Operator: McChord Pipeline Company
Op ID (s): 31049

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety

Field Verification Inspection

Integrity Management Program
49 CFR Part 195.452

General Notes:

1. This Field Verification Inspection is performed on specific field activities being performed by an Operator in support of their Integrity Management Program (IMP).
2. Not all parts of this form may be applicable to a specific Field Verification Inspection, and only those applicable portions of this form need to be completed.
3. This form may be combined with the "IOCS Activity Report" to fulfill the Post Inspection Memo requirement.
4. This is a two part inspection:
   i. A review of applicable Operations and Maintenance (O&M) and IMP processes and procedures applicable to the field activity being inspected to ensure the operator is implementing their IMP in a consistent manner.
   ii. A Field Verification Inspection to determine that activities on the pipeline and facilities are being performed in accordance with written procedures or guidance.

Integrity Management

Inspection Form for Field Verification

Name of Operator: ___McChord Pipeline Co_____

Headquarters Address:	**3001 Marshall Avenue Tacoma, Washington 98421**
Company Official:	**Corey G. Herrick**
Phone Number:	**253-680-6653**
Fax Number:	**253-272-2495**
Operator ID:	**31049**
Activity ID:	

Persons Interviewed	Title	Phone No.	E-Mail
Corey G. Herrick	Chief Engineer (Primary Contact)	253-680-6653	cgh@usor.com

OPS/State Representative(s): Al Jones / UTC Washington **Dates of Inspection:** August 5-7, 2009

Inspector Signature: _____

System Descriptions:

Pipeline consists of approximately 14.5 miles of 6-inch diameter (steel with tape wrap), Control Center, a pump station with duel pumps (150 Hp centrifugal), one rectifier unit, 3 block valves and one check valve, flow meters located at pump station and at McChord AFB.

Site Location of field activities:

Street intersection located at East 72nd and Waller Road; Tacoma, Washington in Pierce County. Approximately 18.5 linear feet of 6-inch pipeline was remover to extract an in-line inspection tool (ILI). The removed section of pipe was previously repaired in 2004 with a clock spring wrap at a dent/gouge located on the bottom of the pipeline where the ILI stopped. Two probable violations and one area of concern were identified.

Key Documents Reviewed:

Document Title	Document No.	Rev. No	Date
Welding Procedure from Puget Sound Energy			**3/1/2009**
PM Testing Laboratory Certificate of NDT Training & Experience			**5/23/2009**

Part 1 - Performance of Integrity Assessments

In-Line Inspection (Protocol 3.04 & 3.05)	No Issue	Issue	N/A	Notes:
Verify that Operator's O&M and IMP procedural requirements (e.g. launching/receiving tools) for performance of ILI were followed.	X			
Verify Operator's ILI procedural requirements were followed (e.g. operation of trap for launching and receiving of pig, operational control of flow), as appropriate.				
Verify ILI tool systems and calibration checks before run were performed to ensure tool was operating correctly prior to assessment being performed, as appropriate.				
Verify ILI complied with Operator's procedural requirements for performance of a successful assessment (e.g. speed of travel within limits), as appropriate.				
Document ILI Tool Vendor and Tool type (e.g. MFL, Deformation). Document other pertinent information about Vendor and Tool, as appropriate				
Other:				

Hydrostatic Pressure Testing (Protocol 3.06)	No Issue	Issue	N/A	Notes:
Verify that hydrostatic pressure tests complied with Part 195 Subpart E requirements.			X	
Review documentation of Hydrostatic Pressure Test parameters and results. Verify test was performed without leakage and in compliance with Part 195 Subpart E requirements.				
Review test procedures and records and verify test acceptability and validity.				
Review determination of the cause of hydrostatic test failures, as appropriate.				
Document Hydrostatic Pressure Test Vendor and equipment used, as appropriate.				
Other:				

Other Assessment Technologies (Protocol 3.07)	No Issue	Issue	N/A	Notes:
Verify that application of "Other Assessment Technology" complied with Operator's requirements, that appropriate notifications had been submitted to OPS, and that appropriate data was collected.	X			
Review documentation of notification to OPS of Operator's application of "Other Assessment Technology". Verify compliance with Operator's procedural requirements and performance of assessment within parameters originally submitted to OPS.				
Verify that appropriate tests are being performed and appropriate data is being collected, as appropriate.				
Other.				

Part 3 - Preventive and Mitigative Actions

Installed Leak Detection System Information (Protocol 6.05)	No Issue	Issue	N/A	Notes:
Identify installed leak detection systems on pipelines and facilities that can affect an HCA.			X	
Document leak detection system components installed on system to enhance capabilities, as appropriate.				
Document the frequency of monitoring of installed leak detection systems and verify connection of installed components to leak detection monitoring system, as appropriate,				
Other:				

Installed Emergency Flow Restrictive Device (Protocol 6.06)	No Issue	Issue	N/A	Notes:
Verify additional preventive and mitigative actions implemented by Operator.			X	
Document Emergency Flow Restrictive Device (EFRD) component(s) installed on system. Note that EFRD per §195.450 means a check valve or remote control valve as follows: (1) Check valve means a valve that permits fluid to flow freely in one direction and contains a mechanism to automatically prevent flow in the other direction. (2) Remote control valve or RCV means any valve that is operated from a location remote from where the valve is installed. The RCV is usually operated by the supervisory control and data acquisition (SCADA) system. The linkage between the pipeline control center and the RCV may be by fiber optics, microwave, telephone lines, or satellite.				
Document the frequency of monitoring of installed EFRDs and verify connection of installed components to monitoring/operating system, as appropriate.				
Comment on the perceived effectiveness of the EFRD in mitigating the consequences of a release on the HCA that it is designed to protect.				
Other:				

Part 2 - Remediation of Anomalies

Remedial Actions – Process (Protocol 4.1)	No Issue	Issue	N/A	Notes:
Verify that remedial actions complied with the Operator's procedural requirements.			X	
Witness anomaly remediation and verify documentation of remediation (e.g. Exposed Pipe Reports, Maintenance Report, any Data Acquisition Forms). Verify compliance with Operator's O&M Manual and Part 195 requirements.				
Verify that Operator's procedures were followed in exposing the anomaly (e.g. any required pressure reductions, line location, excavation, coating removal).				
Verify that procedures were followed in measuring the anomaly, determining the severity of the anomaly, and determining remaining strength of the pipe.				
Other:				

Remediation - Implementation (Protocol 4.02)	No Issue	Issue	N/A	Notes:
Verify that the operator has adequately implemented its remediation process and procedures to effectively remediate conditions identified through integrity assessments or information analysis.			X	
Verify that repairs were completed in accordance with the operator's prioritized schedule and within the time frames allowed in §195.452(h).				
Review any changes to the schedule. Ensure that the changes to the schedule were justified by the operator and the schedule changes were demonstrated not to jeopardize public safety or environmental protection, as appropriate.				
Review any documentation of cases where OPS was notified that the repair schedule could not be met, remediation exceeded the time frames allowed in §195.452(h), and safety could not be provided through a reduction in operating pressure.				
Review any documentation of cases for an immediate repair condition (§195.452(h)(4)(i) where operating pressure was reduced or the pipeline was shutdown. Verify for an immediate repair condition that temporary operating pressure was determined in accordance with the formula in Section 451.7 of ASME/ANSI B31.4 or, if not applicable, the operator should provide an engineering basis justifying the amount of pressure reduction.				
Verify that repairs were performed in accordance with §195.422 and the Operator's O&M Manual, as appropriate.				
Review CP readings at anomaly dig site, if possible. (See Part 4 of this form – "Field Inspection to Verify adequacy of the Cathodic Protection System" , as appropriate.				
Other:				

Part 4 - Field Investigations (Additional Activities as appropriate)

Field Inspection for Verification of HCA Locations	No Issue	Issue	N/A	Notes:
Review HCAs locations as identified by the Operator. Utilize NPMS, as appropriate.	X			
Verify population derived HCAs in the field are as they appear on Operator's maps and NPMS, as appropriate. Document newly constructed (within last 2-3 years) population and/or commercial areas that could be affected by a pipeline release, as appropriate. Note that population derived HCAs are defined in §195.450				
Verify drinking water and ecological HCAs in the field are as they appear on Operator's maps and NPMS, as appropriate. Document newly established drinking water sources and/or ecological resources areas (within last 2-3 years) that could be affected by a pipeline release. Note that unusually sensitive areas (USAs) are defined in §195.6				
Verify commercially navigable waterway HCAs in the field are as they appear on Operator's maps and NPMS, as appropriate. Document any activity (commercial in nature) that could affect the waterways status as a commercially navigable waterway, as appropriate. Note that commercially navigable waterway HCAs are defined in §195.450				

Field Inspection for Verification of Anomaly Digs	No Issue	Issue	N/A	Notes:
Verify repair areas, ILI verification sites, etc.	X			
Identify anomaly dig sites in the area, if possible, that will not be investigated as part of this field activity (e.g. three other digs to be performed in this area, but not part of this inspection)				

Field Inspection to Verify adequacy of the Cathodic Protection System	No Issue	Issue	N/A	Notes:
In case of hydrostatic pressure testing, Cathodic Protection (CP) systems must be evaluated for general adequacy.			X	
Review records of CP readings from CIS and/or annual survey to ensure minimum code requirements are being met, if available.				
Review results of random field CP readings performed during this activity to ensure minimum code requirements are being met, if possible.				
Perform random rectifier checks during this activity and ensure rectifiers are operating correctly, if possible.				

Field inspection for general system characteristics	No Issue	Issue	N/A	Notes:
Through field inspection determine overall condition of pipeline and associated facilities for a general estimation of the effectiveness of the operator's IMP implementation.		X		**Probable violations were issued for:** (1) **Company did not have a qualified welding procedure for maintenance activities (49CFR §195.402)** (2) **Company's contractor NDT certificate was expired. (49CFR §195.505)** **Area of Concern was issued for clearance between McChord's pipeline and an existing 52-inch water main. (49CFR §195.250)**
Visit nearby pump stations, valve settings, aboveground crossings, etc. to ensure minimum code requirements are being met, if possible and as appropriate.				
Evaluate condition of the ROW to ensure minimum code requirements are being met, as appropriate.				
Comment on Operator's apparent commitment to the integrity and safe operation of their system, as appropriate.				
Other				