

# 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	8759 Avista O&M Review	Operator(s)	AVISTA CORP (31232)	Plan Submitted	12/20/2023
Status	LOCKED	Lead	Derek Norwood	Plan Approval	01/08/2024 by Dennis Ritter
Start Year	2024	Team Members	Jason Hoxit	All Activity Start	01/30/2024
System Type	GD	Observer(s)	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, John Trier, Marina Rathbun, Tom Green	All Activity End	04/16/2024
Protocol Set ID	WA.GD.2023.02	Supervisor	Dennis Ritter	Inspection Submitted	04/30/2024
		Director	Scott Rukke	Inspection Approval	05/01/2024 by Scott Rukke

## Inspection Summary

### Inspection Scope and Summary

This inspection was a review of Avista's Gas Standards Manual (GSM) and Gas Emergency and Service Handbook (GESH) for the Operations and Maintenance Plans and Procedures Review (O&M Review).

### Facilities visited and Total AFOD

Facilities were not visited for the O&M Review. This inspection was 4 AFODs.

### Summary of Significant Findings

There were no areas of concern or probable violations as a result of this inspection.

### Primary Operator contacts and/or participants

Randy Bareither, Principal Pipeline Safety Engineer

### 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 Vault Offshore GOM OCS Aluminum/Amphoteric Copper Pipe Cast or Ductile Iron	126	126	126	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)	WUTC O&M Inspection	PRO, PRR, FR, GDIM, LPGIM, MISCTOPICS, GENERIC	P, R, O, S	Detail	--

## Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	O&M Review Questions	--	01/30/2024 04/16/2024	WUTC O&M Inspection	PRO, PRR, FR, GDIM, LPGIM, MISCTOPICS, GENERIC	all assets	all types	126	126	126	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	O&M Review Questions	COMPLETED	04/16/2024	O&M Review Questions	88960 (83)

## Results (all values, 126 results)

### PRO.REPORT: Reporting

- Question Result, ID, References: [Sat, RPT.RR.IMMEDREPORT.P, 191.5\(b\) \(191.7\(a\), 191.7\(d\)\)](#)

Question Text: *Is there a process to immediately report incidents to the National Response Center?*

Assets Covered: 88960 (83)

Result Notes: *The process to immediately report incidents to the NRC is found in GESH, Section 13, 6-8, which covers the reporting requirements of CFR § 191.5 and WAC 480-93-200.*
- Question Result, ID, References: [Sat, RPT.RR.EMERGENCYNOTIFY.P,](#)

Question Text: *Does the manual include procedures to notify the commission of certain incidents or hazardous conditions within the required time frame?*

Assets Covered: 88960 (83)

Result Notes: *GSM Specification 4.14, 3-5, and GESH Section 13, 7-8, include procedures to notify the commission of certain incidents or hazardous conditions within the required time frames.*
- Question Result, ID, References: [Sat, RPT.RR.INCIDENTREPORT.P, 191.9\(a\)](#)

Question Text: *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?*

Assets Covered: 88960 (83)

Result Notes: *GESH Section 13, 8, includes procedures to file the initial report after confirmed discovery of a federal or state reportable incident, and includes procedures to file written notifications not to exceed 30 days after discovery of a reportable incident.*

4. Question Result, ID, References **Sat, RPT.RR.THIRTYDAYRPT.P,**  
 Question Text *Does the manual include procedures to submit a written report to the commission within thirty days of the initial telephonic report?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 13, 8, includes a procedure to submit a written report to the commission within 30 days of the initial telephonic notification for a state reportable incident.**
5. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORTSUPP.P, 191.9(b)**  
 Question Text *Does the process require preparation and filing of supplemental incident reports?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 13, 7-8, includes a process to prepare and file supplemental incident reports upon attaining additional relevant information.**
6. Question Result, ID, References **Sat, RPT.RR.OPID.P, 191.22(a) (191.22(c), 191.22(d))**  
 Question Text *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 14.4, 2, includes the processes to acquire OPIDs, use OPIDs for all reporting requirements and NPMS submissions, and to notify PHMSA of changes in accordance with CFR § 191.22.**
7. Question Result, ID, References **Sat, RPT.RR.SRCR.P, 192.605(a) (191.23(a), 191.23(b), 191.25(a), 191.25(c))**  
 Question Text *Do the procedures require reporting of safety-related conditions?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 4.12, 1-3, requires the reporting of safety-related conditions in accordance with CFR § 192.605, CFR § 191.23, and CFR § 191.25.**
8. Question Result, ID, References **Sat, MO.GO.SRC.P, 192.605(a) (192.605(d), 191.23(a))**  
 Question Text *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 4.12, 1, includes procedures for gas operations personnel to recognize and report conditions that may constitute a safety-related condition in accordance with CFR § 192.605 and CFR § 191.23.**
9. Question Result, ID, References **Sat, DC.CO.FILEREQ.P,**  
 Question Text *Do procedures include requirements to file documents with the UTC at least 45 days prior to operation or construction of a pipeline?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 1.4, 2, contains the requirements to file with the commission any new or updated construction procedures, designs, or specifications a minimum of 45 days prior to the operation or construction of a pipeline.**
10. Question Result, ID, References **Sat, FS.FG.PROXCON.P,**  
 Question Text *Are procedures in place to submit a written request to the commission prior to operating a gas pipeline in the areas and pressures designated in WAC 480-93-020?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 2.12, 12-13, includes procedures to submit a written request to the commission prior to operating a gas pipeline in the areas and pressures outlined in WAC 480-93-020.**
11. Question Result, ID, References **Sat, RPT.RR.MAOPINCREASEPLANS.P,**  
 Question Text *Do procedures require filing with the commission 45 days prior to uprating to a MAOP greater than 60 psig?*  
 Assets Covered **88960 (83)**

Result Notes GSM Specification 4.17, 3, contains procedures to file a written plan and drawings with the commission at least 45 days prior to uprating the MAOP of any pipeline or facility to a pressure over 60 psig in accordance with WAC 480-93-155.

12. Question Result, ID, References Sat, RPT.RR.DIRTREPORTS.P,

Question Text *Do procedures require a report (i.e., DIRT Report) to be submitted to the commission and provide excavators with the required information in the event of damage to their gas pipeline?*

Assets Covered 88960 (83)

Result Notes GSM Specifications 4.13, 13, and 4.14, 3-5, include procedures to file a report with the commission and provide excavators with the required information in the event of damage to the operator's facilities in accordance with RCW 19.122.053 and WAC 480-93-200.

13. Question Result, ID, References Sat, RPT.RR.DAILYCONSTRUCTIONRPT.P,

Question Text *Do procedures require daily construction and repair activities to be emailed to the commission no later than 10 AM each day work is scheduled?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.19, 1, contains the requirement to notify the commission of construction and repair activities on a daily basis, no later than 10:00 AM, in accordance with WAC 480-93-200(12).

14. Question Result, ID, References Sat, RPT.RR.UTCANNUALREPORTS.P,

Question Text *Do procedures require the operator to submit complete and accurate annuals reports and NPMS submissions to the commission by March 15th for the preceding calendar year?*

Assets Covered 88960 (83)

Result Notes GSM Specifications 4.14, 1, and 4.14, 3, contain procedures to submit annual reports and NPMS submissions to the commission no later than March 15 of each calendar year, in accordance with WAC 480-93-200(10).

15. Question Result, ID, References Sat, RPT.RR.PIPELINEMAPPING.P,

Question Text *Do procedures require the operator to provide accurate maps (or updates) of all pipelines operating over 250 psig to specifications developed by the commission sufficient to meet the needs of first responders?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.14, 3, includes a procedure to provide accurate maps of pipelines that operate above 250 psig to the commission no later than March 15 of each calendar year, in accordance with RCW 81.88.080.

## PRO.SUBACUSTEFV: Customer and EFV Installation Notification

16. Question Result, ID, References Sat, MO.GO.CUSTNOTIFY.P, 192.13(c) (192.16(a), 192.16(b), 192.16(c), 192.16(d))

Question Text *Is a customer notification process in place that satisfies the requirements of 192.16?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.22, 1-2, includes a customer notification process concerning customer-owned service lines and buried customer piping systems that satisfies the requirements of CFR § 192.16.

17. Question Result, ID, References Sat, MO.GO.EFVINSTALL.P, 192.383(b) (192.381(a), 192.381(b), 192.381(c), 192.381(d), 192.381(e), 192.383(a), 192.383(c))

Question Text *Is there an adequate excess flow valve (EFV) installation and performance program in place?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.14, 3, includes EFV performance standards in accordance with CFR § 192.381. GSM Specification 3.16, 10-11, includes EFV installation requirements in accordance with CFR § 192.383.

## PRO.SUBLNORMOPS: Normal Operating And Maintenance

18. Question Result, ID, References Sat, MO.GO.OMANNUALREVIEW.P, 192.605(a)

Question Text *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?*

Assets Covered 88960 (83)

- Result Notes GSM Specification 1.4, 1, includes the requirement to review the GSM and GESH documents once each calendar year, not to exceed 15 months, in accordance with CFR § 192.605(a).
19. Question Result, ID, References Sat, MO.GO.OMHISTORY.P, 192.605(a) (192.605(b)(3))
- Question Text *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?*
- Assets Covered 88960 (83)
- Result Notes GSM Specification 1.4, 2, contains the requirements to make manuals, maintenance records, construction records, and maps available to personnel performing design, construction, maintenance, and emergency response of the natural gas systems, as well as making these records available to federal and state regulatory personnel.
20. Question Result, ID, References Sat, MO.GOMAOP.MAOPLIMIT.P, 192.605(a) (192.605(b)(5))
- Question Text *Does the process include requirements for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?*
- Assets Covered 88960 (83)
- Result Notes GSM Specification 4.15, 2, includes MAOP consideration requirements during startup and shutdown to assure operation with the MAOP limits, plus the allowable build-up for operation of pressure-limiting and control devices.
21. Question Result, ID, References Sat, MO.GO.OMEFFECTREVIEW.P, 192.605(a) (192.605(b)(8))
- Question Text *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
- Assets Covered 88960 (83)
- Result Notes GSM Specification 4.61, 1-2.
22. Question Result, ID, References Sat, AR.RMP.SAFETY.P, 192.605(b)(9) (192.713(b))
- Question Text *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?*
- Assets Covered 88960 (83)
- Result Notes GESH Section 4, 3-6; GSM Specifications 3.32A, 1-4; 3.34, 2; and 3.35, 1-2, include processes to ensure that repairs are made in a safe manner and to prevent damage to persons and property.
23. Question Result, ID, References Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))
- Question Text *Does the process require prompt response to the report of a gas odor inside or near a building?*
- Assets Covered 88960 (83)
- Result Notes GESH Section 1, 1-4; GESH Section 2, 2; GESH Section 2, 5-6; and GESH 4, 1-2, include processes for prompt response to a report of gas odor inside or near a building in accordance with WAC 480-93-185 and CFR § 192.605(b)(11).
24. Question Result, ID, References Sat, MO.GM.MOVEANDLOWER.P,
- Question Text *Does the manual include procedures to prepare a study when moving or lowering metallic pipelines?*
- Assets Covered 88960 (83)
- Result Notes GSM Specification 3.12, 19-22, includes procedures for moving or lowering steel pipelines in accordance with WAC 480-93-175.
25. Question Result, ID, References Sat, MO.GM.ONSITEPROCS.P,
- Question Text *Does the manual require that procedures applicable to the work being done are located onsite where the work is being done?*
- Assets Covered 88960 (83)
- Result Notes GSM Specification 3.22, 5-6; GSM Specification 3.23, 1; GSM Specification 3.24, 2; GSM Specification 4.14, 3; and GSM Specification 5.11, 2, require procedures applicable to the work being done are located onsite where the work is being done.

26. Question Result, ID, References **Sat, MO.RW.LEAKRECORDS.P,**  
Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*  
Assets Covered **88960 (83)**  
Result Notes **GSM Specification 4.11, 1; GSM Specification 5.11, 19-20; and GSM Specification 5.19, 2, include procedures to prepare and maintain leak records containing information required by WAC 480-93-187.**

### **PRO.SUBLCLASS: Change In Class Location**

27. Question Result, ID, References **Sat, MO.GOCLASS.CLASSLOCATESTUDY.P, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))**  
Question Text *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?*  
Assets Covered **88960 (83)**  
Result Notes **GSM Specification 4.16, 2-3 includes the requirement that the operator conduct a study when population density indicates a change in the class location of a pipeline segment in accordance with CFR § 192.609.**
28. Question Result, ID, References **Sat, MO.GOCLASS.CLASSLOCATEREV.P, 192.605(b)(1) (192.611(a), 192.611(b), 192.611(c), 192.611(d))**  
Question Text *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?*  
Assets Covered **88960 (83)**  
Result Notes **GSM Specification 4.16, 3-4 includes the requirement that the MAOP of a pipeline segment be confirmed or revised with 24 months when there is a change in class location in accordance with CFR § 192.611.**

### **PRO.SUBLSURVEIL: Continuing Surveillance**

29. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))**  
Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*  
Assets Covered **88960 (83)**  
Result Notes **GSM Specification 3.32, 1-2; GSM Specification 4.11, 1-2; GSM Specification 4.15, 2; GSM Specification 4.16, 1; GSM Specification 5.11, 10; GSM Specification 5.14, 1-2; GSM Specification 5.15, 1; GSM Specification 5.20, 2-3; include processes for performing continuing surveillance of pipeline facilities.**

### **PRO.SUBLDAMAGEPREVENT: Damage Prevention Program**

30. Question Result, ID, References **Sat, PD.DP.PDPROGRAM.P, 192.614(a)**  
Question Text *Is a damage prevention program approved and in place?*  
Assets Covered **88960 (83)**  
Result Notes **GSM Specification 4.13, 2-3 outlines the operator's damage prevention program.**
31. Question Result, ID, References **Sat, PD.DP.ONECALL.P, 192.614(b)**  
Question Text *Does the process require participation in qualified one-call systems?*  
Assets Covered **88960 (83)**  
Result Notes **GSM Specification 4.13, 2-5; requires participation in qualified one-call systems in compliance with WAC 480-93-250 and CFR § 192.614.**
32. Question Result, ID, References **Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)**  
Question Text *Does the process require marking proposed excavation sites to the Common Ground Alliance's (CGA) Best Practices or the use of more stringent and accurate requirements?*  
Assets Covered **88960 (83)**

Result Notes GSM Specification 4.13, 1; and GSM Specification 4.13, 3-8, require marking proposed excavation sites in accordance with WAC 480-93-250 and CFR § 192.614(c)(5).

33. Question Result, ID, References Sat, PD.DP.TPD.P, 192.614(c)(1)

Question Text *Does the process specify how reports of Third-Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.13, 2, includes a process to mail out content and messaging using stakeholder participation in accordance with CFR § 192.614(c)(1).

34. Question Result, ID, References Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)

Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.13, 14, includes a process to check for notification to a one-call center in the event of third-party excavation damage.

## PRO.SUBLEMERGOPS: Emergency

35. Question Result, ID, References Sat, EP.ERG.NOTICES.P, 192.615(a)(1)

Question Text *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?*

Assets Covered 88960 (83)

Result Notes GESH Section 1, 1-2; and GESH Section 13, 1, include procedures for receiving, identifying, and classifying notices of events which require immediate response in accordance with CFR § 192.615(a)(1).

36. Question Result, ID, References Sat, EP.ERG.COMMSYS.P, 192.615(a) (192.615(a)(2))

Question Text *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?*

Assets Covered 88960 (83)

Result Notes GESH Section 1, 4-5; GESH Section 2, 6; GESH Section 2, 16-17; and GESH Section 13, 1-3, include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials in compliance with WAC 480-93-200(11) and CFR § 192.615.

37. Question Result, ID, References Sat, EP.ERG.RESPONSE.P, 192.615(a) (192.615(a)(3), 192.615(a)(11), 192.615(b)(1))

Question Text *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, operational failure (including Cyber-attacks), or a natural disaster?*

Assets Covered 88960 (83)

Result Notes GESH Section 1, 3-5; GESH Section 4, 1-2; GESH Section 13, 2-3; and GESH Section 17, 1-8. include procedures for making a prompt and effective response to a notice of each type of emergency.

38. Question Result, ID, References Sat, EP.ERG.READINESS.P, 192.615(a) (192.615(a)(4))

Question Text *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?*

Assets Covered 88960 (83)

Result Notes GESH Section 13, 2-3; and GESH Section 5, 5-6 include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency in accordance with CFR § 192.615(a)(4).

39. Question Result, ID, References Sat, EP.ERG.PUBLICPRIORITY.P, 192.615(a) (192.615(a)(5))

Question Text *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?*

Assets Covered 88960 (83)

Result Notes GESH Section 4, 1, includes an emergency procedure to safeguard life first then property in accordance with CFR § 192.615(a)(5).

40. Question Result, ID, References **Sat, EP.ERG.PRESSREDUCESD.P, 192.615(a) (192.615(a)(6))**  
 Question Text *Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 5, 1, includes emergency shutdown procedures in accordance with CFR § 192.615(a)(6). As part of its emergency plan, the operator does not undertake pressure reduction.**
41. Question Result, ID, References **Sat, EP.ERG.PUBLICHAZ.P, 192.605(a) (192.615(a)(7))**  
 Question Text *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 1, 1; GESH Section 2, 7; and GESH Section 4, 1, include procedures for making safe any actual or potential hazard to life or property in accordance with CFR § 192.615(a)(7).**
42. Question Result, ID, References **Sat, EP.ERG.AUTHORITIES.P, 192.615(a) (192.615(a)(8))**  
 Question Text *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 1, 5; GESH Section 4, 1; and GESH Section 13, 1-2, include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency in accordance with CFR § 192.615(a)(8).**
43. Question Result, ID, References **Sat, EP.ERG.OUTAGERESTORE.P, 192.615(a) (192.615(a)(9))**  
 Question Text *Does the emergency plan include procedures for safely restoring any service outage?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 4, 2; and GESH Section 5, 2-4 include procedures for safely restoring any service outage in accordance with CFR § 192.615(a)(9).**
44. Question Result, ID, References **Sat, EP.ERG.INCIDENTACTIONS.P, 192.615(a) (192.615(a)(10))**  
 Question Text *Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 13, 3-4; GESH Section 17, 1-5; and GSM Specification 4.62, 1-4; include processes for beginning action under CFR § 192.617, in accordance with CFR § 192.615(a)(10) and WAC 480-93-185.**
45. Question Result, ID, References **Sat, EP.ERG.TRAINING.P, 192.615(b)(2)**  
 Question Text *Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 2, 1; GESH Section 4, 1-2; and GESH Section 13, 3-4, include training appropriate personnel for emergency procedures in accordance with CFR § 192.615(b)(2).**
46. Question Result, ID, References **Sat, EP.ERG.POSTEVTREVIEW.P, 192.615(b)(3)**  
 Question Text *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 13, 4, includes procedures to determine if applicable procedures were followed and if the procedures are effective in accordance with CFR § 192.615(b)(3).**
47. Question Result, ID, References **Sat, EP.ERG.LIAISON.P, 192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-2005-03)**  
 Question Text *Does the process include steps for establishing and maintaining liaison with appropriate fire, police, other public officials, and 911 emergency call centers?*  
 Assets Covered **88960 (83)**

Result Notes GESH Section 13, 1-2, includes steps for establishing and maintaining liaison with appropriate fire, police, other public officials, and 911 emergency call centers.

## PRO.SUBLFAILINV: Failure Investigation

48. Question Result, ID, References Sat, EP.ERG.INCIDENTANALYSIS.P, 192.617

Question Text *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.62; GESH Section 13, 3; and GESH Section 17, 1-5, include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination for determining the causes of the failure and minimizing recurrence in accordance with WAC 480-93-185 and CFR § 192.617.

## PRO.SUBLMAOP: MAOP

49. Question Result, ID, References Sat, MO.GOMAOP.MAOPDETERMINE.P, 192.605(b)(1) (192.619(a), 192.619(b), 192.621(a), 192.621(b), 192.623(a), 192.623(b))

Question Text *Does the process include requirements for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.15, 1-2, includes requirements for determining the MAOP for a pipeline segment in accordance with CFR § 192.619.

## PRO.SUBLPRESSTEST: Pressure Test

50. Question Result, ID, References Sat, AR.PTI.PRESSTESTACCEP.P, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))

Question Text *Were test acceptance criteria and procedures/processes sufficient to assure the basis for an acceptable pressure test?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, 17; GSM Specification 3.13, 11; GSM Specification 3.15, 5; GSM Specification 3.16, 10-11; GSM Specification 3.18; GSM Specification 3.25; GSM Specification 3.32, 2-6; GSM Specification 3.33; GSM Specification

5.11, 16; and GSM Specification 5.17, 1, include acceptance criteria and processes sufficient to assure the basis for an acceptable pressure test.

51. Question Result, ID, References Sat, AR.PTI.EQUIPCALIB.P,

Question Text *Does the manual include procedures to maintain and calibrate pressure testing equipment in accordance with manufacturer's recommendations?*

Assets Covered 88960 (83)

Result Notes GSM Specification 5.21 includes procedures to maintain a calibrate pressure testing equipment in accordance with manufacturer's recommendations in compliance with WAC 480-93-170(10).

## PRO.SUBLODOR: Odorization Of Gas

52. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.P, 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?*

Assets Covered 88960 (83)

Result Notes GSM Specification 4.18 and GSM Specification 5.23 includes procedures to ensure appropriate odorant levels are contained in its combustible gases in accordance with WAC 480-93-015 and CFR § 192.625.

## PRO.SUBLTAP: Tapping Pipelines Under Pressure

53. Question Result, ID, References **Sat, AR.RMP.HOTTAP.P, 192.605(b)(1) (192.627)**  
 Question Text *Is the process adequate for tapping pipelines under pressure?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 3.24, 6; and GSM Specification 3.32, 3, include processes adequate for tapping pipelines under pressure.**
54. 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 Specification 3.32, 3; and GSM Specification 4.31, Appendix A, 17-18, require taps on a pipeline under pressure to be performed by qualified personnel.**

### **PRO.SUBLPURGE: Pipeline Purging**

55. Question Result, ID, References **Sat, MO.GO.PURGE.P, 192.605(b)(1) (192.629(a), 192.629(b))**  
 Question Text *Does the process include requirements for purging of pipelines in accordance with 192.629?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 3.17 includes requirements for purging of pipelines in accordance with CFR § 192.629.**

### **PRO.SUBMLINEMARK: Line Marker**

56. Question Result, ID, References **Sat, MO.RW.ROWMARKER.P, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)**  
 Question Text *Does the process adequately cover the requirements for placement of ROW markers?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.15, 5-7, adequately covers the requirements for placement of ROW markers.**
57. Question Result, ID, References **Sat, MO.RW.MARKERSURVEY.P,**  
 Question Text *Are procedures in place to survey pipeline markers at specified intervals?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.15, 7, includes procedures to place markers in the ground at each end of a bridge or otherwise span an area and to survey markers every five calendar years but not to exceed 63 months.**
58. Question Result, ID, References **Sat, MO.RW.MARKERREPLACE.P,**  
 Question Text *Does the manual include procedures to replace damaged or missing markers within 45 days?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.15, 7, includes procedures to replace reported damaged or missing signs or markers within 45 days in accordance with WAC 480-93-124.**

### **PRO.SUBMPATROLDIST: Distribution System Patrolling & Leakage Survey**

59. Question Result, ID, References **Sat, MO.RW.DISTPATROL.P, 192.721(a) (192.721(b))**  
 Question Text *Does the process require distribution system patrolling to be conducted?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.10, 5, and GSM Specification 5.11, 7-9; and GSM Specification 5.11, 18-19, require distribution system patrolling be conducted in accordance with 480-93-188 and CFR § 192.721.**
60. Question Result, ID, References **Sat, MO.RW.DISTLEAKAGE.P, 192.723(a) (192.723(b))**  
 Question Text *Does the process require distribution system leakage surveys to be conducted?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.11, 7-9; and GSM Specification 5.11, 18-19, require distribution system surveys to be conducted.**

61. Question Result, ID, References **Sat, MO.RW.CASINGLEAKSURVEY.P,**  
 Question Text *Does the process require shorted casings be leak surveyed as required?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.10, 5; and GSM Specification 5.11, 9, require shorted casings be leak surveyed in accordance with WAC 480-93-110(5)(d).**
62. Question Result, ID, References **Sat, MO.RW.MOVEANDLOWERSURVEY.P,**  
 Question Text *Does the manual include procedures to leak survey not more than thirty days after a metallic pipeline has been moved or lowered?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.11, 9, requires a leak survey to be conducted within 30 days from the date a steel pipeline has been moved or lowered that is 2 inches in diameter and smaller that operates at 60 psig or less in accordance with WAC 480-93-175.**
63. Question Result, ID, References **Sat, MO.RW.LEAKGRADE.P,**  
 Question Text *Do procedures require grading/re-grading leaks and evaluating the concentration and extent of leakage?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 2, 16-19, and GSM Specification 5.11, 10-18, require grading/re-grading leaks and evaluating the concentration and extent of leakage in compliance with WAC 480-93-186 and WAC 480-93-18601.**
64. Question Result, ID, References **Sat, MO.RW.LEAKPERIMETER.P,**  
 Question Text *Do procedures require checking the perimeter of a gas leak with a combustible gas indicator?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 2, 8; GESH Section 2, 10-11; GSM Specification 5.11, 13; and GSM Specification 5.11, 16-17, require checking the perimeter of a gas leak with a CGI in accordance with WAC 480-93-186(3).**
65. Question Result, ID, References **Sat, MO.RW.LEAKFOLLOW.P,**  
 Question Text *Do procedures require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground not later than thirty days after the repair?*  
 Assets Covered **88960 (83)**  
 Result Notes **GESH Section 2, 11 and GSM Specification 5.11, 17, require performing a follow-up inspection on all leak repairs with residual gas remaining in the ground no later than 30 days after the repair in accordance with WAC 480-93-186(3).**

## **PRO.SUBMPATROLEAK: Transmission System Patrolling & Leakage Survey**

66. Question Result, ID, References **Sat, MO.RW.TRANSPATROL.P, 192.705(a) (192.705(b), 192.705(c))**  
 Question Text *Does the process adequately cover the requirements for transmission line patrolling the ROW and conditions reported?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 4.14, 2; GSM Specification 5.11, 8; and GSM Specification 5.15, 4, includes processes to adequately cover the requirements for transmission line patrolling the right-of-way and conditions reported in accordance with CFR § 192.705.**
67. Question Result, ID, References **Sat, MO.RW.TRANSLEAKAGE.P, 192.706 (192.706(a), 192.706(b))**  
 Question Text *Does the process require transmission leakage surveys to be conducted?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.11, 8; and GSM Specification 5.15, 4, requires leakage surveys to be conducted in accordance with WAC 480-93-188 and CFR § 192.706.**

## **PRO.SUBMSVCREINSTATE: Test Requirements For Reinstating Service Lines**

68. Question Result, ID, References [Sat, AR.RMP.TESTREINSTATE.P, 192.605\(b\) \(192.725\(a\), 192.725\(b\)\)](#)  
Question Text *Is the process adequate for the testing of disconnected service lines?*  
Assets Covered [88960 \(83\)](#)  
Result Notes [GSM Specification 3.18, 8; GSM Specification 5.11, 16; and GSM Specification 5.17, 1, include adequate processes for the testing of disconnected service lines.](#)

## PRO.SUBMABANDON: Abandonment Or Deactivation Of Facilities

69. Question Result, ID, References [Sat, MO.GM.ABANDONPIPE.P, 192.605\(b\)\(1\) \(192.727\(a\), 192.727\(b\), 192.727\(c\), 192.727\(d\), 192.727\(e\), 192.727\(f\), 192.727\(g\)\)](#)  
Question Text *Does the process include adequate requirements for the abandonment and deactivation of pipelines and facilities?*  
Assets Covered [88960 \(83\)](#)  
Result Notes [GSM Specification 3.17, 2; GSM Specification 3.17, 7; GSM Specification 5.16, 1-4; and GESH Section 8, 3; include adequate requirements for the abandonment and deactivation of pipelines and facilities in accordance with CFR § 192.727.](#)

## PRO.SUBMOVERPRESS: Pressure Limiting And Regulating Station

70. Question Result, ID, References [Sat, MO.GMOPP.PRESSREGTEST.P, 192.605\(b\)\(1\) \(192.739\(a\), 192.739\(b\)\)](#)  
Question Text *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment?*  
Assets Covered [88960 \(83\)](#)  
Result Notes [GSM Specification 5.12, 4-7; and GSM Specification 5.12, 11; include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station.](#)
71. Question Result, ID, References [Sat, MO.GMOPP.PRESSREGMETER.P, 192.605\(b\)\(1\) \(192.741\(a\), 192.741\(b\), 192.741\(c\)\)](#)  
Question Text *Does the process require telemetering or recording gauges be utilized as required for distribution systems?*  
Assets Covered [88960 \(83\)](#)  
Result Notes [GSM Specification 2.23, 4; GSM Specification 2.25, 1; GSM Specification 5.21; and GESH Section 13, 4, require telemetering or recording gauges be utilized in accordance with CFR § 192.741.](#)
72. Question Result, ID, References [Sat, MO.GMOPP.PRESSREGCAP.P, 192.605\(b\)\(1\) \(192.743\(a\), 192.743\(b\), 192.743\(c\)\)](#)  
Question Text *Does the process include procedures for ensuring that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient?*  
Assets Covered [88960 \(83\)](#)  
Result Notes [GSM Specification 2.23, 4; and GSM Specification 5.12, 4, include procedures to ensure that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations is sufficient.](#)
73. Question Result, ID, References [Sat, MO.GMOPP.MULTIPRESSREG.P,](#)  
Question Text *Does the manual include procedures to install two or more regulator stations in a manner that will provide protection between the stations?*  
Assets Covered [88960 \(83\)](#)  
Result Notes [GSM Specification 2.23, 1; and GSM Specification 5.12, 1-2, includes procedures to provide protection between regulator stations.](#)
74. Question Result, ID, References [Sat, DC.METERREGSVC.REGTEST.P,](#)  
Question Text *Does the manual have procedures for testing service regulators and associated safety devices during initial turn-on and when a customer experiences a pressure problem?*  
Assets Covered [88960 \(83\)](#)  
Result Notes [GSM Specification 2.22, 1; and GESH Section 7 include procedures for testing service regulators and associated safety devices during initial turn-on and when a customer experiences a pressure problem in accordance with WAC 480-93-140.](#)

## PRO.SUBMVALVE: Valve And Vault Maintenance

75. Question Result, ID, References **Sat, MO.GM.DISTVALVEINSPECT.P, 192.605(b)(1) (192.747(a), 192.747(b))**
- Question Text *Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?*
- Assets Covered **88960 (83)**
- Result Notes **GSM Specification 2.14 and GSM Specification 5.13 include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year. This includes processes for taking prompt remedial action to correct any valve found inoperable in accordance with WAC 480-93-100 and CFR § 192.747.**

## PRO.SUBMIGNITE: Prevention Of Accidental Ignition

76. Question Result, ID, References **Sat, MO.GM.IGNITION.P, 192.605(b)(1) (192.751(a), 192.751(b), 192.751(c))**
- Question Text *Are there processes for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?*
- Assets Covered **88960 (83)**
- Result Notes **GSM Specification 3.17 includes processes for minimizing the danger of accidental ignition in accordance with WAC 480-93-18601 and CFR § 192.751.**

## PRO.SUBWELD: Welding And Weld Defect Repair/removal

77. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELD.P, 192.225(a) (192.225(b))**
- Question Text *Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?*
- Assets Covered **88960 (83)**
- Result Notes **GSM Specification 3.22 requires welding to be performed by qualified welders using qualified welding procedures.**
78. 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 Specification 3.22, 1-5, requires welders to be qualified in accordance with API 1104 or ASME Boiler and Pressure Vessel Code. The additional construction requirements for steel pipe using alternative MAOP in not applicable.**
79. Question Result, ID, References **NA, 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 **The operator does not qualify in accordance with Appendix C.**
80. Question Result, ID, References **Sat, DC.WELDERQUAL.WELDERLIMITNDT.P, 192.303 (192.229(a), 192.229(b), 192.229(c), 192.229(d))**
- Question Text *Does the process require certain limitations be placed on welders and welding operators in accordance with 192.229?*
- Assets Covered **88960 (83)**
- Result Notes **GSM Specification 3.22, 2, includes limitations on welders in accordance with CFR § 192.229.**
81. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELDWEATHER.P, 192.303 (192.231)**
- Question Text *Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.22, 6, requires the welding operation be protected from weather conditions that would impair the quality of the completed weld in accordance with CFR § 192.231.

82. Question Result, ID, References Sat, DC.WELDPROCEDURE.MITERJOINT.P, 192.303 (192.233(a), 192.233(b), 192.233(c))

Question Text *Does the process prohibit the use of certain miter joints as required by 192.233?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.22, 8, does not allow miter joints.

83. Question Result, ID, References Sat, DC.WELDPROCEDURE.ESSENTIAL.P,

Question Text *Does the process require documenting essential variables when qualifying welders and weld procedures?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.22, 5, documents essential variables when qualifying welders and weld procedures.

84. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELDPREP.P, 192.303 (192.235)

Question Text *Does the process require certain preparations for welding, in accordance with 192.235?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.22, 6-7, includes weld preparations in accordance with CFR § 192.235.

85. Question Result, ID, References Sat, DC.WELDINSP.WELDVISUALQUAL.P, 192.303 (192.241(a), 192.241(b), 192.241(c))

Question Text *Does the process require visual inspections of welds to be conducted by qualified inspectors?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.22, 11-12, requires visual inspections of welds be completed by qualified individual in accordance with CFR § 192.241.

86. Question Result, ID, References Sat, DC.WELDINSP.WELDREPAIR.P, 192.303 (192.245(a), 192.245(b), 192.245(c))

Question Text *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.22, 13, requires welds that are unacceptable to be repaired or removed in accordance with CFR § 192.245.

## PRO.SUBENDT: Nondestructive Testing

87. Question Result, ID, References Sat, DC.WELDINSP.WELDNDT.P, 192.243(a) (192.243(b), 192.243(c), 192.243(d), 192.243(e))

Question Text *Is there a process for welds nondestructive testing and interpretation in accordance with 192.243?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.22, 11-12, includes a process for NDT of welds in accordance with CFR § 192.243.

## PRO.SUBEJOIN: Joining Of Pipeline Materials

88. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINT.P, 192.273(b) (192.281(a), 192.281(b), 192.281(c), 192.281(d), 192.281(e), 192.303)

Question Text *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.23, 1; GSM Specification 3.23, 3-5; GSM Specification 3.24, 1-4; and GSM Specification 3.25, 1, require plastic pipe joints be designed and installed in accordance with CFR § 192.281. CFR § 192.281(b), CFR § 192.281(c)(2), and CFR § 192.281(d) are not applicable to the operator.

89. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTPROCEDURE.P, 192.273(b) (192.283(a), 192.283(b), 192.283(c))

Question Text *Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints?*

Assets Covered 88960 (83)

- Result Notes GSM Specification 3.23, 1-3; GSM Specification 3.24, 1-2; and GSM Specification 3.25, 1, require plastic pipe joining procedures to be qualified in accordance with CFR § 192.283 prior to making plastic pipe joints.
90. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTQUAL.P, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.285(e), 192.805)  
 Question Text *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?*  
 Assets Covered 88960 (83)  
 Result Notes GSM Specification 3.23, 1-2, and GSM Specification 3.24, 1-2, include processes to ensure that personnel making joints in plastic pipelines are qualified in accordance with CFR § 192.285.
91. Question Result, ID, References Sat, DC.PLASTIC.PLASTICJOINTINS.P, 192.287 (192.805(h))  
 Question Text *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?*  
 Assets Covered 88960 (83)  
 Result Notes GSM Specification 3.13, 1; and GSM Specification 4.31, Appendix A, require that persons who inspect joints in plastic pipes are qualified.
92. Question Result, ID, References Sat, DC.CO.PLASTICPIPEPROC.P,  
 Question Text *Do procedures include requirements for storage, handling and installation of plastic pipe, including limits for ultraviolet exposure?*  
 Assets Covered 88960 (83)  
 Result Notes GSM Specification 3.13, 2-3, includes requirements for storage, handling, and installation of plastic pipe, including limits for UV exposure in accordance with WAC 480-93-178.
93. Question Result, ID, References Sat, DC.PLASTIC.PLASTICWEAKLINK.P, 192.329(b) (192.376(b), 192.303)  
 Question Text *Does the process require that during installation of plastic lines and plastic service lines, a "weak link" (as defined by §192.3) is utilized to ensure the pipeline will not be damaged by any excessive forces during the pulling process?*  
 Assets Covered 88960 (83)  
 Result Notes GSM Specification 3.13, 6-10, and GSM Specification 3.19, 4, require plastic pipe and components that are pulled through the ground to use a weak link to ensure the pipeline will not be damaged by any excessive forces during the pulling process in accordance with CFR § 192.329(b), CFR § 192.376(b), and WAC 480-93-178(3).
94. Question Result, ID, References Sat, DC.CO.PLASTICPIPESEP.P,  
 Question Text *Does the manual include procedures to ensure minimum separation requirements are met for plastic pipelines?*  
 Assets Covered 88960 (83)  
 Result Notes GSM Specification 3.15, 2, requires each gas pipeline to be installed with a minimum 12-inch separation from any foreign underground utilities in compliance with WAC 480-93-178(4) and WAC 480-93-178(5).
95. Question Result, ID, References Sat, DC.CO.PLASTICABOVEGROUND.P,  
 Question Text *Does the manual include procedures for temporary above ground plastic pipe installation as well as procedures for commission notification for installations longer than thirty days?*  
 Assets Covered 88960 (83)  
 Result Notes GSM Specification 2.13, 4-5, includes procedures for temporary aboveground plastic pipe installation, as well as the requirement to notify the commission if the temporary installation will exceed 30 days, in accordance with WAC 480-93-178(6)(a) and WAC 480-93-178(6)(b).
96. Question Result, ID, References Sat, DC.CO.PLASTICBACKFILL.P,  
 Question Text *Does the manual include procedures to bury plastic pipe with essentially rock-free material or material recommended by the manufacturer?*  
 Assets Covered 88960 (83)  
 Result Notes GSM Specification 3.13, 7, and GSM Specification 3.15, 4, include procedures to bury plastic pipe with essentially rock-free material in accordance with WAC 480-93-178(7).
97. Question Result, ID, References Sat, MO.GM.EQUIPPLASTICJOINT.P, 192.605(b)(1) (192.756)

Question Text *Does the process require maintaining equipment used in joining of plastic pipe using heat fusion in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.23, 2, and GSM Specification 3.24, 2, require maintenance and calibration of heat fusion and electrofusion equipment in accordance with the manufacturer's recommendations in compliance with CFR § 192.756.

98. Question Result, ID, References Sat, DC.CO.PLASTICSQUEEZING.P,

Question Text *Does the manual include procedures for restrictions on squeezing of plastic pipe?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.34, 4, includes restrictions to not squeeze plastic pipe more than one time in the same location and not to squeeze within 12 inches or 3 pipe diameters, whichever is greater, from any joint or fitting in accordance with CFR § 192.178(8). and CFR § 192.178(9).

## PRO.SUBICORROSION: Corrosion Control

99. Question Result, ID, References Sat, TD.COAT.NEWPIPE.P, 192.605(b)(2) (192.455(a), 192.455(b), 192.455(c), 192.455(d), 192.461(a), 192.461(b), 192.463, 192.483(a))

Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971 be externally coated with a material that is adequate for underground service on a cathodically protected pipeline?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, 2; GSM Specification 2.32, 5; GSM Specification 3.32, 2; and GSM Specification 5.14, 1-2, require that each buried or submerged pipeline installed after 7/31/1971 be externally coated with a material that is adequate for underground service on a cathodically-protected pipeline in accordance with CFR § 192.455(a), CFR § 192.455(d), CFR § 192.461(a), CFR § 192.461(b), CFR § 192.463(a), CFR § 192.463(c), and CFR § 192.483(a). CFR § 192.455(b), CFR § 192.455(c), and CFR § 192.463(b) are not applicable to the operator.

100. 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 GSM Specification 2.32, 6, and GSM Specification 4.31, Appendix A, 4-6, require corrosion control procedures to be carried out by, or under the direction of, qualified personnel in accordance with CFR § 192.453, and CFR § 192.805(b).

101. Question Result, ID, References Sat, TD.COAT.CONVERTPIPE.P, 192.605(b)(2) (192.452(a), 192.455(a), 192.455(b), 192.455(c), 192.455(d), 192.461(a))

Question Text *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, 2, and GSM Specification 2.32, 5, includes a procedure that each buried or submerged pipeline that has been converted to gas service and was installed after 7/31/1971 be protected against external corrosion with an adequate coating. Although the operator has procedures to satisfy the regulations, the operator noted that it does not convert pipes to gas service.

102. Question Result, ID, References Sat, TD.CP.POST1971.P, 192.605(b)(2) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(c), 192.455(d), 192.455(f), 192.455(g))

Question Text *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, 1, and GSM Specification 2.32, 5, require that each buried or submerged pipeline installed after 7/31/1971 be protected against external corrosion with a cathodic protection system within one year after completion in accordance with CFR § 192.457(a), CFR § 192.452(a), CFR § 192.455(a), and CFR § 192.455(d). CFR § 192.452(b), and CFR § 192.455(c) are not applicable.

103. Question Result, ID, References Sat, TD.CP.PRE1971.P, 192.605(b)(2) (192.457(b))

Question Text *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines, or 2) bare or coated pipes in compressor, regulator or meter stations, or 3) bare or coated distribution lines, must be cathodically protected in areas where active corrosion is found?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, and GSM Specification 2.32.

104. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.P, 192.605(b)(2) (192.459)

Question Text *Does the process require that exposed portions of buried pipeline must be examined for external corrosion?*

Assets Covered 88960 (83)

Result Notes GSM Specification 3.44, 2, requires the examination of exposed portions of buried pipelines for external corrosion in accordance with WAC 480-93-110 and CFR § 192.459.

105. Question Result, ID, References Sat, TD.CPMONITOR.MONITORCRITERIA.P, 192.605(b)(2) (192.463(a), 192.463(c))

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

Assets Covered 88960 (83)

Result Notes GSM Specification 5.14, 1-2, requires acceptable cathodic protection monitoring in accordance with CFR § 192.463(a), and CFR § 192.463(c).

106. Question Result, ID, References Sat, TD.CPMONITOR.TEST.P, 192.605(b)(2) (192.465(a))

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

Assets Covered 88960 (83)

Result Notes GSM Specification 5.14, 8, requires each pipeline that is under cathodic protection be tested in accordance with CFR § 192.465(a).

107. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.P, 192.605(b)(2) (192.465(b))

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

Assets Covered 88960 (83)

Result Notes GSM Specification 5.14, 2-3, and GSM Specification 5.14, 8, requires cathodic protection rectifiers and impressed current sources be periodically inspected in accordance with CFR § 192.465(b).

108. Question Result, ID, References Sat, TD.CPMONITOR.REVCURRENTTEST.P, 192.605(b)(2) (192.465(c))

Question Text *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?*

Assets Covered 88960 (83)

Result Notes GSM Specification 5.14, 4; and GSM Specification 5.14, 8, require that each reverse current switch, each diode, and each interference bond whose failure would jeopardize structure protected be electrically checked for proper performance in accordance with CFR § 192.465(c).

109. Question Result, ID, References Sat, TD.CPMONITOR.DEFICIENCY.P, 192.605(b)(2) (192.465(d))

Question Text *Does the process require that the operator promptly correct any identified deficiencies in corrosion control?*

Assets Covered 88960 (83)

Result Notes GSM Specification 5.14, 4, requires the operator promptly correct any identified deficiencies in corrosion control in accordance with WAC 480-93-110(2) and CFR § 192.465(d).

110. Question Result, ID, References NA, TD.CP.UNPROTECT.P, 192.605(b)(2) (192.465(e))

Question Text *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?*

Assets Covered 88960 (83)

Result Notes The operator does not have unprotected buried pipelines. If unprotected buried pipelines were discovered, the operator would protect them.

111. Question Result, ID, References **Sat, FS.FG.CASING.P,**  
 Question Text *Does the manual include procedures to only install bare steel casings and to include test leads on all new casings?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 3.16, 12-13, and GSM Specification 3.42, 4, include procedures to only install bare steel casings and to include test leads on all new casings in accordance with WAC 480-93-115(2).**
112. Question Result, ID, References **Sat, FS.FG.CASESEAL.P,**  
 Question Text *Does the manual include procedures to seal the ends of casings and conduits for mains and transmission and to seal the end nearest a building for service lines?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 2.15, 2; GSM Specification 3.16, 12-13; GSM Specification 3.42, 1; and GSM Specification 3.42, 3-4, include procedures to seal the ends of casings and conduits for mains and transmission and to seal the end nearest a building for service lines in accordance with WAC 480-93-115(3) and WAC 480-90-115(4).**
113. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.P, 192.605(b)(2) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))**  
 Question Text *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 2.32, 7, contains procedures for system isolation in accordance with CFR § 192.467.**
114. Question Result, ID, References **Sat, TD.CP.CASINGINSPECT.P,**  
 Question Text *Does the process give sufficient direction for conducting annual casing inspections to ensure electrical isolation from the pipeline?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 5.10, 4-6; and GSM Specification 5.14, 4-5, provide sufficient direction for conducting annual inspections to ensure electrical isolation from the pipeline in accordance with WAC 480-93-110.**
115. Question Result, ID, References **Sat, TD.CP.MONITOR.TESTSTATION.P, 192.469**  
 Question Text *Does the process contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 3.12, 13; GSM Specification 3.13, 6; GSM Specification 3.42, 4; and GSM Specification 5.14, 2, contain provisions to assure that each pipeline has sufficient test stations or other contact points to determine the adequacy of cathodic protection in accordance with CFR § 192.469.**
116. Question Result, ID, References **Sat, TD.CP.MONITOR.TESTLEAD.P, 192.605(b)(2) (192.471(a), 192.471(b), 192.471(c))**  
 Question Text *Does the process provide adequate instructions for the installation of test leads?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 3.12, 13; GSM Specification 3.42, 4; and GSM Specification 5.14, 4, provide adequate instructions for the installation of test leads in accordance with CFR § 192.471.**
117. Question Result, ID, References **Sat, TD.CP.MONITOR.INTFRCURRENT.P, 192.605(b)(2) (192.473(a))**  
 Question Text *Does the operator have a program in place to minimize detrimental effects of interference currents on its pipeline system and does the process for designing and installing cathodic protection systems provide for the minimization of detrimental effects of interference currents on existing adjacent metallic structures?*  
 Assets Covered **88960 (83)**  
 Result Notes **GSM Specification 2.12 ,17; GSM Specification 2.32, 7; and GSM Specification 5.14, 3, include procedures to minimize the detrimental effects of stray currents in accordance with CFR § 192.473(a).**
118. Question Result, ID, References **Sat, TD.ICP.CORRGAS.P, 192.605(b)(2) (192.475(a))**  
 Question Text *Does the process require that the corrosive effect of the gas in the pipeline be investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, 4-5; GSM Specification 2.32, 4-5; GSM Specification 3.12, 18; GSM Specification 3.32, 5; GSM Specification 3.44, 4; and GSM Specification 5.14, 6; and GSM Specification 5.14, 8, requires that the corrosive effect of gas in the pipeline be investigated and if determined to be corrosive, provides steps to minimize corrosion in accordance with WAC 480-93-110(7) and CFR § 192.475(a).

119. Question Result, ID, References Sat, TD.ICP.EXAMINE.P, 192.605(b)(2) (192.475(a), 192.475(b))

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

Assets Covered 88960 (83)

Result Notes GSM Specification 3.44, 4; and GSM Specification 5.14, 6-8, includes processes to examine removed pipe for evidence of internal corrosion in accordance with CFR § 192.475.

120. Question Result, ID, References Sat, TD.ICP.CORRGASACTION.P, 192.605(b)(2) (192.477)

Question Text *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, 4-5, allows the use of devices for monitoring internal corrosion at locations with significant potential for internal corrosion. The operator does not transport corrosive gas in WA, therefore CFR § 192.477 is not applicable.

121. Question Result, ID, References Sat, TD.ATM.ATMCORRODE.P, 192.605(b)(2) (192.479(a), 192.479(b), 192.479(c))

Question Text *Does the process give adequate guidance identifying atmospheric corrosion and for protecting above ground pipe from atmospheric corrosion?*

Assets Covered 88960 (83)

Result Notes GSM Specification 2.12, 2; GSM Specification 2.12, 17; GSM Specification 2.15, 2; GSM Specification 2.32, 4; GSM Specification 3.12, 5; GSM Specification 5.13, 6; and GSM Specification 5.20, 2-3, provides adequate guidance to protect above ground pipe from atmospheric corrosion in accordance with CFR § 192.479.

122. Question Result, ID, References Sat, TD.ATM.ATMCORRODEINSP.P, 192.605(b)(2) (192.481(a), 192.481(b), 192.481(c), 192.481(d))

Question Text *Does the process give adequate instruction for the inspection of aboveground pipeline segments, including inside meter and pressure regulator installations, for atmospheric corrosion?*

Assets Covered 88960 (83)

Result Notes GSM Specification 5.10, 2; GSM Specification 5.10, 4; GSM Specification 5.12, 6-8; GSM Specification 5.13, 6; GSM Specification 5.15, 2; and GSM Specification 5.20, 1-2, provides adequate inspection of aboveground pipeline segments for atmospheric corrosion in accordance with CFR § 192.481.

123. Question Result, ID, References Sat, AR.RCOM.REPAIR.P, 192.605(b)(2) (192.487(a), 192.487(b), 192.489(a), 192.489(b), 192.491(c))

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

Assets Covered 88960 (83)

Result Notes GSM Specification 3.32, 6-11, provides sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall in accordance with CFR § 192.487. CFR § 192.489 is not applicable to the operator.

124. Question Result, ID, References Sat, TD.CP.RECORDS.P, 192.605(b)(2) (192.491(a), 192.491(b), 192.491(c))

Question Text *Does the process include records requirements for the corrosion control activities listed in §192.491?*

Assets Covered 88960 (83)

Result Notes GSM Specification 5.14, 9, includes records requirements for corrosion control activities in accordance with CFR § 192.491.

## MISCTOPICS.OPTRQUAL: Operator Qualification

125. 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 GSM Specification 4.31 contains an operator qualification plan that includes covered tasks and the basis for identifying covered tasks in accordance with WAC 480-93-013, CFR § 192.801, and CFR § 192.805.

126. 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 GSM Specification 4.31, Appendix A, includes evaluation methods to ensure individuals performing covered tasks are qualified in accordance with CFR § 192.805(b) and WAC 480-93-013.

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