

PHMSA Integrity Management Question Set (IA Equivalent)
HAZARDOUS LIQUID INTEGRITY MANAGEMENT INSPECTION PROTOCOLS

Identification of Pipeline Segments - Protocol 1 Identification of Pipeline Segments That Could Affect High Consequence Areas

1.	IM.HC.HCALOCATION.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.12(b); 195.450; 195.452(a); 195.452(d)(3))							
<p>Does the process that requires identification of segments of HCA-affecting segments include steps to identify, document, and maintain up-to-date geographic locations and boundaries of HCAs using the NPMS and other information sources as necessary?</p>							
<p>Notes</p>							

2.	IM.HC.HCALOCATION.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.12(b); 195.450; 195.452(a); 195.452(b)(2))							
<p>Do records show that locations and boundaries of HCA-affecting segments are correctly identified and maintained up-to-date?</p>							
<p>Notes</p>							

3.	IM.HC.HCAIDENT.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
<p>Is the process adequate to determine all locations where pipeline systems are located in HCAs and, if applicable, is there a requirement for developing adequate and convincing technical justification for concluding that any segments located in an HCA would not affect the HCA?</p>							
<p>Notes</p>							

4.	IM.HC.HCAIDENT.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
<p>Do records indicate that all locations where a pipeline system is located in an HCA are determined and, if any exceptions for segments that directly intersect an HCA are taken, is adequate and convincing technical justification provided?</p>							
<p>Notes</p>							

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5.	IM.HC.HCARELEASE.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Does the process include technically adequate methods to determine the locations/scenarios and volume of potential commodity releases?							
Notes							

6.	IM.HC.HCARELEASE.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Do records indicate that identified release locations and spill volumes are appropriate, technically adequate, and determined consistent with the documented process?							
Notes							

7.	IM.HC.HCABOUNDING.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.452(b)(4))							
Does the HCA analysis bound historical releases/accidents?							
Notes							

8.	IM.HC.HCAOVERLAND.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Does the process include adequate analysis of overland flow of liquids to determine the extent of commodity spread and its effects on HCAs?							
Notes							

9.	IM.HC.HCAOVERLAND.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Do records indicate the overland spread analysis (if applicable) is technically adequate and consistent with program requirements?							
Notes							

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10.	IM.HC.HCAH2OTRANSP.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Does the process include a technically adequate analysis approach for water transport of liquids to determine the extent of commodity spread and its effects on HCAs?							
Notes							

11.	IM.HC.HCAH2OTRANSP.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Do records indicate that water transport analysis (if applicable) is technically adequate and consistent with its program requirements?							
Notes							

12.	IM.HC.HCAAIRDISP.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Does the process include a technically adequate analysis of the dispersion of vapors from the release of highly volatile liquids and volatile liquids to determine effects on HCAs?							
Notes							

13.	IM.HC.HCAAIRDISP.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Do records indicate that the analysis of air dispersion of vapors (if applicable) is technically adequate and consistent with its program requirements?							
Notes							

14.	IM.HC.HCAINDIRECT.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Does the process require that all locations of segments that do not intersect, but could indirectly affect, an HCA be adequately identified?							
Notes							

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15.	IM.HC.HCAINDIRECT.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.6(a); 195.6(b); 195.6(c); 195.450; 195.452(a))							
Do the records indicate that endpoints of segments that could affect an HCA have been correctly identified where a buffer zone approach is utilized?							
Notes							

16.	IM.HC.HCACAT3.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.452(b)(2))							
Does the process require completion of segment identification for Category 3 pipelines prior to beginning of operation?							
Notes							

17.	IM.HC.HCACAT3.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(1) (195.452(b)(2))							
Do records indicate completion of segment identification for Category 3 pipelines prior to beginning of operation?							
Notes							

Integrity Assessment Results - Protocol 3 Integrity Assessment Results Review

1.	AR.IL.ILIREVIEWQUAL.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(8)							
Does the process specify qualification requirements for operator personnel who review and evaluate ILI assessment results?							
Notes							

2.	AR.IL.ILIREVIEWQUAL.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(8)							
Does the process demonstrate that operator personnel who review assessment results are qualified for review of integrity assessment results and information analysis?							
Notes							

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3.	AR.IL.ILISPECS.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(4)							
Do processes assure complete and adequate vendor ILI specifications?							
Notes							

4.	AR.IL.ILIVALIDATE.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(2)							
Do processes provide for validating ILI results?							
Notes							

5.	AR.IL.ILIVALIDATE.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(2)							
Does a review of records for validating ILI assessment results demonstrate that the process was implemented appropriately?							
Notes							

6.	AR.IL.ILIINTEGRATION.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(g)							
Is the process for integrating ILI results with other information adequate?							
Notes							

7.	AR.IL.ILIINTEGRATION.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(g)							
Did the operator integrate other data/information when evaluating tool data/results in the records reviewed?							
Notes							

8.	AR.IL.ILIANALYSIS.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(1)							
Do ILI results and remediation project records indicate that analysis of the ILI data and other information was adequate to identify anomalies requiring remediation?							
Notes							

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9.	AR.RC.DISCOVERY.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(2)							
Does the integrity assessment process properly define discovery and the required time frame for anomalies in a pipeline segment that can affect an HCA?							
Notes							

10.	AR.RC.IMPRC.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(4)							
Does the Integrity Management Plan and/or maintenance processes include all of the §195.452(h)(4) repair criteria for anomalies in a pipeline segment that can affect an HCA?							
Notes							

11.	AR.RC.DEFECTCAT.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(4)							
From the review of the results of integrity assessments and remediation projects, were there any defects that were not properly categorized or discovered?							
Notes							

12.	AR.RC.DISCOVERY.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(2)							
From the review of the results of selected ILI and remediation projects, did discovery of all anomalies occur promptly, but no later than 180 days of completion of the assessment?							
Notes							

13.	AR.PTI.PRESSTESTRESULT.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(c)(1)(i)(b) (195.452(j)(5)(ii); Part 195 Subpart E; Part 195 Subpart G)							
From the review of the results of pressure tests, do the test records validate the pressure test?							
Notes							

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14.	AR.PTI.PRESSTESTCORR.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(g)(3) (195.452(f)(3))							
Does the process require that the effectiveness of the corrosion control program be evaluated when using pressure testing as an integrity assessment?							
Notes							

15.	AR.PTI.PRESSTESTCORR.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(g)(3) (195.452(f)(3))							
From the review of corrosion control records for pressure tests, is the corrosion control program effective?							
Notes							

16.	AR.OT.OTPLAN.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(c)(1)(i)(D) (195.452(j)(5)(iv); 195.452(h)(8))							
Has the operator developed a process for the "other technologies" they have used?							
Notes							

17.	AR.OT.OTPLAN.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(c)(1)(i)(D) (195.452(j)(5)(iv); 195.452(h)(8))							
From the review of the results of selected integrity assessments, was the assessment performed in accordance with procedures and vendor recommendations?							
Notes							

18.	AR.OT.OTDEFECTCAT.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(2) (195.55(a); 195.55(b))							
From the review of the results of selected integrity assessments, were defects identified and categorized within 180 days, if applicable?							
Notes							

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Remedial Action - Protocol 4 Remedial Action

1.	AR.RC.PRESSREDUCE.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(4)(i)							
Does the process for pressure reduction meet the code requirements?							
Notes							

2.	AR.RC.SCHEDULEIMPL.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(4)							
From the review of the results of selected ILI and remediation projects, were defects in segments that could affect an HCA remediated or dispositioned (i.e., repair, pressure reduction, or notification to PHMSA) within the applicable mandatory time limits of 195.452(h)(4)?							
Notes							

3.	AR.RC.PRESSREDUCE.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(h)(4)(i) (195.55(a); 195.55(b))							
From the review of the results of ILI and remediation projects, was an acceptable pressure reduction promptly taken for each Immediate Repair condition or when a repair schedule could not be met?							
Notes							

4.	RPT.RR.ANNUALREPORTJ.R	Sat+	Sat	Con	Unsat	NA	NC
195.49							
Is Annual Report Part J Data complete and accurate?							
Notes							

5.	RPT.RR.ANNUALREPORTK.R	Sat+	Sat	Con	Unsat	NA	NC
195.49							
Is Annual Report Part K Data complete and accurate?							
Notes							

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Risk Analysis - Protocol 5 Risk Analysis

1.	IM.RA.RAMETHOD.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Do processes for evaluating risk to high consequence areas require consideration of all relevant risk categories and operating conditions when evaluating pipeline segments?							
Notes							

2.	IM.RA.RAINTEGRATE.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Do processes for evaluating risk to high consequence areas appropriately integrate the various risk factors and other information?							
Notes							

3.	IM.RA.RADATA.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Are processes for data and information input into the risk analysis process adequate and appropriate?							
Notes							

4.	IM.RA.RADATA.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Are adequate and appropriate data and information input into the risk analysis process?							
Notes							

5.	IM.RA.RASEGMENT.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Does the risk analysis process adequately represent and consider the variation in risk factors along the line such that segment-specific risk results and insights are obtained?							
Notes							

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6.	IM.RA.RAREULTS.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Are results of the process to evaluate risk appropriate and useful for drawing conclusions and insights for decision making?							
Notes							

7.	IM.RA.RAFACILITY.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Does the process include technically adequate approaches to identify and evaluate the risks of facilities that can affect high consequence areas?							
Notes							

8.	IM.RA.RAFACILITY.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(3) (195.452(g))							
Has the analysis of risk of facilities been performed as required?							
Notes							

Preventive and Mitigative Measures - Protocol 6 Preventive and Mitigative Measures

1.	IM.PM.PMMGENERAL.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))							
Do the processes to identify additional preventive and mitigative actions include consideration of risk and cover a spectrum of alternatives? (Note: Leak detection and EFRDs are covered in more detail in subsequent questions within this sub-module.)							
Notes							

2.	IM.PM.PMMGENERAL.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))							
Is there documentation of preventive and mitigative actions that have been considered and implemented?							
Notes							

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3.	IM.PM.PMMRISK.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))							
Do the processes effectively evaluate the effects of potential actions on reducing the likelihood and consequences of pipeline releases?							
Notes							

4.	IM.PM.PMMRISK.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))							
Is there adequate documentation of use of the risk analysis process to evaluate preventive and mitigative measures?							
Notes							

5.	IM.PM.PMMBASIS.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))							
Do the processes provide adequate basis for deciding which candidate preventive and mitigative actions are implemented?							
Notes							

6.	IM.PM.PMMBASIS.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(1); 195.452(i)(2))							
Do records indicate that the P&MM decision making process has been applied as specified?							
Notes							

7.	IM.PM.PMMLEAKDET.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(3))							
Does the process for evaluating leak detection capability adequately consider all of the §195.452 (i) (3)-required factors and other relevant factors?							
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8.	IM.PM.PMMLEAKDET.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(3))							
Do records indicate that all required and other relevant leak detection evaluation factors have been adequately evaluated?							
Notes							

9.	IM.PM.PMMEFRD.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(4))							
Do processes for evaluating the need for additional EFRDs adequately consider all of the §195.452(i)(4)-required factors and other relevant factors?							
Notes							

10.	IM.PM.PMMEFRD.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(6) (195.452(i)(4))							
Do records indicate that all required and other relevant EFRD evaluation factors were adequately evaluated and any actions taken as appropriate?							
Notes							

Continual Evaluation and Assessment - Protocol 7 Continual Process of Evaluation and Assessment

1.	IM.CA.PERIODICEVAL.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(1); 195.452(j)(2))							
Does the process include adequate provisions for performing periodic evaluations of pipeline integrity?							
Notes							

2.	IM.CA.PERIODICEVAL.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(1); 195.452(j)(2))							
Do records indicate performance of periodic evaluations of pipeline integrity on a technically justified frequency?							
Notes							

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3.	I.M.CA.REASSESSINTERVAL.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(1); 195.452(j)(3))							
Does the process include an adequate process for determining re-assessment intervals for pipeline segments that could affect HCAs?							
Notes							

4.	I.M.CA.REASSESSINTERVAL.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(1); 195.452(j)(3))							
Are re-assessment intervals consistent with the risks identified for the pipeline and the results of previous assessments?							
Notes							

5.	I.M.CA.REASSESSMETHOD.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(5))							
Does process specify the assessment methods that are appropriate for the pipeline specific integrity threats?							
Notes							

6.	I.M.CA.REASSESSMETHOD.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(5))							
Are assessment methods shown in the continual assessment plan appropriate for the pipeline specific integrity threats?							
Notes							

7.	I.M.CA.REASSESSNOTIFY.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(4))							
Does the process include adequate methodology for submitting variance notifications to PHMSA for assessment intervals longer than the 5-year maximum assessment interval?							
Notes							

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8.	IM.CA.REASSESSNOTIFY.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(f)(5) (195.452(j)(4))							
Have variance notifications been submitted to PHMSA for assessment intervals longer than the 5-year maximum assessment interval?							
Notes							

9.	AR.EC.ECDAPLAN.P	Sat+	Sat	Con	Unsat	NA	NC
195.588(b)(1)							
Have an ECDA plan and processes been prepared for conducting ECDA?							
Notes							

10.	AR.EC.ECDAPREASSESS.R	Sat+	Sat	Con	Unsat	NA	NC
195.588(b)(2) (NACE RP-0502-2002, Section 3.2)							
Do records indicate that the ECDA pre-assessment process complies with NACE RP0502-2002 Section 3 and §195.588?							
Notes							

11.	AR.EC.ECDAINDIRECT.R	Sat+	Sat	Con	Unsat	NA	NC
195.588(b)(3) (NACE RP0502-2002, Section 4)							
Do records indicate that the ECDA indirect inspection process complies with NACE RP0502-2002 Section 4 and §195.588?							
Notes							

12.	AR.EC.ECDADIRECT.R	Sat+	Sat	Con	Unsat	NA	NC
195.588(b)(4) (NACE RP-05002-2002 Section 5; NACE RP-05002-2002 Section 6.4.2)							
Do records indicate that excavations and data collection were performed in accordance with NACE RP0502-2002, Sections 5 and 6.4.2?							
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13.	AR.EC.ECDAPLANMOC.R	Sat +	Sat	Con	Unsat	NA	NC
195.588(b)(4)(iii)							
Do records indicate that the operator established and implemented criteria and internal notification procedures for any changes in the ECDA Plan?							
Notes							

14.	AR.EC.ECDAPOSTASSESS.R	Sat +	Sat	Con	Unsat	NA	NC
195.588(b)(5) (NACE RP-0502-2002 Section 6.2)							
Do records indicate that requirements were met for post assessment?							
Notes							

Program Evaluation - Protocol 8 Program Evaluation

1.	IM.QA.IMPERFMEAS.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(7) (195.452(k))							
Does the process include an adequate set of performance measures to provide meaningful insight into integrity-related performance?							
Notes							

2.	IM.QA.IMPERFMEAS.R	Sat +	Sat	Con	Unsat	NA	NC
195.452(f)(7) (195.452(k))							
Does the operator's evaluation of the selected performance measures provide meaningful insight into integrity-related performance?							
Notes							

3.	IM.QA.RAMOC.P	Sat +	Sat	Con	Unsat	NA	NC
195.452(l) (195.452(b)(6); 195.452(g))							
Does the process include appropriate Management of Change (MOC) processes for risk management applications?							
Notes							

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4.	IM.QA.RECORDS.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(l) (195.452(b)(6); 195.452(c)(2))							
Is the process adequate to assure that the records required for risk management applications are maintained for the useful life of the pipeline?							
Notes							

5.	IM.QA.RAMOC.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(l) (195.452(b)(6); 195.452(g))							
Do records indicate that Management of Change (MOC) processes for risk management applications (e.g., risk analysis updating, segment identification updating) are being performed as required?							
Notes							

6.	IM.QA.RECORDS.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(l) (195.452(b)(6); 195.452(c)(2))							
From a review of records, are record keeping methods being performed as required?							
Notes							

7.	IM.QA.QARM.P	Sat+	Sat	Con	Unsat	NA	NC
195.452(b)(6) (195.452(l)(ii); 195.452(g))							
Are quality assurance processes in place for risk management applications?							
Notes							

8.	IM.QA.QARM.R	Sat+	Sat	Con	Unsat	NA	NC
195.452(b)(6) (195.452(l)(ii); 195.452(g))							
Do records indicate that quality assurance processes for risk management applications are being performed as required?							
Notes							