

Inspection Output (IOR)

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Report Filters

Assets Georgia-Pacific / 86255

Results All

Inspection Information

Inspection Name [8588] Georgia Pacific TIMP	Operator(s) GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted 09/13/2023
Status PLANNED	Lead Lex Vinsel	Plan Approval 09/19/2023 by Dennis Ritter
Start Year 2023	Observer(s) David Cullom, Anthony DorrOUGH, Derek Norwood, Scott Anderson, John Trier, Marina Rathbun, Tom Green	All Activity Start 10/16/2023
System Type GT	Supervisor Dennis Ritter	All Activity End 10/17/2023
Protocol Set ID WA.GT.2023.01	Director Scott Rukke	Inspection Submitted --
		Inspection Approval --

Inspection Summary

Inspection Scope and Summary

Georgia Pacific TIMP inspection for years 2020-2023

Facilities visited and Total AFOD

Camas WA, Camus Mill

AFOD - 2

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

No Findings

Primary Operator contacts and/or participants

Kellen Rosales Compliance Program Manager EVERLINE (GP) (720)822-1642

Operator executive contact and mailing address for any official correspondence

Shawn Wood Mill Manager Georgia Pacific (360)834-8162

401 Northeast Adams Street, Camus, Washington 98607

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 86255	Georgia-Pacific	unit	86255	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	175	175	175	175	100.0%

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
				Plastic Pipe AMAOP CDA Abandoned					

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

Plans

Plan # Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1. 86255	GT IM Implementation, GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, 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	Inspected	Total	Required % Complete
1. GP TIMP	--	10/16/2023 -- 10/17/2023		all planned questions	all assets	all types	175	175	175	175	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".

3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	GP TIMP	COMPLETED	11/01/2023	GP TIMP	86255

Results (all values, 175 results)

AR.CDA: Confirmatory Direct Assessment

1. 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 **86255**

Result Notes **IMP Manual - Sections 4.1.3 ECDA Direct Examination and 5.1 Discovery, Evaluation and Remediation Scheduling**

2. 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 **86255**

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

AR.EC: External Corrosion Direct Assessment (ECDA)

3. 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 **86255**
 Result Notes **IMP Manual - Section 4.1 External Corrosion Direct Assessment (ECDA)**

4. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Base Line assessment done in 2007, none since 2007.

5. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

6. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

7. 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 **86255**
 Result Notes **IMP Manual - Section 4.1 External Corrosion Direct Assessment (ECDA)**

8. 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 **86255**
 Result Notes **IMP Manual - Section 3.2 Data Gathering and Integration appears adequate.**

9. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

10. Question Result, ID, References **NA, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))**
 Question Text *Do records demonstrate that the operator identified ECDA Regions?*
 Assets Covered **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

11. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

12. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
13. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
14. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
15. 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 **86255**
 Result Notes **IMP Manual - Section 4.1.3.1 Prioritization of indications found during the indirect inspection**
16. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.IC: Internal Corrosion Direct Assessment (ICDA)

17. 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 **86255**
 Result Notes **IMP Manual - Section 4.2.1 Dry Gas ICDA Programmatic Requirements**
18. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
19. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
20. 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 **86255**

Result Notes **IMP Manual - Section 4.2 Internal Corrosion Direct Assessment (ICDA)**

21. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
22. 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 **86255**
Result Notes **IMP Manual - Section 3.2 Data Gathering and Integration**
23. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
24. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
25. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
26. 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 **86255**
Result Notes **IMP Manual - Section 4.2.1 Dry Gas ICDA Programmatic Requirements**
27. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

28. 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 **86255**
Result Notes **IMP Manual - Section 4.1 External Corrosion Direct Assessment**
29. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

30. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
31. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **IMP Manual Section 4.4 - Stress Corrosion Cracking Direct Assessment (SCCDA)**
32. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
33. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
34. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
35. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
36. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
37. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **IMP Manual - Section 5.1 Discovery, Evaluation and Remediation Scheduling**
38. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

39. Question Result, ID, References **Sat, AR.IL.ILIREVIEWQUAL.P, 192.915(a) (192.915(b), 192.493)**
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 **86255**
Result Notes **IMP Manual - Section 12.2 Personnel Qualification and Training Requirements**
40. Question Result, ID, References **NA, AR.IL.ILIREVIEWQUAL.R, 192.947(g) (192.915(a), 192.915(b), 192.493)**
Question Text *Do records demonstrate that personnel who conduct assessments or review assessment results are qualified per the process requirements?*
Assets Covered **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
41. Question Result, ID, References **NA, AR.IL.ILIREVIEWQUAL.O, 192.915(a) (192.915(b), 192.493)**
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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
42. Question Result, ID, References **Sat, AR.IL.ILISPECS.P, 192.921(a)(1) (192.933(b), 192.493, 192.18)**
Question Text *Does the process assure complete and adequate vendor ILI specifications?*
Assets Covered **86255**
Result Notes **IMP Manual - Section 12.2 Personnel Qualification and Training Requirements**
43. Question Result, ID, References **NA, AR.IL.ILISPECS.R, 192.947(g) (192.933(b), 192.493)**
Question Text *Do records demonstrate that the ILI specifications were complete and adequate?*
Assets Covered **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
44. Question Result, ID, References **Sat, AR.IL.ASSESSMETHOD.P, 192.919(b) (192.921(a), 192.937(c), 192.917, 192.493, 192.506)**
Question Text *Does the process specify the assessment methods that are appropriate for the pipeline specific integrity threats?*
Assets Covered **86255**
Result Notes **IMP Manual - Table 2.1 - Acceptable Assessment Methods**
45. Question Result, ID, References **NA, AR.IL.ASSESSMETHOD.R, 192.947 (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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
46. Question Result, ID, References **Sat, AR.IL.ILIVALIDATE.P, 192.921(a)(1) (192.937(c), 192.493)**
Question Text *Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?*
Assets Covered **86255**
Result Notes **IMP Manual - Section 2.1 Assessment Methods**
47. Question Result, ID, References **NA, AR.IL.ILIVALIDATE.R, 192.947 (192.921(a)(1), 192.493)**
Question Text *Do records demonstrate that the operator has validated ILI assessment results per their process?*
Assets Covered **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

48. Question Result, ID, References **NA, AR.IL.ILIVALIDATE.O, 192.921(a)(1) (192.493)**
 Question Text *From observation of field activities, do the employees and vendors validate ILI assessment results per their process?*
 Assets Covered **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
49. Question Result, ID, References **Sat, AR.IL.ILIINTEGRATION.P, 192.917(b) (192.493)**
 Question Text *Is the process for integrating ILI results with other information adequate?*
 Assets Covered **86255**
 Result Notes **IMP Manual - Section 3.2 Data Gathering and Integration**
50. Question Result, ID, References **NA, AR.IL.ILIINTEGRATION.R, 192.947 (192.917(b), 192.493)**
 Question Text *Do records demonstrate that the operator integrated other data/information when evaluating tool data/results?*
 Assets Covered **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
51. Question Result, ID, References **Sat, AR.IL.ILIACCEPCRITERIA.P, 192.921(a) (192.493)**
 Question Text *Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?*
 Assets Covered **86255**
 Result Notes **IMP Manual - Section 3.2 Data Gathering and Integration**
52. Question Result, ID, References **NA, AR.IL.ILIACCEPCRITERIA.R, 192.947 (192.921(a), 192.493)**
 Question Text *Do records indicate adequate implementation of the process for ILI survey acceptance?*
 Assets Covered **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
53. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
54. Question Result, ID, References **NA, AR.IL.ILIIMPLEMENT.O, 192.921(a)(1) (192.620(d), 192.605(b), 192.493)**
 Question Text *Are O&M and IMP procedural requirements for the performance of ILI assessments followed?*
 Assets Covered **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
55. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **IMP Manual - Section 5.1 Discovery, Evaluation and Remediation Scheduling**
56. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.LSR: Low Stress Reassessment

57. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **IMP Manual - Section 6.4 Low Stress Reassessment**
58. Question Result, ID, References **Sat, AR.LSR.LSRBA.R, 192.947(d) (192.919(c), 192.921(d), 192.941(a), 192.506)**
 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 **86255**
 Result Notes **IMP Manual - Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule**
Reviewed assessment Methods and Assessment Schedule
59. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
60. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
61. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **IMP Manual**
Section 6.4 Low Stress Reassessment
Section 5.1 Discovery, Evaluation and Remediation Scheduling
62. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **IMP Manual - Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule**
Reviewed assessment Methods and Assessment Schedule

AR.PTI: Integrity Assessment Via Pressure Test

63. 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 **86255**
 Result Notes **IMP Manual - Section 12.2 Personnel Qualification and Training Requirements**
64. 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 86255

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

65. Question Result, ID, Sat, 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 86255

Result Notes IMP Manual - Section 2.1 Assessment Methods

66. Question Result, ID, 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 86255

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

67. Question Result, ID, 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 86255

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

68. Question Result, ID, Sat, 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 86255

Result Notes IMP Manual - Section 5.1 Discovery, Evaluation and Remediation Scheduling

69. Question Result, ID, 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 86255

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

AR.OT: Other Technology

70. Question Result, ID, Sat, AR.OT.OTPLAN.P, 192.921(a)(4) (192.18)

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

Assets Covered 86255

Result Notes IMP Manual Section 2.1 Assessment Methods

71. Question Result, ID, 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 86255

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

72. Question Result, ID, Sat, AR.OT.OTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(7), 192.493)

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

Assets Covered 86255

Result Notes IMP Manual - Section 12.2 Personnel Qualification and Training Requirements

73. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
74. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
75. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
76. 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 **86255**
 Result Notes **IMP Manual - Section 5.1 Discovery, Evaluation and Remediation Scheduling**
77. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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 **86255**
 Result Notes **IMP Manual - Section I.4 Definitions**
Section 5.1 Discovery, Evaluation and Remediation Scheduling
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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
80. Question Result, ID, References **Sat, AR.RC.IMPRC.P, 192.933(a) (192.933(c), 192.933(d), 192.18)**
 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 **86255**
 Result Notes **IMP Manual - Section 5.3 Repairs**

81. Question Result, ID, References **NA, AR.RC.PRESSREDUCE.R, 192.947(f) (192.933(a)(1), 192.18)**
 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
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 **86255**
 Result Notes **IMP Manual Section 5.3 Repairs**
IMP Manual Section 2.7 Consideration of Environment and Safety Risks
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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
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 **86255**
 Result Notes **IMP Manual - Section 5.3.4 Anomalies Outside of the Classification Criteria**
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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.RMP: Repair Methods and Practices

87. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **IMP Manual - Section 8.9 Cracks**
Section 5.3.6 Determining feature attributes in the field
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 86255

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

IM.HC: High Consequence Areas

89. 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 86255

Result Notes IMP Manual - Figure 1.1 - HCA Identification Process

Usually use Method 2

90. 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 86255

Result Notes Glass Location Study, HCA & MCA analysis for Georgia Pacific Natural Gas Transmission System report November 30, 2022.

Reviewed maps of HCA's. Program appears adequate.

91. 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 86255

Result Notes IMP Manual - Section 1.4 HCA - Identification Using Class Locations (Method 1)

92. 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 86255

Result Notes IMP Manual - Section 1.5 HCA - Identification using PIR (Method 2)

93. 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 86255

Result Notes IMP Manual Section 1.6 HCA - Identification and Evaluation of Newly Identified HCAs

94. Question Result, ID, References NA, 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 86255

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

95. 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 86255

Result Notes IMP Manual - Section 1.2 HCA - Potential Impact Radius

96. 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 86255

Result Notes Results are in EverLine Report for Georgia Pacific Natural Gas Transmission System .

Section High Consequence Area (HCA) Determination Page 8

97. 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 86255

Result Notes IMP Manual Section 1.1 HCA - Identification Process, Table 1.2 - Elements that are used to determine HCAs

98. 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 86255

Result Notes Class Location Study, HCA & MCA Analysis (November 30, 2022) Maps A1 - A5

99. Question Result, ID, References NA, 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 86255

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

Georgia Pacific uses Method 2

100. 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 86255

Result Notes Class Location Study, HCA & MCA Analysis (November 30, 2022) HCA Results Page 8

101. Question Result, ID, References NA, IM.HC.HCADATA.O, 192.905(c)

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

Assets Covered 86255

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

IM.RA: Risk Analysis

102. 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 86255

Result Notes IMP Manual Section 3. Identification of Threats, Data Integration and Risk Assessment

Section 3.3.1 Data sets for Informational Analysis

Process appears adequate.

103. 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 considers all of the identified threats for each covered segment, including the requirements of ASME B31.8S-2004 (Section 5) and the need to address potential risk of a compromised operations control system (e.g., cyber-attack)?*

Assets Covered 86255

Result Notes IMP Manual - Section 3.1 Threat Identification

104. Question Result, ID, References Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1), 192.632)

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

Assets Covered 86255

Result Notes Risk Assessment Results

GP CAMAS 10-INCH Natural Gas Pipeline (October 9, 2023)

Reviewed References used in report.

Records appear adequate.

105. Question Result, ID, References Sat, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(e)(1), 192.911(k), 192.607)

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 86255

Result Notes Risk Assessment Results

GP CAMAS 10-INCH Natural Gas Pipeline (October 9, 2023)

Reviewed References used in report.

Records appear adequate.

106. 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 86255

Result Notes TIMP Manual - Section 3.4 Risk Analysis

Section 3.5 Risk Analysis Results

Risk Assessment Results

GP CAMAS 10-INCH Natural Gas Pipeline (October 9, 2023)

Section 3. Probability of Failure (POF) Results

107. 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 86255

Result Notes Risk Assessment Results

GP CAMAS 10-INCH Natural Gas Pipeline (October 9, 2023)

Section 3. Probability of Failure (POF) Results

108. 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 86255

Result Notes **TIMP Manual - Section 3.4 Risk Analysis**

Section 3.5 Risk Analysis Results

109. 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 86255

Result Notes **Risk Assessment Results**

GP CAMAS 10-INCH Natural Gas Pipeline (October 9, 2023)

Section 3. Probability of Failure (POF) Results

110. 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 86255

Result Notes **TIMP Manual - Section 3.6 Risk Analysis Updates**

111. 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 86255

Result Notes **Risk Assessment has been revised three times , as required.**

112. 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 86255

Result Notes **Conditions on the pipeline are accurately reflected in the appropriate risk assessment.**

IM.BA: Baseline Assessments

113. Question Result, ID, References **Sat, IM.BA.BAENVIRON.P, 192.911(o) (192.919(e), 192.750)**

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

Assets Covered 86255

Result Notes **IMP Manual - Section 2.7 Consideration of Environmental and Safety Risks**

114. Question Result, ID, References **NA, IM.BA.BAENVIRON.R, 192.947(d) (192.911(o), 192.919(e), 192.750)**

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

Assets Covered 86255

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

115. Question Result, ID, References **Sat, IM.BA.BAMETHODS.P, 192.919(b) (192.921(a), 192.921(c), 192.921(h), 192.937(c), Part 192 - Appendix F)**

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 86255

Figure 2.1 - Assessment Process and Figure 2.2 - Assessment Method Decision Process

116. Question Result, ID, Sat, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h), 192.947(d),
References 192.937(c), Part 192 - Appendix F)
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 86255
Result Notes IMP Manual - Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule
117. Question Result, ID, Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))
References
Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*
Assets Covered 86255
Result Notes IMP Manual - Section 2.4 Newly Identified HCAs/Newly Installed Pipe
118. Question Result, ID, NA, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)
References
Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*
Assets Covered 86255
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
119. Question Result, ID, Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))
References
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 86255
Result Notes IMP Manual - Section 2.1 Assessment Methods, Table 2.1 - Acceptable Assessment Methods

Figure 2.1 - Assessment Process and Figure 2.2 - Assessment Method Decision Process

120. Question Result, ID, Sat, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d), 192.947(d))
References
Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*
Assets Covered 86255
Result Notes Reviewed TIMP Manual - Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule
121. Question Result, ID, NA, IM.BA.BAENVIRON.O, 192.911(o) (192.919(e), 192.750)
References
Question Text *From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?*
Assets Covered 86255
Result Notes No such activity/condition was observed during the inspection.

IM.CA: Continual Evaluation and Assessment

122. Question Result, ID, Sat, IM.CA.LOWSTRESSREASSESS.P, 192.941(a) (192.941(b), 192.941(c))
References
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 86255
Result Notes IMP Manual - Section 6.4 - Low Stress Reassessment

Section 6.4.1 - External Corrosion Cathodically Protected Lines

Section 6.4.1 - Internal Corrosion

123. 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 **86255**
 Result Notes **IMP Manual - Section 6.4 - Low Stress Reassessment**
- Section 6.5 - Reassessment Intervals**
124. Question Result, ID, References **Sat, IM.CA.LOWSTRESSREASSESS.R, 192.947 (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 **86255**
 Result Notes **IMP Manual - SECTION II Appendices**
- Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule**
125. 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 **86255**
 Result Notes **TIMP Manual Section 6. Continual Evaluation and Assessment Plan (CAP)**
- Section 6.1 Periodic Evaluations**
126. 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 **86255**
 Result Notes **IMP Manual - SECTION II Appendices**
- Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule**
127. 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 **86255**
 Result Notes **IMP Manual - SECTION II Appendices**
- Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule**
128. Question Result, ID, References **Sat, IM.CA.REASSESSMETHOD.P, 192.937(c) (192.931, 192.937(d), 192.493, 192.506)**
 Question Text *Is the approach for establishing reassessment method(s) consistent with the requirements in 192.937(c)?*
 Assets Covered **86255**
 Result Notes **IMP Manual - Section 6.2 Reassessment Methods**
129. Question Result, ID, References **Sat, IM.CA.REASSESSMETHOD.R, 192.947(d) (192.937(c), 192.937(d), 192.506, 192.493)**
 Question Text *Do records document the assessment methods to be used and the rationale for selecting the appropriate assessment method?*
 Assets Covered **86255**
 Result Notes **IMP Manual - SECTION II Appendices**
- Appendix A - Pipeline Integrity Management Master HCA List and Assessment Schedule**

130. 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 **86255**
 Result Notes **TIMP Manual - Section 6.7 Waiver from Reassessment Interval**
131. 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
132. Question Result, ID, References **Sat, IM.CA.REASSESEXCPERF.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 **86255**
 Result Notes **TIMP Manual - Section 6.6 Deviation from Reassessment Requirements**
133. Question Result, ID, References **NA, IM.CA.REASSESEXCPERF.R, 192.947 (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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

IM.PM: Preventive and Mitigative Measures

134. 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 **86255**
 Result Notes **IMP Manual - Section 8.1 General Requirements (Identification of Additional Measures)**
135. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.R, 192.947 (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 **86255**
 Result Notes **IMP Manual - Appendix E - Prevention Measures Matrix**
136. Question Result, ID, References **Sat, IM.PM.PMTPD.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 **86255**
 Result Notes **IMP Manual - Section 8.2 Third Party Damage**
137. Question Result, ID, References **Sat, IM.PM.PMTPD.R, 192.947 (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 **86255**
 Result Notes **IMP Manual - Appendix E - Prevention Measures Matrix**

Prevention Measures Matrix (I)

138. 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 **86255**
 Result Notes **IMP Manual - Section 8.2 Third Party Damage (1)**
139. 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 **86255**
 Result Notes **Reviewed Qualifications for Roy Rogers and they appear adequate.**
140. Question Result, ID, References **Sat, IM.PM.PMMPDMSMYS.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 **86255**
 Result Notes **IMP Manual - Section 8.3 Pipelines Operating < 30% SMYS Includes Class 3 & 4 Areas**
141. Question Result, ID, References **Sat, IM.PM.PMMPDMSMYS.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 **86255**
 Result Notes **Reviewed Walking Survey records for 2022 and part of 2023.**
142. 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 **86255**
 Result Notes **IMP Manual Section 8.5 Outside Force Damage**
143. 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 **86255**
 Result Notes **Reviewed Walking Survey records for 2022 and part of 2023.**
144. Question Result, ID, References **Sat, IM.PM.PMRRMV.P, 192.935(c)**
 Question Text *Does the process include requirements to decide if RMVs or AETs represent an efficient means of adding protection to potentially affected HCAs?*
 Assets Covered **86255**
 Result Notes **IMP Manual - Section 8.10 Rupture-mitigation Valve (RMV)**
145. Question Result, ID, References **Sat, IM.PM.PMRRMV.R, 192.947(d) (192.935(c))**
 Question Text *Do records demonstrate that the operator has determined, based on risk, whether RMVs or AETs should be added to protect high consequence areas?*
 Assets Covered **86255**
 Result Notes **IMP Manual - Appendix I - EFRD Analysis**
146. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such activity/condition was observed during the inspection.**

147. 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 **86255**
 Result Notes **IMP Manual - Section 8.8 Corrosion**
148. 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 **86255**
 Result Notes **Reviewed Walking Survey records for 2022 and part of 2023.**

IM.QA: Quality Assurance

149. Question Result, ID, References **Sat, IM.QA.QARM.P, 192.911(I)**
 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 **86255**
 Result Notes **IMP Manual - Section 12.1 Program Requirements for the Quality Assurance Process**
150. 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 **86255**
 Result Notes **IMP Manual - Section 12.3 Invoking Non-Mandatory Statements in Standards**
151. Question Result, ID, References **Sat, IM.QA.QARM.R, 192.947(d) (192.911(I))**
 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 **86255**
 Result Notes **IMP Manual - Reviewed Section III. Plan Review/ Revision Log**

No issues
152. 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), 192.517(a))**
 Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*
 Assets Covered **86255**
 Result Notes **IMP Manual - Section 10 Record Keeping**
153. 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 **86255**
 Result Notes **IMP Manual - Section 11. Management of Change (MOC)**
154. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
155. Question Result, ID, References **Sat, IM.QA.IMPERFEFFECTIVE.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 86255

Result Notes IMP Manual - Section 9. Performance Measures

156. Question Result, ID, References Sat, IM.QA.IMPERFEFFECTIVE.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 86255

Result Notes Reviewed Annual Performance Evaluation for October 11, 2023

Evaluation appears adequate

157. 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 86255

Result Notes IMP Manual - Section 9.1 General Performance Measures

158. 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 86255

Result Notes IMP Manual, Reviewed Table 9.1 - Threat Specific Pipeline Integrity Performance Measures

159. 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), 192.517(a))

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

Assets Covered 86255

Result Notes Reviewed Hydo test and Ratrol ROW records.

Records appear to be retained as required.

PD.DP: Damage Prevention

160. 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 86255

Result Notes IMP Manual - Section 10 Record Keeping - Table 10.1 - List of the documentation required to fully implement the IMP.

Records appear adequate.

161. 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 86255

Result Notes Reviewed Annual Performance Evaluation for October 11, 2023

Evaluation appears adequate

Reviewed records for pipeline patrols and leak surveys

RPT.NR: Notices and Reporting

162. 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 **86255**
Result Notes **IMP Manual - Section 14 Agency Notifications**
163. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
164. 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 **86255**
Result Notes **IMP Manual - Section 5.4 Operator Response When Timelines for Evaluation & Remediation Cannot be Met**
165. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
166. 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 **86255**
Result Notes **Georgia Pacific does not do exceptional performance.**
167. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
168. 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 **86255**
Result Notes **IMP Manual - Section 14.3 Performance Reporting**
169. 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 **86255**
Result Notes **Reviewed annual report for 2022 with integrity management performance data.**

TD.SCC: Stress Corrosion Cracking

170. Question Result, ID, References **Sat, TD.SCC.SCCIM.P, 192.911(c) (192.917(a)(1), 192.917(e))**
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 **86255**
Result Notes **IMP Manual - Section 2.1 Assessment Methods**

Figure 2.3 - Integrity Assessment Method Selection Procedure

171. Question Result, ID, References **Sat, TD.SCC.SCCIM.R, 192.947(d) (192.917(a)(1), 192.917(e))**
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 **86255**
Result Notes **IMP Manual - Section 2.1 Assessment Methods**

Table 2.3 - Stress Corrosion Cracking Applicability

172. 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 **86255**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

173. Question Result, ID, References **Sat, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b), 192.493)**
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 **86255**
Result Notes **IMP Manual - Section 12.2 Personnel Qualification and Training Requirements**

174. 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), 192.493)**
Question Text *Do records indicate adequate qualification of integrity management personnel?*
Assets Covered **86255**
Result Notes **Reviewed Ron McMaster qualifications for integrity management personnel.**

Records appear adequate.

175. 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 **86255**
Result Notes **IMP Manual - Section 12.2 Personnel Qualification and Training Requirements**

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.