**Operator and General Audit Information**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Company:** | **Name:** | | | |
|  | | | |
| **Mailing and Official Address (If different):** | | | |
|  | | | |
| **Doing Business as or Affiliation:** | | | |
|  | | | |
| **PHMSA Operator Identification (OPID) No.** | |  | | |
| **LA DNR Pipeline Number (PL Number)** | |  | | |
| **Unit ID Number/ Unit Name inspected** | |  | | |
| **Operator’s Local Address:** |  | | **Inspector(s):** |  |
| **Date of Inspection:** |  |

**Operator Representatives Participating**

|  |  |
| --- | --- |
| **Key Persons** | **Name / Title / Mailing Address / Phone / Email** |
| **Primary Operator or Representative Interviewed** |  |
| **Others Interviewed, Providing Information or Present during the Inspection** |  |
|  |
|  |

**Plan Implementation**

**1. Plan Implementation - Implement Date - PROCEDURES**

Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?

**192.1005**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Plan Implementation - Data Sources - PROCEDURES**

Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?

**192.1007(a)(1)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Knowledge of the System**

**1. System Knowledge - Information Considered - PROCEDURES**

Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?

**192.1007(a)(2)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**2. System Knowledge – Gaps - PROCEDURES**

Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?

**192.1007(a)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. System Knowledge - Information Needed - PROCEDURES**

Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?

**192.1007(a)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. System Knowledge - Information Needed - RECORDS**

Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?

**192.1007(a)(3)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**5. System Knowledge - New Pipe Data - PROCEDURES**

Do the procedures require the capture and retention of data on any new pipeline installed?

**192.1007(a)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**6. System Knowledge - New Pipe Data - RECORDS**

Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?

**192.1007(a)(5)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**7. System Knowledge – Implementation - RECORDS**

Do records demonstrate implementation of the element "Knowledge of the System"?

**192.1007(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**8. System Knowledge – Understanding - RECORDS**

Has the operator demonstrated an adequate understanding of the system?

**192.1007(a)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Identify Threats**

**1. Identify Threats - Information Considered - PROCEDURES**

Did the operator consider the information that was reasonably available to identify existing and potential threats?

**192.1007(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Identify Threats - Information Considered - RECORDS**

In identifying threats did the information considered include all of the required data and information sources?

**192.1007(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Identify Threats - Outside Sources - PROCEDURES**

Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?

**192.1007(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Identify Threats - Threats Considered - PROCEDURES**

In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?

**192.1007(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. Identify Threats – Implementation - RECORDS**

Do records demonstrate implementation of the element "Identify Threats"?

**192.1007(b)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Evaluate and Rank Risk**

**1. Rank Risk – Methodology - PROCEDURES**

Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
| The operator’s written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed. The procedure is located in section 5 of the plan.  The centerpiece of the Simple, Handy, Risk-based Integrity Management Plan (SHRIMP) is the risk ranking model. SHRIMP uses an index model in which numeric scores are assigned based on answers provided by the user to questions asked by SHRIMP. The index model was developed by the APGA Security and Integrity Foundation (SIF) with guidance by an advisory group comprised of industry and federal and state pipeline safety regulators.  Risk is the product of the probability of a failure times the consequences of a failure. The SHRIMP relative risk model considers both the probability and consequences of a failure for each of the eight threats. SHRIMP Risk ranking model assigns numeric scores to questions related to the probability of a failure due to each threat. Relative weightings are based on subject matter expert consensus (e.g. the SHRIMP Advisors). Probability scores are normalized to 1-10. A consequence factor is determined based on answers to questions about consequence. This is multiplied by the probability score. A leak history factor is determined according to the fraction of leak repairs by threat on the operator’s system over the past three years (e.g if 25% of the operator’s leak repairs were corrosion leaks, corrosion threats would get a 25% boost in risk score). Finally, an incident factor is applied, based on the relative probability a failure would result in death, injury or significant property loss (e.g. result a reportable incident). Excavation, incorrect operation and natural force damage threats receive a 25% boost in relative risk ranking. | | | |

**2. Rank Risk - Threats Considered - PROCEDURES**

Do the procedures to evaluate and rank risk consider each applicable current and potential threat?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Rank Risk – Likelihood - PROCEDURES**

Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Rank Risk – Consequences - PROCEDURES**

Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**5. Rank Risk - System Subdivision - RECORDS**

If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**6. Rank Risk – Results - RECORDS**

Are the results of the risk ranking supported by the risk evaluation model/method?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**7. Rank Risk – Validation - RECORDS**

Did the operator validate the results generated by the risk evaluation model/method?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**8. Rank Risk – Implementation - RECORDS**

Do records demonstrate implementation of the element "Evaluate and Rank Risk"?

**192.1007(c)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Preventative and Mitigative Actions**

**1. Measures to Reduce Risk – Identification - PROCEDURES**

Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?

**192.1007(d)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Measures to Reduce Risk – Identification - RECORDS**

When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?

**192.1007(d)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**3. Measures to Reduce Risk - Leak Management - PROCEDURES**

Does the plan include an effective leak management program (unless all leaks are repaired when found)?

**192.1007(d)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**4. Measures to Reduce Risk – Implementation - RECORDS**

Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?

**192.1007(d)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Measure Performance and Evaluate Effectiveness**

**1. Measure Performance – Baseline - PROCEDURES**

Does the plan contain procedures for how the operator established a baseline for each performance measure?

**192.1007(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**2. Measure Performance – Baseline - RECORDS**

Does the plan establish a baseline for each performance measure?

**192.1007(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Measure Performance - Data Collection - PROCEDURES**

Does the operator have procedures to collect the data for each performance measure?

**192.1007(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**4. Measure Performance – Monitoring - PROCEDURES**

Do the procedures require the operator to monitor each performance measure?

**192.1007(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**5. Measure Performance - Measure Effectiveness - PROCEDURES**

When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness?

**192.1007(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**6. Measure Performance – Implementation - RECORDS**

Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?

**192.1007(e)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Periodic Evaluation**

**1. Periodic Evaluation – Requirements - PROCEDURES**

Do the procedures for periodic evaluation include all of the requirements of 192.1007(f)?

**192.1007(f)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**2. Periodic Evaluation – Implementation - RECORDS**

Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?

**192.1007(f)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
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**Reporting**

**1. Report Results - Performance Measures - PROCEDURES**

Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?

**192.1007(g)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Report Results – Submittal - RECORDS**

Has the operator submitted the required reports?

**192.1007(g)**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Report Mechanical Fitting Failures**

**1. Mechanical Fitting Failures - Information Collection - PROCEDURES**

Are there procedures to collect information necessary to comply with the reporting requirements of 192.1009?

**192.1009**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**Records Required to be Kept**

**1. Records – Requirements - PROCEDURES**

Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?

**192.1011**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**2. Records - IM Plans - PROCEDURES**

Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?

**192.1011**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |

**3. Records – Implementation - RECORDS**

Has the operator maintained the required records?

**192.1011**

|  |  |  |  |
| --- | --- | --- | --- |
| No Issue | Potential Issue | Not Applicable | Not Checked |
|  |  |  |  |
| **Notes** | | | |
|  | | | |