

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	8982_Avista_CRM_2025	Operator(s)	AVISTA CORP (31232)	Plan Submitted	10/10/2025
Status	LOCKED	Lead	Derek Norwood	Plan Approval	10/15/2025 by Dennis Ritter
Start Year	2025	Observer(s)	David Cullom, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit, Emma Barrett	All Activity Start	09/02/2025
System Type	GD	Director	Scott Rukke, Dennis Ritter	All Activity End	09/10/2025
Protocol Set ID	GD.2025.01			Inspection Submitted	10/15/2025
				Inspection Approval	10/15/2025 by Dennis Ritter

Inspection Summary

Inspection Scope and Summary

2025 CRM Program Inspection: Representatives from Oregon PUC and Idaho PUC were also present and completed independent inspection. Avista Pipeline System operates in three states, Washington, Oregon and Idaho. They employ SCADA to monitor their pipeline assets and have a control room with controllers that meet the definition of a control room. Avista's control room is at their HQ building on Mission St in Spokane WA.

Avista does not have a backup control room or a redundant back up gas SCADA system. They currently have 6 qualified controllers and a qualified lead controller and employ the Dupont schedule of 12-hr shifts. They have one console and one controller on duty 24-7. Avista's control structure does not have outputs to remote controllable assets. Controllers must call out field employees to make changes to the system. Avista can evacuate their control room and move to Couer d'Alene, ID and operate the pipeline, however, Avista does not consider this a back up control room as they do not have fully redundant SCADA at this location for gas assets.

Facilities visited and Total AFODs

This inspection was conducted virtually using MS Teams with a field visit to the control room in Spokane to complete observation questions.

Summary of Significant Findings(DO NOT Discuss Enforcement options)

There are no areas of concerns and no probable violations as a result of this inspection.

Primary Operator contacts and/or participants

Randy Bareither, Pipeline Safety Engineer

Operator executive contact and mailing address for any official correspondence

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1411 E Mission Ave
Spokane, WA
99220

Scope (Assets)

8982_Avista_CRM_2025

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Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88960 (83)	Avista Utilities Corp - (HQ)	unit	88960	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Abandoned	140	140	140	140	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. 88960 (83)	Control Room Management	AR, CR, DC, EP, FS, MO, GDIM, LPGIM, PD, RPT, TD, TQ, 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. CRM	--	09/02/2025 -- 09/10/2025		all planned questions	all assets	all types	140	140	140	140	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	CRM	COMPLETED	10/10/2025	CRM	88960 (83)

Results (all values, 140 results)

CR.CRMGEN: General

1. Question Result, ID, References Sat, CR.CRMGEN.CRMCRITERIA.P, 192.631(a)(2)

Question Text Do procedures adequately address the process and criteria to determine which facilities are control rooms?

Assets Covered 88960 (83)

Result Notes Control Room Management Plan (CRMP)

Section 1.2.1 Scope

Section 1.3.3 Definitions

2. Question Result, ID, References Sat, CR.CRMGEN.CRMMGMT.P, 192.631(a)(2)

Question Text Are CRM procedures formalized and controlled?

Assets Covered 88960 (83)
Result Notes Control Room Management Plan (CRMP)

Revised/Reviewed each year and made available to personnel

3. Question Result, ID, References Sat, CR.CRMGEN.CRMIMPLEMENT.R, 192.631(a)(2)
Question Text *Were procedures approved, in place, and implemented on or before the regulatory deadline?*
Assets Covered 88960 (83)
Result Notes Rev 0 Approved on 5/25/2010

4. Question Result, ID, References Sat, CR.CRMGEN.CRMPROCLOCATION.O, 192.631(a)(2)
Question Text *Are procedures readily available to controllers in the control room?*
Assets Covered 88960 (83)
Result Notes Visited control room and verified that procedures were available

Available in binder and online

CR.CRMRR: Roles and Responsibilities

5. Question Result, ID, References Sat, CR.CRMRR.RESPONSIBLE.P, 192.631(b)
Question Text *Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets?*
Assets Covered 88960 (83)
Result Notes Control Room Management Plan (CRMP)

Section 1 Table 2.1 Covers service areas

Section 2 Subsection 4 Cover responsibilities and domain of the controller

6. Question Result, ID, References Sat, CR.CRMRR.QUALCONTROL.P, 192.631(b)
Question Text *Are there provisions in place to assure that only qualified individuals may assume control at any console/desk?*
Assets Covered 88960 (83)
Result Notes Control Room Management Plan (CRMP)

Section 2 Subsection 3.4 Qualified Controller

Section 2 Subsection 4

7. Question Result, ID, References NA, CR.CRMRR.DOMAINCHANGE.P, 192.631(b)
Question Text *If the physical domain of responsibility periodically changes, has a clear process been established to describe the conditions for when such a change occurs?*
Assets Covered 88960 (83)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

8. Question Result, ID, References Sat, CR.CRMRR.AUTHORITYABNORMAL.P, 192.631(b)(2)
Question Text *Have processes been established to define the controllers' authority and responsibilities when an abnormal operating condition is detected?*
Assets Covered 88960 (83)
Result Notes Control Room Management Plan (CRMP)

Section 2 Subsection 6.2 Abnormal Operations

9. Question Result, ID, References **Sat, CR.CRMRR.RESPCHANGE.P, 192.631(b)**
Question Text *Do processes address a controller's role during temporary impromptu (unplanned) changes in controller responsibilities?*
Assets Covered **88960 (83)**
Result Notes **Control Room Management Plan (CRMP)**

Section 4 Subsection 6.16 Transfer of Responsibility during the Shift

10. Question Result, ID, References **Sat, CR.CRMRR.COMMANDVERIFY.P, 192.631(b)**
Question Text *Do the defined roles and responsibilities require controllers to stay at the console to verify all SCADA commands that have been initiated are fulfilled, and that commands given via verbal communications are acknowledged before leaving the console for any reason?*
Assets Covered **88960 (83)**
Result Notes **Control Room Management Plan (CRMP)**

Section 2 Subsection 4.1.1 General

11. Question Result, ID, References **Sat, CR.CRMRR.PRESSLIMITS.O, 192.631(b)(2) (192.619(a), 192.631(e)(1))**
Question Text *Are controllers aware of the current MAOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MAOP?*
Assets Covered **88960 (83)**
Result Notes **Visited control room in Spokane**

Controller was able to show MAOP on all lines and was aware of responsibility to maintain MAOP

12. Question Result, ID, References **Sat, CR.CRMRR.AUTHORITYEMERGENCY.P, 192.631(b)(3) (192.615(a)(8), NTSB P-11-9)**
Question Text *Do processes define the controllers' authority and responsibility to make decisions, take actions, and communicate with others upon being notified of, or upon detection of, and during, an emergency or if a leak or rupture is suspected?*
Assets Covered **88960 (83)**
Result Notes **Control Room Management Plan (CRMP)**

Section 2 Subsection 6.2 and 6.3

Section 7 Subsection 5.2 Emergency Condition Notifications

Section 9 Subsection 6.6.2 Rupture Alarms

13. Question Result, ID, References **Sat, CR.CRMRR.EVACUATION.P, 192.631(b)(3)**
Question Text *Do processes specifically address the controller's responsibilities in the event the control room must be evacuated?*
Assets Covered **88960 (83)**
Result Notes **Control Room Management Plan (CRMP)**

Section 9 Subsection 6.5.4.5 Evacuation Procedures

Gas Control Disaster Recovery - Evacuation Procedures

14. Question Result, ID, References **Sat, CR.CRMRR.COMMSYSFAIL.P, 192.631(b)(3)**
Question Text *Do processes specifically address the controller's responsibilities in the event of a SCADA system or data communications system failure impacting large sections of the controller's domain of responsibility?*
Assets Covered **88960 (83)**
Result Notes **Control Room Management Plan (CRMP)**

Section 9 Subsection 6.6.2.2

Loss of SCADA Communications Procedure

15. Question Result, ID, References Sat, CR.CRMRR.HANDOVER.P, 192.631(b)(4) (192.631(c)(5))
Question Text *Have processes been established for the hand-over of responsibility that specify the type of information to be communicated to the oncoming shift?*
Assets Covered 88960 (83)
Result Notes Control Room Management Plan (CRMP)

Section 2 Subsection 6. 5 Shift Change and/or Transfer of Responsibility

Section 4 Subsection 6

16. Question Result, ID, References Sat, CR.CRMRR.HANDOVER.O, 192.631(b)(4) (192.631(c)(5))
Question Text *Do observations indicate adequate hand-over of responsibility to the oncoming shift?*
Assets Covered 88960 (83)
Result Notes No shift change occurred while on site but walked through the process with controllers and reviewed documentation

17. Question Result, ID, References Sat, CR.CRMRR.HANDOVERDOC.P, 192.631(b)(4) (192.631(c)(5))
Question Text *Do processes require that records document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?*
Assets Covered 88960 (83)
Result Notes Control Room Management Plan (CRMP)

Section 2 Subsection 6. 5 Shift Change and/or Transfer of Responsibility

Section 4 Subsection 6

18. Question Result, ID, References Sat, CR.CRMRR.HANDOVERDOC.R, 192.631(b)(4) (192.631(c)(5))
Question Text *Are there records that document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?*
Assets Covered 88960 (83)
Result Notes Reviewed shift change logs with actual time of hand-over of duties

Reviewed notes and discussion from change logs

Reviewed records for 2021-2024

19. Question Result, ID, References Sat, CR.CRMRR.HANDOVEROVERLAP.P, 192.631(b)(4)
Question Text *Do processes require the controllers to discuss recent and impending important activities ensuring adequate overlap?*
Assets Covered 88960 (83)
Result Notes Control Room Management Plan (CRMP)

Section 4 Subsection 6.10-6.17

20. Question Result, ID, References Sat, CR.CRMRR.HANDOVERALTERNATIVE.P, 192.631(b)(4)
Question Text *When a controller is unable to continue or assume responsibility for any reason, do the shift hand-over processes include alternative shift hand-over actions that specifically address this situation?*
Assets Covered 88960 (83)

Result Notes Control Room Management Plan (CRMP)

Section 2 Subsection 6. 5 Shift Change and/or Transfer of Responsibility

21. Question Result, ID, References Sat, CR.CRMRR.UNATTENDCONSOLE.P, 192.631(b)(4)

Question Text *Has the operator established an adequate process for occasions when the console is left temporarily unattended for any reason?*

Assets Covered 88960 (83)

Result Notes Control Room Management Plan (CRMP)

Section 2 Subsection 6.9.4

Section 4 Subsection 6.1.3

22. Question Result, ID, References Sat, CR.CRMRR.CONSOLECOVERAGE.P, 192.631(b)(4)

Question Text *Do processes maintain adequate console coverage during shift hand-over?*

Assets Covered 88960 (83)

Result Notes Shift change happens in same location, at the console, within range of audible sounds.

15 min is allotted at the beginning and end of shift,

Control Room Management Plan (CRMP)

Section 4 Subsection 6.2

Section 5 Subsection 6.1.2

23. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYDISALLOW.P, 192.631(b)(5)

Question Text *Do processes disallow others to have authority to direct or supersede the specific technical actions of a controller?*

Assets Covered 88960 (83)

Result Notes Control Room Management Plan (CRMP)

Section 2 Subsection 4.1 and 6.10.8

24. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYDISALLOW.R, 192.631(b)(5)

Question Text *Do records indicate that the policy disallowing others to have authority to direct or supersede the specific technical actions of a controller has been communicated to controllers and others?*

Assets Covered 88960 (83)

Result Notes Controllers have a required reading log which includes the CRM Plan

Plan includes controllers authority and disallows others to supersede their authority

Covered during CRMP Team Annual Training

25. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYDISALLOW.O, 192.631(b)(5)

Question Text *Are controllers aware of, and can reference, processes that disallow others to have authority to direct or supersede the specific technical actions of a controller?*

Assets Covered 88960 (83)

Result Notes Spoke with controller during control room visit about this policy

Controller indicated that nobody has the authority to supersede the technical actions taken by the controller

26. Question Result, ID, References NA, CR.CRMRR.OTHERAUTHORITYQUAL.P, 192.631(b)(5)

Question Text *Does the process result in identification of required qualification elements for those authorized to direct or supersede the technical actions of a controller that are sufficient for those individuals to understand the implications of the scope of potential actions?*

Assets Covered 88960 (83)

Result Notes Only qualified controllers can perform the duties of the controller

27. Question Result, ID, References NA, CR.CRMRR.OTHERAUTHORITYQUAL.R, 192.631(b)(5)

Question Text *Do records indicate that others given authority to direct or supersede the specific technical actions of a controller were qualified?*

Assets Covered 88960 (83)

Result Notes Only qualified controllers can perform the duties of the controller

28. Question Result, ID, References NA, CR.CRMRR.OTHERAUTHORITYIMPLEMENT.P, 192.631(b)(5)

Question Text *Is the process defined with respect to the details of how those authorized to direct or supersede the technical actions of a controller are to implement their authority?*

Assets Covered 88960 (83)

Result Notes Only qualified controllers can perform the duties of the controller

29. Question Result, ID, References NA, CR.CRMRR.OTHERAUTHORITYLIST.R, 192.631(b)(5)

Question Text *Is a list of individuals with authority to direct or supersede the technical actions of a controller readily available to controllers?*

Assets Covered 88960 (83)

Result Notes Only qualified controllers can perform the duties of the controller

30. Question Result, ID, References NA, CR.CRMRR.OTHERAUTHORITYIMPLEMENT.R, 192.631(b)(5)

Question Text *Do records adequately document occurrences of when others authorized to direct or supersede the technical actions of a controller have done so?*

Assets Covered 88960 (83)

Result Notes Only qualified controllers can perform the duties of the controller

31. Question Result, ID, References NA, CR.CRMRR.OTHERAUTHORITYIMPLEMENT.O, 192.631(b)(5)

Question Text *Do others authorized to direct or supersede the technical actions of a controller demonstrate an understanding of the process to implement this authority?*

Assets Covered 88960 (83)

Result Notes Only qualified controllers can perform the duties of the controller

CR.CRMFM: Fatigue Management

32. Question Result, ID, References Sat, CR.CRMFM.FATIGUEMITIGATION.P, 192.631(d) (192.631(a))

Question Text *Does the fatigue mitigation process or procedures (plan) identify operator-specific fatigue risks?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 6.2.2

CR.SCADA: Supervisory Control and Data Acquisition

33. Question Result, ID, References Sat, CR.SCADA.SYSTEMMOC.P, 192.631(c)(1)

Question Text *Do processes clearly define the types of changes to the SCADA system(s) that constitute additions, expansions, or replacements under the meaning of the CRM rule?*

Assets Covered 88960 (83)

Result Notes CRMP Section 3 Subsection 5

CR.CRMFM: Fatigue Management

34. Question Result, ID, References **Sat, CR.CRMFM.FATIGUERISKS.P, 192.631(d) (192.631(a))**
Question Text *Does the fatigue mitigation plan adequately address how the program reduces the risk associated with controller fatigue?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 5 Subsection 6.4 Fatigue Management Training**
- 6.5 Fatigue Management Education**
 - 6.6 Environmental and Ergonomics**
 - 6.7 Fatigue Countermeasures**

CR.SCADA: Supervisory Control and Data Acquisition

35. Question Result, ID, References **Sat, CR.SCADA.DISPLAYCONFIG.P, 192.631(c)(1)**
Question Text *Are there written processes to implement the API RP 1165 (1st Edition) display standards to the SCADA systems that have been added, expanded, or replaced since August 1, 2012?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 3 Subsection 6.2**

CR.CRMFM: Fatigue Management

36. Question Result, ID, References **Sat, CR.CRMFM.FATIGUEQUANTIFY.P, 192.631(d) (192.631(a), 192.631(g)(1))**
Question Text *Do processes require that the potential contribution of controller fatigue to incidents and accidents be quantified during investigations?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 5 Subsection 5.2.8**

CR.SCADA: Supervisory Control and Data Acquisition

37. Question Result, ID, References **Sat, CR.SCADA.1165HUMANFACTORS.O, 192.631(c)(1)**
Question Text *Has section 4 of API RP 1165 (1st Edition) regarding human factors engineering been implemented?*
Assets Covered **88960 (83)**
Result Notes **Reviewed Avista's SCADA Standards Procedure**
- Section 4 covers Human Factors**
 - During field inspection of control room I verified that SCADA display was consistent with SCADA Standards document**

CR.CRMFM: Fatigue Management

38. Question Result, ID, References **Sat, CR.CRMFM.FATIGUEMANAGER.P, 192.631(d) (192.631(a))**
Question Text *Is there a designated fatigue risk manager who is responsible and accountable for managing fatigue risk and fatigue countermeasures, and someone (perhaps the same person) that is authorized to review and approve HOS emergency deviations?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 5 Subsection 5.2**
- Operations Support Manager**

CR.SCADA: Supervisory Control and Data Acquisition

39. Question Result, ID, References Sat, CR.SCADA.DISPLAYOBJECTS.O, 192.631(c)(1)
Question Text *Has section 8 of API RP 1165 (1st Edition) regarding display object characteristics been implemented?*
Assets Covered 88960 (83)
Result Notes SCADA Standards Manual Section 8 cover colors, symbols, shapes, etc.

During field inspection of control room I verified that SCADA display was consistent with SCADA Standards document

CR.CRMFM: Fatigue Management

40. Question Result, ID, References Sat, CR.CRMFM.SHIFTLENGTH.R, 192.631(d)(1) (192.631(a))
Question Text *Is the scheduled shift length less than or equal to 12 hours (not including shift hand-over) or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?*
Assets Covered 88960 (83)
Result Notes Shift lengths are 12.25 hours and are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep

Avista accounts for controllers normal commute times and they have sufficient number of controllers to provide rest between shifts

Reviewed controller hours of service to ensure limits are not exceeded

Reviewed records for 2021-2024

CR.SCADA: Supervisory Control and Data Acquisition

41. Question Result, ID, References Sat, CR.SCADA.DISPLAYDYNAMICS.R, 192.631(c)(1)
Question Text *Has Section 9 of API RP 1165 (1st Edition) regarding display object dynamics been implemented?*
Assets Covered 88960 (83)
Result Notes Avista's SCADA Standards Manual cover attributes of the SCADA system

Section 9 cover object dynamics and data value display

CR.CRMFM: Fatigue Management

42. Question Result, ID, References Sat, CR.CRMFM.SHIFTLENGTHTIME.R, 192.631(d)(1)
Question Text *Does the operator factor in all time the individual is working for the company when establishing shift lengths and schedule rotations and that periods of time off that accommodates commute time or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?*
Assets Covered 88960 (83)
Result Notes Shift lengths are 12.25 hours and are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep

Avista accounts for controllers normal commute times and they have sufficient number of controllers to provide rest between shifts

Reviewed controller hours of service to ensure limits are not exceeded

Reviewed records for 2021-2024

CR.SCADA: Supervisory Control and Data Acquisition

43. Question Result, ID, References **Sat, CR.SCADA.ADMINISTRATION.R, 192.631(c)(1)**
Question Text *Have applicable paragraphs of section 11 of API RP 1165 (1st Edition) administration been implemented?*
Assets Covered **88960 (83)**
Result Notes **Avista's SCADA Standards Manual cover attributes of the SCADA system**

Avista uses Eterrabrowser application which provides identical functionality and appearance to all controllers

SCADA Manual Section 11

CR.CRMFM: Fatigue Management

44. Question Result, ID, References **Sat, CR.CRMFM.SCHEDULEDTIMEOFF.R, 192.631(d)(1)**
Question Text *Are all scheduled periods of time off at least one hour longer than 8 hours plus commute time or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?*
Assets Covered **88960 (83)**
Result Notes **Reviewed controller hours and schedule**

All controllers were allowed sufficient time to include commute and 8 hours of sleep

CR.SCADA: Supervisory Control and Data Acquisition

45. Question Result, ID, References **NA, CR.SCADA.1165IMPRACTICAL.R, 192.631(c)(1)**
Question Text *If any/all applicable paragraph(s) of API RP 1165 (1st Edition) have not been implemented, has it been demonstrated and documented that the unimplemented provisions are impractical for the SCADA system used?*
Assets Covered **88960 (83)**
Result Notes **All aspects have been implemented**

CR.CRMFM: Fatigue Management

46. Question Result, ID, References **NA, CR.CRMFM.ONCALLCONTROLLER.P, 192.631(d) (192.631(a))**
Question Text *For controllers who are on call, do processes minimize interrupting the required 8 hours of continuous sleep or require a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?*
Assets Covered **88960 (83)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

CR.SCADA: Supervisory Control and Data Acquisition

47. Question Result, ID, References **Sat, CR.SCADA.SETPOINT.P, 192.631(c)(2)**
Question Text *Does the process adequately define safety-related points?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 3 Subsection 3.6**

CR.CRMFM: Fatigue Management

48. Question Result, ID, References **NA, CR.CRMFM.ONCALLCONTROLLER.R, 192.631(d)(1)**
Question Text *Do records for controllers on call, provide records shift schedule, when calls were made for on call and how long the individual worked?*
Assets Covered **88960 (83)**

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

CR.SCADA: Supervisory Control and Data Acquisition

49. Question Result, ID, References Sat, CR.SCADA.SETPOINT.R, 192.631(c)(2)

Question Text *Do records indicate safety-related points have been adequately implemented?*

Assets Covered 88960 (83)

Result Notes New station added in Colville

Data points and alarms added to SCADA

Verified that alarms are below MAOP

CR.CRMFM: Fatigue Management

50. Question Result, ID, References Sat, CR.CRMFM.MAXHOS.P, 192.631(d)(4)

Question Text *Do processes limit the maximum HOS limit in any sliding 7-day period to no more than 65 hours or is there a documented technical basis to show a reduction of the risk associated with controller fatigue?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 6.8.4

CR.SCADA: Supervisory Control and Data Acquisition

51. Question Result, ID, References Sat, CR.SCADA.POINTVERIFY.P, 192.631(c)(2)

Question Text *Are there adequate processes to define and identify the circumstances which require a point-to-point verification?*

Assets Covered 88960 (83)

Result Notes CRMP Section 3 Subsection 6.3 and 6.4

CR.CRMFM: Fatigue Management

52. Question Result, ID, References Sat, CR.CRMFM.DOCSCHEDULE.P, 192.631(d)(4) (192.631(a))

Question Text *Is there a formal system to document all scheduled and unscheduled HOS worked, including overtime and time spent performing duties other than control room duties?*

Assets Covered 88960 (83)

Result Notes CRMP Section 2 Subsection 6.5.7.2

CRMP Section 5 Subsection 4.1.3

HOS are tracked on SharePoint as the official tracker

CR.SCADA: Supervisory Control and Data Acquisition

53. Question Result, ID, References Sat, CR.SCADA.POINTVERIFY.R, 192.631(c)(2)

Question Text *Have required point-to-point verifications been performed?*

Assets Covered 88960 (83)

Result Notes Reviewed Point to Point verification for new rupture alarm setpoint

No new equipment installed but logic setup to determine if rupture has occurred based on pressure drop over a specified amount of time

Point to point completed in field and from control room

CR.CRMFM: Fatigue Management

54. Question Result, ID, References **NA, CR.CRMFM.DAYSOFF.P, 192.631(d)(4) (192.631(a))**

Question Text *For normal business hour type operations (i.e., five days per week), are no more than five days worked in succession before at least two days off?*

Assets Covered **88960 (83)**

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

CR.SCADA: Supervisory Control and Data Acquisition

55. Question Result, ID, References **Sat, CR.SCADA.POINTVERIFYEXTENT.P, 192.631(c)(2)**

Question Text *Are there adequate processes for the thoroughness of the point-to-point verification?*

Assets Covered **88960 (83)**

Result Notes **Reviewed specific P2P procedure**

Levels I-Section 1.4-1.8

CR.CRMFM: Fatigue Management

56. Question Result, ID, References **NA, CR.CRMFM.WORKHOURS.R, 192.631(d)(4)**

Question Text *For normal business hour type operations (i.e., five days per week), do records indicate shift start times no earlier than 6:00 a.m. and shift end times no later than 7:00 p.m.?*

Assets Covered **88960 (83)**

Result Notes **Avista staffs control room 24/7**

CR.SCADA: Supervisory Control and Data Acquisition

57. Question Result, ID, References **Sat, CR.SCADA.POINTVERIFYEXTENT.R, 192.631(c)(2)**

Question Text *Do records demonstrate adequate thoroughness of the point-to-point verification?*

Assets Covered **88960 (83)**

Result Notes **Reviewed Point-to-Point documentation**

Documentation includes setpoint, alarm triggered value, personnel involved, date and reason for verification

CR.CRMFM: Fatigue Management

58. Question Result, ID, References **Sat, CR.CRMFM.CONTROLLERNUMBERS.O, 192.631(d)**

Question Text *Do operations include a sufficient number of qualified controllers?*

Assets Covered **88960 (83)**

Result Notes **There are 6 controllers on rotation and 1 lead controller**

CR.SCADA: Supervisory Control and Data Acquisition

59. Question Result, ID, References **Sat, CR.SCADA.POINTVERFIYINTVL.P, 192.631(c)(2)**

Question Text *Is there an adequate process for defining when the point-to-point verification must be completed?*

Assets Covered **88960 (83)**

Result Notes **CRMP Section 3 Subsection 6.3.3, 6.3.8 and 6.3.9**

CR.CRMFM: Fatigue Management

60. Question Result, ID, References Sat, CR.CRMFM.OFFDUTYHOURS.P, 192.631(d)(4)

Question Text *Do processes ensure that controllers are provided with at least thirty-five (35) continuous off-duty hours when limits are reached following the most recent 35-hour (minimum) off-duty rest period or is there a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 6.8.2-6.8.3

CR.SCADA: Supervisory Control and Data Acquisition

61. Question Result, ID, References Sat, CR.SCADA.POINTVERFIYINTVL.R, 192.631(c)(2)

Question Text *Do records indicate the point-to-point verification has been completed at the required intervals?*

Assets Covered 88960 (83)

Result Notes Reg Station R701 setpoint change

P2P completed 6/11/25

Reviewed equipment changeout

P2P verified 8/3/23

CR.CRMFM: Fatigue Management

62. Question Result, ID, References Sat, CR.CRMFM.SHIFTHOLDOVER.P, 192.631(d)(4) (192.631(a))

Question Text *Does the daily HOS limit and shift holdover process conform to shift HOS and holdover guidelines or is there a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 6.8.7 and 6.8.8

CR.SCADA: Supervisory Control and Data Acquisition

63. Question Result, ID, References NA, CR.SCADA.POINTVERIFY.O, 192.631(c)(2)

Question Text *Are point-to-point verifications performed adequately when required?*

Assets Covered 88960 (83)

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

CR.CRMFM: Fatigue Management

64. Question Result, ID, References Sat, CR.CRMFM.SPECIFICCOUNTERMEASURES.P, 192.631(d)(4) (192.631(a))

Question Text *Do processes require specific fatigue countermeasures during applicable time periods, or is there a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 6.7

CR.SCADA: Supervisory Control and Data Acquisition

65. Question Result, ID, References Sat, CR.SCADA.COMMPLAN.P, 192.631(c)(3)

Question Text *Has an internal communication plan been established and implemented that is adequate to manually operate the pipeline during a SCADA failure/outage?*

Assets Covered 88960 (83)

CR.CRMFM: Fatigue Management

66. Question Result, ID, References Sat, CR.CRMFM.HOSDEVIATIONS.P, 192.631(d)(4) (192.631(a))

Question Text *Is there a formal process for approving deviations from the maximum HOS limits?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 6.8.9

CR.SCADA: Supervisory Control and Data Acquisition

67. Question Result, ID, References Sat, CR.SCADA.COMMPLAN.R, 192.631(c)(3)

Question Text *Has the internal communication plan been tested and verified for manual operation of the pipeline safely at least once each calendar year but at intervals not exceeding 15 months?*

Assets Covered 88960 (83)

Result Notes Reviewed mock exercises for 2021-2024

All completed annually NTE 15 months

CR.CRMFM: Fatigue Management

68. Question Result, ID, References Sat, CR.CRMFM.FATIGUEEDUCATE.P, 192.631(d)(2) (192.631(d)(3), 192.631(a))

Question Text *Does the program require that fatigue education/training is required for all controllers and control room supervisors?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 5.2.3, 6.4 and 6.5

CR.SCADA: Supervisory Control and Data Acquisition

69. Question Result, ID, References NA, CR.SCADA.BACKUPSCADA.O, 192.631(c)

Question Text *Is there a backup SCADA system?*

Assets Covered 88960 (83)

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

CR.CRMFM: Fatigue Management

70. Question Result, ID, References Sat, CR.CRMFM.FATIGUEREVIEW.P, 192.631(d)(2) (192.631(d)(3), 192.605(a))

Question Text *Do processes require that the effectiveness of the fatigue education/training program be reviewed at least once each calendar year, not to exceed 15 months?*

Assets Covered 88960 (83)

Result Notes CRMP Section 5 Subsection 6.4.5

CR.SCADA: Supervisory Control and Data Acquisition

71. Question Result, ID, References NA, CR.SCADA.BACKUPSCADADEV.P, 192.631(c)(4)

Question Text *Has the use of the backup SCADA system for development work been defined?*

Assets Covered 88960 (83)

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

CR.CRMFM: Fatigue Management

72. Question Result, ID, References **Sat, CR.CRMFM.FATIGUESTRATEGY.P, 192.631(d)(2) (192.631(a))**
Question Text *Does fatigue education address fatigue mitigation strategies (countermeasures), how off-duty activities contribute to fatigue and recognizing the effects of fatigue?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 5 Subsection 6.4.7.11, 6.4.7.8, 6.4.7.13**

CR.SCADA: Supervisory Control and Data Acquisition

73. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADATEST.P, 192.631(c)(4)**
Question Text *Is the backup SCADA system required to be tested at least once each calendar year at intervals not to exceed 15 months?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

CR.CRMFM: Fatigue Management

74. Question Result, ID, References **Sat, CR.CRMFM.FATIGUEEDUCATE.R, 192.631(d)(2) (192.631(d)(3))**
Question Text *Is fatigue education/training documented for all controllers and control room supervisors?*
Assets Covered **88960 (83)**
Result Notes **Required reading each month and annual training for fatigue mitigation strategies from Pipeline Performance Group**

Reviewed records for 2021-2024

CR.SCADA: Supervisory Control and Data Acquisition

75. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADATEST.R, 192.631(c)(4)**
Question Text *Is the backup SCADA system tested at least once each calendar year at intervals not to exceed 15 months?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

CR.CRMFM: Fatigue Management

76. Question Result, ID, References **Sat, CR.CRMFM.FATIGUECONTENT.P, 192.631(d)(3)**
Question Text *Is the content of fatigue training adequate for training controllers and supervisors to recognize the effects of fatigue?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 5 Subsection 6.4**

Content covers all required information from code and FAQs

CR.SCADA: Supervisory Control and Data Acquisition

77. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADAVERIFY.P, 192.631(c)(4)**
Question Text *Is testing required to verify adequate processes are in place for decision-making and internal communications to successfully implement a transition from primary SCADA to backup SCADA, and back to primary SCADA?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

CR.CRMFM: Fatigue Management

78. Question Result, ID, References **Sat, CR.CRMFM.FATIGUECONTENT.R, 192.631(d)(3)**
Question Text *Has controller and supervisor training to recognize the effects of fatigue been documented?*
Assets Covered **88960 (83)**
Result Notes **Required reading each month and annual training for fatigue mitigation strategies from Pipeline Performance Group**

Reviewed records for 2021-2024

CR.SCADA: Supervisory Control and Data Acquisition

79. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADAVERIFY.R, 192.631(c)(4)**
Question Text *Does the testing verify that there are adequate processes in place for decision-making and internal communications to successfully implement a transition from primary SCADA to backup SCADA, and back to primary SCADA?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
80. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADADEQUACY.R, 192.631(c)(4)**
Question Text *If the back-up SCADA system is not designed to handle all the functionality of the main SCADA system, does the testing determine whether there are adequate procedures in place to account for displaced and/or different available functions during back-up operations?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
81. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADATRANSFER.P, 192.631(c)(4)**
Question Text *Do processes adequately address and test the logistics of transferring control to a backup control room?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
82. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADARETURN.P, 192.631(c)(4)**
Question Text *Do procedures adequately address and test the logistics of returning operations back to the primary control room?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
83. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADAFUNCTIONS.R, 192.631(c)(4)**
Question Text *Is a representative sampling of critical functions in the back-up SCADA system being tested to ensure proper operation in the event the backup system is needed?*
Assets Covered **88960 (83)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

CR.CRMAM: Alarm Management

84. Question Result, ID, References **Sat, CR.CRMAM.ALARM.P, 192.631(e)**
Question Text *Is the alarm management plan a formal process that specifically identifies critical topical areas included in the program?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 6 Alarm Management Plan**

Subsection 2.6

CR.CRMCMGT: Change Management

85. Question Result, ID, References Sat, CR.CRMCMGT.EQUIPMENTCHANGES.P, 192.631(f)(1)

Question Text *Is there a process to assure changes in field equipment that could affect control room operations are coordinated with the control room personnel?*

Assets Covered 88960 (83)

Result Notes CRMP Section 7 Change Management Plan

Subsection 2.1 and 4.1.4

CR.CRMAM: Alarm Management

86. Question Result, ID, References Sat, CR.CRMAM.ALARMMALFUNCTION.P, 192.631(e)(1)

Question Text *Is there a process to identify and correct inaccurate or malfunctioning alarms?*

Assets Covered 88960 (83)

Result Notes CRMP Section 6 Alarm Management Plan

Subsection 6.7 and 6.8

CR.CRMCMGT: Change Management

87. Question Result, ID, References Sat, CR.CRMCMGT.CONTROLLERPARTICIPATE.P, 192.631(f)(1) (192.631(f)(3))

Question Text *Are control room representative(s) required to participate in meetings where changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented?*

Assets Covered 88960 (83)

Result Notes CRMP Section 7 Change Management Plan

Subsection 4.4, 4.5 and 5.3

CR.CRMAM: Alarm Management

88. Question Result, ID, References Sat, CR.CRMAM.ALARMREVIEW.P, 192.631(e)(1)

Question Text *Does the review of safety-related alarms account for different alarm designs and all alarm types/priorities?*

Assets Covered 88960 (83)

Result Notes CRMP Section 6 Alarm Management Plan

Subsection 6.7 Alarm Performance Report

CR.CRMCMGT: Change Management

89. Question Result, ID, References Sat, CR.CRMCMGT.CONTROLLERPARTICIPATE.R, 192.631(f)(1) (192.631(f)(3))

Question Text *Do records indicate that control room representative(s) participate in meetings where changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented?*

Assets Covered 88960 (83)

Result Notes Reviewed a sample of meeting notes where control room had opportunity for input

Meetings included Williams/Avista Operations meetings, Telemetry meetings, etc.

CR.CRMAM: Alarm Management

90. Question Result, ID, References **NA, CR.CRMAM.CONTROLLERPERFORMANCE.P, 192.631(h) (192.631(e)(1))**
Question Text *Does the review of safety-related alarms account for console differences that could affect individual-specific controller qualification and performance?*
Assets Covered **88960 (83)**
Result Notes **All consoles are identical thus all controllers have same training/qualifications**

CR.CRMCMGT: Change Management

91. Question Result, ID, References **Sat, CR.CRMCMGT.EMERGENCYCONTACT.P, 192.631(f)(2)**
Question Text *Is there a process requiring field personnel and SCADA support personnel to contact the control room when emergency conditions exist?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 7 Change Management Plan**

Subsection 5.2 and 5.3

CR.CRMAM: Alarm Management

92. Question Result, ID, References **Sat, CR.CRMAM.STALEDATA.P, 192.631(e)(1)**
Question Text *Does the review of safety-related alarms include specific procedures and practices for managing stale or unreliable data?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 6 Alarm Management Plan**

Subsection 6.6 Key Performance Indicators

Subsection 6.8 Alarm Handling Methods

CR.CRMCMGT: Change Management

93. Question Result, ID, References **Sat, CR.CRMCMGT.FIELDCONTACT.P, 192.631(f)(2)**
Question Text *Does the process require field personnel and SCADA support personnel to contact the control room when making field changes (for example, moving a valve) that affect control room operations?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 7 Change Management Plan**

Subsection 4.4 and 5.3

CR.CRMAM: Alarm Management

94. Question Result, ID, References **Sat, CR.CRMAM.MONTHLYANALYSIS.P, 192.631(e)(2)**
Question Text *Do processes require the monthly identification, recording, review, and analysis of points that have been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 6 Alarm Management Plan**

Subsection 6.7.1

CR.CRMCMGT: Change Management

95. Question Result, ID, References **Sat, CR.CRMCMGT.FIELDCHANGES.R, 192.631(f)(2)**

Question Text *Do records indicate field personnel and SCADA support personnel contacted the control room when making field changes (for example, moving a valve) that affect control room operations?*

Assets Covered 88960 (83)

Result Notes Field personnel are required to contact control room during changes or testing

Contacted documented in controller logs

CR.CRMAM: Alarm Management

96. Question Result, ID, References Sat, CR.CRMAM.PROBLEMCORRECTION.P, 192.631(e)(2)

Question Text *Does the alarm management plan include a process for promptly correcting identified problems and for returning these points to service?*

Assets Covered 88960 (83)

Result Notes CRMP Section 6 Alarm Management Plan

Subsection 6.8.4

97. Question Result, ID, References Sat, CR.CRMAM.ALARMVERIFY.R, 192.631(e)(2)

Question Text *Do records verify that monthly reviews and analysis of alarm points have been performed?*

Assets Covered 88960 (83)

Result Notes Avista completes monthly alarm reviews

Reviewed records for 2021-2024

98. Question Result, ID, References Sat, CR.CRMAM.ALARMSETPOINTS.P, 192.631(e)(3)

Question Text *Is there a formal process to determine the correct alarm setpoint values and alarm descriptions?*

Assets Covered 88960 (83)

Result Notes CRMP Section 6 Alarm Management Plan

Subsection 5.4.6

99. Question Result, ID, References NA, CR.CRMAM.SETTINGCONTROL.P, 192.631(e)(3)

Question Text *Have procedures been established to clearly address how and to what degree controllers can change alarm limits or setpoints, or inhibit alarms, or take points off-scan?*

Assets Covered 88960 (83)

Result Notes Controllers do not have the ability to change setpoints or alarm limits

100. Question Result, ID, References Sat, CR.CRMAM.ALARMVALUEVERIFY.R, 192.631(e)(3)

Question Text *Do records demonstrate verification of correct safety-related alarm set-point values and alarm descriptors when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months?*

Assets Covered 88960 (83)

Result Notes Alarm Value Verification Annually NTE 15 months

Reviewed records for 2021-2024

101. Question Result, ID, References Sat, CR.CRMAM.PLANREVIEW.P, 192.631(e)(4)

Question Text *Are there processes to review the alarm management plan at least once each calendar year, but at intervals not exceeding 15 months, in order to determine the effectiveness of the plan?*

Assets Covered 88960 (83)

Result Notes CRMP Section 6 Alarm Management Plan

Subsection 5.4.7

102. Question Result, ID, References **Sat, CR.CRMAM.PLANREVIEW.R, 192.631(e)(4)**
 Question Text *Do records indicate review of the alarm management plan at least once each calendar year, but at intervals not exceeding 15 months, in order to determine the effectiveness of the plan?*
 Assets Covered **88960 (83)**
 Result Notes **Annual alarm review and CRMP review completed**

Reviewed records for 2021-2024
103. Question Result, ID, References **Sat, CR.CRMAM.WORKLOAD.P, 192.631(e)(5)**
 Question Text *Does the CRM program have a means of identifying and measuring the work load (content and volume of general activity) being directed to an individual controller?*
 Assets Covered **88960 (83)**
 Result Notes **CRMP Section 11 Activity Review Process**

Subsection 6.2 and 6.5
104. Question Result, ID, References **Sat, CR.CRMAM.WORKLOADMONITORING.P, 192.631(e)(5)**
 Question Text *Is the process of monitoring and analyzing general activity comprehensive?*
 Assets Covered **88960 (83)**
 Result Notes **CRMP Section 11 Activity Review Process**

Subsection 6.2
105. Question Result, ID, References **Sat, CR.CRMAM.CONTROLLERREACTION.P, 192.631(e)(5)**
 Question Text *Does the process have a means of determining that the controller has sufficient time to analyze and react to incoming alarms?*
 Assets Covered **88960 (83)**
 Result Notes **CRMP Section 11 Activity Review Process**

Subsection 6.3 and 6.4
106. Question Result, ID, References **Sat, CR.CRMAM.PERFORMANCEANALYSIS.R, 192.631(e)(5)**
 Question Text *Has an analysis been performed to determine if controller(s) performance is currently adequate?*
 Assets Covered **88960 (83)**
 Result Notes **Completed annually with last review completed 7/10/24**

All reviews concluded that controllers were not oversubscribed by alarms
107. Question Result, ID, References **Sat, CR.CRMAM.DEFICIENCIES.P, 192.631(e)(6)**
 Question Text *Is there a process to address how deficiencies found in implementing 192.631(e)(1) through 192.631(e)(5) will be resolved?*
 Assets Covered **88960 (83)**
 Result Notes **CRMP Section 1 Subsection 4.3.2**

CRMP Section 2 Subsection 6.2.9
108. Question Result, ID, References **Sat, CR.CRMAM.DEFICIENCIES.R, 192.631(e)(6)**
 Question Text *Do records indicate deficiencies found in implementing 192.631(e)(1) through 192.631(e)(5) have been resolved?*
 Assets Covered **88960 (83)**
 Result Notes **Deficiencies found were resolved by taking alarms off scan or moving equipment to new location**

Reviewed SCADA Alarm reviews, Alarm Summary documents and SCADA-ARS Comparison

CR.CRMEXP: Operating Experience

109. Question Result, ID, References **Sat, CR.CRMEXP.REPORTABLEINCIDENTREVIEW.P, 192.631(g)(1)**
Question Text *Is there a formal, structured approach for reviewing and critiquing reportable events to identify lessons learned?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 5 Subsection 6.9**
110. Question Result, ID, References **Sat, CR.CRMEXP.REPORTABLEINCIDENTREVIEW.R, 192.631(g)(1)**
Question Text *Do records indicate reviews of reportable events specifically analyzed all contributing factors to determine if control room actions contributed to the event, and corrected any deficiencies?*
Assets Covered **88960 (83)**
Result Notes **One federal reportable incident (3rd Party Excavation Damage) in Nov 2023 but Avista actions or lack thereof could have caused the event**
111. Question Result, ID, References **Sat, CR.CRMEXP.LESSONSLEARNED.P, 192.631(g)(2) (192.631(b)(5))**
Question Text *Does the program require training on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance errors, etc.), even though the control room may not have been at fault?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 8 Operating Experience Program**

Subsection 5.2.8 and 5.2.9
112. Question Result, ID, References **Sat, CR.CRMEXP.LESSONSLEARNED.R, 192.631(g)(2) (192.631(b)(5))**
Question Text *Has operating experience review training been conducted on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance errors, etc.)?*
Assets Covered **88960 (83)**
Result Notes **Training to cover lessons learned include near misses, AOCs, incidents, NTSB reports, etc.**

Reviewed records of meeting minutes where these lessons learned were covered

CR.CRMTRAIN: Training

113. Question Result, ID, References **Sat, CR.CRMTRAIN.CONTROLLERTRAIN.P, 192.631(h)**
Question Text *Has a controller training program been established to provide training for each controller to carry out their roles and responsibilities?*
Assets Covered **88960 (83)**
Result Notes **CRMP Section 9 Control Room Training Program**

Subsection 6
114. Question Result, ID, References **Sat, CR.CRMTRAIN.CONTROLLERTRAIN.R, 192.631(h)**
Question Text *Has a controller training program been implemented to provide training for each controller to carry out their roles and responsibilities?*
Assets Covered **88960 (83)**
Result Notes **Reviewed the controller training program and CRMP Section 9 Subsection 6**

Reviewed controller training records
115. Question Result, ID, References **Sat, CR.CRMTRAIN.TRAININGREVIEW.P, 192.631(h)**
Question Text *Have processes been established to review the controller training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months?*
Assets Covered **88960 (83)**

Result Notes CRMP Section 9 Control Room Training Program

Subsection 5.5.1

116. Question Result, ID, References Sat, CR.CRMTRAIN.TRAININGREVIEW.R, 192.631(h)
Question Text *Have processes been implemented to review the controller training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months?*
Assets Covered 88960 (83)
Result Notes Training program assessment completed annually

Reviewed records for 2021-2024
117. Question Result, ID, References Sat, CR.CRMTRAIN.TRAININGCONTENT.R, 192.631(h)
Question Text *Does training content address all required material, including training each controller to carry out the roles and responsibilities that were defined by the operator?*
Assets Covered 88960 (83)
Result Notes Training program content covered in CRMP Section 9 Subsection 6.4

Reviewed controller training records and training program
118. Question Result, ID, References Sat, CR.CRMTRAIN.AOCLIST.R, 192.631(h)(1)
Question Text *Has training been conducted on the abnormal operating conditions (AOCs) that are likely to occur simultaneously or in sequence identified by the operator?*
Assets Covered 88960 (83)
Result Notes Reviewed controller OQs and recognition of AOC records for 2021-2024
119. Question Result, ID, References Sat, CR.CRMTRAIN.TRAININGABNORMAL.P, 192.631(h)(1)
Question Text *Does the training program provide controller training on recognizing and responding to abnormal operating conditions that are likely to occur simultaneously or in sequence?*
Assets Covered 88960 (83)
Result Notes CRMP Section 9 Control Room Training Program

Subsection 6.7.3.2 and 6.7.3.3
120. Question Result, ID, References Sat, CR.CRMTRAIN.TRAINING.R, 192.631(h)(2)
Question Text *Do records indicate the training program used a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?*
Assets Covered 88960 (83)
Result Notes Controllers participate in annual mock drills

Reviewed records for 2021-2024
121. Question Result, ID, References NA, CR.CRMTRAIN.TRAINING.O, 192.631(h)(2)
Question Text *Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?*
Assets Covered 88960 (83)
Result Notes No such activity/condition was observed during the inspection.
122. Question Result, ID, References Sat, CR.CRMTRAIN.COMMUNICATIONTRAINING.P, 192.631(h)(3)
Question Text *Does the CRM program train controllers on their responsibilities for communication under the operator's emergency response procedures?*
Assets Covered 88960 (83)
Result Notes CRMP Section 9 Control Room Training Program

Subsection 6.5

Gas Controller Training Program

123. Question Result, ID, References Sat, CR.CRMTRAIN.SYSKNOWLEDGE.P, 192.631(h)(4)
Question Text *Does the training program provide controllers a working knowledge of the pipeline system, especially during the development of abnormal operating conditions?*
Assets Covered 88960 (83)
Result Notes CRMP Section 9 Control Room Training Program

Subsection 6.4, 6.4.3.4

Gas Controller Training Program

124. Question Result, ID, References NA, CR.CRMTRAIN.INFREQOPSLIST.R, 192.631(h)(5)
Question Text *Has a list of pipeline operating setups that are periodically (but infrequently) used been established?*
Assets Covered 88960 (83)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

125. Question Result, ID, References NA, CR.CRMTRAIN.INFREQOPSREVIEW.P, 192.631(h)(5)
Question Text *Do processes specify that, for pipeline operating set-ups that are periodically (but infrequently) used, the controllers must be provided an opportunity to review relevant procedures in advance of their use?*
Assets Covered 88960 (83)
Result Notes No such event occurred, or condition existed, in the scope of inspection review.

126. Question Result, ID, References Sat, CR.CRMTRAIN.TEAMTRAINPERSONNEL.P, 192.631(h)(6)
Question Text *Do processes establish who, regardless of location, operationally collaborates with control room personnel?*
Assets Covered 88960 (83)
Result Notes CRMP Section 9 Control Room Training Program

Subsection 6.9.13

127. Question Result, ID, References Sat, CR.CRMTRAIN.TEAMTRAINFREQ.P, 192.631(h)(6)
Question Text *Do processes define the frequency of new and recurring team training?*
Assets Covered 88960 (83)
Result Notes CRMP Section 9 Control Room Training Program

Subsection 6.9.13

128. Question Result, ID, References Sat, CR.CRMTRAIN.TEAMTRAINCOMPLETE.P, 192.631(h)(6)
Question Text *Do processes address all operational modes and operational collaboration/control?*
Assets Covered 88960 (83)
Result Notes CRMP Section 9 Control Room Training Program

Subsection 6.9

129. Question Result, ID, References Sat, CR.CRMTRAIN.TEAMTRAINEXPERIENCE.P, 192.631(h)(6)
Question Text *Do processes include incorporation of lessons learned from actual historical events and other oil-gas industry events?*
Assets Covered 88960 (83)
Result Notes CRMP Section 9 Control Room Training Program

Subsection 6.9

130. Question Result, ID, References **Sat, CR.CRMTRAIN.TEAMTRAINEXERCISE.R, 192.631(h)(6)**
 Question Text *Do records indicate that training exercises were adequate and involved at least one qualified controller?*
 Assets Covered **88960 (83)**
 Result Notes **Team Training exercises completed annually and include at least one controller and other field personnel**
- Reviewed records for 2021-2024**
131. Question Result, ID, References **NA, CR.CRMTRAIN.TEAMTRAINEXERCISE.O, 192.631(h)(6)**
 Question Text *Does implementation of a control room team exercise demonstrate performance in accordance with regulatory and process requirements?*
 Assets Covered **88960 (83)**
 Result Notes **No such activity/condition was observed during the inspection.**
132. Question Result, ID, References **Sat, CR.CRMTRAIN.TEAMTRAINIDENTINDIVIDUAL.R, 192.631(h)(6)**
 Question Text *Do records demonstrate that individuals identified as of January 23, 2018 received team training by January 23, 2019?*
 Assets Covered **88960 (83)**
 Result Notes **Training completed April 2018**
- All new controllers receive training annually**
- Reviewed records for 2021-2024**

CR.CRMCOMP: Compliance Validation and Deviations

133. Question Result, ID, References **Sat, CR.CRMCOMP.SUBMITPROCEDURES.P, 192.631(i)**
 Question Text *Are there adequate processes to assure that the operator is responsive to requests from applicable agencies to submit their CRM procedures?*
 Assets Covered **88960 (83)**
 Result Notes **CRMP Section 10 Compliance and Deviations**
- Subsection 5.1**
134. Question Result, ID, References **Sat, CR.CRMCOMP.SUBMITPROCEDURES.R, 192.631(i)**
 Question Text *Has the operator been responsive to requests from applicable agencies to submit their CRM procedures?*
 Assets Covered **88960 (83)**
 Result Notes **Avista submits revision to UTC when changes are made**
- Latest submission was 06/12/2025**
135. Question Result, ID, References **Sat, CR.CRMCOMP.CRMCOORDINATOR.P, 192.631(i)**
 Question Text *Is there an individual that is responsible and accountable for compliance with requests from PHMSA or other applicable agencies?*
 Assets Covered **88960 (83)**
 Result Notes **CRMP Section 10 Compliance and Deviations**
- Subsection 5.1**
- Responsibility of Manager, Pipeline Integrity & Compliance and the Operations Support Manager**
136. Question Result, ID, References **Sat, CR.CRMCOMP.RECORDS.P, 192.631(j)(1)**
 Question Text *Are records management processes adequate to assure records are sufficient to demonstrate compliance with the CRM rule?*

Assets Covered 88960 (83)
Result Notes CRMP Section 10 Compliance and Deviations

Subsection 5.4

137. Question Result, ID, References Sat, CR.CRMCOMP.RECORDS.R, 192.631(j)(1)

Question Text *Are records sufficient to demonstrate compliance with the CRM rule?*

Assets Covered 88960 (83)

Result Notes All records reviewed were compliant with CRM requirements

138. Question Result, ID, References Sat, CR.CRMCOMP.ELECTRONICRECORDS.R, 192.631(j)(1)

Question Text *Are electronic records properly stored, safeguarded, and readily retrievable?*

Assets Covered 88960 (83)

Result Notes All records are store in Gas compliance sharepoint site and only accessible to appropriate personnel

All records were readily accessible during the inspection

139. Question Result, ID, References Sat, CR.CRMCOMP.DEVIATIONS.P, 192.631(j)(2)

Question Text *Are there processes to demonstrate and provide a documented record that every deviation from any CRM rule requirement was necessary for safe operation?*

Assets Covered 88960 (83)

Result Notes CRMP Section 10 Compliance and Deviations

Subsection 5.2 and 5.3

140. Question Result, ID, References Sat, CR.CRMCOMP.DEVIATIONS.R, 192.631(j)(2)

Question Text *Were all deviations documented in a way that demonstrates they were necessary for safe operation?*

Assets Covered 88960 (83)

Result Notes Three compliance deviations during this inspection period (2022, 2023, 2024)

All were due to exceeding hours of service in a 7 day period

Extenuating circumstances due to illness, scheduled time off, etc.

All were well-documented and had protections and backup in place for fatigue mitigation purposes

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