

Abbreviated Form 1

STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Report** is to be submitted to the Director within 60 days from completion of the inspection. A **Post Inspection Memorandum (PIM)** is to be completed and submitted to the Director within 30 days from the completion of the inspection, or series of inspections, and is to be filed as part of the **Standard Inspection Report**.

Inspection Report		Post Inspection Memorandum	
Inspector/Submit Date: Al Jones, September 20, 2010	Chief Eng/Review Date: Joe Subits 10/22/2010		
	Peer Review/Date:		
	Director Approval/Date:		
POST INSPECTION MEMORANDUM (PIM)			
Name of Operator: TransCanada Gas Transmission Northwest (GTN)			OPID #: 15014
Name of Unit(s): Wallula District			Unit #(s): 3605
Records Location: Spokane, Washington			Activity # PG-100016
Unit Type & Commodity: Natural Gas			
Inspection Type: Standard	Inspection Date(s): August 23-27, 2010		
PHMSA Representative(s): Al Jones / UTC			AFO Days: 5

Company System Maps (copies for Region Files): At Wallula Compressor Station

Validate SMART Data (components, miles, etc): **Acquisition(s), Sale or New Construction** (submit SMART update):

Validate Additional Requirements Resulting From Waiver(s) or Special Permit(s):

Summary:

A review of the operations and maintenance records for the Wallula District was conducted at the Spokane, WA office. Field inspection included the Starbuck and Wallula Compressor Stations; block valves 7-1 and 7-2, pipeline right-of-way, rectifiers, and numerous cathodic protection pipe-to-soil test sites along 55 miles of the pipeline that transverses agricultural wheat fields. There are no laterals and HCAs within the District.

Building "C" at each Compressor Stations was placed off-line for testing the gas and fire detectors and verified ventilation fans and the ESD systems were activated. The block valves were manually and gas operated. The testing of the block valves and compressor stations operated as designed. Seventy (70) circuits for anode beds along the pipeline and at compressor stations were checked for output voltage and amperage.

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Findings:

Three probable violations were identified.

- (1) The anode beds placed along the pipelines were not energized during the 2008 and 2010 inspections. During the inspections zero amperes were measured at circuits #75 and #78. The power supply for the circuits is located at the Greenville Road Rectifier (MP 229.9). See Field Data log for 2008 and 2010 for more details. GTN did not take prompt remedial action (192.465) to correct the deficient cathodic protection (192.463).
- (2) GTN's Public Awareness Program includes a letter to first responders that is misleading about the natural gas in their pipelines. The letter is dated March 2009 that states, "Mercaptan is also added for Odorization." The letter needs to be corrected to reflect that transmission gas is not odorized. Mercaptan is not unique attribute and characteristic of GTN's pipeline (192.616(b)). See Exhibit "A" TransCanada letter to emergency responders.
- (3) **Soil subsidence concerns:**
A section of the pipeline located in a ravine near Wallula has soil erosion along the pipeline. I met with Ms. Vivian Smith, TransCanada Geotechnical Program Manager for Pipe Integrity to discuss GTN mitigation plans. The ravine is shallow with a slope varying from about 7% to 14% with an elevation change of about 200 feet. There are several large sink holes along the pipeline where soil has been washed out, transported along the pipeline trench, and deposited somewhere at a lower elevation. The location where the soil was deposited has not been identified. Ms. Smith indicated that some type of erosion barrier is proposed, possibly in 2011, to prevent soil displacement along the pipeline. It is my understanding that the sink holes have been occurring for several years and the mitigation plans are long overdue. The forecast for this coming winter is heavier than normal rain fall.

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Name of Operator: TransCanada Transmission Northwest (GTN)			
OP ID No. ⁽¹⁾ 15014		Unit ID No. ⁽¹⁾ 3605	
HQ Address:		System/Unit Name & Address: ⁽¹⁾	
201 West North River Drive Spokane, WA 99201		638 Lambdin Road Wallula, WA 99363	
Note: Use Spokane address for all mailing responses.			
Co. Official:	Ken Leier, Regional Director	Activity Record ID No.:	PG-100016
Phone No.:	509-533-2831	Phone No.:	509-546-8865
Fax No.:	509-533-2825	Fax No.:	509-546-8825
Emergency Phone No.:	800-447-8066	Emergency Phone No.:	800-447-8066
Persons Interviewed		Title	
Kurt Smith		Compliance Specialist, GTN Systems	
Neil Isley		Multi-Skilled Technician-Mechanical	
Brett Huntley		Multi-Skilled Technician-Controls	
PHMSA Representative(s) ⁽¹⁾			Inspection Date(s) ⁽¹⁾
Company System Maps (Copies for Region Files): Maps are available at Wallula Compressor Station via internet.			

Unit Description:

The GTN's Wallula District begins at the Snake River and extends south to the Washington/Oregon state line with the compressor stations at Starbuck and Wallula, Washington. The pipelines consists of looped 36-inch and 42-inch diameter approximately 55 miles in length, two main line block valves, two compressor stations, numerous rectifiers, 70 anode beds, and deep wells. The pipelines MAOP is 911 psig (approx. 72% SMYS) transverse mostly agricultural wheat land (class 1 location) with no HCA's.

Portion of Unit Inspected: ⁽¹⁾

District records were reviewed at TransCanada's Spokane office.

Compressor stations inspected at Starbuck included Roll-Royce Avon 12,500 hp and RB0211 unit at 39,000 hp and the Wallula Station included Roll-Royce Avon 12,500 hp and two Solar Titans at 19,500 hp, each. The gas sensors were tested in each building and firefighting equipment inspected.

Field inspection of the pipeline right-of-way from the Snake River to the WA/OR state line. The cathodic protection systems were inspected at casing, rectifiers, test stations, and 70 anode sites. Block valves, #7-1 and & 7-2 on the A-Line were operated.

¹ Information not required if included on page 1.

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For gas transmission pipeline inspections, the attached evaluation form should be used in conjunction with 49 CFR 191 and 192 during PHMSA inspections. For those operators, procedures do not have to be evaluated for content unless: 1) new or amended regulations have been placed in force after the team inspection, or 2) procedures have changed since the team inspection. Items in the procedures sections of this form identified with "*" reflect applicable and more restrictive new or amended regulations that became effective between 03/16/05 and 03/19/10.

This form may be used in lieu of Form 1 if the operator's procedures were inspected by the region within the prior year, or if the operator has received a Team O&M Inspection within the past five years.

Operator's procedures reviewed during the previous inspection (enter previous inspection date below) may be marked with a "1" in the N/C column.

(check applicable box and enter inspection date)

Team inspection of the operator's O & M Manual was performed:	Date:	October 2008
Region inspection of the operator's O & M Manual was performed:	Date:	

49 CFR PART 192

.605(a)	CHANGE in CLASS LOCATION PROCEDURES	S	U	N/A	N/C
*	.611 Confirmation or revision of MAOP. Final Rule Pub. 10/17/08, eff. 12/22/08.	X			

Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.611 No changes were made in the class locations.

PUBLIC AWARENESS PROGRAM PROCEDURES (Also in accordance with API RP 1162)		S	U	N/A	N/C
.605(a)	*	.616 Public Awareness Program also in accordance with API RP 1162. Amdt 192-99 pub. 5/19/05 eff. 06/20/05.			
	.616(d)	The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:			
	(1)	X			
	(2)	X			
	(3)		X		
	(4)	X			
	(5)	X			
	.616(e)	X			
	.616(f)	X			
	.616(g)	X			
	.616(h)	X			

Comments:

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Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.616(d) GTN's Public Awareness Program includes a letter to first responders with misleading information about the natural gas in their pipelines. The letter is dated March 2009 that states, "Mercaptan is also added for Odorization." The letter needs to be corrected to reflect that transmission gas is not odorized.

.605(a)	MAOP PROCEDURES	S	U	N/A	N/C															
	Note: If the operator is operating under a Special Permit, a Waiver or 192.620, the inspector needs to review the special conditions of the Special Permit, Waiver or refer to Attachment 1 for additional .620 requirements.																			
	.619 Establishing MAOP so that it is commensurate with the class location	X																		
	MAOP cannot exceed the lowest of the following:																			
*	(a)(1) Design pressure of the weakest element, Amdt. 192-103 pub. 06/09/06, eff. 07/10/06	1																		
*	(a)(3) The highest actual operating pressure to which the segment of line was subjected during the 5 years preceding the applicable date in second column, unless the segment was tested according to .619(a)(2) after the applicable date in the third column or the segment was uprated according to subpart K. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.	1																		
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Pipeline segment</th> <th style="width: 20%;">Pressure date</th> <th style="width: 30%;">Test date</th> </tr> </thead> <tbody> <tr> <td>--Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006.</td> <td>March 15, 2006, or date line becomes subject to this part, whichever is later.</td> <td>5 years preceding applicable date in second column.</td> </tr> <tr> <td>-- Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.</td> <td></td> <td></td> </tr> <tr> <td>Offshore gathering lines.</td> <td>July 1, 1976.</td> <td>July 1, 1971.</td> </tr> <tr> <td>All other pipelines.</td> <td>July 1, 1970.</td> <td>July 1, 1965.</td> </tr> </tbody> </table>	Pipeline segment	Pressure date	Test date	--Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.	-- Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.			Offshore gathering lines.	July 1, 1976.	July 1, 1971.	All other pipelines.	July 1, 1970.	July 1, 1965.	1			
Pipeline segment	Pressure date	Test date																		
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Offshore gathering lines.	July 1, 1976.	July 1, 1971.																		
All other pipelines.	July 1, 1970.	July 1, 1965.																		
*	(c) The requirements on pressure restrictions in this section do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in paragraph (a)(3) of this section. An operator must still comply with § 192.611. Amdt 192-102 pub. 3/15/06, eff. 04/14/06. For gathering line related compliance deadlines and additional gathering line requirements, refer to Part 192 including this amendment.	1																		
*	.620 Refer to Attachment 1 for additional Alternative MAOP requirements. Amdt. 192-111 pub. 11/30/09, eff. 1/29/2010.																			

Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

GTN's pipeline is designed to Class 1 Location.

.605(b)	RECORD KEEPING PROCEDURES	S	U	N/A	N/C
	.709 Records must be maintained:				
	(a) Repairs to the pipe – life of system	X			
	(b) Repairs to "other than pipe" – 5 years	X			
	(c) Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests – 5 years or until next one	X			

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Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

GTN's Wallula District is patrolled twice a year with fixed wing aircraft and twice a year with helicopter equipped with gas sensors.

.605(b)	ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES	S	U	N/A	N/C
*	.727 (g) Operator must file reports upon abandoning underwater facilities crossing navigable waterways, including offshore facilities. Amdt. 192-103 corr. pub 02/01/07, eff. 03/05/07.			X	

Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.605(b)	COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
*	.735 (b) Tank must be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06.	X			

Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.735 The Compressor Stations at Starbuck and Wallula have above ground tanks that are greater than five feet from the buildings.

.13(c)	WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	S	U	N/A	N/C
*	.225 (a) Welding procedures must be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test. Amdt. 192-103 pub 06/09/06, eff. 07/10/06. Note: Alternate welding procedures criteria are addressed in API 1104 Appendix A, section A.3.	X			
*	.227 (a) Welders must be qualified by Section 6 of API 1104 (19th Ed., 1999, including errata October 31, 2001; and 20 th edition 2007, including errata 2008) or Section IX of ASME Boiler and Pressure Code (2004 ed. Including addenda through July 1, 2005) See exception in .227(b). Amdt. 192-103 pub 06/09/06, eff. 07/10/06; Amdt. 192-103 corr. Pub 02/01/07 eff. 03/05/07; Amdt 195-91 Pub. 4/14/09 eff. 4/14/09. <i>Note: Operator's procedures must specify the edition of API 1104 they are using. Operator may not use both editions, and procedures must be consistent with the edition used.</i>	X			

Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.273(b)	JOINING of PIPELINE MATERIALS	S	U	N/A	N/C
*	.283 Qualified joining procedures for plastic pipe must be in place. Amdt. 192-103 pub. 06/09/06, eff. 07/10/06.			X	

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Comments:

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.605(b)	CORROSION CONTROL PROCEDURES	S	U	N/A	N/C
	.476 Systems designed to reduce internal corrosion	X			
*	(a) New construction Final Rule Pub. 4/23/07, eff. 5/23/07.				
*	(b) Exceptions – offshore pipeline and systems replaced before 5/23/07 Final Rule Pub. 4/23/07, eff. 5/23/07.			X	
*	(c) Evaluate impact of configuration changes to existing systems Final Rule Pub. 4/23/07, eff. 5/23/07.	X			

Comments:

Note 1: This item was reviewed in the O & M Manual since the effective date of the applicable amendment.

.476(b) GTN's risk assessment is per IMP. The Wallula District has no HCA's, coupons or locations for critical flows.

.801-.809	Subpart N — Qualification of Pipeline Personnel Procedures
	Operator Qualification Inspection – Use PHMSA Form # 14 as applicable

.901-.951	Subpart O — Pipeline Integrity Management
	This form does not cover Gas Pipeline Integrity Management Programs

Subparts A - C	PART 199 – DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES
	Drug & Alcohol Testing & Alcohol Misuse Prevention Program – Use PHMSA Form # 13. PHMSA Drug and Alcohol Program Check.

Comments:

See attached Form #13- Drug & Alcohol Questions, Form #15- OQ Field Inspection Protocol, and Western Region Unit Information

PIPELINE INSPECTION (Field)		S	U	N/A	N/C
.179	Valve Protection from Tampering or Damage	X			
.463	Cathodic Protection		X		
.465	Rectifiers	X			
.476	Systems designed to reduce internal corrosion	X			
.479	Pipeline Components Exposed to the Atmosphere	X			
.605	Knowledge of Operating Personnel	X			
.612 (c) (2)	Pipelines exposed on seabed (Gulf of Mexico and Inlets): Marking			X	
.613(b), .703	Pipeline condition, unsatisfactory conditions, hazards, etc.		X		
.707	ROW Markers, Road and Railroad Crossings	X			
.719	Pre-pressure Tested Pipe (Markings and Inventory)	X			
.739/.743	Pressure Limiting and Regulating Devices (spot-check field installed equipment vs. inspection records)	X			

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PIPELINE INSPECTION (Field)		S	U	N/A	N/C
.745	Valve Maintenance	X			
.751	Warning Signs	X			
.801 - .809	Operator Qualification - Use PHMSA Form 15 Operator Qualification Field Inspection Protocol Form	X			

Comments:

.613(b), .703 A section of the pipeline located in a ravine near Wallula has soil erosion along the pipeline. The erosion is at Milepost 231.5 and approximately 0.5 mile upstream of the crossing of Walker Road in Walla Walla County. The tenant farming the property is Barry Chabre.

.801-.809 See attached Form #15- Operator Qualification field Inspection Protocol Form.

.463 The anode beds placed along the pipelines were not energized during the 2008 and 2010 inspections. During the inspections zero amperes were measured at circuits #75 and #78. The power supply for the circuits is located at the Greenville Road Rectifier (MP 229.9). See Field Data log for more details.

COMPRESSOR STATIONS INSPECTION (Field)		S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")					
.163 (c)	Main operating floor must have (at least) two (2) separate and unobstructed exits	X			
	Door latch must open from inside without a key	X			
	Doors must swing outward	X			
(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit	X			
	Each gate located within 200 ft of any compressor plant building must open outward	X			
	When occupied, the door must be opened from the inside without a key	X			
(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?	X			
.165(a)	If applicable, are there liquid separator(s) on the intake to the compressors?	X			
.165(b)	Do the liquid separators have a manual means of removing liquids?	X			
	If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?	X			
.167(a)	ESD system must:				
	- Discharge blowdown gas to a safe location	X			
	- Block and blowdown the gas in the station	X			
	- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers	X			
	- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage	X			
	ESD system must be operable from at least two locations, each of which is:				
.167 (b)	- Outside the gas area of the station	X			
	- Not more than 500 feet from the limits of the station	X			
	- ESD switches near emergency exits?	X			
	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
.167(c)	Are ESDs on platforms designed to actuate automatically by...				
	- For unattended compressor stations, when:				
	• The gas pressure equals MAOP plus 15%?	X			
	• An uncontrolled fire occurs on the platform?	X			
	- For compressor station in a building, when				
	• An uncontrolled fire occurs in the building?	X			

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COMPRESSOR STATIONS INSPECTION (Field)		S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")					
	Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?	X			
.171(a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.	X			
(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?	X			
(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?	X			
(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?	X			
(e)	Are the mufflers equipped with vents to vent any trapped gas?	X			
.173	Is each compressor station building adequately ventilated?	X			
.457	Is all buried piping cathodically protected?	X			
.481	Atmospheric corrosion of aboveground facilities	X			
.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?	X			
	Are facility maps current/up-to-date?	X			
.615	Emergency Plan for the station on site?	X			
.707	Markers	X			
.731	Overpressure protection – reliefs or shutdowns	X			
.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?	X			
	Are aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?	X			
.736	Gas detection – location	X			

Comments:

CONVERSION TO SERVICE PERFORMANCE and RECORDS		S	U	N/A	N/C
.14 (a)(2)	Visual inspection of right of way, aboveground and selected underground segments			X	
(a)(3)	Correction of unsafe defects and conditions			X	
(a)(4)	Pipeline testing in accordance with Subpart J			X	
(b)	Pipeline records: investigations, tests, repairs, replacements, alterations (life of pipeline)			X	

REPORTING PERFORMANCE and RECORDS		S	U	N/A	N/C
191.5	Telephonic reports to NRC (800-424-8802)			X	
191.15	Written incident reports; supplemental incident reports (DOT Form RSPA F 7100.2)			X	
191.17 (a)	Annual Report (DOT Form RSPA F 7100.2-1)	X			
191.23	Safety related condition reports			X	
191.27	Offshore pipeline condition reports			X	
192.727 (g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports			X	

CONSTRUCTION PERFORMANCE and RECORDS		S	U	N/A	N/C
.225	Test Results to Qualify Welding Procedures			X	
.227	Welder Qualification			X	
.241 (a)	Visual Weld Inspector Training/Experience			X	

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CONSTRUCTION PERFORMANCE and RECORDS		S	U	N/A	N/C
243 (b)(2)	Nondestructive Technician Qualification			X	
(c)	NDT procedures			X	
(f)	Total Number of Girth Welds			X	
(f)	Number of Welds Inspected by NDT			X	
(f)	Number of Welds Rejected			X	
(f)	Disposition of each Weld Rejected			X	
.303	Construction Specifications			X	
.325	Underground Clearance			X	
.327	Amount, Location, Cover of each Size of Pipe Installed			X	
.328	If the pipeline will be operated at the alternative MAOP standard calculated under 192.620 (80% SMYS) refer to PHMSA Form 5 (Construction) for additional construction requirements			X	
.455	Cathodic Protection			X	

OPERATIONS and MAINTENANCE PERFORMANCE and RECORDS		S	U	N/A	N/C
.16	Customer Notification (Verification – 90 days – and Elements)	X			
.603(b)	.605(a) Procedural Manual Review – Operations and Maintenance (1 per yr/15 months)	X			
.603(b)	.605(c) Abnormal Operations	X			
.603(b)	.605(b)(3) Availability of construction records, maps, operating history to operating personnel	X			
.603(b)	.605(b)(8) Periodic review of personnel work – effectiveness of normal O&M procedures	X			
.603(b)	.605(c)(4) Periodic review of personnel work – effectiveness of abnormal operation procedures	X			
.709	.609 Class Location Study (If Applicable)	X			
.603(b)	.612(b) Gulf of Mexico/inlets: Periodic underwater inspections based on the identified risk			X	
.709	.614 Damage Prevention (Miscellaneous)	X			
.603(b)	.615(b)(1) Location Specific Emergency Plan	X			
.603(b)	.615(b)(2) Emergency Procedure training, verify effectiveness of training	X			
.603(b)	.615(b)(3) Employee Emergency activity review, determine if procedures were followed.	X			
.603(b)	.615(c) Liaison Program with Public Officials	X			
.603(b)	.616 Public Awareness Program				
	.616(e & f) Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:		X		
	API RP 1162 Baseline* Recommended Message Deliveries				
	Stakeholder Audience (Natural Gas Transmission Line Operators)				
	Baseline Message Frequency (starting from effective date of Plan)				
	Residents Along Right-of-Way and Places of Congregation				
	Emergency Officials				
	Public Officials				
	Excavator and Contractors				
	One-Call Centers				
	Stakeholder Audience (Gathering Line Operators)				
	Baseline Message Frequency				
	Residents and Places of Congregation				
	Emergency Officials				
	Public Officials				
	Excavators and Contractors				
	One-Call Centers				

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OPERATIONS and MAINTENANCE PERFORMANCE and RECORDS			S	U	N/A	N/C												
		* Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc.																
	.616(g)	The program must be conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.	X															
	.616(h)	Effectiveness Review of operator's program.	X															
.517		Pressure Testing	X															
.553(b)		Upgrading	X															
.709	.619 / .620	Maximum Allowable Operating Pressure (MAOP) If the pipeline is operating at the alternative MAOP under 192.620 (80% SMYS), refer to Attachment I for additional requirements.	X															
.709	.625	Odorization of Gas			X													
.709	.705	Patrolling (Refer to Table Below)	X															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Class Location</th> <th style="width: 35%;">At Highway and Railroad Crossings</th> <th style="width: 35%;">At All Other Places</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1 and 2</td> <td style="text-align: center;">2/yr (7½ months)</td> <td style="text-align: center;">1/yr (15 months)</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">4/yr (4½ months)</td> <td style="text-align: center;">2/yr (7½ months)</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">4/yr (4½ months)</td> <td style="text-align: center;">4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
Class Location	At Highway and Railroad Crossings	At All Other Places																
1 and 2	2/yr (7½ months)	1/yr (15 months)																
3	4/yr (4½ months)	2/yr (7½ months)																
4	4/yr (4½ months)	4/yr (4½ months)																
.709	.706	Leak Surveys (Refer to Table Below)	X															
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Class Location</th> <th style="width: 35%;">Required</th> <th style="width: 35%;">Not Exceed</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1 and 2</td> <td style="text-align: center;">1/yr</td> <td style="text-align: center;">15 months</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">2/yr*</td> <td style="text-align: center;">7½ months</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">4/yr*</td> <td style="text-align: center;">4½ months</td> </tr> </tbody> </table> <p>* Leak detector equipment survey required for lines transporting un-odorized gas.</p>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr*	7½ months	4	4/yr*	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr*	7½ months																
4	4/yr*	4½ months																
.709	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)	X															
.709	.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)	X															
.709	.736(c)	Compressor Stations – Detection and Alarms (Performance Test)	X															
.709	.739	Pressure Limiting and Regulating Stations (1 per yr/15 months)	X															
.709	.743	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months)	X															
.709	.745	Valve Maintenance (1 per yr/15 months)	X															
.709	.749	Vault Maintenance (≥ 200 cubic feet)(1 per yr/15 months)			X													
.603(b)	.751	Prevention of Accidental Ignition (hot work permits)	X															
.603(b)	.225(b)	Welding – Procedure	X															
.603(b)	.227/.229	Welding – Welder Qualification	X															
.603(b)	.243(b)(2)	NDT – NDT Personnel Qualification	X															
.709	.243(f)	NDT Records (Pipeline Life)	X															
.709		Repair: pipe (Pipeline Life); Other than pipe (5 years)	X															
.807(b)		Refer to PHMSA Form # 15 to document review of operator's employee covered task records																

Comments:

.807(B) See attached Form #15- Operator Qualification field Inspection Protocol Form.

.616 (e & f) GTN's Public Awareness Program includes a letter to first responders with misleading information about the natural gas in their pipelines. The letter is dated March 2009 that states, "Mercaptan is also added for Odorization." The letter needs to be corrected to reflect that transmission gas is not odorized.

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Comments:

CORROSION CONTROL PERFORMANCE and RECORDS		S	U	N/A	N/C
.453	CP procedures (system design, installation, operation, and maintenance) must be carried out by qualified personnel	X			
.491	.491(a) Maps or Records	X			
.491	.459 Examination of Buried Pipe when Exposed	X			
.491	.465(a) Annual Pipe-to-soil Monitoring (1 per yr/15 months) or short sections (10 % per year, all in 10 years)	X			
.491	.465(b) Rectifier Monitoring (6 per yr/2½ months)	X			
.491	.465(c) Interference Bond Monitoring – Critical (6 per yr/2½ months)			X	
.491	.465(c) Interference Bond Monitoring – Non-critical (1 per yr/15 months)			X	
.491	.465(d) Prompt Remedial Actions		X		
.491	.465(e) Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months)			X	
.491	.467 Electrical Isolation (Including Casings)	X			
.491	.469 Test Stations – Sufficient Number	X			
.491	.471 Test Leads	X			
.491	.473 Interference Currents	X			
.491	.475(a) Internal Corrosion; Corrosive Gas Investigation	X			
.491	.475(b) Internal Corrosion; Internal Surface Inspection; Pipe Replacement	X			
.491	.476 (c) Internal Corrosion; New system design; Evaluation of impact of configuration changes to existing systems	X			
.491	.477 Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months)			X	
.491	.481 Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore)	X			
.491	.483/.485 Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions	X			

Comments:

.465(c) The GTN pipelines cross ChevronTexaco pipeline where the CP between the pipelines are monitored. The pipelines are not bonded.

.465(d) The anode beds placed along the pipelines were not energized during the 2008 and 2010 inspections. During the inspections zero amperes were measured at circuits #75 and #78. The power supply for the circuits is located at the Greenville Road Rectifier (MP 229.9). See Field Data log for more details.

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Attachment 1 Alternative Maximum Allowable Operating Pressure

For additional guidance refer to <http://primis.phmsa.dot.gov/maop/faqs.htm>
For Additional guidance see the FAQs at <http://primis.phmsa.dot.gov/maop/faqs.htm>

192.620	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C								
	The alternative MAOP is calculated by using different factors in the same formulas used for calculating MAOP in §192.619. In determining the alternative design pressure under §192.105 use a design factor determined in accordance with §192.111(b), (c), or (d), or, if none of these apply in accordance with:												
	<table style="margin-left: auto; margin-right: auto;"> <tr> <td style="padding-right: 20px;">Class Location</td> <td>Alternative Design Factor (F)</td> </tr> <tr> <td style="padding-right: 20px;">1</td> <td>0.80</td> </tr> <tr> <td style="padding-right: 20px;">2</td> <td>0.67</td> </tr> <tr> <td style="padding-right: 20px;">3</td> <td>0.56</td> </tr> </table>	Class Location	Alternative Design Factor (F)	1	0.80	2	0.67	3	0.56				
Class Location	Alternative Design Factor (F)												
1	0.80												
2	0.67												
3	0.56												
.620(a)	(1) Establish alternative MAOP commensurate with class location – no class 4				X								
	(2) MAOP cannot exceed the lowest of the following:												
	(i) Design pressure of the weakest element				X								
	(ii) Test pressure divided by applicable factor				X								
.620(b)	(2) Pipeline constructed of steel pipe meeting additional requirements in §192.112.				X								
	(3) SCADA system with remote monitoring and control				X								
	(4) Additional construction requirements described in §192.328				X								
	(5) No mechanical couplings				X								
	(6) No failures indicative of systemic material fault – if previously operated at lower MAOP				X								
	(7) 95% of girth welds have NDT				X								
	.620(c)	(1) PHMSA notified 180 days before operating at alternative MAOP				X							
(2) Senior Executive signatures and copy to PHMSA					X								
(4) Strength test per §192.505 or certify previous strength test					X								
(6) Construction tasks treated as covered tasks for Operator Qualification					X								
(7) Records maintained for life of system					X								
(8) Class location change anomaly remediations					X								
.620(d)		(1) Threat matrix developed consistent with §192.917				X							
		(2) Recalculate the potential impact circle per §192.903 and implement public education per §192.616				X							
	(3) Responding to an emergency in an HCA												
	(i) Identify HCAs using larger impact circle				X								
	(ii) Check personnel response times				X								
	(iii) Verify remote valve abilities				X								
	(iv) Verify line break valve control system				X								
	(4) Protect the right-of-way:												
	(i) ROW patrols 12 per year not to exceed 45 days				X								
	(ii) Plan to identify and mitigate unstable soil				X								
	(iii) Replace loss of cover if needed				X								
	(iv) Use line-of-sight markers per §192.707				X								
	(v) Review damage prevention program in light of national consensus practices				X								
	(vi) ROW management plan to protect against excavation activities				X								
	(5) Control Internal Corrosion:												
(i) Program to monitor gas constituents				X									

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	Alternative MAOP Procedures and Verifications	S	U	N/A	N/C
192.620	(ii) Filter separators if needed			X	
	(iii) Gas Monitoring equipment used			X	
	(iv) Cleaning pigs, inhibitors, and sample accumulated liquids				
.620(d)	(v) Limit CO2, H2S, and water in the gas stream			X	
	(vi) Quarterly program review based on monitoring results			X	
	(6) (i) Control interference that can impact external corrosion			X	
	(ii) Survey to address interference currents and remedial actions			X	
	(7) Confirm external corrosion control through indirect assessment			X	
	(i) Assess adequacy of CIS and perform DCVG or ACVG within 6 months				
	(ii) Remediate damage with IR drop > 35%			X	
	(iii) Integrate internal inspection results with indirect assessment			X	
	(iv) Periodic assessments for HCAs			X	
	(A-C) Close interval surveys, test stations at ½ mile intervals, and integrate results				
	(8) Cathodic Protection			X	
	(i) Complete remediations within 6 months of failed reading				
	(ii) Confirm restoration by a close interval survey			X	
	(iii) Cathodic protection system operational within 12 months of construction completion			X	
	(9) Baseline assessment of integrity			X	
	(i)(A) Geometry tool run within 6 months of service				
	(i)(B) High resolution MFL tool run within 3 years of service			X	
	(ii) Geometry and MFL tool 2 years prior to raising pressure for existing lines			X	
	(iii) If short portions cannot accommodate tools, use direct assessment per §192.925, 927, 929 or pressure testing			X	
	(10) Periodic integrity assessments			X	
	(i) Frequency for assessments determined as if all segments covered by Subpart O				
	(ii) Inspect using MFL tool or direct assessment per §192.925, 927, 929 or pressure testing.			X	
	(11) Repairs			X	
	(i)(A) Use of the most conservative calculation for anomaly remaining strength				
	(B) Tool tolerances taken into consideration			X	
	(ii) Immediate repairs for:			X	
	(A) Dents meeting 309(b) criteria				
	(B) Defects meeting immediate criteria in §192.933(d)			X	
	(C) Calculated failure pressure ratio less than 1.25 for .67 design factor			X	
	(D) Calculated failure pressure ratio less than 1.4 for .56 design factor			X	
(iii) Repairs within 1 year for:			X		
(A) Defects meeting 1 year criteria in 933(d)					
(B) Calculated failure pressure ratio less than 1.25 for .80 design factor			X		
(C) Calculated failure pressure ratio less than 1.50 for .67 design factor			X		
(D) Calculated failure pressure ratio less than 1.80 for .56 design factor			X		
(iv) Evaluate defect growth rate for anomalies with > 1 year repair interval and set repair interval			X		
(1) Provide overpressure protection to a max of 104% MAOP			X		
.620(e)				X	
	(2) Procedure for establishing and maintaining set points for SCADA			X	

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192.620	Alternative MAOP Procedures and Verifications	S	U	N/A/N/C
				X
				X

Comments:

Leave this list with the operator.

Recent PHMSA Advisory Bulletins (Last 2 years)

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to Premature Brittle-Like Cracking of Older Plastic Pipe
ADB-08-01	May 13, 2008	Pipeline Safety - Notice to Operators of Gas Transmission Pipelines on the Regulatory Status of Direct Sales Pipelines
ADB-08-02	March 4, 2008	Pipeline Safety - Issues Related to Mechanical Couplings Used in Natural Gas Distribution Systems
ADB-08-03	March 10, 2008	Pipeline Safety - Dangers of Abnormal Snow and Ice Build-Up on Gas Distribution Systems
ADB-08-04	June 5, 2008	Pipeline Safety - Installation of Excess Flow Valves into Gas Service Lines
ADB-08-05	June 25, 2008	Pipeline Safety - Notice to Hazardous Liquid Pipeline Operators of Request for Voluntary Adv Notification of Intent To Transport Biofuels
ADB-08-06	July 2, 2008	Pipeline Safety - Dynamic Riser Inspection, Maintenance, and Monitoring Records on Offshore Floating Facilities
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-01	Jan 26, 2010	Pipeline Safety: Leak Detection on Hazardous Liquid Pipelines
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

For more PHMSA Advisory Bulletins, go to <http://ops.dot.gov/regs/advise.htm>