

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	8801 - NWN TIMP	Operator(s)	NORTHWEST NATURAL GAS CO (13840) Lead Scott Anderson	Plan Submitted	12/07/2023
Status	LOCKED	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	Plan Approval	12/13/2023 by Dennis Ritter
Start Year	2024	Supervisor	Dennis Ritter	All Activity Start	10/14/2024
System Type	GT	Director	Scott Rukke	All Activity End	10/14/2024
Protocol Set ID	WA.GT.2023.02			Inspection Submitted	11/05/2024
				Inspection Approval	11/06/2024 by Scott Rukke

Inspection Summary

NOTE: Inspection Setup/pre plan analysis is not used for this type of WA intrastate inspection.

Inspection Scope and Summary

This inspection consisted of a records and procedure review for NW Natural Gas (NWN). NWN operates the Camas Feeder (P-04), MAOP is 400 psig @ 26.2% SMYS. The line operates at around 370 psig and had been originally hydro tested to 850 psig in 1956. The materials used were 8.625" diameter ERW, Grade B, .188" WT, coal tar coated pipe. NWN performed the first ILI on the P-04 Line, 11/1/2023.

Facilities visited and Total AFOD

1 AFOD

Summary of Significant Findings

No findings

Primary Operator contacts and/or participants

Ryan Truair, Compliance Senior Manager, NW Natural

Samantha Rookstool, Compliance Specialist, NW Natural

Andy Fortier, Compliance Engineer, NW Natural

Hanna Koonce, Code Compliance Specialist, NW Natural

Operator executive contact and mailing address for any official correspondence

Joe Karney

VP, Engineering and Utility Operations

250 SW Taylor St.

Portland, OR 97204

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88966 (1,879)	Northwest Natural-TRANSMISSION	unit	88966	Compressor Stations Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA	159	159	159	159	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.	88966 (1,879)	GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R	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.	TIMP	--	10/14/2024	10/14/2024	GT IM	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	all assets	all types	159	159	159	159	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

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

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	TIMP	COMPLETED	11/04/2024	TIMP	88966 (1,879)

Results (all values, 159 results)

AR.CDA: Confirmatory Direct Assessment

1. Question Result, ID, References **NA, 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 **88966 (1,879)**

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

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

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

Assets Covered 88966 (1,879)

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

AR.EC: External Corrosion Direct Assessment (ECDA)

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

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

Assets Covered 88966 (1,879)

Result Notes NWN TIMP section(s) 12.6, 12.6.1, 12.6.2

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

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

Assets Covered 88966 (1,879)

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

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

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

Assets Covered 88966 (1,879)

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

6. 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 88966 (1,879)

Result Notes NWN TIMP section 4.1

7. 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 88966 (1,879)

Result Notes NWN TIMP section 4.2.1, Table 4-1

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

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

Assets Covered 88966 (1,879)

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

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

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

Assets Covered 88966 (1,879)

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

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

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

Assets Covered 88966 (1,879)

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

11. Question Result, ID, References **NA, AR.EC.ECDADIRECT.R, 192.947(g) (192.925(b)(3))**
 Question Text *Do records demonstrate that excavations, direct examinations, and data collection were performed in accordance with NACE SP 0502-2010, Sections 5 and 6.4.2 and ASME B31.8S-2004, Section 6.4?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
12. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
13. Question Result, ID, References **NA, AR.EC.ECDAPOSTASSESS.R, 192.947(g) (192.925(b)(4))**
 Question Text *Do records demonstrate that the requirements for post-assessment were met?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
14. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section(s) 3.2, 4, 5.4.2**
15. Question Result, ID, References **NA, AR.EC.ECCORR.R, 192.933 (192.917(e)(5))**
 Question Text *Do records demonstrate that required actions are being taken to address significant external corrosion threats as required?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.IC: Internal Corrosion Direct Assessment (ICDA)

16. Question Result, ID, References **Sat, AR.IC.ICDAREVQUAL.P, 192.915(a) (192.915(b))**
 Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate ICDA assessment results meet appropriate training, experience, and qualification criteria?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section(s) 12.6, 12.6.1, 12.6.2**
17. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
18. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section 4.6**
19. Question Result, ID, References **NA, AR.IC.ICDAPREASSESS.R, 192.927(c)(1) (192.947(g))**
 Question Text *Do records demonstrate that the requirements for an ICDA pre-assessment were met?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

20. Question Result, ID, References **Sat, AR.IC.ICDAINTEGRATION.P, 192.917(b)**
 Question Text *Is the process for integrating ICDA results with other information adequate?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 4.7.1**
21. Question Result, ID, References **NA, AR.IC.ICDAINTEGRATION.R, 192.917(b) (192.947(g))**
 Question Text *Do records demonstrate that other data/information was integrated when evaluating data/results?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
22. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
23. Question Result, ID, References **NA, AR.IC.ICDAPOSTASSESS.R, 192.947(g) (192.927(c)(4)(i), 192.927(c)(4)(ii), 192.477)**
 Question Text *Do records demonstrate that the operator assessed the effectiveness of the ICDA process?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
24. Question Result, ID, References **Sat, AR.IC.ICCORR.P, 192.933 (192.917(e)(5))**
 Question Text *Does the process adequately account for taking required actions to address significant internal corrosion threats related to internal corrosion?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 4.8.1**
25. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

26. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. NWN TIMP section 4.11**
27. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
28. Question Result, ID, References **NA, AR.SCC.SCCDAPLAN.P, 192.929(b)**
 Question Text *Is an adequate plan developed for performing SCCDA, if the conditions for SCC were present?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. NWN TIMP section 4.11**

29. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
30. Question Result, ID, References **NA, AR.SCC.SCCDAMETHOD.R, 192.947(g) (192.929(b)(2))**
 Question Text *Do records demonstrate that an assessment was performed using one of the methods specified in ASME B31.8S-2004 Appendix A3?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
31. Question Result, ID, References **NA, AR.SCC.SCCDANEARNEUTRAL.R, 192.947(g) (192.929(b)(2))**
 Question Text *From the review of the results of selected integrity assessments, was the pipeline evaluated for near neutral SCC?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
32. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
33. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. NWN TIMP section 4.11**
34. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

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

35. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section 12.6, 12.6.1, 12.6.2**
36. Question Result, ID, References **Sat, 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 **88966 (1,879)**
 Result Notes **An ILI run was performed 11/1/23 by Entegra, combo tool UHR MFL/Cal combo tool. Analyzed by Joaquin Peraza exp. 1/4/24 level III technician.**
37. 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 88966 (1,879)
Result Notes NWN TIMP section(s) 2.1.1

38. Question Result, ID, References Sat, 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 88966 (1,879)
Result Notes P-04 Camas line, ILI 11/1/23, performed by Entegra, combo tool UHR MFL/Cal combo tool. Section 5.2 in the final report contains all the tool specifications.
39. 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 88966 (1,879)
Result Notes NWN TIMP section 2.2
40. 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 88966 (1,879)
Result Notes Section 2 in the TIMP defines the appropriate tool selection, specifically 2.1.1.1.
41. Question Result, ID, References Sat, AR.IL.ILIVALIDATE.P, 192.921(a)(1) (192.937(c), 192.493)
Question Text *Does the process for validating ILI results ensure that accurate integrity assessment results are obtained?*
Assets Covered 88966 (1,879)
Result Notes NWN TIMP section 2.1.1.3, figure 2-2
42. Question Result, ID, References Sat, 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 88966 (1,879)
Result Notes Reviewed Entegra ILI report for the 11/1/2023 run. No immediate digs were called out. NWN performed 5 prudent operator digs.

Per the unity plot:

Tool called out 19 locations @ 10-19% internal metal loss due to manufacturing/mill.

Tool called out 35 locations @ 10-19% due to corrosion, 37 locations manufacturing/mill

Tool called out 3 locations @ 20-29% due to corrosion.
43. Question Result, ID, References Sat, AR.IL.ILIINTEGRATION.P, 192.917(b) (192.493)
Question Text *Is the process for integrating ILI results with other information adequate?*
Assets Covered 88966 (1,879)
Result Notes NWN TIMP section 3, 3.2.4
44. Question Result, ID, References Sat, 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 88966 (1,879)
Result Notes Reviewed Entegra ILI report for the 11/1/2023 run. No immediate digs were called out. NWN performed 5 prudent operator digs. This was the first ILI ran on the P-04 Camas line. A launcher and receiver were installed, NWN used historical data to remove a number of appurtenances prior to this initial run. Reviewed construction documentation related to the pipeline, also launcher receiver construction documentation.

45. Question Result, ID, References **Sat, AR.IL.ILIACCEPCRITERIA.P, 192.921(a) (192.493)**
 Question Text *Is the process for ILI survey acceptance criteria adequate to assure an effective assessment?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 2.1.1.3, figure 2-2**
46. Question Result, ID, References **Sat, 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 **88966 (1,879)**
 Result Notes **Reviewed Entegra ILI report for the 11/1/2023 run. No immediate digs were called out. Section 1, figure 1 in the executive summary of the report indicated adequate implementation of the process for the ILI survey acceptance.**
47. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
48. Question Result, ID, References **Sat, AR.IL.ILCORR.P, 192.933 (192.917(e)(5))**
 Question Text *Does the process adequately account for taking required actions to address significant corrosion threats identified during in-line inspections?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section(s) 5, Appendix K**
49. Question Result, ID, References **Sat, 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 **88966 (1,879)**
 Result Notes **There were no immediate or scheduled digs due to corrosion. The 3 locations @ 20-29% due to corrosion will be continually monitored.**

AR.LSR: Low Stress Reassessment

50. Question Result, ID, References **NA, AR.LSR.LSRPLAN.P, 192.941(a) (192.941(b), 192.941(c))**
 Question Text *Is the process for performing low stress reassessment adequate?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
51. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
52. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
53. 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 88966 (1,879)

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

54. 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 88966 (1,879)

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

55. 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 88966 (1,879)

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

AR.PTI: Integrity Assessment Via Pressure Test

56. 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 88966 (1,879)

Result Notes NWN TIMP section 12.6, 12.6.1, 12.6.2

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

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

Assets Covered 88966 (1,879)

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

58. 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 88966 (1,879)

Result Notes NWN TIMP section 2.1.2

59. Question Result, ID, References NA, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))

Question Text *Do the test records validate the pressure test?*

Assets Covered 88966 (1,879)

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

60. 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 88966 (1,879)

Result Notes NWN TIMP section(s) 5, 5.4.2, Appendix K

61. 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 88966 (1,879)

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

AR.OT: Other Technology

62. Question Result, ID, References **Sat, AR.OT.OTPLAN.P, 192.921(a)(4) (192.18)**
Question Text *Has a process been developed for "other technologies" that provide an equivalent understanding of the condition of the pipe?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section 6.2, 14.1 if something needs to be submitted to PHMSA.**
63. Question Result, ID, References **NA, AR.OT.OTPLAN.R, 192.947(d) (192.921(a)(4), 192.933(b))**
Question Text *Do records demonstrate that the assessments were performed in accordance with the process and vendor recommendations and that defects were identified and categorized within 180 days, if applicable?*
Assets Covered **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
64. Question Result, ID, References **Sat, AR.OT.OTREVQUAL.P, 192.915(a) (192.915(b), 192.921(a)(7), 192.493)**
Question Text *Does the process require that operator/vendor personnel (including supervisors) who review and evaluate assessment results meet acceptable qualification standards?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section 12.6, 12.6.1, 12.6.2**
65. Question Result, ID, References **NA, AR.OT.OTREVQUAL.R, 192.947(d) (192.915(a), 192.915(b))**
Question Text *Do records demonstrate that operator/vendor personnel, including supervisors, who conduct assessments or review assessment results are qualified for the tasks they perform?*
Assets Covered **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
66. 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 **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. NWN TIMP section 5**
67. 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 **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

AR.RC: Repair Criteria (HCA)

68. Question Result, ID, References **Sat, AR.RC.DISCOVERY.P, 192.933(b)**
Question Text *Does the integrity assessment process properly define discovery and the required time frame?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section 5**
69. Question Result, ID, References **NA, AR.RC.DISCOVERY.R, 192.947(f) (192.933(b))**
Question Text *Do records demonstrate that discovery was declared in the required time frame or justification was documented?*
Assets Covered **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.
No immediate or scheduled callouts from the initial ILI run 11/1/2023**
70. Question Result, ID, References **Sat, AR.RC.IMPRC.P, 192.933(a) (192.933(c), 192.933(d), 192.18)**

Question Text *Does the Integrity Management Plan and/or maintenance processes include all of the actions that must be taken to address integrity issues in accordance with 192.933?*

Assets Covered 88966 (1,879)

Result Notes NWN TIMP section 5, Appendix K

71. Question Result, ID, References NA, AR.RC.PRESSREDUCE.R, 192.947(f) (192.933(a)(1), 192.18)

Question Text *Do records demonstrate that an acceptable pressure reduction was promptly taken for each immediate repair condition or when a repair schedule could not be met?*

Assets Covered 88966 (1,879)

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

No immediate or scheduled callouts from the initial ILI run 11/1/2023

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

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

Assets Covered 88966 (1,879)

Result Notes NWN TIMP section 5, Appendix K

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

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

Assets Covered 88966 (1,879)

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

No immediate or scheduled callouts from the initial ILI run 11/1/2023

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

Question Text *Does the process require an evaluation of all pipeline segments with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?*

Assets Covered 88966 (1,879)

Result Notes NWN TIMP section 5, Appendix K

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

Question Text *From the review of the results of integrity assessments, were all pipeline segments evaluated with similar environmental and material coating conditions as segments where corrosion that could adversely affect the integrity of the pipeline was found?*

Assets Covered 88966 (1,879)

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

AR.RMP: Repair Methods and Practices

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

Question Text *Does the process require that when a pipeline segment that meets the conditions for cracking and/or possible SCC is exposed (i.e., the coating is removed), an NDE method (e.g., MPI, UT) is employed to evaluate for cracking?*

Assets Covered 88966 (1,879)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. NWN TIMP section 4.11

IM.HC: High Consequence Areas

77. 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 88966 (1,879)

Result Notes NWN TIMP section 1

78. 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 88966 (1,879)

Result Notes Reviewed Gas HCA Report performed by Integrity Plus in January 2024, section 7. NWN uses method 1 for pipes inside the Urban Growth Area (UGA), method 2 for pipes outside the UGA.

79. 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 88966 (1,879)

Result Notes NWN TIMP section 1.4

80. 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 88966 (1,879)

Result Notes NWN TIMP section 1.5

81. 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 88966 (1,879)

Result Notes NWN TIMP section 1.6

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

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

Assets Covered 88966 (1,879)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. Nothing new in WA.

83. 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 88966 (1,879)

Result Notes NWN TIMP section 1.2

84. 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 88966 (1,879)

Result Notes Per the Gas HCA Report performed by Integrity Plus in January 2024, NWN PIR calculations are consistent with 192.903.

85. 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 88966 (1,879)

Result Notes **NWN TIMP section 1.3, table 1-1**

86. 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 **88966 (1,879)**
Result Notes **Per the Gas HCA Report performed by Integrity Plus in January 2024, identified sites are being identified using patrols, leak survey, and continuing surveillance. Also reviewed GIS data.**
87. Question Result, ID, References **Sat, IM.HC.HCAMETHOD1.R, 192.947(d) (192.903(1)(i), 192.903(1)(ii), 192.903(1)(iii), 192.903(1)(iv))**
Question Text *Do records demonstrate that identification of 192.903 High Consequence Areas using Method (1) was adequate?*
Assets Covered **88966 (1,879)**
Result Notes **Records demonstrated that identification of 192.903 High Consequence Areas using Method (1) was adequate. Reviewed P-04 Camas line HCA identifier in NWN ESRI GIS viewer.**
88. 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 **88966 (1,879)**
Result Notes **Records demonstrated that identification of 192.903 High Consequence Areas using Method (1) was adequate. Reviewed P-04 Camas line HCA identifier in NWN ESRI GIS viewer.**

IM.RA: Risk Analysis

89. Question Result, ID, References **Sat, IM.RA.RADATA.P, 192.917(b) (192.917(e)(1), 192.911(k))**
Question Text *Does the process include requirements to gather and integrate existing data and information on the entire pipeline that could be relevant to covered segments?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section 3.2**
90. Question Result, ID, References **Sat, IM.RA.RAMETHOD.P, 192.917(c) (192.917(d))**
Question Text *Does the process include requirements for a risk assessment that considers all of the identified threats for each covered segment, including the requirements of ASME B31.8S-2004 (Section 5) and the need to address potential risk of a compromised operations control system (e.g., cyber-attack)?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section 3.3**
91. Question Result, ID, References **Sat, IM.RA.THREATID.R, 192.947(b) (192.917(a), 192.917(e), 192.913(b)(1), 192.632)**
Question Text *Do records demonstrate that all potential threats to each covered pipeline segment have been identified and evaluated?*
Assets Covered **88966 (1,879)**
Result Notes **NWN uses a Software program called Uptime to capture threats. Appendix A and ECDA section in the TIMP.**
92. Question Result, ID, References **NA, IM.RA.RADATA.R, 192.947(b) (192.917(b), 192.917(e)(1), 192.911(k), 192.607)**
Question Text *Do records demonstrate that existing data and information on the entire pipeline that could be relevant to covered segments being adequately gathered and integrated?*
Assets Covered **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Section 3.2 in the TIMP, also ESRI GIS map. No new data since the initial ILI run 11/1/2023.**
93. Question Result, ID, References **Sat, IM.RA.THREATID.P, 192.917(a) (192.917(e), 192.913(b)(1))**
Question Text *Does the process include requirements to identify and evaluate all potential threats to each covered pipeline segment?*

Assets Covered 88966 (1,879)
Result Notes NWN TIMP section 3.1, Table 3-1

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

Assets Covered 88966 (1,879)
Result Notes NWN TIMP Appendix A. The data is integrated into Uptime.

95. Question Result, ID, References Sat, IM.RA.RAFACTORS.P, 192.917(c)
Question Text *Does the process include requirements for factors that could affect the likelihood of a release, and for factors that could affect the consequences of potential releases, be accounted for and combined in an appropriate manner to produce a risk value for each pipeline segment?*

Assets Covered 88966 (1,879)
Result Notes NWN TIMP section(s) 3.3.1, 3.3.2

96. 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 88966 (1,879)
Result Notes The P-04 Camas line is the only pipeline segment in the system.

97. 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 88966 (1,879)
Result Notes NWN TIMP section(s) 3.2.3, 3.3.3

98. Question Result, ID, References NA, 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 88966 (1,879)
Result Notes No such event occurred, or condition existed, in the scope of inspection review. No changes on the 1 pipeline segment that is in WA.

IM.BA: Baseline Assessments

99. 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 88966 (1,879)
Result Notes NWN TIMP section(s) 2.6

100. 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 88966 (1,879)
Result Notes Engineering procedures are created for any ILI run. There has been only 1 one on the P-04 Camas line. Reviewed Procedure GOP-23-099 for the initial ILI run that occurred 11/1/2023

101. 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 88966 (1,879)

Result Notes **NWN TIMP section(s) 2.1**

102. 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 **88966 (1,879)**
Result Notes **P-04 Camas line is the only segment in WA for NWN and ILI is the primary assessment method they will be using. ECDA may also be used. Appendix A in NWN TIMP identifies these.**
103. 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 **88966 (1,879)**
Result Notes **NWN TIMP section(s) 2.5**
104. Question Result, ID, References **NA, IM.BA.BANEW.R, 192.947(d) (192.905(c), 192.911(p), 192.921(f), 192.921(g), 192.620)**
Question Text *Do records demonstrate that the assessment plan has been adequately updated for new HCAs and newly installed pipe?*
Assets Covered **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. HCAs haven't changed.**
105. 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 **88966 (1,879)**
Result Notes **NWN TIMP section(s) 2.3**
106. 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 **88966 (1,879)**
Result Notes **NWN performed their first ILI run on the P-04 Camas line 1/11/2023. No other assessments have occurred since then.**

IM.CA: Continual Evaluation and Assessment

107. 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 **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. NWN TIMP section(s) 6.3**
108. 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 **88966 (1,879)**
Result Notes **NWN TIMP section(s) 6.2**
109. 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 **88966 (1,879)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

110. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section(s) 2.7, 6.3**
111. 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 **88966 (1,879)**
 Result Notes **NWN performed their first ILI run on the P-04 Camas line 1/11/2023. No other assessments have occurred since then. TIMP Appendix A lists potential threats.**
112. 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 **88966 (1,879)**
 Result Notes **NWN is on the 7 year ILI schedule, the first was 11/1/2023.**
113. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section(s) 6.4**
114. 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 **88966 (1,879)**
 Result Notes **NWN uses ILI as their primary assessment method for the P-04 Camas line.**
115. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section(s) 6.6**
116. 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
117. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section(s) 6.5**
118. 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 **88966 (1,879)**

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

IM.PM: Preventive and Mitigative Measures

119. Question Result, ID, References **Sat, IM.PM.PMMGENERAL.P, 192.935(a)**
Question Text *Does the process include requirements to identify additional measures to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section(s) 8.1**
120. Question Result, ID, References **NA, IM.PM.PMMGENERAL.R, 192.947 (192.935(a))**
Question Text *Do records demonstrate that additional measures have been identified and implemented (or scheduled) beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in an HCA?*
Assets Covered **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No additional.**
121. Question Result, ID, References **Sat, IM.PM.PMTPD.P, 192.917(e)(1) (192.935(b)(1), 192.935(e))**
Question Text *Does the preventive and mitigative measure process include requirements that threats due to third party damage be addressed?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section(s) 8.2**
122. Question Result, ID, References **Sat, IM.PM.PMTPD.R, 192.947 (192.917(e)(1), 192.935(b)(1), 192.935(e))**
Question Text *Do records demonstrate that preventive & mitigative measures have been implemented regarding threats due to third party damage as required by the process?*
Assets Covered **88966 (1,879)**
Result Notes **TIMP section 8.2. NWN field staff is on site whenever any digging occurs near the transmission line. Patrols and leak survey data is also integrated into NWN P&M measures, reviewed a sampling.**
123. 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 **88966 (1,879)**
Result Notes **NWN TIMP section 12.6, 12.6.1, 12.6.2, 8.2**
124. 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 **88966 (1,879)**
Result Notes **Personnel who implement preventive and mitigative measures or directly supervise excavation work are qualified. No excavation work has occurred since the initial ILI run.**
125. Question Result, ID, References **Sat, IM.PM.PMTPD SMYS.P, 192.935(d) (192.935(e), 192 Appendix E Table E.II.1)**
Question Text *Does the process include requirements for preventive and mitigative measures for pipelines operating below 30% SMYS?*
Assets Covered **88966 (1,879)**
Result Notes **NWN TIMP section 8.3, table 8-1**
126. Question Result, ID, References **NA, IM.PM.PMTPD SMYS.R, 192.947(d) (192.935(d), 192.935(e), 192 Appendix E Table E.II.1)**
Question Text *Do records demonstrate that preventive and mitigative measures for pipelines operating below 30% SMYS are being performed as required?*
Assets Covered **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

127. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section 8.5**
128. Question Result, ID, References **NA, 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No outside force threats identified.**
129. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section 8.7**
130. Question Result, ID, References **NA, 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 **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
131. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section 5.4.2**
132. Question Result, ID, References **NA, IM.PM.PMCORR.R, 192.933 (192.917(e)(5))**
 Question Text *Do records demonstrate that required actions are being taken to address significant corrosion threats as required?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. The initial tool run called out corrosion threats but none were immediate or scheduled.**

IM.QA: Quality Assurance

133. Question Result, ID, References **Sat, IM.QA.QARM.P, 192.911(l)**
 Question Text *Are quality assurance processes in place for risk management applications that meet the requirements of ASME B31.8S-2004, Section 12?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 12**
134. Question Result, ID, References **Sat, IM.QA.IMNONMANDT.P, 192.7(a)**
 Question Text *Does the process include requirements that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2004 and NACE SP0502-2010) be addressed by an appropriate approach?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 12.3**

135. Question Result, ID, References **Sat, IM.QA.QARM.R, 192.947(d) (192.911(l))**
 Question Text *Do records demonstrate that the quality assurance process for risk management applications is being completed as required by ASME B31.8S-2004, Section 12?*
 Assets Covered **88966 (1,879)**
 Result Notes **The P-04 line has a QA process and is being completed as required. Since there is only 1 segment it is the highest and the lowest risk.**
136. Question Result, ID, References **Sat, IM.QA.RECORDS.P, 192.947(a) (192.947(b), 192.947(c), 192.947(d), 192.947(e), 192.947(f), 192.947(g), 192.947(h), 192.947(i), 192.517(a))**
 Question Text *Is the process adequate to assure that required records are maintained for the useful life of the pipeline?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 10.1**
137. Question Result, ID, References **Sat, IM.QA.IMMOC.P, 192.911(k) (192.909(a), 192.909(b))**
 Question Text *Is the process for management of changes that may impact pipeline integrity adequate?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 11**
138. Question Result, ID, References **NA, IM.QA.IMMOC.R, 192.947(d) (192.909(a), 192.909(b), 192.911(k))**
 Question Text *Do records demonstrate that changes that may impact pipeline integrity are being managed as required?*
 Assets Covered **88966 (1,879)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
139. Question Result, ID, References **Sat, IM.QA.IMPERFEFFECTIVE.P, 192.945(a) (192.913(b), 192.951)**
 Question Text *Does the process for measuring IM program effectiveness include the elements necessary to conduct a meaningful evaluation?*
 Assets Covered **88966 (1,879)**
 Result Notes **NWN TIMP section 9, table 9-1**
140. 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 **88966 (1,879)**
 Result Notes **Section 9.2 in NWN TIMP also data contained in annual reports and damage prevention evaluates this. The line was also being assessed using ECDA as a primary method, now it is ILI.**
141. 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 **88966 (1,879)**
 Result Notes **NWN TIMP section 9, table 9-1**
142. 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 **88966 (1,879)**
 Result Notes **Data contained in annual reports and damage prevention.**
143. 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 **88966 (1,879)**
 Result Notes **NWN has the original installation documentation from 1956. Records for the first ILI run is also maintained.**

PD.DP: Damage Prevention

144. 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 **88966 (1,879)**
Result Notes **NWN TIMP section 8.2**
145. 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 **88966 (1,879)**
Result Notes **NWN damage prevention program and program information gathering is adequate. Reviewed a sampling of NWN internal Semi-annual Report documentation.**

RPT.NR: Notices and Reporting

146. 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 **88966 (1,879)**
Result Notes **NWN TIMP section 14**
147. 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 **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
148. 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 **88966 (1,879)**
Result Notes **NWN TIMP section 4.4.1, 14**
149. 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 **88966 (1,879)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
150. 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 **88966 (1,879)**
Result Notes **NWN TIMP section 14**
151. 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 88966 (1,879)

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

152. 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 88966 (1,879)

Result Notes NWN TIMP section 9.1

153. 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 88966 (1,879)

Result Notes Annual reports were adequate.

TD.SCC: Stress Corrosion Cracking

154. Question Result, ID, References NA, 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 88966 (1,879)

Result Notes No such event occurred, or condition existed, in the scope of inspection review. NWN TIMP section 4.11

155. 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 88966 (1,879)

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

156. 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 88966 (1,879)

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

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

157. 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 88966 (1,879)

Result Notes NWN TIMP section 12.6, 12.6.1, 12.6.2

158. Question Result, ID, References Sat, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d), 192.493)

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

Assets Covered 88966 (1,879)

Result Notes P-04 Camas line performed an ILI 11/1/23 performed by Entegra, combo tool UHR MFL/Cal combo tool. Analyzed by Joaquin Peraza exp. 1/4/24 level III technician

159. Question Result, ID, References Sat, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))

Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*

Assets Covered 88966 (1,879)

Result Notes NWN TIMP section 12.6, 12.6.1, 12.6.2

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