

# 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	8757 Avista OQ	Operator(s)	AVISTA CORP (31232)	Plan Submitted	02/16/2024
Status	STARTED	Lead	Derek Norwood	Plan Approval	--
Start Year	2024	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Tom Green, Jason Hoxit	All Activity Start	02/07/2024
System Type	GD	Supervisor	Dennis Ritter	All Activity End	02/07/2024
Protocol Set ID	GD.2024.01	Director	Scott Rukke	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

The Inspection was a review of Avista's Operator Qualification Program and the associated records. The inspection was completed remotely via MS Teams and email. Team inspection completed in conjunction with Idaho PUC and Oregon PUC. There were no violations or concerns as a result of the inspection.

### Facilities visited and Total AFOD

Inspection conducted remotely

No facilities visited

1 AFOD

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

Avista was able to provide all records and procedures requested. There are no violations or concerns as a result of the inspection.

### Primary Operator contacts and/or participants

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

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## Scope (Assets)

Short #	Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88960 (83)	Avista Utilities Corp - (HQ)	unit	88960	Storage Fields Bottle/Pipe - Holders Offshore	32	32	32	100.0%

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
				GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric					

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)	--	TQ.OQ, TQ.QU, TQ.QUOMCONST	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. OQ	--	02/07/2024 -- 02/07/2024		all planned questions	all assets	all types	32	32	32	32	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	OQ	COMPLETED	02/16/2024	OQ	88960 (83)

## Results (all values, 32 results)

36 (instead of 32) results are listed due to re-presentation of questions in more than one sub-group.

### TQ.OQ: Operator Qualification

1. Question Result, ID, References [Sat, TQ.OQ.CHANGENOTIFY.P, 192.805\(i\) \(192.18\)](#)

Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*

Assets Covered [88960 \(83\)](#)

Result Notes [OQ Plan Pg 8](#)

#### **Notification of OQ Program Changes**

Changes determined to be significant by the Director of Natural Gas shall be communicated to regulatory agencies, including state commissions, as soon as practical following implementation.

2. Question Result, ID, References [Sat, TQ.OQ.CHANGERECORD.R, 192.805\(i\) \(192.805\(f\), 192.18\)](#)

Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*

Assets Covered [88960 \(83\)](#)

Result Notes No significant changes to the plan but Avista tracks all changes to covered tasks

Reviewed OQ Task Change Tracker (Attached)

3. Question Result, ID, References Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))  
Question Text *Are evaluation methods established and documented appropriate to each covered task?*  
Assets Covered 88960 (83)  
Result Notes All Evaluation Methods have been Established and Documented for each covered task

GSM Spec 4.31 Appendix A

OQ Program Pg 3

4. Question Result, ID, References Sat, TQ.OQ.MOC.P, 192.805(f)  
Question Text *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*  
Assets Covered 88960 (83)  
Result Notes OQ Program pg 8

### **Communication of Changes**

Changes to the OQ Program shall be communicated to affected individuals. Methods for communicating such changes include:

- Revisions to the GSM, GESH, and any other documents in the Avista Operating and Maintenance (O&M) Plan.
- Group or individual meetings, training, and/or testing.
- On-the-job training and/or testing.
- Addendums to contracts.
- Or other forms of effective communication.

5. Question Result, ID, References Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)  
Question Text *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?*  
Assets Covered 88960 (83)  
Result Notes GSM 4.31 Appendix A

Each task list span of control requirements

OQ Program Pg 5

6. Question Result, ID, References NA, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)  
Question Text *Does the OQ plan document that the operator has assured that the procedures on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*  
Assets Covered 88960 (83)  
Result Notes Avista does not use an OQ Vendor

7. Question Result, ID, References NA, TQ.OQ.OQPLAN.O, 192.805(h)

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

Assets Covered 88960 (83)

Result Notes No field observations completed during this inspection

Will answer during Pullman/Clarkston Field (ID 8760) visit in May 2024

8. Question Result, ID, References Sat, TQ.OQ.OQPLAN.P, 192.805(a) (192.801(b))

Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*

Assets Covered 88960 (83)

Result Notes OQ Program Pg 2

GSM 4.31

9. Question Result, ID, References Sat, TQ.OQ.OQPLANCONTRACTOR.P, 192.805(b) (192.805(f), 192.805(c))

Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*

Assets Covered 88960 (83)

Result Notes OQ Program pg 9,10

10. Question Result, ID, References NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))

Question Text *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*

Assets Covered 88960 (83)

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

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

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

Assets Covered 88960 (83)

Result Notes Avista provided OQs for all employees and contractors

Full Status User View Report (Attached)

No concerns

12. Question Result, ID, References Sat, TQ.OQ.TRAINING.P, 192.805(h)

Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered 88960 (83)

Result Notes OQ Program page 2-3

13. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.P, 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))

Question Text *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*

Assets Covered 88960 (83)

Result Notes Contractor Qualifications; OQ Program Page 9

Contractor OQ Programs and Third Party Portability; OQ Program Page 10

Mutual Assistance Agreement; OQ Program Page 10

14. Question Result, ID, References Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)

Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*

Assets Covered 88960 (83)

Result Notes OQ Program Page 2: Subsequent Evaluation Intervals

GSM Section 4.31 Appendix A Lists all tasks and re-evaluation interval

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

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

Assets Covered 88960 (83)

Result Notes Avista provided OQs for all employees and contractors

Full Status User View Report (Attached)

No concerns

16. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 88960 (83)

Result Notes Avista provided OQs for all employees and contractors

Full Status User View Report (Attached)

No concerns

17. Question Result, ID, References Sat, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)

Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*

Assets Covered 88960 (83)

Result Notes Reviewed OQs from outage during Williams dig in in Fall 2023

Avista had records for personnel from Black Hills, Cascade, Dominion, City of Ellensburg, North Western Energy, Northwest Natural, PGE, and PSE

18. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.P, 192.803

Question Text *Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*

Assets Covered 88960 (83)

Result Notes OQ Program page 3

Abnormal Operating Conditions

19. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 88960 (83)

Result Notes Reviewed a sample of Knowledge, Skills and Abilities Evaluations

Each task has AOCs that employees must recognize and react to

20. Question Result, ID, References NA, TQ.OQ.ABNORMAL.O, 192.803

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

Assets Covered 88960 (83)

Result Notes No field observations completed during this inspection

Will answer during Pullman/Clarkston Field (ID 8760) visit in May 2024

21. Question Result, ID, References **Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))**  
Question Text *Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?*  
Assets Covered **88960 (83)**  
Result Notes **OQ Program Page 5-6**
- Post Reportable or OQ Incident Investigation**

## **TQ.QU: Qualification of Personnel - Specific Requirements**

22. Question Result, ID, References **Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))**  
Question Text *Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel?*  
Assets Covered **88960 (83)**  
Result Notes **CP Foreman certified as NACE Level 4**

**Each individual CP Tech has individual NACE qualifications based on job title**

**GSM 4.31 Appendix A has CP Tasks**

23. Question Result, ID, References **Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))**  
Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*  
Assets Covered **88960 (83)**  
Result Notes **Reviewed a sample of CP Tech certifications during the inspection**

24. Question Result, ID, References **Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))**  
Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*  
Assets Covered **88960 (83)**  
Result Notes **GSM 4.31 Appendix A**

**Tasks 221.040.001, 221.040.010, 221.040.005, 221.040.015**

## **TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)**

25. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b))**  
Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*  
Assets Covered **88960 (83)**  
Result Notes **GSM 3.22 Pg 1**

**Welder Qualification Requirements**

26. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))**  
Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*  
Assets Covered **88960 (83)**  
Result Notes **GSM 3.22 Pg 1**

**Welder Qualification Requirements**

27. Question Result, ID, **Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**  
 Question Text *Do records indicate adequate qualification of welders?*  
 Assets Covered **88960 (83)**  
 Result Notes **Reviewed a sample of Welder Qualifications during the inspection**
- No concern**
28. Question Result, ID, **Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**  
 Question Text *Do records indicate the qualification of nondestructive testing personnel?*  
 Assets Covered **88960 (83)**  
 Result Notes **NDT performed during High Pressure replacement in Airway Heights in 2022**
- Reviewed Qualifications**
29. Question Result, ID, **Sat, TQ.QUOMCONST.PLASTIC.P, 192.285(a) (192.285(d), 192.805(b), 192.285(c))** (also presented in: **DC.PLASTIC**)  
 Question Text *Does the process require personnel making joints in plastic pipelines be qualified?*  
 Assets Covered **88960 (83)**  
 Result Notes **Gas Standards Manual (GSM) Spec. 3.23, 3.24, 3.25 Qualifications of Persons to Join Plastic Pipe**
30. Question Result, ID, **Sat, TQ.QUOMCONST.PLASTICINSPECT.P, 192.287 (192.805(b))** (also presented in: **DC.PLASTIC**)  
 Question Text *Does the process require that persons who inspect joints in plastic pipes be qualified?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Spec. 4.31, Appendix A, Pg 12-13**
31. Question Result, ID, **Sat, TQ.QUOMCONST.PLASTIC.R, 192.285(a) (192.285(d), 192.287, 192.807(a), 192.807(b), 192.285(c))** (also presented in: **DC.PLASTIC**)  
 Question Text *Do records indicate adequate qualification of personnel making/inspecting joints in plastic pipelines?*  
 Assets Covered **88960 (83)**  
 Result Notes **Reviewed Pipe Joining Compliance Report (attached) which shows all joining qualifications for Avista and contractors**
32. Question Result, ID, **NA, TQ.QUOMCONST.PLASTIC.O, 192.285(a) (192.287, 192.803)** (also presented in: **DC.PLASTIC**)  
 Question Text *Do field observations verify personnel making/inspecting joints in plastic pipelines demonstrate adequate skills and knowledge?*  
 Assets Covered **88960 (83)**  
 Result Notes **No field observations completed during this inspection**
- Will answer during Pullman/Clarkston Field (ID 8760) visit in May 2024**

## **DC.PLASTIC: Plastic Pipe Construction**

33. Question Result, ID, **Sat, TQ.QUOMCONST.PLASTIC.P, 192.285(a) (192.285(d), 192.805(b), 192.285(c))** (also presented in: **TQ.QUOMCONST**)  
 Question Text *Does the process require personnel making joints in plastic pipelines be qualified?*  
 Assets Covered **88960 (83)**  
 Result Notes **Gas Standards Manual (GSM) Spec. 3.23, 3.24, 3.25 Qualifications of Persons to Join Plastic Pipe**
34. Question Result, ID, **Sat, TQ.QUOMCONST.PLASTICINSPECT.P, 192.287 (192.805(b))** (also presented in: **TQ.QUOMCONST**)  
 Question Text *Does the process require that persons who inspect joints in plastic pipes be qualified?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Spec. 4.31, Appendix A, Pg 12-13**
35. Question Result, ID, **Sat, TQ.QUOMCONST.PLASTIC.R, 192.285(a) (192.285(d), 192.287, 192.807(a), 192.807(b), 192.285(c))** (also presented in: **TQ.QUOMCONST**)

Question Text *Do records indicate adequate qualification of personnel making/inspecting joints in plastic pipelines?*

Assets Covered 88960 (83)

Result Notes Reviewed Pipe Joining Compliance Report (attached) which shows all joining qualifications for Avista and contractors

36. Question Result, ID, References NA, TQ.QUOMCONST.PLASTIC.O, 192.285(a) (192.287, 192.803) (also presented in: TQ.QUOMCONST)

Question Text *Do field observations verify personnel making/inspecting joints in plastic pipelines demonstrate adequate skills and knowledge?*

Assets Covered 88960 (83)

Result Notes No field observations completed during this inspection

Will answer during Pullman/Clarkston Field (ID 8760) visit in May 2024

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