

Form A- Annual Review 9032

UTC Standard Annual Review Inspection Report
 Intrastate Operators
 FORM A: Annual Review

Print Inspection Record PHMSA Pipeline Regulations PHMSA Advisory Bulletins Print Blank Form

Inspector and Operator Information

Inspection ID 9032	Inspection Link 9032	Inspector - Lead Scott Anderson	Inspector - Assist
Operator Northwest Natural Gas	Unit HQ	OPID # 13840	Records Location - City & State Vancouver, WA
Inspection Start Date 06-02-2025	Inspection Exit Interview Date 06-02-2025	Engineer Submit Date 06-02-2025	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

Inspection Scope and Summary
 This was an annual review of NWNs procedural manuals, annual reports, and damage prevention information.

Facilities visited and Total AFOD
 1 AFOD

Summary of Significant Findings
 No findings

Primary Operator contacts and/or participants
 Samantha Rookstool, NWN Code Compliance Specialist

Hannah Koonce, NWN Code Compliance Specialist

Andy Fortier, NWN Compliance Engineer

Operator executive contact and mailing address for any official correspondence
 Joe Karney

VP, Engineering and Utility Operations

NW Natural

250 SW Taylor St.

Portland, OR 97204

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
29	1,3,5,6,9,10,12,13,14,15,16,17,21,22,23,24,25,26,27,28,29,30,31,32,35,37,39,40,	5	2.N,2.O,2.P,3.1,3.2,
0	Unsatisfactory List		
0	Area of Concern List		
9	Not Applicable List 4,7,8,18,19,20,42,43,44		
3	Yes List 34,36,38,	No Responses 1	No List 41
0	Not Checked / Evaluated List		

**If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

- Crew Inspection History
- Facility Inspection History
- Scheduled Inspection History
- GAS System Operations History
- HL System Operations History
- ANNUAL REPORT: ACCURACY/TRENDS

Question #1. Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.	1. Result Satisfactory
Question 1-a. Are Operator Manuals Up to Date? WAC 480-93-180(2) / WAC 480-75-660(2) requires operators to provide manual updates to the UTC.	1a. Result Satisfactory
Question 1-b. Are Operator Contacts Up to Date? WAC 480-93-200(11) Requires operators to notify the UTC of changes to company contacts. HL does not have a corresponding rule.	1b. Result Satisfactory

1. Notes
 Submitted 3/14/2025 for CY 2024, 3/13/2024 for CY 2023, 3/15/2023 for CY 2022

DAMAGE PREVENTION

Question #2.

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?

Yes

Q2.b. Is the annual report damages root cause information complete and accurate?

Yes

Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?

Yes

Q2.d. Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

Yes

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?

Yes, NWN uses Heath for locating

Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?

Yes

Q2.g. What is the number of damages resulting from mismarks?

1

Q2.h. What is the number of damages resulting from not locating within the time requirements?

0

Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?

1

Q2.j. Are mapping corrections timely and according to written procedures?

Yes, FOM and Standard Practices Manual

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?

Yes

Q2.L. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?

Yes, through their PA program

Q2.M. Does the operator track on-time performance of locate requests? (i.e. 2 Business Days) If so, review and record the statistics.

This is tracked and a sampling was reviewed

2. Notes

Question 2.N

2.N Result

2.N Notes

Question 2.O

2.O Result

2.O Notes

Question 2.P

2.P Result

2.P Notes

Mapping Records / NPMS Updates

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

3. Result

Satisfactory

3. Notes

Submitted 3/13/2025 for CY 2024, 3/13/2024 for CY 2023, 2/27/2023 for CY 2022.

Question 3.1

3.1 Result

3.1 Notes

Question 3.2

3.2 Result

3.2 Notes

INCIDENT/SRC/AOC REPORTS REVIEW

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks per 1,000 Locate
No Damages records found													

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Notes

No federal reportable incidents.

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City
No Incident Notification records found							

Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of recurrence?

5. Notes

Reviewed annual reports for this information along with PA annual effectiveness reviews. Damage prevention procedures were also reviewed.

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?
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No Incident Notification records found

6. Notes

Incidents were reviewed most trends were due to 3rd party damage.

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company No
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No Incident Notification records found

7. Notes

No SRCs.

Question #8.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

8. Notes

No AOCs.

O&M & EMERGENCY PROGRAMS

Question #9.

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

9. Result

Satisfactory

9. Notes

O&M is up to date.

Question #10.

If changes to the O&M were made, are changes acceptable?

10. Result

Satisfactory

10. Notes

Changes were acceptable.

Question #11.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

11. Notes

Changes based on most current business practices and cybersecurity.

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Satisfactory

12. Notes

Changes were acceptable and revisions log is up to date.

INTEGRITY MANAGEMENT PROGRAMS

Question #13

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

13. Result

Satisfactory

13. Notes

Appendix F in the DIMP manual shows the revisions to the plan. Appendix L in the TIMP manual show the revisions to the plan.

Question #14.

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

14. Result

Satisfactory

14. Notes

Plans are up to date.

Question #15

Are IMP program changes acceptable?

15. Result

Satisfactory

15. Notes

Appendix L in the TIMP manual show the revisions to the plan.

Question #16

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

16. Results

Satisfactory

16. Notes

NWN performed an ILI run in July 2024. Anomaly recorded as a sharp dent measuring 2" L x 1.75" W x 0.2055" D with a gouge running beneath, through, and above the dent in the normal direction measuring 9" L x 0.25" W x 0.0175" D resulting from a third party damage on the install of a forced 2" sewer lateral. A 24" sleeve was installed for the repair. Reviewed documentation.

Question #17

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

17. Results

Satisfactory

17. Notes

HCA locations are up to date.

Question #18

What assessment work is planned for the upcoming year?

18. Results

Not Applicable

18. Notes

None planned for 2025

Question #19

19. Results

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

Not Applicable

19. Notes

No low pressure systems

Question #20

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

20. Results
Not Applicable

20. Notes

No low pressure systems

Question #21

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

21. Results
Satisfactory

21. Notes

This is being tracked and mitigated through the DIMP program.

Question #22

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

22. Results
Satisfactory

22. Notes

This is ongoing. Appendix A in NWNs DIMP plan are the accelerated actions.

Question #23

What DIMP remediation work is anticipated for upcoming year?

23. Results
Satisfactory

23. Notes

This is ongoing. Appendix A in NWNs DIMP plan are the accelerated actions.

OQ PROGRAM

Question #24

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

24. Results
Satisfactory

24. Notes

Grammatical and punctuation updates.

Question #25

Are the OQ plan updates satisfactory?

25. Results
Satisfactory

25. Notes

Revisions log is up to date

Question #26

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Results
Satisfactory

26. Notes

Qualified individuals are requalified every three years for OQ related tasks and requalified annually for AOC related tasks.

PUBLIC AWARENESS PROGRAM

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Results
Satisfactory

27. Notes

Revisions log is up to date

Question #28

Are changes to the PA program satisfactory?

28. Results
Satisfactory

28. Notes

Revisions log is up to date

CONTROL ROOM PROGRAM

Question #29

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Results
Satisfactory

29. Notes

CRM is Up to date, NWN CRM Audit Checklist section shows revisions and is up to date.

Question #30

Are the CRM program changes satisfactory?

30. Results
Satisfactory

30. Notes

NWN CRM Audit Checklist section shows revisions and is up to date.

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

Is the operator developing and implementing an API 1173 Safety Management System?

31. Results
Satisfactory

31. Notes

NWN has developed and implemented an API 1173 SMS.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Results
Satisfactory

32. Notes

Units are adequate.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	Operator - OPID	Unit ID	Date Created
No Unit records found						

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.D How to get additional information ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.K Pipeline Location Information ; Q33.L Integrity Management Programs ; Q33.M Emergency Preparedness

33. Notes

NWN website is adequate and contains the elements listed in this question.

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Results

YES

34. Notes

See notes question 35

Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results

Satisfactory

35. Notes

ADB's are regularly tracked and added into NWN's PSMS program.

Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Results

YES

36. Notes

See notes in question 37

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results

Satisfactory

37. Notes

ADB's are regularly tracked and added into NWN's PSMS program.

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Results

YES

38. Notes

See notes in question 39.

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Results

Satisfactory

39. Notes

NWN has located these and is in the process of retrofitting/replacing these. Reviewed spreadsheet showing locations and discussed remediation plans.

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Results

Satisfactory

40. Notes

Reviewed spreadsheet showing locations of all indoor sets.

Question #41

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Results

NO

41. Notes

No low pressure

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02

ADB 2020-02 Low Pressure Systems

42. Results

Not Applicable

42. Notes

No low pressure

Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02
ADB 2020-02 Low Pressure Systems

43. Results
Not
Applicable

43. Notes
No low pressure

Question #44
Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02
ADB 2020-02 Low Pressure Systems

44. Results
Not
Applicable

44. Notes
No low pressure

☐ SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.