notices and Reporting

174. Question Result, ID, References: Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b) (192.921(a)(7), 192.937(c)(7), 192.18)

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

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 11.1

175. Question Result, ID, References: NA, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b), 192.921(a)(7), 192.937(c)(7))

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

Assets Covered: 88971 (1,935)

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

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

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

Assets Covered: 88971 (1,935)

Result Notes: IMP Section 5.4

177. Question Result, ID, References: NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))

Question Text: *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*

Assets Covered: 88971 (1,935)

Result Notes: None of these events have occurred

178. Question Result, ID, References: NA, RPT.NR.IMDEVIATERPT.P, 192.913(b)(1)(vii)

Question Text: *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered: 88971 (1,935)

Result Notes: Section 9.3 of the IMP states that Nippon does not use exceptional performance

179. Question Result, ID, References: NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii))

Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*

Assets Covered 88971 (1,935)

Result Notes Nippon has not deviated IMP requirements

180. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.P, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text *Is there a process for annual reporting of integrity management performance data?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 14.1

181. Question Result, ID, References Sat, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)

Question Text *Do annual reports demonstrate that integrity management performance data were reported?*

Assets Covered 88971 (1,935)

TD.SCC: Stress Corrosion Cracking

182. Question Result, ID, References NA, TD.SCC.SCCIM.P, 192.911(c) (192.917(a)(1))

Question Text *Does the integrity management program have a process to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*

Assets Covered 88971 (1,935)

Result Notes Based on current operating conditions, the pipeline is not susceptible to SCC

183. Question Result, ID, References NA, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1))

Question Text *Do integrity management program records document results of studies to identify and evaluate stress corrosion cracking threats to each covered pipeline segment?*

Assets Covered 88971 (1,935)

Result Notes Nippon has determined that SCC is not a threat based on the operating conditions of their pipeline

184. Question Result, ID, References NA, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b))

Question Text *Do records document that the operator has properly remediated any occurrences of SCC?*

Assets Covered 88971 (1,935)

Result Notes Nippon has found no occurrences of SCC

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

185. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b))

Question Text *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?*

Assets Covered 88971 (1,935)

Result Notes OQ Plan and IMP Section 12.2

186. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))

Question Text *Do records indicate adequate qualification of integrity management personnel?*

Assets Covered 88971 (1,935)

Result Notes ECDA performed by Jeremy Hailey in 2019 and 2020

NACE Coating Inspector Level 3 expires 10/31/21

NACE Corrosion Specialist expires 2/28/23

NACE CP4 expires 2/28/23

NACE Material Selection/Design Specialist expires 2/28/23

Professional Engineering License expires 2/28/23

187. Question Result, ID, References	Sat, 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))
Question Text	*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)?*
Assets Covered	88971 (1,935)
Result Notes	OQ Plan and IMP Section 12.2

Report Parameters: Results: all

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.