

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 [8798] Nippon TIMP 2024 | Operator(s) NIPPON DYNAWAVE PACKAGING CO., LLC (22515) | Plan Submitted 03/27/2024 |
| Status LOCKED | Lead Lex Vinsel | Plan Approval 04/02/2024 by Dennis Ritter |
| Start Year 2024 | Observer(s) David Cullom, Anthony Dorrrough, Derek Norwood, John Trier, Marina Rathbun, Tom Green, Jason Hoxit | All Activity Start 04/15/2024 |
| System Type GT | Supervisor Dennis Ritter | All Activity End 05/28/2024 |
| Protocol Set ID WA.GT.2024.01 | Director Scott Rukke | Inspection Submitted 06/11/2024 |
| | | Inspection Approval 06/12/2024 by Scott Rukke |

Inspection Summary

Inspection Scope and Summary

Transmission Integrity Management Program (TIMP) Inspection [8798]

From last TIMP and/or last three (3) years.

Facilities visited and Total AFOD

Longview Facility

3401 Industrial Way

PO Box 188

Longview WA 98632

Summary of Significant Findings

Findings: There were no significant findings. The following submittals were late as noted during the inspection. The operator submitted them prior to the end of records review.

01 WAC Contact List (WUTC) Contact List up-to-date within 72-hours

02 WAC Submit Up-to-Date Manuals (Annually or when revised) SEE John T memo on 15Apr24 regarding updates.

Primary Operator contacts and/or participants

*Johnny Lopez, Regulatory Compliance Specialist, Everline,

Everline

920 Cypresswood Drive, Suite 360

Houston TX 77070

Brian Wood, Director of Support Services

Steve Cash, Engineering

Mark Jankowski, Plant Engineering Manager

Andi Jackson, Project Engineer, Energy and Utilities

Operator executive contact and mailing address for any official correspondence

Brian Wood, Director Support Services

3401 Industrial Way

PO Box 188

Longview, Washington 98632

Scope (Assets)

| # | Short Name | Long Name | Asset Type | Asset IDs | Excluded Topics | Planned | Required | Inspected | Total | Required % Complete |
|----|---------------|----------------------|------------|-----------|---|---------|----------|-----------|-------|---------------------|
| 1. | 88971 (1,935) | Nippon Dynawave Pack | unit | 88971 | Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Compressor Stations Offshore GOM OCS Plastic Pipe Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric CDA AMAOP Abandoned | 386 | 386 | 386 | 386 | 100.0% |

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

Plans

| # | Plan Assets | Focus Directives | Involved Groups/Subgroups | Qst Type(s) | Extent | Notes |
|----|---------------|------------------|--|-------------|--------|-------|
| 1. | 88971 (1,935) | -- | TD, AR | P, R, O, S | Detail | -- |
| 2. | 88971 (1,935) | 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. | [8798] TIMP | -- | 04/15/2024 | 05/28/2024 | -- | all planned questions | all assets | all types | 386 | 386 | 386 | 386 | 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 | [8798] TIMP | COMPLETED | 05/25/2024 | [8798] TIMP | 88971 (1,935) |

Results (all values, 386 results)

391 (instead of 386) results are listed due to re-presentation of questions in more than one sub-group.

AR.RCOM: Repair Criteria (O&M)

- Question Result, ID, [Sat, AR.RCOM.NONCOVERED.P, 192.485\(a\) \(192.485\(b\), 192.485\(c\), 192.703\(b\), 192.710, 192.711, 192.713, 192.714\)](#)
Question Text *Does the integrity assessment and maintenance processes include adequate criteria for determining the need for, and timeliness of, pipeline defect repairs in non-covered segments?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [O&M Section 15.3 - Permanent Repairs - General](#)
- Question Result, ID, [NA, AR.RCOM.NONCOVERED.R, 192.485\(a\) \(192.485\(b\), 192.485\(c\), 191.23\(a\)\(1\), 192.703\(b\), 192.710, 192.711, 192.713\)](#)
Question Text *From the review of the results of integrity assessments, did the operator repair conditions that posed a threat to pipeline integrity on Non-Covered segments?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
- Question Result, ID, [NA, AR.RCOM.REMEDIATIONOM.O, 192.485\(a\) \(192.485\(b\), 192.485\(c\), 192.710, 192.711, 192.713\)](#)
Question Text *Is anomaly remediation and documentation of remediation adequate for all segments?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [No such activity/condition was observed during the inspection.](#)
- Question Result, ID, [NA, AR.RCOM.GGREMEDIATION.P, 192.485\(a\) \(192.9\(d\)\(2\), 192.9\(e\)\(1\)\(ii\), 192.453, 192.485\(b\)\)](#)
Question Text *Do maintenance procedures include adequate criteria for determining the need for, and timeliness of, pipeline repairs in gas gathering pipelines?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
- Question Result, ID, [NA, AR.RCOM.GGREMEDIATION.R, 192.485\(a\) \(191.23\(a\)\(1\), 191.23\(b\)\(1\), 192.9\(d\)\(2\), 192.9\(e\)\(1\)\(ii\), 192.453, 192.485\(b\)\)](#)
Question Text *From the review of records, did the operator repair or replace pipe to permanently restore the serviceability of the pipe?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [No such activity/condition was observed during the inspection.](#)
- Question Result, ID, [NA, AR.RCOM.GGREMEDIATION.O, 192.485\(a\) \(192.453, 192.459, 192.485\(b\)\)](#)
Question Text *Is operator's remediation and documentation of remediation adequate?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [No such relevant facilities/equipment existed in the scope of inspection review.](#)

AR.CDA: Confirmatory Direct Assessment

- Question Result, ID, [Sat, AR.CDA.CDACORR.P, 192.933 \(192.917\(e\)\(5\)\)](#)
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using confirmatory direct assessment?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [O&M Section 15.3 - Permanent Repairs - General](#)

8. Question Result, ID, References **NA, AR.CDA.CDACORR.R, 192.933 (192.917(e)(5))**
 Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified by CDA as required?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.EC: External Corrosion Direct Assessment (ECDA)

9. Question Result, ID, References **Sat, AR.EC.ECDAREVQUAL.P, 192.915(a) (192.915(b))**
 Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ECDA assessment results meet appropriate training, experience, and qualification criteria?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Sections 4.1, 12.1**
10. Question Result, ID, References **Sat, AR.EC.ECDAPREASSESS.R, 192.947(g) (192.925(b)(1))**
 Question Text *Do records demonstrate that the ECDA pre-assessment process complied with NACE SP0502-2010 Section 3 and 192.925(b)(1)?*
 Assets Covered **88971 (1,935)**
 Result Notes **Reviewed ECDA records, appear adequate**
11. Question Result, ID, References **Sat, AR.EC.ECDAREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**
 Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct ECDA assessments or review and analyze assessment results are qualified for the tasks they perform?*
 Assets Covered **88971 (1,935)**
 Result Notes **Reviewed ECDA records, appear adequate**
12. Question Result, ID, References **NA, AR.EC.ECDAREVQUAL.O, 192.915(a) (192.915(b))**
 Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
13. Question Result, ID, References **Sat, AR.EC.ECDAPLAN.P, 192.925(a) (192.925(b))**
 Question Text *Is an adequate ECDA plan and process in place for conducting ECDA?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 4.**
14. Question Result, ID, References **Sat, AR.EC.ECDAINTEGRATION.P, 192.917(b) (ASME B31.8S-2004 Section 4.5)**
 Question Text *Is the process for integrating ECDA results with other information adequate?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 4.1.3**
15. Question Result, ID, References **Sat, AR.EC.ECDAINTEGRATION.R, 192.947(g) (192.917(b))**
 Question Text *Do records demonstrate that the operator integrated other data/information when evaluating data/results?*
 Assets Covered **88971 (1,935)**
 Result Notes **Reviewed 2019 ECDA Records**
16. Question Result, ID, References **Sat, AR.EC.ECDAREGION.R, 192.947(g) (192.925(b)(1))**
 Question Text *Do records demonstrate that the operator identified ECDA Regions?*
 Assets Covered **88971 (1,935)**

Result Notes Reviewed 2019 ECDA Records

17. Question Result, ID, References Sat, AR.EC.ECDAINDIRECT.R, 192.947(g) (192.925(b)(2))
Question Text *Do records demonstrate that ECDA indirect inspection process complied with NACE SP 0502-2010 Section 4 and ASME B31.8S-2004, Section 6.4?*
Assets Covered 88971 (1,935)
Result Notes 2019 EDCA records appear adequate
18. Question Result, ID, References Sat, AR.EC.ECDADIRECT.R, 192.947(g) (192.925(b)(3))
Question Text *Do records demonstrate that excavations, direct examinations, and data collection were performed in accordance with NACE SP 0502-2010, Sections 5 and 6.4.2 and ASME B31.8S-2004, Section 6.4?*
Assets Covered 88971 (1,935)
Result Notes Reviewed 2019 ECDA Records
19. Question Result, ID, References NA, AR.EC.ECDADIRECT.O, 192.925(b)(3)
Question Text *Were ECDA direct examinations adequately conducted?*
Assets Covered 88971 (1,935)
Result Notes No such activity/condition was observed during the inspection.
20. Question Result, ID, References Sat, AR.EC.ECDAANALYSIS.R, 192.947(g) (192.925(b)(4), 192.933(b))
Question Text *Do records demonstrate that an analysis of the ECDA data and other information was adequate to identify areas where external corrosion activity is most likely?*
Assets Covered 88971 (1,935)
Result Notes 2019 ECDA Records
21. Question Result, ID, References Sat, AR.EC.ECDAPLANMOC.P, 192.947(g) (192.925(b)(3)(iii), 192.911(k))
Question Text *Have criteria and internal notification processes been established and implemented for any changes in the ECDA plan?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 4.1.4.7
22. Question Result, ID, References NA, AR.EC.ECDAPLANMOC.R, 192.947(g) (192.925(b)(3)(iii))
Question Text *Do records demonstrate that changes in the ECDA plan have been implemented and documented?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
23. Question Result, ID, References Sat, AR.EC.ECDAPOSTASSESS.R, 192.947(g) (192.925(b)(4))
Question Text *Do records demonstrate that the requirements for post-assessment were met?*
Assets Covered 88971 (1,935)
Result Notes 2019 ECDA Records
24. Question Result, ID, References Sat, AR.EC.ECCORR.P, 192.933 (192.917(e)(5))
Question Text *Does the process adequately account for taking required actions to address significant external corrosion threats?*
Assets Covered 88971 (1,935)
Result Notes Nippon IMP Section 4.1.3.2
25. Question Result, ID, References Sat, AR.EC.ECCORR.R, 192.933 (192.917(e)(5))
Question Text *Do records demonstrate that required actions are being taken to address significant external corrosion threats as required?*
Assets Covered 88971 (1,935)
Result Notes 2019 ECDA Records

AR.IC: Internal Corrosion Direct Assessment (ICDA)

26. Question Result, ID, References Sat, AR.IC.ICDAPLANPRE.P, 192.927(c) (192.927(a), 192.927(b))
Question Text *Is an ICDA plan and process in place prior to conducting the pre-assessment step of ICDA?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 4.2.2
27. Question Result, ID, References Sat, AR.IC.ICDAPLANINDIRECT.P, 192.927(c) (192.927(a), 192.927(b))
Question Text *Is an ICDA plan and process in place prior to conducting the indirect inspection step in the ICDA process?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 4.2.2
28. Question Result, ID, References Sat, AR.IC.ICDAPLANEXAM.P, 192.927(c) (192.927(a), 192.927(b), 192.485, 192.712, 192.714, 192.933)
Question Text *Is an ICDA plan and process in place prior to conducting the detailed examination step of the ICDA process?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 4.2.3
29. Question Result, ID, References Sat, AR.IC.ICDAPLANPOST.P, 192.927(c) (192.927(a), 192.927(b), 192.478, 192.485, 192.712, 192.714, 192.933)
Question Text *Is an ICDA plan and process in place prior to conducting the post assessment monitoring?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 4.2.4
30. Question Result, ID, References NA, AR.IC.ICDAPREASSESS.R, 192.947(g)
Question Text *Do records demonstrate that the requirements for an ICDA pre-assessment were met?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
31. Question Result, ID, References NA, AR.IC.ICDAREGION.R, 192.947(g) (192.927(c)(2), 192.927(c)(5))
Question Text *Do records demonstrate that ICDA Regions were adequately identified?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
32. Question Result, ID, References NA, AR.IC.ICDAINDIRECT.R, 192.947(g) (192.927(c)(2), 192.927(c)(5))
Question Text *Do records demonstrate that sites where internal corrosion may be present were properly identified?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
33. Question Result, ID, References NA, AR.IC.ICDADIRECT.R, 192.947(g) (192.927(c)(3), 192.927(c)(5))
Question Text *Do records demonstrate the operator performed detailed examinations of locations identified during the Indirect Inspection?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
34. Question Result, ID, References NA, AR.IC.ICDAPOSTASSESS.R, 192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.927(c)(4)(iii)(A), 192.477)
Question Text *Do records demonstrate that the operator assessed the effectiveness of the ICDA process?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
35. Question Result, ID, References NA, AR.IC.ICDAANALYSIS.R, 192.947(g) (192.927(c), 192.933(b))
Question Text *Do records demonstrate that sufficient data was used to complete the ICDA analysis to identify the internal corrosion threats to the pipeline?*

Assets Covered 88971 (1,935)

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

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

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

Assets Covered 88971 (1,935)

Result Notes Integrity Management Program Manual - Section 4.2 Internal Corrosion Direct Assessment (ICDA)

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

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

Assets Covered 88971 (1,935)

Result Notes Nippon does not use ICDA

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

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

Assets Covered 88971 (1,935)

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

Chromatographs showed very low moisture.

39. Question Result, ID, References NA, AR.IC.ICDAREVQUAL.P, 192.915(a) (192.915(b))

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

Assets Covered 88971 (1,935)

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

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

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

Assets Covered 88971 (1,935)

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

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

Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 88971 (1,935)

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

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

42. Question Result, ID, References Sat, AR.SCC.SCCDAPLANPRE.P, 192.929(b)

Question Text *Does the SCCDA plan include requirements for preassessment?*

Assets Covered 88971 (1,935)

Result Notes IMP pg 41 and Section 4.4 - Conditions for SCCDA do not exist on this pipeline.

43. Question Result, ID, References NA, AR.SCC.SCCDAPLANINDIRECT.P, 192.929(b) (192.929(b)(2))

Question Text *Is an adequate SCCDA plan developed prior to indirect inspections?*

Assets Covered 88971 (1,935)

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

44. Question Result, ID, References **NA, AR.SCC.SCCDAPLANDIRECT.P, 192.929(b) (192.929(b)(3))**
 Question Text *Is an adequate plan developed prior to performing SCCDA?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
45. Question Result, ID, References **NA, AR.SCC.SCCDAPLANPOST.P, 192.929(b) (192.929(b)(5))**
 Question Text *Is an adequate SCCDA plan developed prior to post assessment requirements?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
46. Question Result, ID, References **NA, AR.SCC.SCCDAMITIG.P, 192.929(b)(4) (NACE SP0204, Section 5.5.1, 6.1.2 and 6.2.1, ASME B31.8S, Appendix A3 and A3.4)**
 Question Text *Is an adequate plan developed for remediating and mitigating SCC once discovered?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
47. Question Result, ID, References **NA, AR.SCC.SCCDADATA.R, 192.947(g) (192.929(b)(1))**
 Question Text *Do records demonstrate that data was collected and evaluated?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
48. Question Result, ID, References **NA, AR.SCC.SCCDAINSPECTION.R, 192.947(g) (192.929(b)(2))**
 Question Text *Do records demonstrate that at least two Indirect Inspections were conducted using complementary measurement tools appropriate for the pipeline segment?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
49. Question Result, ID, References **NA, AR.SCC.SCCDAEXAM.R, 192.947(g) (192.929(b)(3))**
 Question Text *Do records demonstrate that a minimum of three direct examinations for SCC were performed within the covered pipeline segment?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
50. Question Result, ID, References **NA, AR.SCC.SCCDAMITIG.R, 192.947(g) (192.929(b)(4), NACE SP0204, Section 5.5.1, 6.1.2, and 6.2.1, ASME B31.8S, Appendix A3 and A3.4)**
 Question Text *Do records demonstrate that the operator mitigated the threat of SCC, if found?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
51. Question Result, ID, References **NA, AR.SCC.SCCDAMETHOD.O, 192.929**
 Question Text *From field observations, was SCCDA performed in accordance with 192.929 and the SCCDA plan?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
52. Question Result, ID, References **NA, AR.SCC.SCCDANEARNEUTRAL.R, 192.947(g) (192.929(b))**
 Question Text *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
53. Question Result, ID, References **NA, AR.SCC.SCCDAREASSESSINTRVL.R, 192.947(d) (192.939(a)(3))**
 Question Text *From the review of the results of selected integrity assessments, did the operator determine a reassessment interval based on SCCDA results?*

Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

54. Question Result, ID, References NA, AR.SCC.SCCCORR.P, 192.933 (192.917(e)(5))
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats found following SCCDA?*

Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

55. Question Result, ID, References NA, AR.SCC.SCCCORR.R, 192.933 (192.917(e)(5))
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following SCCDA?*

Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

56. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.P, 192.915(a) (192.915(b))
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate SCCDA assessment results meet appropriate training, experience, and qualification criteria?*

Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

57. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.R, 192.947(e) (192.915(a), 192.915(b))
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results, are qualified for the tasks they perform?*

Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

58. Question Result, ID, References NA, AR.SCC.SCCDAREVQUAL.O, 192.915(a) (192.915(b))
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*

Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

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

59. 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 88971 (1,935)
Result Notes IMP Section 12.2 -

60. 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

61. 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

62. 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 **88971 (1,935)**
 Result Notes **IMP Section 2.1 - Assessment Methods**
63. 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 **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
64. 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 **88971 (1,935)**
 Result Notes **Integrity Management Program (IMP) - Section 2.1 - Assessment Methods**
65. Question Result, ID, References **Sat, 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 **88971 (1,935)**
 Result Notes **Pipeline is non piggable - Only 2009 Hydrotest, and ECDA**
66. Question Result, ID, References **NA, 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 **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
67. 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 **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
68. 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 **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
69. Question Result, ID, References **NA, AR.IL.ILIINTEGRATION.P, 192.917(b) (192.493)**
 Question Text *Is the process for integrating ILI results with other information adequate?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
70. 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 **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
71. Question Result, ID, References **NA, 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

72. 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

73. Question Result, ID, References NA, AR.IL.ILIDELAY.R, 192.947(d) (192.909(a), 192.909(b), 192.943(a), 192.943(b), 190.341, 192.18)
Question Text *Do records indicate that the performance of integrity assessments has been delayed and integrity assessment delays have been justified?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

74. 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

75. Question Result, ID, References NA, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))
Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?*
Assets Covered 88971 (1,935)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

76. Question Result, ID, References NA, AR.IL.ILCORR.R, 192.933 (192.917(e)(5))
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats identified during in-line inspections?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.LSR: Low Stress Reassessment

77. Question Result, ID, References NA, AR.LSR.LSRPLAN.P, 192.941 (192.919, 192.921, 192.941(b), 192.941(c))
Question Text *Is the process for performing low stress reassessment adequate?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Nippon did not use Low Stress Reassessment

78. Question Result, ID, References NA, 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

79. Question Result, ID, References NA, AR.LSR.LSREXTCORR.R, 192.947(d) (192.941(b))
Question Text *Do records demonstrate that the requirements of §192.941(b) were implemented when performing low stress reassessment for external corrosion?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

80. Question Result, ID, References **NA, AR.LSR.LSRINTCORR.R, 192.947(d) (192.941(c))**
 Question Text *Do records demonstrate that the requirements of §192.941(c) were implemented when performing low stress reassessment for internal corrosion?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
81. Question Result, ID, References **NA, AR.LSR.LSRCORR.P, 192.933 (192.917(e)(5))**
 Question Text *Does the process adequately account for taking required actions to address significant corrosion threats following a LSR?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
82. Question Result, ID, References **NA, AR.LSR.LSRCORR.R, 192.933 (192.917(e)(5))**
 Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following a LSR?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.PTI: Integrity Assessment Via Pressure Test

83. Question Result, ID, References **Sat, AR.PTI.PRESSTESTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(4))**
 Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate pressure test assessment results meet appropriate training, experience, and qualification criteria?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 12 Hydro Pressure Test - 2009**
84. Question Result, ID, References **Sat, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))**
 Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?*
 Assets Covered **88971 (1,935)**
 Result Notes **Hydro Pressure Test - 2009**
85. Question Result, ID, References **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 **88971 (1,935)**
 Result Notes **IMP Section 2.1, Table 2.1**
86. Question Result, ID, References **Sat, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))**
 Question Text *Do the test records validate the pressure test?*
 Assets Covered **88971 (1,935)**
 Result Notes **Reviewed 2009 Hydrotest**
87. Question Result, ID, References **NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))**
 Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
88. Question Result, ID, References **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 88971 (1,935)
Result Notes New IMP forms

89. Question Result, ID, References NA, AR.PTI.PTICORR.R, 192.933 (192.917(e)(5))
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
Assets Covered 88971 (1,935)
Result Notes No know integrity issues at the time of the test and not were suspected.
90. Question Result, ID, References Sat, AR.PTI.SPIKEHYDRO.P, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))
Question Text *Do the procedures for selecting pipeline assessment methods specifically include spike hydrotests as the assessment method for detecting time-dependent threats?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 2-7
91. Question Result, ID, References NA, AR.PTI.SPIKEHYDRO.R, 192.506(a) (192.505, 192.710(c)(3), 192.921(a)(3))
Question Text *Where time-dependent threats were an identified risk, do the records indicate that a spike hydrotest was performed to "clear" any cracks that might otherwise grow during pressure reductions after the hydrostatic test?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.OT: Other Technology

92. Question Result, ID, References Sat, AR.OT.OTPLAN.P, 192.921(a)(7) (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 88971 (1,935)
Result Notes IMP Section 2.1
93. Question Result, ID, References NA, AR.OT.OTPLAN.R, 192.947(d) (192.921(a)(7), 192.933(b))
Question Text *Do records demonstrate that the assessments were performed in accordance with the process and vendor recommendations and that defects were identified and categorized within 180 days, if applicable?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
94. Question Result, ID, References NA, 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
95. Question Result, ID, References NA, AR.OT.OTREVQUAL.R, 192.947(d) (192.915(a), 192.915(b))
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
96. Question Result, ID, References NA, AR.OT.OTREVQUAL.O, 192.915(a) (192.915(b))
Question Text *From the observation of selected integrity assessments, are operator and vendor personnel, including supervisors, who conduct assessments or review assessment results, qualified for the tasks they perform?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

97. Question Result, ID, References **NA, AR.OT.OTPLAN.O, 192.921(a)(7)**
 Question Text *Were assessments conducted using "other technology" adequately performed in accordance with the OT process?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
98. Question Result, ID, References **NA, AR.OT.OTCORR.P, 192.933 (192.917(e)(5))**
 Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified using Other Technology?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
99. Question Result, ID, References **NA, AR.OT.OTCORR.R, 192.933 (192.917(e)(5))**
 Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required following the use of Other Technology?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.PFP: Predicted Failure Pressure

100. Question Result, ID, References **Sat, AR.PFP.ANOMALYMETALLOSS.P, 192.605 (192.607, 192.712(a), 192.917(b), 192.933(d), 192.485, 192.712(b))**
 Question Text *Do the procedures for evaluating corrosion metal loss anomalies or defects, ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5**
101. Question Result, ID, References **Sat, AR.PFP.ANOMALYDENTS.P, 192.605 (192.607, 192.712(a), 192.712(b), 192.933(d), 192.485, 192.712(c), 192.712(h))**
 Question Text *Do the procedures for evaluating dents and other mechanical damage anomalies or defects, ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.3.6**
102. Question Result, ID, References **Sat, AR.PFP.ANOMALYCRACKMODEL.P, 192.605 (192.607, 192.712(a), 192.712(d)(1))**
 Question Text *Do the procedures for evaluating cracks and crack like defects ensure that a determination of the predicted failure pressure and the remaining life of the pipeline segment is established at the location of each anomaly or defect, in accordance with §192.712(d)(1)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.2.1, 8.9**
103. Question Result, ID, References **Sat, AR.PFP.ANOMALYCRACKGROWTH.P, 192.605 (192.607, 192.712(d)(2))**
 Question Text *Do the procedures detail the performance of fatigue analysis and remaining life calculations for pipeline segments susceptible to cyclic fatigue or other loading conditions that could lead to fatigue crack growth?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5, 8.6**
104. Question Result, ID, References **Sat, AR.PFP.ANOMALYCRACKSURVIVEPT.P, 192.712(d)(3) (192.607, 192.712(a), 192.712(d)(1))**
 Question Text *Do procedures call for the calculation of the largest potential crack defect sizes when analyzing potential cracks that could have survived a pressure test, specifically in the absence of any in-line inspection data in accordance with §192.712(d)(3)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 8.6, 8.9**

105. Question Result, ID, References **Sat, AR.PFP.ANOMALYDATAUSE.P, 192.605 (192.607, 192.712(e))**
 Question Text *Do the procedures detail the use of data when performing analyses of predicted or assumed anomalies or defects, in accordance with §192.712(e)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 8.6, 8.9**
106. Question Result, ID, References **Sat, AR.PFP.ANOMALYRECORDS.P, 192.605 (192.607, 192.712(g))**
 Question Text *Do procedures detail the collection, creation and retention of records including all investigations, analyses, and other actions taken in performing analyses of predicted or assumed anomalies or defects, in accordance with 192.712(g)?*
 Assets Covered **88971 (1,935)**
 Result Notes **ECDA Direct Assessment**
107. Question Result, ID, References **NA, AR.PFP.ANOMALYREASSESS.P, 192.605 (192.712(h))**
 Question Text *Do procedures detail the reassessment of anomalies when an operator used an Engineering Critical Assessment method?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
108. Question Result, ID, References **Sat, AR.PFP.ANOMALYRECORDS.R, 192.712(g) (192.712(e))**
 Question Text *Do the records capture all investigations, analyses and other actions taken to support the analysis of predicted failure pressure in accordance with §192.712(g)?*
 Assets Covered **88971 (1,935)**
 Result Notes **ECDA**

AR.RC: Repair Criteria (HCA)

109. Question Result, ID, References **Sat, AR.RC.GENERAL.P, 192.907(a) (192.933(a))**
 Question Text *Do the repair procedures detail what actions must be taken to address integrity issues?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5**
110. Question Result, ID, References **Sat, AR.RC.GENERAL.R, 192.947(a) (192.933(a))**
 Question Text *Do the repair records show what actions the operator took to address integrity issues?*
 Assets Covered **88971 (1,935)**
 Result Notes **2019 ECDA Records**
111. Question Result, ID, References **Sat, AR.RC.PRESSUREREDUC.P, 192.907(a) (192.933(a)(1), 192.933(a)(2), 192.933(d)(1))**
 Question Text *Do the repair procedures require a temporary pressure reduction for making repairs in covered segments?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.4**
112. Question Result, ID, References **NA, AR.RC.PRESSUREREDUC.R, 192.947 (192.933(a)(1), 192.933(a)(2), 192.933(d)(1))**
 Question Text *Do records demonstrate that a temporary pressure reduction was taken immediately or when a repair schedule could not be met?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
113. Question Result, ID, References **Sat, AR.RC.DISCOVERY.P, 192.907 (192.933(b))**
 Question Text *Do the repair procedures require properly define discovery and the required time frame for response in covered segments?*

Assets Covered 88971 (1,935)
Result Notes 2019 ECDA Records

114. Question Result, ID, References Sat, AR.RC.DISCOVERY.R, 192.947 (192.933(b))
Question Text *Do the records show that discovery was declared in the required timeframe?*
Assets Covered 88971 (1,935)
Result Notes 2019 ECDA Records
115. Question Result, ID, References Sat, AR.RC.SCHEDULE.P, 192.907(a) (192.933(c))
Question Text *Do the repair procedures discuss remediating conditions according to a prioritization schedule in covered segments?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 5.1.1
116. Question Result, ID, References Sat, AR.RC.SCHEDULE.R, 192.947 (192.933(c))
Question Text *Do records demonstrate that defects in covered segments were remediated according to a prioritization schedule?*
Assets Covered 88971 (1,935)
Result Notes 2019 ECDA Records
117. Question Result, ID, References Sat, AR.RC.IMMEDIATE.P, 192.907 (192.933(d)(1))
Question Text *Do the repair procedures cover all of the elements for making immediate repairs in covered segments?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 5.2.1
118. Question Result, ID, References Sat, AR.RC.IMMEDIATE.R, 192.947 (192.933(d)(1))
Question Text *Do records demonstrate that all conditions requiring immediate repair were repaired immediately upon discovery?*
Assets Covered 88971 (1,935)
Result Notes 2019 ECDA Records
119. Question Result, ID, References Sat, AR.RC.ONEYEAR.P, 192.907 (192.933(d)(2))
Question Text *Do the repair procedures cover all of the elements for making repairs in covered segments for One-year conditions?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 5.2.2
120. Question Result, ID, References NA, AR.RC.ONEYEAR.R, 192.947 (192.712, 192.933(d)(2))
Question Text *Do records demonstrate that all conditions meeting the one-year condition requirements were repaired within one year of discovery?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
121. Question Result, ID, References Sat, AR.RC.MONITOR.P, 192.907 (192.933(d)(3))
Question Text *Do the repair procedures require the operator to record and monitor conditions that meet monitoring criteria in covered segments?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 5.2.3
122. Question Result, ID, References NA, AR.RC.MONITOR.R, 192.947 (192.712, 192.933(d)(3))
Question Text *Do records demonstrate that all defects were properly categorized?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

123. Question Result, ID, References **Sat, AR.RC.CRACK.P, 192.907 (192.933(e))**
 Question Text *Do the repair procedures require the operator to perform direct examinations of known locations of cracks or crack-like defects?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5**
124. Question Result, ID, References **NA, AR.RC.CRACK.R, 192.947 (192.933(e))**
 Question Text *Do the records show that the operator performed direct examinations of known locations of cracks or crack-like defects?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
125. Question Result, ID, References **NA, AR.RC.REMEDIATION.O, 192.933**
 Question Text *Is anomaly remediation adequate for the covered segments being observed?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such activity/condition was observed during the inspection.**
126. Question Result, ID, References **Sat, AR.RC.CRITERIATEMP.P, 192.605(b)(1) (192.711(a))**
 Question Text *Do the repair procedures require the operator to take immediate temporary measures to protect the public?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.3.1**

O&M Section 15.2
127. Question Result, ID, References **NA, AR.RC.CRITERIATEMP.R, 192.709 (192.711(a))**
 Question Text *Do the records show that the operator took immediate temporary measures to protect the public?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
128. Question Result, ID, References **Sat, AR.RC.CRITERIAPERM.P, 192.605(b)(1) (192.711(b))**
 Question Text *Do the repair procedures require the operator to make permanent repairs?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 15.3**

ECDA Coating Repair
129. Question Result, ID, References **Sat, AR.RC.CRITERIAPERM.R, 192.709 (192.711(b))**
 Question Text *Do the records show that the operator made permanent repairs on both non-integrity management and integrity management segments of the pipeline?*
 Assets Covered **88971 (1,935)**
 Result Notes **2019 ECDA Coating Repair**
130. Question Result, ID, References **Sat, AR.RC.CRITERIAWELD.P, 192.605(b)(1) (192.711(c))**
 Question Text *Do the repair procedures prohibit the operator from using welded patches?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5 Table 4**

O&M Section 15.4
131. Question Result, ID, References **NA, AR.RC.CRITERIAWELD.R, 192.709 (192.711(c))**
 Question Text *Do the records show that the operator made repairs using welded patches?*

Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

IMP Section 5 Table 4

O&M Section 15.4

132. Question Result, ID, References NA, AR.RC.CRITERIAOBSERVE.O, 192.711
Question Text *Is the anomaly remediation adequate for segment being observed?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

AR.RCNONHCA: Repair Criteria (Non-HCA)

133. Question Result, ID, References Sat, AR.RCNONHCA.GENERAL.P, 192.605(a) (192.714(a), 192.714(b), 192.714(h))
Question Text *Do the repair procedures detail making repairs in a safe manner in non-covered segments?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 5.3.7
134. Question Result, ID, References NA, AR.RCNONHCA.GENERAL.R, 192.714(b) (192.714(h))
Question Text *Do records demonstrate that repairs were made in a safe manner in non-covered segments?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
135. Question Result, ID, References Sat, AR.RCNONHCA.SCHEDULE.P, 192.605 (192.714(c), 192.714(h))
Question Text *Do the repair procedures discuss remediating conditions according to a prioritization schedule in non-covered segments?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 15
136. Question Result, ID, References NA, AR.RCNONHCA.SCHEDULE.R, 192.714(c) (192.105, 192.714(h))
Question Text *Do records demonstrate that defects in non-covered segments were remediated according to a prioritization schedule?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
137. Question Result, ID, References Sat, AR.RCNONHCA.IMMEDIATE.P, 192.605 (192.714(d)(1), 192.714(h))
Question Text *Do the repair procedures cover all of the elements for making immediate repairs in non-covered segments?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 15
138. Question Result, ID, References NA, AR.RCNONHCA.IMMEDIATE.R, 192.714(d)(1) (192.712, 192.714(h))
Question Text *Do records demonstrate that all conditions requiring immediate repair were repaired immediately upon discovery?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
139. Question Result, ID, References Sat, AR.RCNONHCA.TWOYEAR.P, 192.605 (192.714(d)(2), 192.714(h))
Question Text *Do the repair procedures cover all of the elements for making repairs in non covered segments for Two-year conditions?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 15

140. Question Result, ID, References **NA, AR.RCNONHCA.TWOYEAR.R, 192.714(d)(2) (192.712, 192.714(h))**
 Question Text *Do records demonstrate that all conditions meeting the two-year condition requirements were repaired within two years of discovery?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
141. Question Result, ID, References **Sat, AR.RCNONHCA.MONITOR.P, 192.605 (192.714(d)(3), 192.714(h))**
 Question Text *Do the repair procedures require the operator to record and monitor conditions that meet monitoring criteria in non covered segments?*
 Assets Covered **88971 (1,935)**
 Result Notes **ECDA NA**
142. Question Result, ID, References **Sat, AR.RCNONHCA.MONITOR.R, 192.714(d)(3) (192.712, 192.714(h))**
 Question Text *Do records demonstrate that all defects were properly categorized?*
 Assets Covered **88971 (1,935)**
 Result Notes **ECDA NA**
143. Question Result, ID, References **Sat, AR.RCNONHCA.PRESSUREREDUC.P, 192.605 (192.714(e), 192.714(h))**
 Question Text *Do the repair procedures require a temporary pressure reduction for making repairs in non-covered segments?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.4**

O&M Section 15.2, 15.3
144. Question Result, ID, References **NA, AR.RCNONHCA.PRESSUREREDUC.R, 192.714(e) (192.714(h))**
 Question Text *Do records demonstrate that a temporary pressure reduction was taken immediately or when a repair schedule could not be met?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
145. Question Result, ID, References **Sat, AR.RCNONHCA.OTHER.P, 192.605 (192.714(f), 192.714(h))**
 Question Text *Do the repair procedures require the operator to take appropriate remedial action for other conditions that could affect safe operations in non-covered segments?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.2.4**

O&M Sections 15.2, 15.3
146. Question Result, ID, References **NA, AR.RCNONHCA.OTHER.R, 192.714(f) (192.714(h))**
 Question Text *Do the records show that the operator took appropriate remedial action for other conditions that could affect safe operations in non-covered segments?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
147. Question Result, ID, References **Sat, AR.RCNONHCA.CRACK.P, 192.605 (192.714(g), 192.714(h))**
 Question Text *Do the repair procedures require the operator to perform direct examinations of known locations of cracks or crack-like defects?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 8.9**

O&M Sections 15.2, 15.3

148. Question Result, ID, References **NA, AR.RCNONHCA.CRACK.R, 192.714(g) (192.714(h))**
 Question Text *Do the records show that the operator performed direct examinations of known locations of cracks or crack-like defects?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
149. Question Result, ID, References **NA, AR.RCNONHCA.REMEDIATION.O, 192.714**
 Question Text *Is anomaly remediation adequate for the non-covered segments being observed?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.RMP: Repair Methods and Practices

150. Question Result, ID, References **Sat, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))**
 Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.1**
151. Question Result, ID, References **NA, AR.RMP.SAFETY.O, 192.605(b)(9) (192.713(b))**
 Question Text *Are repairs made in a safe manner and to prevent damage to persons and property?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
152. Question Result, ID, References **Sat, AR.RMP.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))**
 Question Text *Is there a process for preventing accidental ignition where gas presents a hazard of fire or explosion?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 12.1**

IMP Section 2.7
153. Question Result, ID, References **NA, AR.RMP.IGNITION.R, 192.751(a) (192.751(b), 192.751(c))**
 Question Text *Do records indicate adequate steps were taken by the operator to prevent accidental ignition prior to performing work?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
154. 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 **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
155. Question Result, ID, References **Sat, AR.RMP.HOTTAP.P, 192.605(b)(1) (192.627)**
 Question Text *Is the process adequate for tapping pipelines under pressure?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 15.12**
156. Question Result, ID, References **Sat, AR.RMP.HOTTAP.R, 192.627 (192 Subpart N)**
 Question Text *From a review of selected records, were the personnel who performed pressure taps on pipelines under pressure qualified?*
 Assets Covered **88971 (1,935)**

Result Notes Hot tap qualifications were observed onsite. Appeared adequate.

157. Question Result, ID, References NA, AR.RMP.HOTTAP.O, 192.627 (192 Subpart N)
Question Text *Were pressure taps on pipelines under pressure performed in accordance with processes by qualified personnel?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
158. Question Result, ID, References Sat, AR.RMP.REPAIRREQT.P, 192.605(b)(1) (192.711(a), 192.711(b), 192.711(c), 192.717(b)(3))
Question Text *Does the repair process capture the requirements of 192.711 for transmission lines?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 15.1

IMP Section 5.1
159. Question Result, ID, References Sat, AR.RMP.FIELDREPAIRDEFECT.P, 192.605(b)(1) (192.713(a), 192.713(b))
Question Text *Is the process adequate for the permanent field repair of defects in transmission lines?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 15.3

IMP Section 5.3.7
160. Question Result, ID, References Sat, AR.RMP.METHOD.R, 192.709(a) (192.713(a), 192.713(b), 192.717(a), 192.717(b), ASME B31.8S-2004 Section 7)
Question Text *From the review of records, were all repairs performed in accordance with processes, applicable sections of Part 192, the guidance of ASME B31.8S-2004, Section 7, and the Pipeline Repair Manual, Revision 5?*
Assets Covered 88971 (1,935)
Result Notes Review ECDA records and there were no repairs.
161. Question Result, ID, References Sat, AR.RMP.REPAIRQUAL.R, 192.807(b) (192.805(h))
Question Text *From the review of selected records, were personnel performing repairs, other than welding, and post repair tests qualified for the task they performed?*
Assets Covered 88971 (1,935)
Result Notes Review ECDA records, coating was performed by qualified personnel.
162. Question Result, ID, References Sat, AR.RMP.FIELDREPAIRWELDS.P, 192.605(b) (192.715(a), 192.715(b), 192.715(c))
Question Text *Is the process adequate for the permanent field repair of welds?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 15.4
163. Question Result, ID, References NA, AR.RMP.WELDERQUAL.R, 192.225(a) (192.225(b), 192.227(a), 192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d))
Question Text *From the review of selected records, were repairs requiring welding performed by qualified welders using qualified welding processes?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
164. Question Result, ID, References NA, AR.RMP.WELDQUAL.R, 192.245(a) (192.245(b), 192.245(c), 192.715(a), 192.715(b), 192.715(c))
Question Text *From the review of records, were weld defects repaired in accordance with 192.245 and 192.715?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
165. Question Result, ID, References Sat, AR.RMP.WELDINSPECT.R, 192.241(a) (192.241(b), 192.241(c), 192.243(a), 192.243(b), 192.243(c), 192.243(d), 192.243(e), 192.243(f))
Question Text *From the review of records, were welds inspected and examined in accordance with 192.241 and 192.243?*

Assets Covered 88971 (1,935)
Result Notes Reviewed welding records appeared complete.

166. Question Result, ID, NA, AR.RMP.WELDINSPECT.O, 192.241(a) (192.241(b), 192.241(c), 192.243(a), 192.243(b),
References 192.243(c), 192.243(d), 192.243(e), 192.243(f))

Question Text *Were welds inspected and examined in accordance with 192.241 and 192.243?*

Assets Covered 88971 (1,935)

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

167. Question Result, ID, Sat, AR.RMP.PIPECONDITION.R, 192.709(a) (192.709(b))
References

Question Text *Do repair records document all information needed to understand the conditions of the pipe and its environment and provide the information needed to support the Integrity Management Risk Model?*

Assets Covered 88971 (1,935)

Result Notes ECDA - There was no repair. The coating was removed and pipe sand blasted and evaluated. No issues so they recoated the pipe.

168. Question Result, ID, NA, AR.RMP.REPLACESTD.R, 192.713(a) (Part 192 Subpart D)
References

Question Text *From the review of records, were any components that were replaced constructed to the same or higher standards as the original component?*

Assets Covered 88971 (1,935)

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

169. Question Result, ID, Sat, AR.RMP.FIELDREPAIRLEAK.P, 192.605(b) (192.717(a), 192.717(b))
References

Question Text *Is there an adequate process for the permanent field repair of leaks on transmission lines?*

Assets Covered 88971 (1,935)

Result Notes O&M 15.5

170. Question Result, ID, NA, AR.RMP.FIELDREPAIRLEAK.R, 192.717(a) (192.717(b))
References

Question Text *From the review of records, did the operator properly repair leaks on transmission lines?*

Assets Covered 88971 (1,935)

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

171. Question Result, ID, NA, AR.RMP.FIELDREPAIRLEAK.O, 192.717(a) (192.717(b))
References

Question Text *Does the operator properly repair leaks on transmission lines?*

Assets Covered 88971 (1,935)

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

172. Question Result, ID, Sat, AR.RMP.WELDTTEST.P, 192.605(b) (192.719(a), 192.719(b))
References

Question Text *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88971 (1,935)

Result Notes O&M Section 15.13

173. Question Result, ID, NA, AR.RMP.WELDTTEST.R, 192.719(a) (192.719(b))
References

Question Text *From the review of records, did the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88971 (1,935)

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

174. Question Result, ID, NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))
References

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88971 (1,935)

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

175. 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 **88971 (1,935)**
 Result Notes **IMP Section 5.3.6, 2.1**
176. Question Result, ID, References **NA, AR.RMP.CRACKNDT.R, 192.947(g) (192.929(b))**
 Question Text *From the review of records, when a pipeline segment that meets the conditions of possible cracking and/or SCC is exposed (i.e., the coating is removed), was an NDE method (e.g., MPI, UT) employed to evaluate for cracking and/or SCC?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.PA: Pipeline Assessments for Non-IM Onshore Pipelines

177. Question Result, ID, References **Sat, AR.PA.ASSESSSCHD.P, 192.710(b)(1) (192.710(b)(3))**
 Question Text *What is the process/plan (including the selection criteria, timeline, and use of prior assessments) for performing the initial assessments as required by §192.710(b)(1) and (b)(3)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 1.7.2**
178. Question Result, ID, References **Sat, AR.PA.ASSESSSCHD.R, 192.710(b)(1) (192.710(b)(3))**
 Question Text *Do records demonstrate pipeline segments were initially assessed (and when) per §192.710(b)(1)?*
 Assets Covered **88971 (1,935)**
 Result Notes **Review of Class Location, HCA, MCA Analysis**
179. Question Result, ID, References **Sat, AR.PA.ASSESSMETHODS.P, 192.710(c)**
 Question Text *Do the procedures include a methodology for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 1.7**
180. Question Result, ID, References **Sat, AR.PA.ASSESSMETHODS.R, 192.710(c)**
 Question Text *Do the records confirm the methodology used for conducting the initial assessment of pipeline segments outside of an HCA per §192.710(c) was selected based on the results of a risk-based prioritization?*
 Assets Covered **88971 (1,935)**
 Result Notes **Class Location, HCA, MCA Analysis**
181. Question Result, ID, References **Sat, AR.PA.REASSESSMENTS.P, 192.710(b)(2) (192.710(b)(3), 192.939(a))**
 Question Text *Do the procedures require reassessments to be conducted at least once every 10 years, not to exceed 126 months, or a shorter interval based upon the nature and extent of anomalies discovered in the previous assessment as required by §192.710(b)(2)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 1.7 - Pipeline is currently non-piggable.**
182. Question Result, ID, References **Sat, AR.PA.REASSESSMENTS.R, 192.710(b)(2) (192.710(b)(3), 192.939(a))**
 Question Text *Do the records indicate adequate documentation of and rationale for the reassessment intervals?*
 Assets Covered **88971 (1,935)**
 Result Notes **Class Location, HCA, MCA Analysis**
183. Question Result, ID, References **Sat, AR.PA.OTHERTECH.P, 192.710(c)(7) (192.18, 192.506(b))**

Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, does the process demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 2 pg. 2-7

184. Question Result, ID, References NA, AR.PA.OTHERTECH.R, 192.710(c)(7) (192.18, 192.506(b))

Question Text *Where the operator has elected to use "Other Technology" (or other technical evaluation process) for assessing pipeline segments, do the records demonstrate an equivalent understanding of the condition of the line pipe for each of the threats to which the pipeline is susceptible?*

Assets Covered 88971 (1,935)

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

185. Question Result, ID, References Sat, AR.PA.REMEDIATIONCRITERIA.P, 192.710(f)

Question Text *Did the operator's procedures for anomaly investigation and remediation criteria for non-HCA pipeline segments meet the requirements of §§192.485, 192.711, and 192.713?*

Assets Covered 88971 (1,935)

Result Notes O&M 15.1

186. Question Result, ID, References NA, AR.PA.REMEDIATIONCRITERIA.R, 192.710(f) (192.933, 192.709)

Question Text *Do the remediation records indicate that conducted remediation activities were conducted in accordance with the procedures?*

Assets Covered 88971 (1,935)

Result Notes Nippon has no Non-IM Onshore Pipelines

187. Question Result, ID, References Sat, AR.PA.THREATID.P, 192.710

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 3.1

188. Question Result, ID, References Sat, AR.PA.THREATID.R, 192.710

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

Assets Covered 88971 (1,935)

Result Notes 2023 Risk Analysis

189. Question Result, ID, References Sat, AR.PA.RAMETHOD.P, 192.710

Question Text *Does the process include requirements for a risk assessment and/or risk prioritization, that considers all of the identified threats for each assessable non-HCA pipeline segment?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 3.0

190. Question Result, ID, References Sat, AR.PA.RAMETHOD.R, 192.710

Question Text *Do records demonstrate that the operator has performed a risk assessment on the non-HCA pipeline segments?*

Assets Covered 88971 (1,935)

Result Notes 2023 Risk Analysis

191. Question Result, ID, References Sat, AR.PA.RAFACTORS.P, 192.710

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

Assets Covered 88971 (1,935)

Result Notes [IMP Section 3.5](#)

192. Question Result, ID, References [Sat, AR.PA.RAFACTORS.R, 192.710](#)

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

Assets Covered [88971 \(1,935\)](#)

Result Notes [2023 Risk Analysis](#)

AR.SP: Special Permits

193. Question Result, ID, References [Sat, AR.SP.ILISP.P, 190.341\(d\)](#)

Question Text *If the pipeline operates under a special permit have the processes been modified to incorporate the requirements of the permit for required ILI assessments performed?*

Assets Covered [88971 \(1,935\)](#)

Result Notes [IMP Section 6.7](#)

194. Question Result, ID, References [NA, AR.SP.ILISP.R, 190.341\(d\)](#)

Question Text *If the pipeline operates under a special permit, from a review of selected records, were required ILI assessments performed?*

Assets Covered [88971 \(1,935\)](#)

Result Notes [Pipeline does not operate under a Special Permit.](#)

195. Question Result, ID, References [NA, AR.SP.REPAIRSP.P, 190.341\(d\)](#)

Question Text *If the pipeline operates under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*

Assets Covered [88971 \(1,935\)](#)

Result Notes [Pipeline does not operate under a Special Permit](#)

196. Question Result, ID, References [NA, AR.SP.REPAIRSP.R, 190.341\(d\)](#)

Question Text *If the pipeline operates under a special permit, from a review of selected records, were required repairs performed?*

Assets Covered [88971 \(1,935\)](#)

Result Notes [Pipeline does not operate under a Special Permit](#)

IM.HC: High Consequence Areas

197. Question Result, ID, References [Sat, IM.HC.HCAID.P, 192.905\(a\)](#)

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

Assets Covered [88971 \(1,935\)](#)

Result Notes [IMP Section 1.1](#)

198. Question Result, ID, References [Sat, IM.HC.HCAID.R, 192.947\(d\) \(192.905\(a\), 192.907\(a\), 192.911\(a\)\)](#)

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

Assets Covered [88971 \(1,935\)](#)

Result Notes [Class Location Study, HCA and MCA Analysis 07-13-2023](#)

199. Question Result, ID, References [Sat, IM.HC.HCAMETHOD1.P, 192.903\(1\)\(i\) \(192.903\(1\)\(ii\), 192.903\(1\)\(iii\), 192.903\(1\)\(iv\)\)](#)

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

Assets Covered [88971 \(1,935\)](#)

Result Notes [IMP Section 1.4](#)

200. Question Result, ID, References [Sat, IM.HC.HCAMETHOD2.P, 192.903\(2\)\(i\) \(192.903\(2\)\(ii\)\)](#)
Question Text *Is the integrity management process adequate for identification of 192.903 High Consequence Areas using Method (2)?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [IMP Section 1.5](#)
201. Question Result, ID, References [Sat, IM.HC.HCANEW.P, 192.905\(c\)](#)
Question Text *Does the process include a requirement for evaluation of new information that impacts, or creates a new, high consequence area?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [IMP Section 1.6](#)
202. Question Result, ID, References [Sat, IM.HC.HCANEW.R, 192.947\(d\) \(192.905\(c\)\)](#)
Question Text *Do records demonstrate new information that impacts, or creates a new, high consequence area has been integrated with the integrity management program?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [Class Location Study, HCA and MCA Analysis 07-13-2023](#)
203. Question Result, ID, References [Sat, IM.HC.HCAPIR.P, 192.903 \(192.905\(a\)\)](#)
Question Text *Is the process for defining and applying potential impact radius (PIR) for establishment of high consequence areas consistent with the requirements of 192.903?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [IMP Section 1.5](#)
204. Question Result, ID, References [Sat, IM.HC.HCAPIR.R, 192.947\(d\) \(192.903, 192.905\(a\)\)](#)
Question Text *Do records demonstrate the use of potential impact radius (PIR) for establishment of high consequence areas consistent with requirements of 192.903?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [Class Location Study, HCA and MCA Analysis 07-13-2023](#)
205. Question Result, ID, References [Sat, IM.HC.HCASITES.P, 192.903 \(192.905\(b\)\)](#)
Question Text *Does the process for identification of identified sites include the sources listed in 192.905(b) for those buildings or outside areas meeting the criteria specified by 192.903 and require the source(s) of information selected to be documented?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [IMP Section 1.3](#)
206. Question Result, ID, References [Sat, IM.HC.HCASITES.R, 192.947\(d\) \(192.903, 192.905\(b\)\)](#)
Question Text *Do records indicate identification of identified sites being performed as required?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [Class Location Study, HCA and MCA Analysis 07-13-2023](#)
207. 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 [88971 \(1,935\)](#)
Result Notes [Nippon did not use method 1](#)
208. Question Result, ID, References [Sat, IM.HC.HCAMETHOD2.R, 192.947\(d\) \(192.905\(a\), 192.903\(2\)\(ii\)\)](#)
Question Text *Do records demonstrate that the identification of 192.903 High Consequence Areas using Method (2) was adequate?*

Assets Covered 88971 (1,935)
Result Notes Class Location Study, HCA and MCA Analysis 07-13-2023

209. Question Result, ID, NA, IM.HC.HCADATA.O, 192.905(c)
References
Question Text *Are HCAs correctly identified per up-to-date information?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

IM.RA: Risk Analysis

210. Question Result, ID, Sat, IM.RA.RADATA.P, 192.907 (192.917(b)(1), 192.917(b)(2), 192.917(b)(3), 192.917(b)(4),
References 192.917(e)(1), 192.911(k))
Question Text *Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 3.2

211. Question Result, ID, Sat, IM.RA.RAMETHOD.P, 192.907 (192.917(d), 192.917(c))
References
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 88971 (1,935)
Result Notes IMP Section 3.1

212. Question Result, ID, Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1), 192.632)
References
Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*
Assets Covered 88971 (1,935)
Result Notes 2023 Risk Analysis

213. Question Result, ID, Sat, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(b)(2), 192.917(b)(3), 192.917(b)(4),
References 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 88971 (1,935)
Result Notes 2023 RA

214. Question Result, ID, Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e), 192.913(b)(1))
References
Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 3.1

215. Question Result, ID, Sat, IM.RA.RAMETHOD.R, 192.947(b) (192.917(c), 192.917(d))
References
Question Text *Do records demonstrate that the risk assessment follows 192.917(c), 192.917(d), and ASME B31.8S-2004, Section 5, and considers the identified threats for each covered segment?*
Assets Covered 88971 (1,935)
Result Notes 2023 RA

216. Question Result, ID, Sat, IM.RA.RAFACTORS.P, 192.907 (192.917(c))
References
Question Text *Does the process include requirements for factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 3.4, 3.5

217. Question Result, ID, References **Sat, IM.RA.RAFACTORS.R, 192.947(b) (192.917(c))**
 Question Text *Do records demonstrate that risk analysis data is combined in an appropriate manner to produce a risk value for each pipeline segment?*
 Assets Covered **88971 (1,935)**
 Result Notes **2023 Risk Analysis**
218. Question Result, ID, References **Sat, IM.RA.RAMOC.P, 192.917(c)**
 Question Text *Does the process provide for revisions to the risk assessment if new information is obtained or conditions change on the pipeline segments?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 3.6**
219. Question Result, ID, References **Sat, IM.RA.RAMOC.R, 192.947(b) (192.917(c))**
 Question Text *Was the risk assessment revised as necessary as new information is obtained or conditions change on the pipeline segments?*
 Assets Covered **88971 (1,935)**
 Result Notes **2023 Risk Analysis**
220. Question Result, ID, References **Sat, IM.RA.RAMOC.O, 192.917(c)**
 Question Text *Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?*
 Assets Covered **88971 (1,935)**
 Result Notes **Field observations of conditions on covered segments appear to be accurate.**

IM.BA: Baseline Assessments

221. 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 **88971 (1,935)**
 Result Notes **IMP Section 2.7**
222. Question Result, ID, References **Sat, 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 **88971 (1,935)**
 Result Notes **2009 Hydrotest**
223. 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 **88971 (1,935)**
 Result Notes **IMP Section 2.1**
224. Question Result, ID, References **Sat, IM.BA.BAMETHODS.R, 192.947(c) (192.919(b), 192.921(a), 192.921(c), 192.921(h), 192.947(d), 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 **88971 (1,935)**
 Result Notes **2019 ECDA**

2009 Pressure Test (Hydro)

225. Question Result, ID, References **Sat, IM.BA.BANEW.P, 192.911(p) (192.905(c), 192.921(f), 192.921(g))**
 Question Text *Does the process include requirements for updating the assessment plan for newly identified areas and newly installed pipe?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 2.4**
226. Question Result, ID, References **Sat, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)**
 Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*
 Assets Covered **88971 (1,935)**
 Result Notes **Class Location Study, HCA and MCA Analysis 07-13-2023**
227. Question Result, ID, References **Sat, IM.BA.BASCHEDULE.P, 192.917(c) (192.919(c), 192.921(b))**
 Question Text *Did the BAP process require a schedule for completing the assessment activities for all covered segments and consideration of applicable risk factors in the prioritization of the schedule?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 2.2**
228. Question Result, ID, References **Sat, IM.BA.BASCHEDULE.R, 192.947(c) (192.921(d), 192.947(d))**
 Question Text *Do records demonstrate that all BAP required assessments were completed as scheduled?*
 Assets Covered **88971 (1,935)**
 Result Notes **1990 Hydrotest**
229. Question Result, ID, References **NA, IM.BA.BAENVIRON.O, 192.911(o) (192.919(e), 192.750)**
 Question Text *From field observations, are integrity assessments conducted in a manner that minimizes environmental and safety risks?*
 Assets Covered **88971 (1,935)**
 Result Notes **No field operations observed**

IM.CA: Continual Evaluation and Assessment

230. Question Result, ID, References **NA, IM.CA.LOWSTRESSREASSESS.P, 192.941(a) (192.941(b), 192.941(c))**
 Question Text *Does the process include requirements for the "low stress reassessment" method to address threats of external and/or internal corrosion for pipelines operating below 30% SMYS?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon does not use Low Stress Reassessments**
231. Question Result, ID, References **Sat, IM.CA.REASSESSINTERVAL.P, 192.937(a) (192.939(a), 192.939(b), 192.913(c))**
 Question Text *Is the process for establishing the reassessment intervals consistent with §192.939 and ASME B31.8S-2004?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 6.1**
232. Question Result, ID, References **NA, 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 **88971 (1,935)**
 Result Notes **Nippon does not use Low Stress Reassessments**
233. Question Result, ID, References **Sat, IM.CA.PERIODICEVAL.P, 192.937(b) (192.917(a), 192.917(b), 192.917(c), 192.917(d), 192.917(e))**

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 6.1

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

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

Assets Covered 88971 (1,935)

Result Notes IM Evaluations

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

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

Assets Covered 88971 (1,935)

Result Notes Hydrotest, 2019 ECDA

236. 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 88971 (1,935)

Result Notes IMP Section 6.2

237. 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 88971 (1,935)

Result Notes 2019 ECDA

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

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

Assets Covered 88971 (1,935)

Result Notes IMP Section 6.7

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

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

Assets Covered 88971 (1,935)

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

240. 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 88971 (1,935)

Result Notes IMP Section 6.6

241. 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 88971 (1,935)

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

IM.PM: Preventive and Mitigative Measures

242. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.P, 192.907 (192.935(a), 192.935(f))**
Question Text *Do the procedures include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*
Assets Covered **88971 (1,935)**
Result Notes **IMP Section 8**
243. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.R, 192.947 (192.935(a), 192.935(f))**
Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*
Assets Covered **88971 (1,935)**
Result Notes **Reviewed PM Records**
244. Question Result, ID, References **Sat, IM.PM.PMMPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))**
Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*
Assets Covered **88971 (1,935)**
Result Notes **IMP Section 8.2**
245. Question Result, ID, References **Sat, IM.PM.PMMPD.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 **88971 (1,935)**
Result Notes **Reviewed PM Records**
246. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.P, 192.915(c)**
Question Text *Does the process require that persons who implement preventive and mitigative measures or directly supervise excavation work be qualified?*
Assets Covered **88971 (1,935)**
Result Notes **IMP Section 8.2**
247. Question Result, ID, References **Sat, IM.PM.PMMREVQUAL.R, 192.947(e) (192.915(c))**
Question Text *Do records demonstrate that personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified?*
Assets Covered **88971 (1,935)**
Result Notes **Reviewed operator qualifications.**
248. Question Result, ID, References **NA, IM.PM.PMMPDMSMYS.P, 192.907 (192.935(b)(1)(i), 192.935(b)(1)(iii), 192.935(d), 192 Appendix E Table E.II.1)**
Question Text *Do the procedures include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*
Assets Covered **88971 (1,935)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Nippon operates above 30%
249. Question Result, ID, References **NA, IM.PM.PMMPDMSMYS.R, 192.947(d) (192.935(d))**
Question Text *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed?*
Assets Covered **88971 (1,935)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Nippon operates above 30%

250. Question Result, ID, References **NA, IM.PM.PMMPLASTIC.P, 192.907 (192.935(e))**
 Question Text *Do the procedures include requirements for preventive and mitigative measures for plastic transmission pipelines?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Nippon does not use plastic transmission pipe.**
251. Question Result, ID, References **NA, IM.PM.PMMPLASTIC.R, 192.947(d) (192.935(e))**
 Question Text *Do records demonstrate that preventive and mitigative measures for plastic transmission pipelines were performed?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
- Nippon does not use plastic pipe for transmission.**
252. Question Result, ID, References **Sat, IM.PM.PMMOF.P, 192.935(b)(2)**
 Question Text *Does the process adequately address significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 8.5**
253. Question Result, ID, References **Sat, IM.PM.PMMOF.R, 192.947(d) (192.935(b)(2))**
 Question Text *Do records demonstrate that significant threats due to outside force (e.g., earth movement, floods, unstable suspension bridge) are being adequately addressed?*
 Assets Covered **88971 (1,935)**
 Result Notes **2023 Risk Analysis**
254. Question Result, ID, References **Sat, IM.PM.PMMRMV.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 **88971 (1,935)**
 Result Notes **IMP Section 8.10**
255. Question Result, ID, References **Sat, IM.PM.PMMRMV.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 **88971 (1,935)**
 Result Notes **2023 Risk Assessment**
256. Question Result, ID, References **Sat, IM.PM.PMMIMPLEMENT.O, 192.935(a)**
 Question Text *Have identified additional preventive and mitigative measures to reduce the likelihood or consequence of a pipeline failure in an HCA been implemented?*
 Assets Covered **88971 (1,935)**
 Result Notes **The number of markers appears to be more than required by code.**
- IM Evaluation**
257. Question Result, ID, References **Sat, IM.PM.PMCORR.P, 192.933 (192.917(e)(5))**
 Question Text *Does the process adequately account for taking required actions to address significant corrosion threats?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 8.8**

258. Question Result, ID, NA, IM.PM.PMCCORR.R, 192.933 (192.917(e)(5))
References
Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
Assets Covered 88971 (1,935)
Result Notes No significant corrosion threats

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

IM.QA: Quality Assurance

259. Question Result, ID, Sat, IM.QA.QARM.P, 192.911(l)
References
Question Text *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 12

260. Question Result, ID, Sat, IM.QA.IMNONMANDT.P, 192.7(a)
References
Question Text *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 12.3

261. Question Result, ID, Sat, IM.QA.QARM.R, 192.947(d) (192.911(l))
References
Question Text *Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?*
Assets Covered 88971 (1,935)
Result Notes Review IM Performance Measure and DOT Manuals

262. Question Result, ID, Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f),
References 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 88971 (1,935)
Result Notes IMP Section 10

263. Question Result, ID, Sat, IM.QA.IMMOC.P, 192.911(k) (192.13(d), 192.909(a), 192.909(b)) (also presented in: MO.GO)
References
Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 11

264. Question Result, ID, Sat, IM.QA.IMMOC.R, 192.947(d) (192.13(d), 192.909(a), 192.909(b), 192.911(k))
References
Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*
Assets Covered 88971 (1,935)
Result Notes Reviewed Class Location Study, HCA and MCA Analysis 07-13-2023

No significant changes.

265. Question Result, ID, Sat, IM.QA.IMPERFEFFECTIVE.P, 192.945(a) (192.913(b), 192.951)
References
Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*
Assets Covered 88971 (1,935)
Result Notes IMP Section 9

266. 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 **88971 (1,935)**
 Result Notes **Compliance group does a quarterly effectiveness evaluation**
267. Question Result, ID, References **Sat, IM.QA.IMPERFMETRIC.P, 192.945(a) (192.913(b), 192.951)**
 Question Text *Does the process to evaluate IM program effectiveness include an adequate set of performance metrics to provide meaningful insight into IM program performance?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 9**
268. Question Result, ID, References **Sat, IM.QA.IMPERFMETRIC.R, 192.947(d) (192.913(b), 192.945(a), 192.951)**
 Question Text *Do records demonstrate that performance metrics are providing meaningful insight into integrity management program performance?*
 Assets Covered **88971 (1,935)**
 Result Notes **Reviewed records appear adequate.**
269. 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 **88971 (1,935)**
 Result Notes **Nippon pipeline records are available and maintained.**

PD.DP: Damage Prevention

270. Question Result, ID, References **Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))**
 Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 18., 7.0**
271. Question Result, ID, References **Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))**
 Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*
 Assets Covered **88971 (1,935)**
 Result Notes **Patrolling and leak surveying have not identified any issues in regard to damage prevention. Extra patrols being conducted as part of P&M measures.**

RPT.NR: Notices and Reporting

272. Question Result, ID, References **Sat, RPT.NR.NOTIFYIMCHANGE.P, 192.909(b) (192.921(a)(7), 192.937(c)(7), 192.18)**
 Question Text *Is the process for notifying PHMSA and/or state/local authorities of significant changes to the Integrity Management Program adequate?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 11, 14**
273. Question Result, ID, References **NA, RPT.NR.NOTIFYIMCHANGE.R, 192.947(i) (192.909(b), 192.921(a)(7), 192.937(c)(7))**
 Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified of substantial or significant changes to the Integrity Management Program?*
 Assets Covered **88971 (1,935)**
 Result Notes **No substantial or significant changes to the IMP**

274. Question Result, ID, References **Sat, RPT.NR.NOTIFYIMPRESS.P, 192.933(a)(1)**
 Question Text *Do processes require notifying PHMSA and/or state/local authorities: 1) if the schedule for evaluation and remediation required under paragraph 192.933(c) cannot be met and safety cannot be provided through temporary reduction in operating pressure or other action, and 2) when a pressure reduction exceeds 365 days?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 5.4, 14.2**
275. Question Result, ID, References **NA, RPT.NR.NOTIFYIMPRESS.R, 192.947(i) (192.933(a)(1))**
 Question Text *Do records demonstrate that PHMSA and/or state/local authorities were notified with the required information when one of the following occurred: 1) schedule for evaluation and remediation could not be met and safety could not be provided through a temporary reduction in operating pressure, or 2) when a pressure reduction exceeded 365 days?*
 Assets Covered **88971 (1,935)**
 Result Notes **No pressure reductions**
276. Question Result, ID, References **Sat, RPT.NR.IMDEVIATERPT.P, 192.913(b)(1)(vii)**
 Question Text *Is there a process for reporting integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 6.6**
277. Question Result, ID, References **NA, RPT.NR.IMDEVIATERPT.R, 192.947(i) (192.913(b)(1)(vii))**
 Question Text *Do records demonstrate adequate reporting of integrity management program performance measures if deviating from certain IMP requirements (exceptional performance)?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon has not deviated from IMP requirements.**
278. Question Result, ID, References **Sat, RPT.NR.IMPERFRPT.P, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)**
 Question Text *Is there a process for annual reporting of integrity management performance data?*
 Assets Covered **88971 (1,935)**
 Result Notes **IMP Section 14.3**
279. Question Result, ID, References **Sat, RPT.NR.IMPERFRPT.R, 192.947(i) (192.945(a), 191.17, ASME B31.8S-2004 Appendix A Section 9.8)**
 Question Text *Do annual reports demonstrate that integrity management performance data were reported?*
 Assets Covered **88971 (1,935)**
 Result Notes **2023 AR**

TD.ATM: Atmospheric Corrosion

280. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.P, 192.605(b)(2) (192.479(a), 192.479(b), 192.479(c), 192.9(f)(1), 192.453)**
 Question Text *Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 10.10**
281. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c), 192.9(f)(1), 192.453)**
 Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*
 Assets Covered **88971 (1,935)**
 Result Notes **Reviewed Nippon - Dynawave above ground painting for 2023.**
282. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.P, 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c), 192.481(d), 192.9(f)(1), 192.453)**

Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 10.10

283. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d), References 192.9(f)(1), 192.453)

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

Assets Covered 88971 (1,935)

Result Notes Reviewed atmospheric corrosion inspection reports for aboveground system pipe

284. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), References 192.481(d), 192.9(f)(1), 192.453, 192.491)

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

Assets Covered 88971 (1,935)

Result Notes All observed above ground piping had an adequate coating.

TD.CPMONITOR: External Corrosion - CP Monitoring

285. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.P, 192.605(b)(2) (192.463(a), 192.463(c), 192.9(f)(1), References 192.452(b), 192.452(c), 192.453)

Question Text *Does the process require CP monitoring criteria to be used that is acceptable?*

Assets Covered 88971 (1,935)

Result Notes IMP Section 1.5

286. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a), 192.9(f)(1), 182.452, 192.453, References 192.491)

Question Text *Do records document that the CP monitoring criteria used was acceptable?*

Assets Covered 88971 (1,935)

Result Notes Reviewed Safepipe records

287. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a), 192.463(b), 192.463(c), Part 192, References Appendix D)

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

Assets Covered 88971 (1,935)

Result Notes Observed CP monitoring

288. Question Result, ID, References Sat, TD.CPMONITOR.TEST.P, 192.605(b)(2) (192.465(a), 192.9(f)(1), 192.452, 192.453)

Question Text *Does the process adequately describe how to monitor CP that has been applied to pipelines?*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M Section 10.5

289. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a), 192.9(f)(1), 192.452, 192.453, 192.491)

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

Assets Covered 88971 (1,935)

Result Notes Reviewed Safepipe monitoring records

290. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.P, 192.605(b)(2) (192.465(b), 192.9(f)(1), 192.452, 192.453)

Question Text *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M Section 10.6

291. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b), 192.9(f)(1), 192.452, 192.453, 192.491)

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

Assets Covered 88971 (1,935)
Result Notes Reviewed records for monthly rectifier reads.

292. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)
Question Text *Are impressed current sources properly maintained and are they functioning properly?*
Assets Covered 88971 (1,935)
Result Notes Observed personnel making measurements on the (one) rectifier. Rectifier is in good condition.
293. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.P, 192.605(b)(2) (192.465(c), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?*
Assets Covered 88971 (1,935)
Result Notes Nippon O&M Section 10.6
294. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*
Assets Covered 88971 (1,935)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
295. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)
Question Text *Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*
Assets Covered 88971 (1,935)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
296. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCYEXTENT.P, 192.605(b)(2) (192.465(d), 192.465(f))
Question Text *For onshore gas transmission pipelines, does the process require that the operator develop a remedial action plan to determine the extent of the area affected when low cathodic protection levels are detected?*
Assets Covered 88971 (1,935)
Result Notes 2022 Gas O&M - Section 10: Corrosion Control; 10.5, 10.6, 10.13, 10.17
297. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCYEXTENT.R, 192.491(c) (192.465(d), 192.465(f))
Question Text *For onshore gas transmission pipelines, does the remedial action plan adequately document actions taken to determine the extent of inadequate cathodic protection, and correct any identified deficiencies in corrosion control?*
Assets Covered 88971 (1,935)
Result Notes Reviewed 2023 CP Survey
298. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCYEXTENT.O, 192.465(f) (192.465(d))
Question Text *Is the extent of inadequate cathodic protection identified, and if found, corrected?*
Assets Covered 88971 (1,935)
Result Notes Reviewed 2023 CP Survey - no issues
299. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.P, 192.605(b)(2) (192.465(d), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process require that the operator promptly correct any identified deficiencies in corrosion control?*
Assets Covered 88971 (1,935)
Result Notes 2022 Gas O&M - Section 10: Corrosion Control; 10.5, 10.6, 10.13, 10.17
300. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*
Assets Covered 88971 (1,935)

Result Notes Reviewed 2023 CP Survey - no issues

301. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCYGT.P, 192.605(b)(2) (192.465(d))
Question Text *For onshore gas transmission pipelines, does the process require prompt actions are taken to correct any identified deficiencies in corrosion control found during inspections/testing?*
Assets Covered 88971 (1,935)
Result Notes 2022 Gas O&M - Section 10: Corrosion Control; 10.5, 10.6, 10.13, 10.17
302. Question Result, ID, References NA, TD.CPMONITOR.DEFICIENCYGT.R, 192.491(c) (192.465(d))
Question Text *For onshore gas transmission pipelines, do records adequately document actions taken to correct any identified deficiencies in corrosion control found during inspections/testing?*
Assets Covered 88971 (1,935)
Result Notes No identified deficiencies
303. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.P, 192.469 (192.9(f)(1), 192.452, 192.453)
Question Text *Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?*
Assets Covered 88971 (1,935)
Result Notes Nippon O&M Section 10.7
304. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.R, 192.469 (192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*
Assets Covered 88971 (1,935)
Result Notes Nippon 2023 CP Survey
305. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.O, 192.469
Question Text *Do cathodically protected pipelines have a sufficient number of test stations?*
Assets Covered 88971 (1,935)
Result Notes Nippon 2023 CP Survey

Pipeline appears to have adequate number of test stations.
306. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.P, 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c), 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process provide adequate instructions for the installation of test leads?*
Assets Covered 88971 (1,935)
Result Notes Nippon O&M Section 10.8, 10.9
307. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*
Assets Covered 88971 (1,935)
Result Notes Review 2023 CP Survey
308. Question Result, ID, References NA, TD.CPMONITOR.TESTLEAD.O, 192.471(a) (192.471(b), 192.471(c))
Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*
Assets Covered 88971 (1,935)
Result Notes No such activity/condition was observed during the inspection.

no test leads installations observed.
309. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.P, 192.605(b)(2) (192.473(a), 192.9(d), 192.9(e), 192.9(f)(1), 192.452, 192.453)

Question Text *For pipelines other than onshore gas transmission, does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system?*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M Section 10.17

310. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a), 192.9(f)(1), 192.452, 192.453, References 192.491)

Question Text *For pipelines other than onshore gas transmission, 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 88971 (1,935)

Result Notes Review of 2023 CP Survey

311. Question Result, ID, NA, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a) References

Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*

Assets Covered 88971 (1,935)

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

312. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENTDES.P, 192.605(b)(2) (192.473(b)) References

Question Text *Does the operator have a program for designing and installing cathodic protection systems that minimizes the detrimental effects of interference currents on existing adjacent metallic structures?*

Assets Covered 88971 (1,935)

Result Notes O&M Section 10.17

313. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENTDES.R, 192.491(c) (192.473(b)) References

Question Text *Do records for the design and installation of cathodic protection systems demonstrate the operator reduced the detrimental effects of interference currents on existing adjacent metallic structures?*

Assets Covered 88971 (1,935)

Result Notes Review of 2023 CP Survey

314. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENTSURV.P, 192.605(b)(2) (192.473(c)(1), 192.473(c)(2)) References

Question Text *For onshore transmission pipelines, does the operator have a program in place to identify and analyze the detrimental effects of interference currents on its pipeline system by performing interference surveys to detect the presence and level of any electrical stray current.*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M Section 10.17

315. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENTSURV.R, 192.491(c) (192.473(c)(1), 192.473(c)(2)) References

Question Text *For onshore gas transmission pipelines, do records document an effective program to identify and analyze interference currents by performing interference and monitoring surveys to detect the presence and level of any electrical stray current?*

Assets Covered 88971 (1,935)

Result Notes Review 2023 CP Survey

316. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENTREM.P, 192.605(b)(2) (192.473(c)(3), 192.473(c)(4)) References

Question Text *For transmission pipelines, does the program to minimize the detrimental effects of interference currents on its pipeline system include requirements to develop a remedial plan to correct instances that would impede the safe operation of the pipeline or adversely impact the environment or public?*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M Section 10.17

317. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENTREM.R, 192.491(c) (192.473(c)(3), 192.473(c)(4)) References

Question Text *For onshore gas transmission pipelines, 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 88971 (1,935)
Result Notes Review 2023 CP Survey

TD.CP: External Corrosion - Cathodic Protection

318. Question Result, ID, Sat, TD.CP.POST1971.P, 192.605(b)(2) (192.455(a), 192.452(a), 192.452(b), 192.455(f), 192.455(g),
References 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
Assets Covered 88971 (1,935)
Result Notes Nippon O&M Section 10.4
319. Question Result, ID, NA, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(f),
References 192.455(g), 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*
Assets Covered 88971 (1,935)
Result Notes Pipeline was built in 1990 and CP was applied as required.
320. Question Result, ID, Sat, TD.CP.PRE1971.P, 192.605(b)(2) (192.457(b), 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found?*
Assets Covered 88971 (1,935)
Result Notes Nippon O&M - Section 10.4
321. Question Result, ID, NA, TD.CP.PRE1971.R, 192.491(c) (192.457(b), 192.9(f)(1), 192.452, 192.453, 192.491)
References
Question Text *Do records document that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines, or 2) bare or coated pipes in compressor, regulator or meter stations have been cathodically protected in areas where active corrosion was found?*
Assets Covered 88971 (1,935)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
322. Question Result, ID, NA, TD.CP.PRE1971.O, 192.457(b)
References
Question Text *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I of Part 192?*
Assets Covered 88971 (1,935)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
323. Question Result, ID, Sat, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e), 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*
Assets Covered 88971 (1,935)
Result Notes Nippon O&M - Section 10.4
324. Question Result, ID, NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e), 192.9(f)(1), 192.452, 192.453, 192.491)
References
Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*
Assets Covered 88971 (1,935)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
325. Question Result, ID, Sat, TD.CP.ELECISOLATE.P, 192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d),
References 192.467(e), 192.9(f)(1), 192.452, 192.453)

Question Text *Does the process give adequate guidance for electrically isolating 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 88971 (1,935)

Result Notes Nippon O&M Section 10.16

326. Question Result, ID, Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e),
References 192.9(f)(1), 192.452, 192.453, 192.491)

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 88971 (1,935)

Result Notes 2023 CP Survey

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

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 88971 (1,935)

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

328. Question Result, ID, Sat, TD.CP.ELECISOLATETEST.P, 192.605(b)(2) (192.467(d), 192.9(f)(1), 192.452, 192.453)
References

Question Text *Does the process provide adequate guidance to inspect and electrically test to ensure that electrical isolation is adequate?*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M Section 10.16

329. Question Result, ID, Sat, TD.CP.ELECISOLATETEST.R, 192.491(c) (192.467(d), 192.9(f)(1), 192.452, 192.453, 192.491)
References

Question Text *Do records adequately document the inspection and electrical testing performed to ensure that electrical isolation is adequate?*

Assets Covered 88971 (1,935)

Result Notes Review 2023 CP Inspection

330. Question Result, ID, Sat, TD.CP.CASINGINSPECT.P,
References

Question Text *Does the process give sufficient direction for conducting annual casing inspections to ensure electrical isolation from the pipeline?*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M Section 10.16

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

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

Assets Covered 88971 (1,935)

Result Notes Review 2023 CP Inspection

332. Question Result, ID, NA, TD.CP.CASINGINSPECT.O,
References

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

Assets Covered 88971 (1,935)

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

333. Question Result, ID, NA, TD.CP.ELECISOLATETEST.O, 192.467(d)
References

Question Text *Do field observations verify that inspection and electrical testing ensured that electrical isolation is adequate?*

Assets Covered 88971 (1,935)

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

334. Question Result, ID, References **Sat, TD.CP.FAULTCURRENT.P, 192.605(b)(2) (192.467(f), 192.9(f)(1), 192.452, 192.453)**
 Question Text *Does the process provide sufficient guidance for determining when protection against damage from fault currents or lightning is needed and how that protection must be installed?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon O&M Section 10.16**
335. Question Result, ID, References **Sat, TD.CP.FAULTCURRENT.R, 192.491(c) (192.467(f), 192.9(f)(1), 192.452, 192.453, 192.491)**
 Question Text *Do records adequately document the installation and inspection of fault current and lightning protection?*
 Assets Covered **88971 (1,935)**
 Result Notes **2023 CP Inspection**
336. Question Result, ID, References **NA, TD.CP.FAULTCURRENT.O, 192.467(f)**
 Question Text *Are fault current and lightning protection for the pipeline installed and inspected?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such activity/condition was observed during the inspection.**
337. Question Result, ID, References **Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)**
 Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
 Assets Covered **88971 (1,935)**
 Result Notes **corrosion control records are retained as the other pipeline records are retained**
338. Question Result, ID, References **Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c), 192.9(f)(1), 192.452, 192.453) (also presented in: TD.CPMONITOR, TD.CPEXPOSED)**
 Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*
 Assets Covered **88971 (1,935)**
 Result Notes **Corrosion control records show locations of all corrosion control items.**

TD.COAT: External Corrosion - Coatings

339. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.P, 192.605(b)(2) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a), 192.9(f)(1), 192.452, 192.453)**
 Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 10.4**
340. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 192.461(a), 192.461(b), 192.483(a), 192.9(f)(1), 192.452, 192.453, 192.491)**
 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 **88971 (1,935)**
 Result Notes **Reviewed construction records for pipeline.**
341. Question Result, ID, References **NA, TD.COAT.NEWPIPENOCOAT.R, 192.491(c) (192.455(b), 192.9(f)(1), 192.452, 192.453, 192.491)**
 Question Text *If a buried or submerged pipeline installed after July 31, 1971 was not installed with an external protective coating do records provide adequate documentation why such a coating was not necessary to protect the pipe from external corrosion?*
 Assets Covered **88971 (1,935)**
 Result Notes **No pipe buried without proper external coating.**
342. Question Result, ID, References **Sat, TD.COAT.NEWPIPEINSTALL.P, 192.605(b)(2) (192.461(c), 192.461(d), 192.461(e), 192.483(a), 192.9(f)(1), 192.452, 192.453)**
 Question Text *Does the process give adequate guidance for the application and inspection of protective coatings on pipe?*
 Assets Covered **88971 (1,935)**

Result Notes O&M Section 10.4

343. Question Result, ID, **Sat**, TD.COAT.NEWPIPEINSTALL.R, 192.491(c) (192.461(c), 192.461(d), 192.461(e), 192.483(a),
References 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document that acceptable external protective coating materials have been used and the application and inspection was done in accordance with the written procedures?*
Assets Covered 88971 (1,935)
Result Notes **Construction Records**
344. Question Result, ID, **NA**, TD.COAT.NEWPIPEINSTALL.O, 192.461(a) (192.461(c), 192.461(d), 192.461(e), 192.319(b),
References 192.483(a))
Question Text *Do field observations confirm pipe protective coating is adequately and properly applied?*
Assets Covered 88971 (1,935)
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
345. Question Result, ID, **NA**, TD.COAT.ASSESS.P, 192.605(b)(2) (192.461(f), 192.461(g), 192.461(h))
References
Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, Does the procedure include requirements to assess for external coating damage promptly after the transmission line is backfilled but no later than 6 months?*
Assets Covered 88971 (1,935)
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
346. Question Result, ID, **NA**, TD.COAT.ASSESS.R, 192.491(c) (192.461(f), 192.461(g), 192.461(h), 192.461(i))
References
Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, do records document an assessment for external coating damage promptly but no later than 6 months after the transmission line was backfilled?*
Assets Covered 88971 (1,935)
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
347. Question Result, ID, **NA**, TD.COAT.ASSESS.O, 192.461(c)
References
Question Text *For onshore steel gas transmission pipelines with a continuous backfill length greater than or equal to 1000 feet, do field observations confirm pipe protective coating is adequately surveyed promptly after backfilling?*
Assets Covered 88971 (1,935)
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
348. Question Result, ID, **Sat**, TD.COAT.CONVERTPIPE.P, 192.605(b)(2) (192.452(a), 192.455(a), 192.455(b), 192.455(c),
References 192.455(d), 192.461(a))
Question Text *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)?*
Assets Covered 88971 (1,935)
Result Notes **O&M Section 10.4**

TD.CPEXPOSED: External Corrosion - Exposed Pipe

349. Question Result, ID, **Sat**, TD.CPEXPOSED.EXPOSEINSPECT.P, 192.605(b)(2) (192.459, 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination is required to determine the extent of the corrosion?*
Assets Covered 88971 (1,935)
Result Notes **Nippon O&M 10.4**
350. Question Result, ID, **Sat**, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459, 192.9(f)(1), 192.452, 192.453, 192.491)
References
Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
Assets Covered 88971 (1,935)

Result Notes 2019 Exposed Pipe Reports

351. Question Result, ID, NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459
References
Question Text *Is exposed buried piping examined for corrosion and deteriorated coating?*
Assets Covered 88971 (1,935)
Result Notes No such activity/condition was observed during the inspection.
352. Question Result, ID, Sat, TD.CPEXPOSED.EXTCORRODEEVAL.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c),
References 192.9(f)(1), 192.452, 192.453, 192.712(b))
Question Text *Does the process provide sufficient direction for personnel to evaluate the remaining strength of externally corroded pipe?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 10.15
353. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODEEVAL.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c), 192.9(f)(1),
References 192.452, 192.453, 192.491, 192.712(b))
Question Text *Do records adequately document the evaluation of externally corroded pipe?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.
354. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODEEVAL.O, 192.485(a) (192.485(b), 192.485(c))
References
Question Text *Do field observations confirm externally corroded pipe was properly evaluated?*
Assets Covered 88971 (1,935)
Result Notes No such activity/condition was observed during the inspection.
355. Question Result, ID, Sat, TD.CPEXPOSED.EXTCORRODREPAIR.P, 192.605(b)(2) (192.485(a), 192.485(b), 192.485(c),
References 192.9(f)(1), 192.452, 192.453)
Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that is externally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
Assets Covered 88971 (1,935)
Result Notes O&M Section 10.15
356. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c),
References 192.9(f)(1), 192.452, 192.453, 192.491)
Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*
Assets Covered 88971 (1,935)
Result Notes No externally corroded pipe
357. Question Result, ID, NA, TD.CPEXPOSED.EXTCORRODREPAIR.O, 192.485(a) (192.485(b), 192.485(c))
References
Question Text *Do field observations confirm the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*
Assets Covered 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.ICCG: Internal Corrosion - Corrosive Gas

358. Question Result, ID, Sat, TD.ICCG.CORRGAS.P, 192.605(b)(2) (192.475(a), 192.9(f)(1), 192.452, 192.453)
References
Question Text *Does the process require that the corrosive effect of the gas in the pipeline be investigated?*
Assets Covered 88971 (1,935)
Result Notes Nippon O&M 10.2
359. Question Result, ID, NA, TD.ICCG.CORRGAS.R, 192.491(c) (192.475, 192.9(f)(1), 192.452, 192.453, 192.491, 192.477,
References 192.478(a), 192.478(b))
Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*
Assets Covered 88971 (1,935)
Result Notes Nippon does not transport corrosive gas

360. Question Result, ID, References **Sat, TD.ICCG.CORRGASACTION.P, 192.605(b)(2) (192.477, 192.9(f)(1), 192.452, 192.453, 192.478)**
 Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 10.2**
361. Question Result, ID, References **NA, TD.ICCG.CORRGASACTION.R, 192.491(c) (192.477, 192.9(f)(1), 192.452, 192.453, 192.491, 192.478(a), 192.478(b))**
 Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Nippon does not transport corrosive gas
362. Question Result, ID, References **NA, TD.ICCG.CORRGASACTION.O, 192.477 (192.478)**
 Question Text *Are adequate actions taken when corrosive gas is being transported by pipeline?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such activity/condition was observed during the inspection.**

Nippon does not transport corrosive gas.
363. Question Result, ID, References **Sat, TD.ICCG.CORRCONSTMONT.P, 192.605(b)(2) (192.478(a), 192.478(b)(1), 192.478(b)(2))**
 Question Text *For onshore gas transmission, does the process require monitoring of the corrosive constituents in the transported gas, and effective mitigation as necessary?*
 Assets Covered **88971 (1,935)**
 Result Notes **O&M Section 10.2**

Nippon does not transport corrosive gas
364. Question Result, ID, References **NA, TD.ICCG.CORRCONSTMONT.R, 192.491(c) (192.478(a), 192.478(b)(1), 192.478(b)(2))**
 Question Text *For onshore gas transmission, do operator records indicate monitoring the gas stream for corrosive constituents, effectively mitigating as necessary?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon does not transport corrosive gas.**
365. Question Result, ID, References **Sat, TD.ICCG.GTEVAL.P, 192.478(a) (192.478(b)(3))**
 Question Text *For onshore gas transmission pipelines, does the internal corrosion management process require an evaluation to ensure corrosive constituents are effectively monitored and mitigated?*
 Assets Covered **88971 (1,935)**
 Result Notes **Nippon O&M 10.2**
366. Question Result, ID, References **NA, TD.ICCG.GTEVAL.R, 192.491(c) (192.478(b)(3))**
 Question Text *For onshore gas transmission pipelines, do records indicate the operator performed an internal corrosion management evaluation at least once per calendar year, not to exceed 15 months?*
 Assets Covered **88971 (1,935)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Nippon does not transport corrosive gas
367. Question Result, ID, References **NA, TD.ICCG.CORRGASREVIEW.P, 192.605(b)(2) (192.478(c))**
 Question Text *For onshore gas transmission pipelines, do procedures include a requirement to review the results from the internal corrosion monitoring and mitigation program at least once each calendar year, but at intervals not exceeding 15 months?*
 Assets Covered **88971 (1,935)**

Result Notes Nippon does not transport corrosive gas

368. Question Result, ID, References NA, TD.ICCG.CORRGASREVIEW.R, 192.491(c) (192.478(c))

Question Text *For onshore gas transmission pipelines, has the operator conducted annual reviews of the internal corrosion monitoring and mitigation program as required?*

Assets Covered 88971 (1,935)

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

Nippon does not transport Corrosive Gas.

TD.ICP: Internal Corrosion - Preventive Measures

369. Question Result, ID, References Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453)

Question Text *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?*

Assets Covered 88971 (1,935)

Result Notes Nippon O&M 10.3

370. Question Result, ID, References Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.9(f)(1), 192.452, 192.453, 192.491)

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

Assets Covered 88971 (1,935)

Result Notes Reviewed Exposed Pipe reports

371. Question Result, ID, References NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))

Question Text *Is removed pipe examined for evidence of internal corrosion?*

Assets Covered 88971 (1,935)

Result Notes No pipe examination observed

372. 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 88971 (1,935)

Result Notes Nippon does not transport corrosive pipe

373. Question Result, ID, References Sat, TD.ICP.EVALUATE.P, 192.605(b)(2) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c), 192.712(b))

Question Text *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?*

Assets Covered 88971 (1,935)

Result Notes O&M Section 10.15

374. Question Result, ID, References NA, TD.ICP.EVALUATE.R, 192.491(c) (192.9(f)(1), 192.452, 192.453, 192.485(a), 192.485(c), 192.491, 192.712(b))

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

Assets Covered 88971 (1,935)

Result Notes No internally corroded pipe

375. Question Result, ID, References Sat, TD.ICP.REPAIRINT.P, 192.491(c) (192.485(a), 192.485(b), 192.9(f)(1), 192.452, 192.453)

Question Text *Does the process give sufficient guidance for personnel to repair or replace pipe that has internally corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?*

Assets Covered 88971 (1,935)

Result Notes O&M Section 10.15, 15.1

376. Question Result, ID, References NA, TD.ICP.REPAIRINT.R, 192.485(a) (192.485(b), 192.9(f)(1), 192.452, 192.453, 192.491)

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 88971 (1,935)
Result Notes No internally corroded pipe on system.

377. Question Result, ID, References NA, TD.ICP.REPAIRINT.O, 192.485(a) (192.485(b))
Question Text *Do field observations confirm 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 88971 (1,935)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.SP: Special Permits

378. Question Result, ID, References NA, TD.SP.CONDITIONS.P, 190.341(d)(2)
Question Text *Has a process been developed as necessary for complying with the special permit conditions?*
Assets Covered 88971 (1,935)
Result Notes No Special Permits
379. Question Result, ID, References NA, TD.SP.CONDITIONS.R, 190.341(d)(2)
Question Text *Do records demonstrate compliance with all special permit or waiver requirements?*
Assets Covered 88971 (1,935)
Result Notes No special permits
380. Question Result, ID, References NA, TD.SP.CONDITIONS.O, 190.341(d)(2)
Question Text *Are special permit requirements being complied with?*
Assets Covered 88971 (1,935)
Result Notes No special permits

TD.SCC: Stress Corrosion Cracking

381. 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 88971 (1,935)
Result Notes Nippon IMP Section 2 pg. 2-8, Section 4.3-4
382. Question Result, ID, References NA, 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 88971 (1,935)
Result Notes SCC is not a factor for this pipeline
383. Question Result, ID, References NA, TD.SCC.SCCREPAIR.R, 192.709(a) (192.703(b))
Question Text *Do records document that the operator has properly remediated any occurrences of SCC?*
Assets Covered 88971 (1,935)
Result Notes SCC is not a factor for this pipeline.

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

384. 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 88971 (1,935)

Result Notes [Nippon IMP Section 12.2](#)

385. Question Result, ID, [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\)](#)
References
Question Text *Do records indicate adequate qualification of integrity management personnel?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [Reviewed qualification records appear adequate](#)
386. Question Result, ID, [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\(l\)\)](#)
References
Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [Nippon IMP Section 12.2](#)

MO.GO: Gas Pipeline Operations

387. Question Result, ID, [Sat, IM.QA.IMMOC.P, 192.911\(k\) \(192.13\(d\), 192.909\(a\), 192.909\(b\)\)](#) (also presented in: [IM.QA](#))
References
Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [IMP Section 11](#)

TD.CPMONITOR: External Corrosion - CP Monitoring

388. Question Result, ID, [Sat, TD.CP.RECORDS.P, 192.605\(b\)\(2\) \(192.491\(a\), 192.491\(b\), 192.491\(c\), 192.9\(f\)\(1\), 192.452, 192.453\)](#) (also presented in: [TD.CP](#), [TD.CPEXPOSED](#))
References
Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [corrosion control records are retained as the other pipeline records are retained](#)
389. Question Result, ID, [Sat, TD.CP.RECORDS.R, 192.491\(a\) \(192.491\(b\), 192.491\(c\), 192.9\(f\)\(1\), 192.452, 192.453\)](#) (also presented in: [TD.CP](#), [TD.CPEXPOSED](#))
References
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [Corrosion control records show locations of all corrosion control items.](#)

TD.CPEXPOSED: External Corrosion - Exposed Pipe

390. Question Result, ID, [Sat, TD.CP.RECORDS.P, 192.605\(b\)\(2\) \(192.491\(a\), 192.491\(b\), 192.491\(c\), 192.9\(f\)\(1\), 192.452, 192.453\)](#) (also presented in: [TD.CP](#), [TD.CPMONITOR](#))
References
Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [corrosion control records are retained as the other pipeline records are retained](#)
391. Question Result, ID, [Sat, TD.CP.RECORDS.R, 192.491\(a\) \(192.491\(b\), 192.491\(c\), 192.9\(f\)\(1\), 192.452, 192.453\)](#) (also presented in: [TD.CP](#), [TD.CPMONITOR](#))
References
Question Text *Do records indicate the location of all corrosion control items listed in §192.491(a)?*
Assets Covered [88971 \(1,935\)](#)
Result Notes [Corrosion control records show locations of all corrosion control items.](#)

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