

# Inspection Output (IOR)

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## Report Filters

Assets All, and including items not linked to any asset.  
Results All

## Inspection Information

Inspection Name	8611 - Northwest Natural Gas Distribution - Gorge	Operator(s)	NORTHWEST NATURAL GAS CO (13840)	Plan Submitted	01/19/2023
		Lead	David Cullom	Plan Approval	01/19/2023 by Dennis Ritter
		Team Members	Jason Hoxit	All Activity Start	08/29/2023
Status	LOCKED	Observer(s)	Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Tom Green	All Activity End	10/05/2023
Start Year	2023	Supervisor	Dennis Ritter	Inspection Submitted	10/25/2023
System Type	GD	Director	Scott Rukke	Inspection Approval	10/25/2023 by Scott Rukke
Protocol Set ID	WA.GD.2022.02				

## Inspection Summary

### Inspection Scope and Summary

This inspection of the Northwest Natural Gorge Inspection Unit consisted of a procedure, records, and field review of assets in the Columbia River Gorge unit.

### Facilities visited and Total AFOD

This inspection consisted of 3 days of program plan, records, and procedures review with an additional 3 field days. The exit interview was conducted on October 5, 2023.

### Summary of Significant Findings

There were 2 Areas of Concern due to low CP readings and the operator will be sent an Area of Concern letter.

In Carson, Wa there were two test station readings on the same impressed current system that were not able to achieve a polarized "instant off" reading of -850mV using a Cu/CuSO4 reference cell during our field portion. There was no time to perform a depolarization test on-site to check for the 100mV shift. I discussed potential reasons for this abnormal operating condition with the corrosion control supervisor and it was mentioned that it may be a potential ground bed issue at the rectifier.

122 Henryetta Ln, Carson, Wa.	-1059mV CSE PSP (on) -667mV CSE PSP (off)	Currently an annual test site per the operator and is not achieving adequate CP. An AOC letter to be drafted.
1201 Smith Beckon Rd Carson, Wa.	-1008mV CSE PSP (on) -613mV CSE PSP (off)	Not achieving adequate CP. An AOC letter to be drafted.

### Primary Operator contacts and/or participants

- Samantha Rookstool - Compliance Specialist
- Scott Lundgren - Integrity Management Supervisor Ryan Truair - Compliance Supervisor
- Lisa Sherer - Compliance Specialist

Additional participants detailed in the attached attendance form

### Operator executive contact and mailing address for any official correspondence

Joe Karney

Vice President of Engineering and Utility Operations

250 Southwest Taylor Street, Portland, Oregon 97204

Inspection setup - WA GD Protocol Set Directive: WUTC Standard Inspection

Form C to be completed as well in QB.

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1. 90887	Northwest Natural-COLUMBIA GORGE	unit	90887	Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Abandoned Storage Fields	143	143	143	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.	90887	WUTC Standard Inspection	PRO, PRR, FR, GDIM, LPGIM, MISCTOPICS, GENERIC	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s) )	Planned	Required	Total Inspected	Required % Complete
1	Records and Field	--	08/29/2023 10/05/2023	--	all planned questions	all assets	all types	143	143	143	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	Records and Field	COMPLETED	08/31/2023	Records and Field	90887

# Results (all values, 143 results)

147 (instead of 143) results are listed due to re-presentation of questions in more than one sub-group.

## PRO.SUBLNORMOPS: Normal Operating And Maintenance

1. Question Result, ID, References **Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))**  
Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*  
Assets Covered **90887**  
Result Notes **SPW- 603 Odor Call Response and SPW 709 is the classification guidance.**

## PRR.REPORT: Reporting

2. Question Result, ID, References **Sat, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.7(d))**  
Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*  
Assets Covered **90887**  
Result Notes **No federal reportable incidents during the inspection time-period. There were six state reportable incidents between 2020 and 2023 for the Gorge unit. I checked the operator's records vs what we had in our database and there were no issues.**
3. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORT.R, 191.9(a)**  
Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.1 within the required time frame?*  
Assets Covered **90887**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No federal reportable incidents during this inspection time period.**
4. Question Result, ID, References **NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.9(b)**  
Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*  
Assets Covered **90887**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No federal reportable incidents during this inspection time period.**
5. Question Result, ID, References **Sat, RPT.RR.ANNUALREPORT.R, 191.11(a)**  
Question Text *Have complete and accurate Annual Reports been submitted?*  
Assets Covered **90887**  
Result Notes **NWN demonstrated a PDF copy of what is saved is the portal is sent to the UTC and was it reviewed along with historical reports stored in our system.**
6. Question Result, ID, References **Sat, RPT.RR.UTCANNUALREPORTS.R,**  
Question Text *Have complete and accurate annual reports been submitted to the commission?*  
Assets Covered **90887**  
Result Notes **Annual reports were reviewed and were suitable. No errors noted.**
7. Question Result, ID, References **Sat, RPT.RR.MISDATAREPORTS.R,**  
Question Text *Has the operator submitted a copy of DOT Drug and Alcohol Testing MIS Data Collection Form to the commission when required?*  
Assets Covered **90887**  
Result Notes **All three 3 year's of MIS submissions are in our system for this inspection time period.**
8. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(c))**  
Question Text *Do records indicate safety-related condition reports were filed as required?*

Assets Covered 90887

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

9. Question Result, ID, References NA, RPT.RR.MAOPINCREASENOTIFY.R,

Question Text Do records indicate submittal of a written plan of procedures to the commission at least forty-five days before uprating to a MAOP greater than 60 psig?

Assets Covered 90887

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

10. Question Result, ID, References Sat, RPT.RR.THIRTYDAYRPT.R,

Question Text Has the operator submitted a written report within 30 days following each reportable incident?

Assets Covered 90887

Result Notes 30 day reports were verified for this inspection time period.

11. Question Result, ID, References Sat, MO.GO.CUSTNOTIFY.R, 192.16(d) (192.16(a), 192.16(b), 192.16(c))

Question Text Do records indicate the customer notification process satisfies the requirements of 192.16?

Assets Covered 90887

Result Notes 2020-2023. Brochures discussing customer maintenance of lines not maintained by the operator were reviewed. Samples requested of notices that went out were requested and reviewed.

Feb 2023 - New customer list was reviewed. 3rd party mailer sent by contractor was reviewed.

Dec 2021 - New customer list reviewed.

June 2022 - New customer list reviewed.

12. Question Result, ID, References Sat, RPT.RR.DAILYCONSTRUCTIONRPT.R,

Question Text Do records indicate daily construction and repair activities were emailed to the commission no later than 10 AM each day work is scheduled?

Assets Covered 90887

Result Notes Email notices reviewed and the operator has been sending construction crew sheets to the pipeline email box on time.

13. Question Result, ID, References Sat, RPT.RR.PIPELINEMAPPING.R,

Question Text Has the operator provided accurate maps (or updates) of all pipelines operating over 250 psig to specifications developed by the commission sufficient to meet the needs of first responders?

Assets Covered 90887

Result Notes Submissions to the UTC reviewed from 2020 - Feb 5 2021 It was sent to records@utc.wa.gov. The submission for 2021 on 3-14-2022 was sent to the pipeline director and the Records Center. The submission for 2022 was sent to the pipeline director and the Records Center on March 1, 2023.

## PRR.CORROSION: Corrosion Control

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

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

Assets Covered 90887

Result Notes Ryan Van Gordon is the supervisor for NW Natural Gas for Oregon and Washington. NACE CP2 Exp 2/8/2024.

The unit operator individual performing CTs for the Gorge unit is John Mours (DOQ-20001 Rectifier exp 11/13/2023) and (Isolation DOQ-20101 Measuring Electrical Values 11/13/2023)

15. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c))

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

Assets Covered 90887

Result Notes There are no AC mitigation assets and no bonds critical or non-critical in this unit.

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

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

Assets Covered 90887

Result Notes W/O 3635882 - Existing coating was marked as "Coat" Note, On this work order, CP readings were taken close to the pipe to consider IR drop.

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

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

Assets Covered 90887

Result Notes The document provided, WUTC\_NWN\_The\_Dalles\_CP\_Annual\_Sites\_Inspections\_2020-2023, was reviewed. There were no issues.

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

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

Assets Covered 90887

Result Notes Records from 2020-2023 were reviewed. There were no issues. They are all enclosed in this inspection under the attachments.

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

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

Assets Covered 90887

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No bonds critical or non critical in this unit.

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

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

Assets Covered 90887

Result Notes Deficiencies from 2020 reviewed were from a CIS work order on March 12, 2020 and March 17, 2020. Ultimately resolved as no issue.

White Salmon - 2022 work order reviewed was to install test leads. This was also reviewed in the IA test lead maintenance question.

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

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

Assets Covered 90887

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. None

22. Question Result, ID, References NA, FS.FG.CASINGTESTLEAD.R,

Question Text *Do records indicate that all casings without vents installed after September 5, 1992 had separate test lead wires installed?*

Assets Covered 90887

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

23. Question Result, ID, References Sat, FS.FG.CASINGSEALS.R,

Question Text *Do records indicate that mains and service lines installed in casing or conduit are sealed at the ends as required?*

Assets Covered 90887

Result Notes FOM - Field Operation manual procedure and these are checked during QA inspections by the operator and noted on field forms.

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

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

Assets Covered 90887

Result Notes Casing records reviewed. Report produced did not have foreign line readings. This is investigated if there is an issue with low readings at upstream flanges.

25. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.R,

Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*

Assets Covered 90887

Result Notes Casing inspections reviewed for 2020-2023 (4 years) no issues. They are all enclosed in this inspection under the attachments.

26. Question Result, ID, References Sat, TD.CP.MONITOR.TESTSTATION.R, 192.469

Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*

Assets Covered 90887

Result Notes Several maps with test station locations reviewed for Klickitat, N Bonneville, White Salmon, and Carson.

27. Question Result, ID, References Sat, TD.CP.MONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))

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

Assets Covered 90887

Result Notes I reviewed a Test lead CP problem report that ended up being a non-issue.

28. Question Result, ID, References NA, TD.CP.MONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))

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

Assets Covered 90887

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No interference currents that are being mitigated in this unit.

29. Question Result, ID, References Sat, TD.ICP.CORRGAS.R, 192.491(c) (192.475(a))

Question Text *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*

Assets Covered 90887

Result Notes This is contained in the Pipe Inspection Report. This contains an evaluation portion to be completed if the pipe is removed. No liquid "drips" are in this unit.

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

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

Assets Covered 90887

Result Notes Riser stop IC record reviewed. Work order 03663241 (No visible corrosion). Work order 03631698 also had no internal corrosion.

31. Question Result, ID, References NA, TD.ICP.CORRGASACTION.R, 192.491(c) (192.477)

Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*

Assets Covered 90887

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

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

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

Assets Covered 90887

Result Notes This is performed during the leak surveys at the plat level and the operator is using exception reporting. Plat 411175 for the level 3 corrosion to show that all services were reviewed. Reviewed remediation records. Leak survey are personnel to check for Atmospheric Corrosion. F1 procedures "Guidelines for Visually Inspecting Pipeline Locations" has notes to check for corrosion. Remediation is classified after the corrosion reaches level 2 per FOM inspecting atmospheric corrosion. OQ 220-01 is the covered task number.

For plat 115097, 3 services were reviewed in IQ Geo.

Plat: 1-004-147

Bingen, WA

5/26/2021 IQGeo Walking - equipment id [9101937013] [8211934003] by Vincent Paulson

Vincent Paulson, 5/26/2022 at E Stueben and another at 218 E Jefferson.

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

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

Assets Covered 90887

Result Notes Job number 03615007 East Jewit and Vine, White Salmon 6/3/2020 coating used is 1" FBE with wax tape joints. This was on a standard construction completion form.

Job number 03658477 98 School Dr 10/18/2021 coating used was wax. (Fitting)

34. Question Result, ID, References NA, TD.ICP.EVALUATE.R, 192.491(c) (192.487)

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

Assets Covered 90887

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

35. Question Result, ID, References NA, AR.RCOM.REPAIR.R, 192.491(c) (192.487, 192.489)

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

Assets Covered 90887

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

## PRR.PT: Pressure Test

36. Question Result, ID, References Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.517(a) (192.507(a), 192.507(b), 192.507(c))

Question Text Do records indicate that pressure testing is conducted in accordance with 192.507?

Assets Covered 90887

Result Notes WO 03630331 North Bonneville Gate Test ID 2543 1/29/2021 TP min is 600 max 800 for an MAOP 400 in a Class 3 Gauge ID 804595 exp 2/5/2021

WO 03677436 Dallesport. Hwy 197 and Dow Class 3 TP Min 600 MAOP 250 1 hour test on at 10:00-11:00 5/10/2022 and Gauge ID 257874 exp 08/09/2022

37. Question Result, ID, References Sat, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.517(b) (192.509(a), 192.509(b))



Question Text *Do records indicate that pressure testing is conducted in accordance with 192.509(a) (except for service lines and plastic pipelines)?*

Assets Covered 90887

Result Notes 345 W Jewett 03673394 TP at 109 psig 12/15/21 Steel FBE Gauge ID 1215 60 min test exp 9/1/2022

Multiple tests 4' 4" PM 03659540 reviewed X-52 .237 WT Tested 8-14-2021 3-4pm test Passed Yes Gauge 556 exp (Loy gauge - replaced each year) MAOP 60 Tested at 100.

38. Question Result, ID, References Sat, DC.PT.SERVICELINE.R, 192.517(b) (192.511(a), 192.511(b), 192.511(c))

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.511?*

Assets Covered 90887

Result Notes 98 School Drive Rd, Klickitat 6 feet replaced, air, Tp 106 psig, 2 hour test, Gauge ID # 60 exp 10/18/2021 Completed by TWD.

1/2 poly 7/28/2022 323 E Stueben St Unit# Studio Test duration 11 min TP 108 psig Air EFV 475 Completed by TWD. Gauge ID # 60 exp 10/18/2021

39. Question Result, ID, References Sat, DC.PT.PRESSTESTPLASTIC.R, 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.513?*

Assets Covered 90887

Result Notes The pressure tests reviewed met the following requirements.

(b) The test procedure must ensure discovery of all potentially hazardous leaks in the segment being tested.

(c) The test pressure must be at least 150% of the maximum operating pressure or 50 psi (345 kPa) gauge, whichever is greater. However, the maximum test pressure may not be more than 2.5 times the pressure determined under § 192.121 at a temperature not less than the pipe temperature during the test.

(d) During the test, the temperature of thermoplastic material may not be more than 100 °F (38 °C), or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater.

## PRR.UPRATE: Uprating

40. Question Result, ID, References NA, MO.GOUPRATE.MAOPINCREASE.R, 192.553(a) (192.553(b), 192.553(c))

Question Text *Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553?*

Assets Covered 90887

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

41. Question Result, ID, References NA, MO.GOUPRATE.MAOPINCREASELIMIT.R, 192.553(b) (192.553(c), 192.553(d), 192.557(a))

Question Text *Do records indicate that increases in MAOP are limited in accordance with 192.619 and 192.621?*

Assets Covered 90887

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

42. Question Result, ID, References NA, MO.GOUPRATE.MAOPINCREASEPREP.R, 192.553(b) (192.553(c), 192.553(a), 192.557(b), 192.557(c))

Question Text *Do records indicate that increases in MAOP were preceded by the actions specified in 192.557?*

Assets Covered 90887

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

## PRR.OM: Operations And Maintenance

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



Question Text *Have annual reviews of the written procedures or processes in the manual been conducted as required?*

Assets Covered 90887

Result Notes Annual reviews with the SP for procedures for 2020-2022 were reviewed and contained review signatures.

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

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

Assets Covered 90887

Result Notes IQ GEO is now on tablets and if there is connectivity issues there are printed procedures available.

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

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

Assets Covered 90887

Result Notes 2020 Crew inspection 7/6/2020 performed by the QA inspector with Inspection 28675. White Salmon.

2021 Construction Inspection ID 33263 September 9, 2021. There was follow-up needed for stationing on the casing. QA follow-up reviewed.

46. Question Result, ID, References Sat, EP.ERG.POSTEVTNREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

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

Assets Covered 90887

Result Notes There is an emergency review committee and an incident review committee. Damage reports are also QAed. A QA inspection report for a odor near a meter was reviewed 5/26/2021.

A whole company report was reviewed and it showed metrics Avg/High/Low of the QA review emergency response evaluations. No issues noted.

47. Question Result, ID, References Sat, EP.ERG.TRAINING.R, 192.605(a) (192.615(b)(2))

Question Text *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?*

Assets Covered 90887

Result Notes Operating personnel have initial training and then refreshers every 3 years. The Dalles/Gorge unit ER training was reviewed for 2020-2022. The refresher training (3yr interval) had not passed when the report was queried for this inspection. I also reviewed ER FR OQs.

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

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*

Assets Covered 90887

Result Notes 2020-2023 combined public official mailing list was reviewed. Fire and police current mailing lists reviewed for July 2023.

Mailers to FR and police went out June 2023. Mailers to police reviewed for July 27, 2022. Mailers reviewed for FRs on June 15, 2022.

The Culver Company sends out the physical mailings and postings.

49. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: MISCTOPICS.PUBAWARE)

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

Assets Covered 90887

Result Notes The ROW and multi-dwelling, and commercials are multi-lingual. A campaign from 2021 and 2022 was performed and it contained metrics and post engagements which were reviewed.

50. Question Result, ID, [Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616\(c\) \(API RP 1162 Section 8.4\)](#) (also presented in: References [MISCTOPICS.PUBAWARE](#))  
 Question Text *Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?*  
 Assets Covered [90887](#)  
 Result Notes [A public effectiveness evaluation is performed every year. The detail for this includes in Section 8.2 \(Process Evaluation\) The dates for the evaluation including the statistics and trends are contained in the ECM. I reviewed those for the past 3 years. March 31, 2021 was the evaluation date for 2020. In 2021, it was conducted on April 14, 2022. On May 11, 2023, the review was conducted for 2022.](#)
51. Question Result, ID, [NA, PD.PA.MSTRMETER.R, 192.616\(j\) \(192.616\(h\), API RP 1162 Section 2.7 \(Step 12\), API RP 1162 Section 8.5\)](#) (also presented in: [MISCTOPICS.PUBAWARE](#))  
 Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*  
 Assets Covered [90887](#)  
 Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)
52. Question Result, ID, [NA, EP.ERG.INCIDENTANALYSIS.R, 192.605\(a\) \(192.617\)](#)  
 Question Text *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?*  
 Assets Covered [90887](#)  
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
53. Question Result, ID, [Sat, PD.DP.PDPROGRAM.R, 192.614\(c\)](#)  
 Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*  
 Assets Covered [90887](#)  
 Result Notes [This is in SP 605. Reviewed for 3/16/2022. The 2021 listing of the excavators was reviewed. It contained 30730 records. For 2022, the list contained 33039 records, but this was a Oregon and Washington combined list.](#)  
  
[Documentation reviewed for the Dalles/Gorge for 2020-2023.](#)  
  
[Requested One Call locates for the 2 day limit review. Locate tickets for 9/29/2020 completed on 10/1/2020 with work to begin on 10/2/2020 for 125 Palos Verdes, White Salmon. In 2021, 3/9/2021 another ticket in White Salmon was reviewed. Work was to begin on 3/12/2021. Locate completed on 3/10/2021. On 3/14/2022 a ticket was created, work was to begin on 3/17/2022, and the ticket was completed on 3/15/2022 for 503 Sol Vista, White Salmon.](#)
54. Question Result, ID, [Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.619\(a\) \(192.619\(b\), 192.621\(a\), 192.621\(b\), 192.623\(a\), 192.623\(b\)\)](#)  
 Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*  
 Assets Covered [90887](#)  
 Result Notes [MAOP for Class A and B Distribution Systems procedure doc was reviewed. No grandfather clause for MAOP is used for these systems. Design records reviewed for 11/06/20. W/O #03630331 was reviewed for design limitations.](#)
55. Question Result, ID, [Sat, MO.GOODOR.ODORIZE.R, 192.709\(c\) \(192.625\(a\), 192.625\(b\), 192.625\(c\), 192.625\(d\), 192.625\(e\), 192.625\(f\)\)](#)  
 Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*  
 Assets Covered [90887](#)  
 Result Notes [NWN ID: 10123 Plat: 4-005-178 Klickitat](#)  
  
[Klickitat, WA](#)  
  
[2/8/2023 GEOFFREY S DIVISH OTHER 0.1400](#)

Cals for "DETEX D01710" unit requested cals exp 7/10/2024 OQ is a 3 year exp 6/27/2024

1/10/2023 GEOFFREY S DIVISH OTHER 0.0900 OQ records requested and reviewed

Cals for "DETEX D01710" unit requested cals exp 7/10/2024 OQ is a 3 year exp 6/27/2024

NWN ID: 10097 Plat: 1-014-097 66 CBD MALL North

Bonneville, WA

2/3/2023 Albert Tiedemann 1068 0.1200 OQ records requested and provided. Calibrations requested and provided. Albert Tiedemann DOQ-70001 Odorant Sampling exp 6/27/2024

7/8/2020 CHAD O KOHLER 1710 0.2300 OQ records requested and provided. Calibrations requested and provided Chad Kohler DOQ-70001 Odorant Sampling exp 3/12/2022

56. Question Result, ID, References NA, MO.RW.DISTPATROL.R, 192.603(b) (192.721(a), 192.721(b))

Question Text *Do records indicate distribution patrolling was conducted as required?*

Assets Covered 90887

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No areas of soil subsidence or anticipated movement per the operator.

57. Question Result, ID, References NA, MO.RW.LEAKFOLLOW.R,

Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*

Assets Covered 90887

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No residual gas for this inspection timeframe per Lisa. Leak work orders are in SAP. WO 3606695 3/5/2020 Damage repair completed Travis Davis by replacing 1' of 1" poly. CGI number on the form. WO 3652621 Started off as a C Leak 4/21/2020. Rechecked 5/14/2021 Upgraded to a B leak. Less than 5 months to eliminate the leak. Repaired October 2020.

58. Question Result, ID, References NA, MO.RW.DOWNGRADELEAKREPAIR.R,

Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*

Assets Covered 90887

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No downgraded leaks during this inspection timeframe.

59. Question Result, ID, References Sat, MO.RW.LEAKREPAIRTIME.R,

Question Text *Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?*

Assets Covered 90887

Result Notes WO 3652621 reviewed. Leak Started as a C leak, rechecked annually, upgraded to a B leak, and then repaired.

60. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.R,

Question Text *Have gas leak records been prepared and maintained as required?*

Assets Covered 90887

Result Notes Requested W/O 3658477 Initial inspection and C Repair/Replacement.

Followed on the valve installation year for W Humbolt It was 1/1/1963.

W Humbolt and Ash St Initial 5/27/21 and 7/12/2021 was the recheck.

61. Question Result, ID, References Sat, MO.RW.DISTPATROLLEAKAGE.R, 192.603(b) (192.723(a), 192.723(b))

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

Assets Covered 90887

Result Notes 9/27/2022 Joel Shelton equipment 8211933005 (self test report 9/27/2022) and OQs Patrolling exp 5/10/2024

5/17/2021 Vincent Paulson, equipment was the same as previously requested Cals requested 5/26/2021 DPIR [9101937013] RMLD [8211934003] cals shown.

Follow-up process on "Cant Get Ins." For both the business districts 2022-2023 HOS Site CGIs (1 year) The contractor tries 3x before they return it back to NWN. Then they try 2x. After that, it goes to the Energy Integrity Group at NWN, then a couple letters and email goes out. If the customer does not provide access, the service gets cut and capped.

Leak survey maps requested and reviewed for:

NWN ID: 1015175-09

Plat: 1-015-175

Dallesport WA

5/27/2021 IQGeo Walking [9202014004] [8212049004] Michelle Smith, Michelle Smith,

5/7/2018 b3f Walking [BTR-402940] Michelle Smith

2/25/2015 b1t Walking [BTR-402345] Robert Novy

62. Question Result, ID, References NA, MO.RW.CASINGLEAKSURVEY.R,

Question Text *Do records indicate shorted casings were leak surveyed as required?*

Assets Covered 90887

Result Notes No such event occurred, or condition existed, in the scope of inspection review. No shorted casings that needed leak surveys.

63. Question Result, ID, References Sat, MO.RW.MARKERSURVEY.R,

Question Text *Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?*

Assets Covered 90887

Result Notes Operator provided by Plat and by Crossing. Bridge markers are inspected under bridge inspections and were suitable.

64. Question Result, ID, References NA, MO.RW.MARKERREPLACE.R,

Question Text *Do records indicate that damaged or missing markers were replaced within forty-five days of discovery?*

Assets Covered 90887

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

65. Question Result, ID, References Sat, AR.RMP.TESTREINSTATE.R, 192.603(b) (192.725(a), 192.725(b))

Question Text *From the review of records, did the operator properly test disconnected service lines?*

Assets Covered 90887

Result Notes There were 2 during this time frame as indicated on the standard constriction completion report.

125 Palos Verdes, White Salmon Pressure test 10/05/2020 = Tested OK

435 NW Strawberry Mtn Ln Unit #New 10/06/2020 EFV Lyall 1" 775 10 min PT 118psig

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

- Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?*
- Assets Covered 90887
- Result Notes Records were reviewed for 2020 to 2023 (partial year) and are available in the attachments. No issues or exceedances noted.
67. Question Result, ID, References Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))
- Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?*
- Assets Covered 90887
- Result Notes Records were reviewed for 2020 to 2023 (partial year) and are available in the attachments. No issues or exceedances noted.
68. Question Result, ID, References Sat, DC.METERREGSVC.REGTEST.R,
- Question Text *Do records indicate that service regulators have been installed, operated, maintained, tested during initial turn-on and tested when customers experience pressure problems?*
- Assets Covered 90887
- Result Notes Reviewed a meter addition report in Bingen of 6.5" WC on 6/2/2020. On 5/20/2021, The operator set the meter to 6.5" WC in another location within the same city.
- Pressure problems. NWN produced a couple instances. One was a meter change on 8/62020 at 915 Halo Chako North, Bonneville and the operator set the regulator to 6.5" WC. A pressure problem report was reviewed for 1/5/2021 at 670 NE Estes St. It was a pressure check initiated by the customer after some gas work was performed by a contractor in order to verify the correct settings.
69. Question Result, ID, References Sat, MO.GM.DISTVALVEINSPECT.R, 192.603(b) (192.747(a), 192.747(b))
- Question Text *Do records indicate proper inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?*
- Assets Covered 90887
- Result Notes Valve testing was reviewed in the document WUTC\_NWN\_The\_Dalles\_Key\_Operating\_Valve\_Inspections\_2020-2023. It is contained within the attachments in IA and SharePoint. No issues noted.
70. Question Result, ID, References NA, FS.FG.VAULTINSPECT.R, 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d))
- Question Text *Do records document the adequacy of inspections of all vaults having an internal volume =200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?*
- Assets Covered 90887
- Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
71. Question Result, ID, References Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))
- Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*
- Assets Covered 90887
- Result Notes None during this timeframe for this district. The operator did show one from Camas from a QA inspection, but just for an example.
72. Question Result, ID, References Sat, DC.DPC.FLANGE.R, 192.147(a) (192.147(b), 192.147(c))
- Question Text *Do records indicate flanges and flange accessories meet the requirements of 192.147?*
- Assets Covered 90887
- Result Notes Procedures for flanges include MSS-SP44 and AMSE 16.8S. Examples of records produced for W/O 3630331.
73. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225(a) (192.225(b))
- Question Text *Do records indicate weld procedures are being qualified in accordance with 192.225?*

Assets Covered 90887

Result Notes No changes since 2018. No new procedures used in this unit. This was reviewed with NWN's welding inspector, Cory Fisher, to answer any additional questions about time of travel, bevel, filler type, .etc.

74. Question Result, ID, References Sat, DC.WELDPROCEDURE.ESSENTIAL.R,

Question Text Do records indicate that essential variables were measured and documented when welders and procedures were qualified?

Assets Covered 90887

Result Notes North Bonneville and Dallesport welders qualifications with essential variables documented requested and provided. Cory Fisher was the welder on the North Bonneville qualified 1-3-2020 The Dallesport welder was Josh Henstein (reviewed a coaching report) Qualified 1/4/2022 and the XX18 test was on 1/7/2022.

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

Question Text Do records indicate adequate qualification of welders?

Assets Covered 90887

Result Notes North Bonneville and Dallesport welders qualifications with essential variables documented requested and provided. Cory Fisher was the welder on the North Bonneville qualified 1-3-2020 The Dallesport welder was Josh Henstein (reviewed a coaching report) Qualified 1/4/2022 and the XX18 test was on 1/7/2022.

76. Question Result, ID, References NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))

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

Assets Covered 90887

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

77. Question Result, ID, References Sat, DC.CO.PLASTICJOINTPROCEDURE.R, 192.273(b) (192.283(a), 192.283(b), 192.283(c))

Question Text Have plastic pipe joining procedures been qualified in accordance with 192.283?

Assets Covered 90887

Result Notes TR-33 used for plastic joining.

78. Question Result, ID, References Sat, DC.CO.PLASTICJOINTQUAL.R, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), 192.807(b))

Question Text Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?

Assets Covered 90887

Result Notes Travis Davis 6/2021 Butt fusion and Electrofusion OQs Both exp 5/14/2021 (NTE 15 months)

James Gibson 6/2021 Butt Fusion and Electrofusion OQs Both exp 5/22/2021 (NTE 15 months)

79. Question Result, ID, References Sat, DC.CO.PLASTICJOINTINSR.R, 192.287 (192.807(a), 192.807(b))

Question Text Do records indicate persons inspecting the making of plastic pipe joints have been qualified?

Assets Covered 90887

Result Notes QA personnel that inspect joints have been qualified and OQs were reviewed.

80. Question Result, ID, References Sat, DC.CO.PLASTICPIPESEP.R,

Question Text Do records indicate minimum separation requirements are met for plastic pipelines?

Assets Covered 90887

Result Notes Standard Construction Completion Report. Depth/Separation Information Separation = "Yes" on the form This location was 100 North Main St Klickitat, Wa. There was 1 variance report where the operator maintained 6" separation on the power 4" on other utilities that were not as critical as the electric line.

81. Question Result, ID, References Sat, MO.GM.EQUIPPLASTICJOINT.R, 192.603(b) (192.756)

Question Text Do records indicate equipment used in joining plastic pipe by heat fusion was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?

Assets Covered 90887



Result Notes Checked calibration records from the "tool room" as the operator identifies it. A Tracstar 28 C845548 was serviced on 8/25/2020.

82. Question Result, ID, References NA, MO.GM.MOVEANDLOWER.R,

Question Text Do records indicate that a study was prepared before moving or lowering a steel gas pipeline as required?

Assets Covered 90887

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

83. Question Result, ID, References NA, MO.GM.MOVEANDLOWERSURVEY.R,

Question Text Do records indicate that a leak survey was conducted not more than thirty days after moving and/or lowering a metallic pipeline?

Assets Covered 90887

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

84. Question Result, ID, References Sat, MO.RW.MARKERSMAPSDRAW.R,

Question Text Are records sufficient to indicate class location and other areas where pipeline markers are required?

Assets Covered 90887

Result Notes Maps are sufficient, but this is a distribution inspection and there are not any transmission lines in this unit. NWN only has one transmission line in Camas and that is in it's own inspection unit.

## FR.FIELDPIPE: Pipeline Inspection (Field)

85. Question Result, ID, References NA, DC.MA.MARKING.O, 192.63(a) (192.63(b), 192.63(c), 192.63(d))

Question Text Are pipe, valves, and fittings properly marked for identification in accordance with the requirements of 192.63?

Assets Covered 90887

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

86. Question Result, ID, References NA, DC.DPC.FLANGE.O, 192.141 (192.147(a), 192.147(b), 192.147(c))

Question Text Do flanges and flange accessories meet the requirements of 192.147?

Assets Covered 90887

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

87. Question Result, ID, References NA, DC.DPC.GDVALVEPLACEMENT.O, 192.141 (192.181(a), 192.181(b), 192.181(c))

Question Text Are distribution line valves being installed as required of 192.181?

Assets Covered 90887

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

88. Question Result, ID, References Sat, DC.CO.PLASTICPIPEPROC.O,

Question Text Is plastic pipe handled, stored and installed in accordance with manufacturer's recommendations, including maximum ultraviolet exposure?

Assets Covered 90887

Result Notes Plastic pipe storage was inspected at the Dalles Service Center and there were no issues. See Form "R" in IA attachments for more detail.

89. Question Result, ID, References NA, DC.CO.PLASTICPIPESEP.O,

Question Text Are plastic pipelines installed with the minimum separation from other utilities as required?

Assets Covered 90887

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

90. Question Result, ID, References NA, DC.CO.PLASTICBACKFILL.O,



Question Text *Is plastic pipe buried in essentially rock-free material or material recommended by the pipe manufacturer?*

Assets Covered 90887

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

91. Question Result, ID, NA, DC.CO.PLASTICSQUEEZING.O,  
References

Question Text *Verify that the operator has limits in place for squeezing plastic pipe.*

Assets Covered 90887

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

92. Question Result, ID, NA, DC.METERREGSVC.CUSTOMETERREGLOC.O, 192.351 (192.353(a), 192.353(b), 192.353(c),  
References 192.353(d))

Question Text *Are meters and service regulators being located consistent with the requirements of 192.353?*

Assets Covered 90887

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

93. Question Result, ID, Sat, DC.METERREGSVC.CUSTOMETERREGPROT.O, 192.351 (192.355(a), 192.355(b), 192.355(c))  
References

Question Text *Are meters and service regulators being protected from damage consistent with the requirements of 192.355?*

Assets Covered 90887

Result Notes Meters and regulators did not have any protection or location issues observed during this inspection.

94. Question Result, ID, NA, DC.METERREGSVC.CUSTOMETERREGINSTALL.O, 192.351 (192.357(a), 192.357(b), 192.357(c),  
References 192.357(d))

Question Text *Based on the meters and service regulators observed being installed, are the installations consistent with the requirements of §192.357?*

Assets Covered 90887

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

95. Question Result, ID, NA, DC.METERREGSVC.CUSTOMETEROPPRESS.O, 192.351 (192.359(a), 192.359(b), 192.359(c))  
References

Question Text *Are customer meter operating pressures consistent with the requirements of 192.359?*

Assets Covered 90887

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

96. Question Result, ID, NA, DC.METERREGSVC.SVCLINEINSTALL.O, 192.351 (192.361(a), 192.361(b), 192.361(c), 192.361(d),  
References 192.361(e), 192.361(f), 192.361(g))

Question Text *Are customer service lines being installed consistent with the requirements of 192.361?*

Assets Covered 90887

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

97. Question Result, ID, NA, DC.METERREGSVC.SVCLINEVLVLOCATEREQT.O, 192.351 (192.363(a), 192.363(b), 192.363(c),  
References 192.365(a), 192.365(b), 192.365(c))

Question Text *Are customer service line valves being installed meeting the valve and locations requirements of 192.363 and 192.365?*

Assets Covered 90887

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

98. Question Result, ID, NA, DC.METERREGSVC.SVCLINECONNECT.O, 192.351 (192.367(a), 192.367(b), 192.369(a), 192.369(b))  
References

Question Text *Are customer service lines being installed with connections meeting the requirements of 192.367 and 192.369?*

Assets Covered 90887

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

99. Question Result, ID, NA, DC.METERREGSVC.SVCLINEMATERIAL.O, 192.351 (192.371, 192.373(a), 192.373(b), 192.373(c),  
References 192.375(a), 192.375(b), 192.377)

Question Text *Are customer service lines being installed constructed appropriately for the types of materials used?*

Assets Covered 90887

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

100. Question Result, ID, NA, DC.METERREGSVC.NEWSVCLINENOTUSED.O, 192.351 (192.379, 192.379(a), 192.379(b),  
References 192.379(c))

Question Text Are new customer service lines not in use configured in accordance with the requirements of 192.379?

Assets Covered 90887

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

101. Question Result, ID, NA, DC.METERREGSVC.EXCSFLOWVLVLOCATE.O, 192.351 (192.381(c), 192.381(d), 192.381(e))  
References

Question Text Are service line excess flow valves located and identified in accordance with the requirements of 192.381?

Assets Covered 90887

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

102. Question Result, ID, NA, DC.METERREGSVC.REGTEST.O,  
References

Question Text Are service regulators operated, maintained, installed and tested during the initial turn-on in accordance with manufacturer's recommendations and WAC requirements?

Assets Covered 90887

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

103. Question Result, ID, NA, DC.WELDPROCEDURE.ONSITE.O,  
References

Question Text Are qualified written welding procedures located onsite where welding is being performed?

Assets Covered 90887

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

104. Question Result, ID, NA, DC.WELDPROCEDURE.ESSENTIAL.O,  
References

Question Text Does the operator document essential variables when qualifying welders and weld procedures?

Assets Covered 90887

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

105. Question Result, ID, NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(d)  
References

Question Text Is external protective coating being protected from damage that could result from adverse ditch conditions or supporting blocks?

Assets Covered 90887

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

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

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

Assets Covered 90887

Result Notes All readings on the impressed current CP system were performed with "Instant Offs" using the polarized - 850mV threshold. See attached Form "R" for actual readings.

107. Question Result, ID, Concern, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)  
References

Question Text Do field observations confirm impressed current sources are properly maintained and are functioning properly?

Assets Covered 90887

Result Issue Summary **Finding(s):**

In Carson, Wa there was a cathodic protection test at an annual test site that was unable to achieve a polarized "instant off" reading of at least -850mV using a Cu/CuSO4 reference cell during our field portion. It was at the following location.

122 Henryetta Ln, Carson, Wa. -1059mV CSE PSP (on) -667mV CSE PSP (off)

**Finding(s):**

In Carson, Wa there was a cathodic protection test at an annual test site that was unable to achieve a polarized "instant off" reading of at least -850mV using a Cu/CuSO4 reference cell during our field portion. It was at the following location.

1201 Smith Beckon Rd Carson, Wa. -1008mV CSE PSP (on) -613mV CSE PSP (off)

**Result Notes** In Carson, Wa there were two test station readings on the same impressed current system that were not able to achieve a polarized "instant off" reading of -850mV using a CU/CuSO4 reference cell during our field portion. There was no time to perform a depolarization test on-site to check for the 100mV shift. I discussed potential reasons for this abnormal operating condition with the corrosion control supervisor and it was mentioned that it may be a potential ground bed issue at the rectifier.

	-1059mV CSE PSP (on)	
122 Henryetta Ln, Carson, Wa.	-667mV CSE PSP (off)	Currently an annual test site per the operator and is not achieving adequate CP. An AOC letter to be drafted.
	-1008mV CSE PSP (on)	
1201 Smith Beckon Rd Carson, Wa.	-613mV CSE PSP (off)	Not achieving adequate CP. An AOC letter to be drafted.

108. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered 90887

Result Notes No issues in the field. See attached Form "R" for actual readings.

109. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.O,

Question Text *Are casings electrically isolated from the pipeline?*

Assets Covered 90887

Result Notes Casings had more than 200mV deviation from the carrier pipe (NWN uses 200mV rather than 100mV)

110. Question Result, ID, References Sat, TD.CP.MONITOR.TESTSTATION.O, 192.469

Question Text *Do cathodically protected pipelines have a sufficient number of test stations?*

Assets Covered 90887

Result Notes There was a sufficient number of test stations in the areas visited during the field portion.

111. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEAD.O, 192.471(a)**  
 Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*  
 Assets Covered **90887**  
 Result Notes **Test leads are installed on pipelines in this unit in areas needed for monitoring CP.**
112. Question Result, ID, References **NA, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a)**  
 Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*  
 Assets Covered **90887**  
 Result Notes **No such activity/condition was observed during the inspection.**
113. Question Result, ID, References **NA, TD.ICP.CORRGASPRVNT.O, 192.475(a)**  
 Question Text *If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented?*  
 Assets Covered **90887**  
 Result Notes **No such activity/condition was observed during the inspection.**  
  
**The product that NWN transports comes from WNP in this unit and is monitored for presence of H2S and H2O. No drips in NWN's distribution system for WA.**
114. Question Result, ID, References **NA, TD.ICP.PIPEBOTTLE.O, 192.475(c)**  
 Question Text *Is gas containing more than 0.25 grain of hydrogen sulfide per 100 standard cubic feet (5.8 milligrams/m3) at standard conditions (4 parts per million) being stored in pipe-type or bottle-type holders?*  
 Assets Covered **90887**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
115. Question Result, ID, References **NA, TD.ICP.CORRGASACTION.O, 192.477**  
 Question Text *Are adequate actions taken when corrosive gas is being transported by pipeline?*  
 Assets Covered **90887**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
116. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))**  
 Question Text *Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?*  
 Assets Covered **90887**  
 Result Notes **Pipe needing protection from atmospheric corrosion was inspected at supports and the soil to air interface. There were no issues.**
117. Question Result, ID, References **Sat, PD.DP.ONECALL.O, 192.614(c)(3)**  
 Question Text *Observe operator process a "One Call" ticket.*  
 Assets Covered **90887**  
 Result Notes **I observed an operator perform a locate. It is the field portion of processing a locate ticket. I reviewed the workflow as the ticket gets routed from HQ to the local unit and the processing time was suitable.**
118. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.O, 192.625(a) (192.625(c), 192.625(d), 192.625(e), 192.625(f))**  
 Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*  
 Assets Covered **90887**  
 Result Notes **Odorant was checked and was suitable. Please see the attached field form for values collected.**
119. Question Result, ID, References **NA, MO.GO.PURGE.O, 192.629(a) (192.629(b))**  
 Question Text *Are lines being purged in accordance with 192.629?*

Assets Covered 90887

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

120. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-References 5, CGA Best Practices, v4.0, Practice 4-20)

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

Assets Covered 90887

Result Notes Markers observed were placed suitably and had the correct contact information.

121. Question Result, ID, NA, MO.RW.ROWMARKERABOVE.O, 192.707(c) (CGA Best Practices, v4.0, Practice 2-5, CGA BestReferences Practices, v4.0, Practice 4-20)

Question Text *Are line markers placed and maintained as required for above ground pipelines?*

Assets Covered 90887

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No spans or other above grade pipelines.

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

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

Assets Covered 90887

Result Notes Regulator and overpressure protection checks were performed and there were no issues. Please review attached field notes.

123. Question Result, ID, NA, MO.GMOPP.PRESSREGMETER.O, 192.741(a) (192.741(b), 192.741(c))References

Question Text *Are telemetering or recording gauges properly utilized as required for distribution systems?*

Assets Covered 90887

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

124. Question Result, ID, NA, MO.GMOPP.MULTIPRESSREG.O,References

Question Text *Are regulator stations installed in a manner to provide protection between regulator stages?*

Assets Covered 90887

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No facilities that had interstage pressure runs observed in this unit inspection.

125. Question Result, ID, Sat, MO.GM.DISTVALVEINSPECT.O, 192.747(a) (192.747(b))References

Question Text *Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?*

Assets Covered 90887

Result Notes Several valves were greased and operated. See field notes for site list. No issues.

126. Question Result, ID, NA, FS.FG.CASING.O,References

Question Text *Are all casings bare steel and do they have test leads installed on new casings without vents?*

Assets Covered 90887

Result Notes No such activity/condition was observed during the inspection. No casings observed being installed during the field portion so I cannot confirm the lack of coating on the casing. However, there were no casings without vents and test leads in this unit.

127. Question Result, ID, NA, FS.FG.CASESEAL.O,References

Question Text *Does the operator seal both ends of casings/conduits for mains and transmission lines and seal the end nearest the building for service lines?*

Assets Covered 90887

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

128. Question Result, ID, NA, FS.FG.VAULTINSPECT.O, 192.749(a) (192.749(b), 192.749(c), 192.749(d))References

Question Text *Are inspections of selected vaults with internal volume =200 cubic feet (5.66 cubic meters) housing pressure regulating/limiting equipment adequate?*

Assets Covered 90887

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

129. Question Result, ID, References NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered 90887

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

130. Question Result, ID, References NA, DC.CO.PLASTICWEAKLINK.O, 192.329(b) (192.376(b), 192.303)

Question Text *Do field observations confirm plastic lines and plastic service lines are being installed using a "weak link" (as defined by §192.3) to ensure the pipeline will not be damaged by any excessive forces during the pulling process?*

Assets Covered 90887

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

131. Question Result, ID, References NA, MO.GM.EQUIPPLASTICJOINT.O, 192.756

Question Text *Is proper maintenance being performed on equipment used in joining plastic pipe by heat fusion in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*

Assets Covered 90887

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

132. Question Result, ID, References Sat, MO.GM.ONSITEPROCS.O,

Question Text *Are procedures applicable to the work being done located onsite where the work is being done?*

Assets Covered 90887

Result Notes Procedures were available at all times while on site.

133. Question Result, ID, References NA, AR.PTI.PLASTICPRESSURETEST.O,

Question Text *Is plastic pipe installed and backfilled prior to pressure testing?*

Assets Covered 90887

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

134. Question Result, ID, References Sat, AR.PTI.EQUIPCALIB.O,

Question Text *Is pressure testing equipment calibrated according to calibration schedules and procedures?*

Assets Covered 90887

Result Notes Pressure gauges used for the field portion had calibrations checked and are available for review in the attached field inspection form.

## MISCTOPICS.PROT9: OQ Field Inspection

135. Question Result, ID, References NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))

Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered 90887

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

136. Question Result, ID, References Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered 90887

Result Notes These are available for review in the attached field inspection form, but have been included here per request.

**Albert Tiedemann**

DOQ-70001 Odorant Sampling exp 6/27/2024

**John Goebel**

DOQ-20001 Exp 11-6-24

DOQ-20101 Exp 11-6-24

DOQ-20102 Exp 11-6-24

(Rectifier checks, PSP readings, Electrical Isolation)

**James Gibson** DOQ-83101 Valve Operation.

**Steve Olson** DOQ-83101 Valve Operation.

**Seth Rogan** (Heath) is the new locate contractor. DOQ-13702 – Locating exp 5/30/24

**Caeser Marroquin** DOQ-80004 Inspect and Test Regulators exp 6/29/2024 DOQ-80401 Inspect and Test Reliefs exp 6/29/2024

**Andrew Mogil** DOQ-80004 Inspect and Test Regulators exp 6/26/2024 DOQ-80401 Inspect and Test Reliefs exp 6/26/2024

137. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*

Assets Covered 90887

Result Notes Operator personnel followed procedures for operation and testing. There were no issues.

138. Question Result, ID, References Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered 90887

Result Notes AOCs were verbalized by the operator and discussed while demonstrating task performance.

139. Question Result, ID, References Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered 90887

Result Notes I reviewed CT OQ documentation with the compliance representative and department supervisors before observing the operator perform tasks.

## MISCTOPICS.OPTRQUAL: Operator Qualification

140. Question Result, ID, References Sat, TQ.OQ.OQPLAN.O, 192.805(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability?*

Assets Covered 90887



Result Notes There were no issues or concerns with operation of tasks.

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

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

Assets Covered 90887

Result Notes Records for OQ reviewed for selected covered tasks (CTs) within the unit.

142. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered 90887

Result Notes Records for operator and contractor personnel were reviewed for maintenance and repair tasks.

143. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.O, 192.803

Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*

Assets Covered 90887

Result Notes During the CP testing portion there were two readings on steel services that did not achieve adequate cathodic protection which the operator recognized and began the process to remedy the issue.

## MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

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

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*

Assets Covered 90887

Result Notes 2020-2023 combined public official mailing list was reviewed. Fire and police current mailing lists reviewed for July 2023.

Mailers to FR and police went out June 2023. Mailers to police reviewed for July 27, 2022. Mailers reviewed for FRs on June 15, 2022.

The Culver Company sends out the physical mailings and postings.

145. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: PRR.OM)

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

Assets Covered 90887

Result Notes The ROW and multi-dwelling, and commercials are multi-lingual. A campaign from 2021 and 2022 was performed and it contained metrics and post engagements which were reviewed.

146. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: PRR.OM)

Question Text *Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?*

Assets Covered 90887

Result Notes A public effectiveness evaluation is performed every year. The detail for this includes in Section 8.2 (Process Evaluation) The dates for the evaluation including the statistics and trends are contained in the ECM. I reviewed those for the past 3 years. March 31, 2021 was the evaluation date for 2020. In 2021, it was conducted on April 14, 2022. On May 11, 2023, the review was conducted for 2022.

147. Question Result, ID, References NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) (also presented in: PRR.OM)

Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*

Assets Covered 90887

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

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.