



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

2019 Gas State Program Evaluation

for

RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS

Document Legend

PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



2019 Gas State Program Evaluation -- CY 2019

Gas

State Agency: Rhode Island

Agency Status:

Date of Visit: 07/27/2020 - 09/22/2020

Agency Representative: Robert D. Bailey

Program Manager, Gas Safety Engineer

PHMSA Representative: Clint Stephens

State Liaison

Commission Chairman to whom follow up letter is to be sent:

Name/Title: Ms. Linda George, Administrator

Agency: Rhode Island Division of Public Utilities and Carriers

Address: 89 Jefferson Blvd.

City/State/Zip: Warwick, Rhode Island 02888

Rating:

60105(a): Yes **60106(a):** No **Interstate Agent:** No

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2019 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS

Possible Points Points Scored

- A Progress Report and Program Documentation Review
- B Program Inspection Procedures
- C State Qualifications
- D Program Performance
- E Field Inspections
- F Damage prevention and Annual report analysis
- G Interstate Agent/Agreement States

0
15
10
50
15
4
0

0
15
9
41
15
3
0

TOTALS

94 **83**

State Rating

88.3

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1 Were the following Progress Report Items accurate?

Info Only Info Only

Info Only = No Points

- a. Stats On Operators Data - Progress Report Attachment 1
- b. State Inspection Activity Data - Progress Report Attachment 2
- c. List of Operators Data - Progress Report Attachment 3*
- d. Incidents/Accidents Data - Progress Report Attachment 4*
- e. Stats of Compliance Actions Data - Progress Report Attachment 5*
- f. List of Records Kept Data - Progress Report Attachment 6 *
- g. Staff and TQ Training Data - Progress Report Attachment 7
- h. Compliance with Federal Regulations Data - Progress Report Attachment 8
- i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

- a. There should be 36 master meter units in Attachment 1 of the Progress Report.
- b. The information in Attachment 2 of Progress Report is recorded on personnel time sheets.
- c. The data in Attachment 3 of Progress Report seems accurate.
- d. There were no reportable incidents/accidents in 2019 as listed in Attachment 4 of Progress Report.
- e. There were 2 civil penalties collected in 2019, not 3 as listed in Attachment 5 of Progress Report.
- f. All files are stored electronically and stored in a Shared drive with no issues for Attachment 6 of Progress Report.
- g. Verified staff training in TQ Blackboard with no issues for Attachment 7 of Progress Report.
- h. The RIDUC automatically adopts federal regulations with no issues in Attachment 8 of Progress Report.
- i. Attachment 10 ? Hired pipeline safety engineer in 2019. Hired a consultant who was able to accomplish 75% of the Operator audits and completed 100% of the master meter and propane inspections for 2019. No issues.

Total points scored for this section: 0
Total possible points for this section: 0



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

The pre-inspection procedures are found in Part V, Section B ? Preparation for Inspection, page 10 (Exception construction); Inspection procedures are found in Part V, Sections C ? O, pages 10 ? 14; and post inspection procedures are found in Part V, Sections P ? U, pages 14 ? 16.

- | | | | |
|---|---|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)c. Type of activity being undertaken by operators (i.e. construction)d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

The procedure is found in Part IV, Section B ? Inspection Priorities, page 8. Recommend the RIDPUC add procedure to include process to identify high-risk inspection units that include all threats. (Bullet five) Yes. Inspection units are broken down appropriately.

- | | | | |
|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

The procedure is found in Part V, Section P ? S, pages 14 ? 15.

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|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reportsb. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site. | | |

Evaluator Notes:

The procedures are found in Part VI, Sections B ? G, pages 16 ? 18.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Recommended that the RIDPUC add to procedures a process to identify high‐risk inspection units that includes all threats ‐; (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors).

Total points scored for this section: 15
Total possible points for this section: 15



PART C - State Qualifications

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

The staff and program manager have not fulfilled training requirements. The RIDPUC has hired a consultant that has fulfilled all training requirements performing as lead on all inspections in 2019 and 2020. There were no issues.

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|---|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 4 |
|---|--|---|---|

Evaluator Notes:

The program manager has less than one year in the position and no prior experience in pipeline safety.

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|---|--|-----------|-----------|
| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

The follow issue was identified in Part C of the evaluation:

The program manager has less than one year in the position and no prior experience in pipeline safety.

Total points scored for this section: 9
Total possible points for this section: 10



PART D - Program Performance

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed inspection time intervals for Niagara Mohawk Power Corp. (Distribution and LNG), Douglas Pipeline Co. (Standard), Propane Plus (2019 & 2016), Hull Propane (2019, 2016, 2015), Spicer Gas (2019 & 2017), Providence H/A (2019 & 2017), Riverbend Apts. (2019 & 2017), Sandy Lane Apts., (2019 & 2017), University of Rhode Island (2019 & 2017), and Wellington Resorts (2019 & 2018) which were required on annual basis as stated in the RIDPUC Operations procedures. The RIDPUC did complete all specialized inspections in the CY 2019, but there was no records for the CY 2018 inspections as documented in the 2018 program evaluation.

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|---|---|----|---|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 7 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed inspection time intervals for Niagara Mohawk Power Corp. (Standard, DIMP, LNG) ? Inspection consisted of a partial procedural and field inspection; not all questions were checked on the Standard Distribution Gas inspection form. Reviewed DIMP inspection for Niagara Mohawk Power Corp performed on August 2, 2019. Inspection form was incomplete. The RIDPUC needs to update Standard Gas Distribution inspection form. They are using old PHMSA inspection form with a revision date of 1/29/15. The RIDPUC needs to add comments for N/As and N/Cs checked on the inspection forms.

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|---|---|---|---|
| 3 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Reviewed OQ program inspection for Niagara Mohawk Power Corp. performed November 2019. The state verified plan was updated and that persons performing covered task were properly qualified and requalified at the correct intervals.

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|---|--|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none"> a. Are the state's largest operator(s) plans being reviewed annually? b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan? c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | | |

Evaluator Notes:

Yes. Reviewed DIMP inspection for Niagara Mohawk Power Corp performed on August 2, 2019. The RIDPUC is verifying National Grid is including low pressure distribution systems in their threat analysis through the accelerated main replacement plan of cast iron pipe.

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|---|---|---|---|
| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
| | <ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance); c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21; d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617; e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies; f. Operator procedures for considering low pressure distribution systems in threat analysis? g. Operator compliance with state and federal regulations for regulators located inside buildings? | | |

Evaluator Notes:

a&b - National Grid is the only operator in the State of Rhode Island with cast iron pipe and they are under an accelerated main replacement program.
 c. The RIDPUC has not reviewed operator response procedures for leaks caused by excavation damage near buildings.
 d. Question is included in the Standard Gas Distribution inspection form.
 e. National Grid sends out in the Public Awareness pamphlet information to sewer companies about protecting their pipelines from cross bores and trenchless technologies.
 f. Low pressure distribution systems are included in the National Grid DIMP risk model.
 g. The RIDPUC has not verified National Grid has a policy that all regulators inside building must be vented to the outdoors or moved outside of building. National Grid has been identified by the state as the largest operator in the state with the possibility of having numerous service line regulators located inside buildings.

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|---|--|---|---|
| 6 | Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Recommended the RIDPUC take appropriate action regarding ADBs by emailing the operators a link with the ADBs on an annual basis.

7	(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1	10	5
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Yes = 10 No = 0 Needs Improvement = 1-9

- a. Were compliance actions sent to company officer or manager/board member if municipal/government system?
- b. Were probable violations documented properly?
- c. Resolve probable violations
- d. Routinely review progress of probable violations
- e. Did state issue compliance actions for all probable violations discovered?
- f. Can state demonstrate fining authority for pipeline safety violations?
- g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
- h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Douglas Pipeline Co. ? had non-compliance items selected in the inspection checklist, but no letter was sent to the operator (Standard); Hull Propane - Warning Letter sent to operator on November 14, 2019, no response from operator(Standard); Spicer Gas ? Warning Letter sent to operator on November 20, 2019, no response from operator (Standard); Providence H/A - Inspected December 2019 ? non-compliance items selected in the inspection form, no letter sent to operator (Standard); Riverbend Apts. ? Inspected December 31, 2019 ? non-compliance items selected in the inspection form, no letter sent to operator (Standard); and Wellington Resorts - Letter sent to operator on January 15, 2020, no response received from operator at the time of program evaluation(Standard).

The RIDPUC has no procedures for enforcement actions, such as Warning Letters, Letters of Concern, etc. Recommend the RIDPUC add procedure for all enforcement actions being issued to operators with a required response.

8	(Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations?	10	10
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Yes = 10 No = 0 Needs Improvement = 1-9

- a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?
- b. Did state keep adequate records of Incident/Accident notifications received?
- c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?
- d. Were onsite observations documented?
- e. Were contributing factors documented?
- f. Were recommendations to prevent recurrences, where appropriate, documented?
- g. Did state initiate compliance action for any violations found during any incident/accident investigation?
- h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?
- i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

The RIDPUC had no incidents in 2019. The RIDPUC assisted AID in February 2019 in gas outage which lost >7,000 customers. The RIDPUC shares lessons learned during the NAPSR Regional meetings.

9	Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Chair letter sent on December 26, 2019, received letter February 21, 2020. No issue.

- 10** Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only Info Only
Info Only = No Points

Evaluator Notes:

The RIDPUC participated in the NEPSR seminar in New Hampshire in 2019. Also, attended the national South Portland, Maine seminar in 2019.

- 11** Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes. The transmission operator has submitted information into NPMS database.

- 12** Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. The RIDPUC provides training to the public, excavators, and operators. The MUST (Managing Underground Safety Training) is done on an annual basis providing dig safe information to excavators, operators, and regulators. Enforcement cases are not available to the public; however, civil penalty cases are available to the public.

- 13** Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The RIDPUC had no SRCRs in 2019. The last SRCR was in 2017 on a LNG facility.

- 14** Was the State responsive to: 1 1
Yes = 1 No = 0 Needs Improvement = .5
a. Surveys or information requests from NAPS or PHMSA;
b. Operator IM notifications; and
c. PHMSA Work Management system tasks?

Evaluator Notes:

- a. Yes. The RIDPUC has responded to surveys or information request from NAPS and PHMSA.
b. The RIDPUC is not aware of any IM notifications.
c. The RIDPUC has not performed any tasks in WMS.
-

- 15** If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The RIDPUC has not issued any waivers/ special permits.

- 16** Were pipeline program files well-organized and accessible? Info Only Info Only
Info Only = No Points

Evaluator Notes:

Yes. The files were provided electronically, well organized, and accessible.

- 17 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3
Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:

Discussed with the State on accuracy of inspection day information in CY2019 SICT days was 145 person days required. The State has updated SICT data and was calculated to 149 person days in CY2020.

- 18 Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>
Info Only = No Points

Evaluator Notes:

Discussed State program performance metrics with the RIDPUC - Damage Prevention Program ? excavation damages per 1,000 tickets for natural gas distribution has increased from 2016 ? 2019; Inspection Activity ? inspection days per 1,000-mile gas pipelines has decreased dramatically from 2018 to 2019 - Inspection days per master meter/LPG has decreased slightly from 2018 to 2019; and Inspector Qualification ? % of inspectors with core training has decreased to zero from 2018 to 2019. % of inspectors with 5-year retention has decreased drastically from 2018 to 2019.

- 19 Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only
Info Only = No Points

- a. <https://pipelinesms.org/>
- b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Recommend the RIDPUC discuss the Pipeline Safety Management Systems with its largest operator (National Grid).

- 20 General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

The following issues were identified in Part D of the evaluation:

1) Reviewed inspection time intervals for Niagara Mohawk Power Corp. (Standard, DIMP, LNG) ? Inspection consisted of a partial procedural and field inspection; not all questions were checked on inspection form; cannot give credit for inspection (Standard). Reviewed DIMP inspection for Niagara Mohawk Power Corp performed on August 2, 2019. Inspection form was incomplete. The RIDPUC needs to update Standard Gas Distribution inspection form. They are using old PHMSA inspection form with a revision date of 1/29/15. The RIDPUC needs to add comments for N/As and N/Cs checked on the inspection forms.

2) The RIDPUC has not reviewed operator response procedures for leaks caused by excavation damage near buildings. The RIDPUC has not verified National Grid has a policy that all regulators inside building must be vented to the outdoors or moved outside of building.

3) Douglas Pipeline Co. ? had non-compliance items selected in the inspection checklist, but no letter was sent to the operator (Standard); Hull Propane - Warning Letter sent to operator on November 14, 2019, no response from operator(Standard); Spicer Gas ? Warning Letter sent to operator on November 20, 2019, no response from operator (Standard); Providence H/A - Inspected December 2019 ? non-compliance items selected in the inspection form, no letter sent to operator (Standard); Riverbend Apts. ? Inspected December 31, 2019 ? non-compliance items selected in the inspection form, no letter sent to operator (Standard); and Wellington Resorts - Letter sent to operator on January 15, 2020, no response received from operator at the time of program evaluation(Standard).

The RIDPUC has no procedures for enforcement actions, such as Warning Letters, Letters of Concern, etc. Recommend the RIDPUC add procedure for all enforcement actions being issued to operators with a required response.

Total points scored for this section: 41
Total possible points for this section: 50

PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

Comments:

Operator: National Grid

Inspectors: Ken McCarthy, Robert Bailey, and Donald Ledversis

Location: Woonsocket, RI and Cumberland RI

Date: September 22, 2020

PHMSA Rep: Clint Stephens

? Observed inspectors audit construction project, the replacement of steel service line with plastic pipe and 6" cast iron pipe with 2" PE. Verified OQ qualifications of operator personnel performing covered tasks.

? The pipeline operator or representative was present during the inspection.

? Mr. Ledversis was only inspector qualified to lead construction inspections.

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

RIDPUC utilized the EN33A (Short A) and EN33 inspection forms. The forms were used as a guide for the inspection.

- 3 Did the inspector adequately review the following during the inspection 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

- Procedures (were the inspector's questions of the operator adequate to determine compliance?)
- Records (did the inspector adequately review trends and ask in-depth questions?)
- Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
- Other (please comment)
- Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

Yes. The inspector reviewed procedures for the installation of the service regulator near a house window and welding procedures for installation of a service tee. OQ qualification records for operator personnel installing tracer wire on service line, plastic pipe fusion, and welding. Checked calibration and temperature of PE fusion heating equipment.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The inspector showed adequate knowledge of the pipeline safety program and regulations.

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The inspector did not conduct an exit interview due to the construction projects not being completed. However, if any issues were identified they were communicated to the operator at the time of discovery.

6 Was inspection performed in a safe, positive, and constructive manner ?

Info Only Info Only

Info Only = No Points

- a. No unsafe acts should be performed during inspection by the state inspector
- b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

? There were no unsafe acts observed during the inspection by the state inspectors.

? The inspector observed installation of plastic service line and main. The inspector did a good job of requesting information from operator, such as procedures and OQ records.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part E of the evaluation.

Total points scored for this section: 15
Total possible points for this section: 15



PART F - Damage prevention and Annual report analysis**Points(MAX) Score**

- | | | | |
|---|--|---|---|
| 1 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes. The only major operator in Rhode Island is National Grid, and the RIDPUC is reviewing the operator annual reports which indicates increase in total excavation damages per 1000 tickets from 2017 -2019. This could be due to less tickets called in from 2017 to 2019.

- | | | | |
|---|--|---|----|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (? 192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (? 192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
|---|--|---|----|

Evaluator Notes:

Discussed with the RIDPUC about having meeting with National Grid to communicate issues with excavator that repeatedly violate one-call laws and damaged their facilities. This is not being performed by the RIDPUC at the present time.

- | | | | |
|---|---|---|----|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D ? Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">a. Is the information complete and accurate with root cause numbers?b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a)?c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following?d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?e. Is the operator appropriately requalifying locators to address performance deficiencies?f. What is the number of damages resulting from mismarks?g. What is the number of damages resulting from not locating within time requirements (no-shows)?h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?i. Are mapping corrections timely and according to written procedures?j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c)? | 4 | NA |
|---|---|---|----|

Evaluator Notes:

Discussed with the RIDPUC about having meeting with National Grid to communicate operator's annual report pertaining to Part D ? Excavation Damage. The RIDPUC needs to analyze specific categories in Parts D.1.a, D.1.b, and D.1.c. This is not being performed by the RIDPUC at the present time.

- | | | | |
|---|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages? | 2 | 1 |
|---|---|---|---|

- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

The RIDPUC has collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests; however, the state needs to determine stakeholder group causing the highest number of damages to the pipeline, such as operator, contractor, locating company, excavator, or public.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The following issue was identified during Part F of the evaluation:

The RIDPUC has collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests; however, the state needs to determine stakeholder group causing the highest number of damages to the pipeline, such as operator, contractor, locating company, excavator, or public.

Total points scored for this section: 3
Total possible points for this section: 4



PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections. Info Only Info Only
Info Only = No Points

Evaluator Notes:

RIDPUC is not an interstate agent.

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days. Info Only Info Only
Info Only = No Points

Evaluator Notes:

RIDPUC is not an interstate agent.

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only
Info Only = No Points

Evaluator Notes:

RIDPUC is not an interstate agent.

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only
Info Only = No Points

Evaluator Notes:

RIDPUC is not an interstate agent.

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only
Info Only = No Points

Evaluator Notes:

RIDPUC is not an interstate agent.

- 6 General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

RIDPUC is not an interstate agent.

Total points scored for this section: 0
Total possible points for this section: 0