



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

1200 New Jersey Avenue SE
Washington DC 20590

2017 Gas State Program Evaluation

for

NORTH CAROLINA UTILITIES COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2017 Gas State Program Evaluation -- CY 2017

Gas

State Agency: North Carolina

Agency Status:

Date of Visit: 04/23/2018 - 04/27/2018

Agency Representative: Steve Wood, Director-Pipeline Safety Section

PHMSA Representative: Agustin Lopez- State Programs Liaison

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

Name/Title: Edward S. Finley, Jr., Chairman

Agency: North Carolina Utilities Commission

Address: 430 North Salisbury Street, Dobbs Building

City/State/Zip: Raleigh, North Carolina 27603

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2017 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on 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.

Field Inspection (PART G):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

| | |
|---|--|
| A | Progress Report and Program Documentation Review |
| B | Program Inspection Procedures |
| C | Program Performance |
| D | Compliance Activities |
| E | Incident Investigations |
| F | Damage Prevention |
| G | Field Inspections |
| H | Interstate Agent State (If Applicable) |
| I | 60106 Agreement State (If Applicable) |

Possible Points Points Scored

| | |
|----|----|
| 10 | 10 |
| 13 | 13 |
| 47 | 43 |
| 15 | 15 |
| 11 | 11 |
| 8 | 8 |
| 12 | 12 |
| 0 | 0 |
| 0 | 0 |

TOTALS

116 112

State Rating 96.6

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | Points(MAX) | Score |
|--|-------------|-------|
| 1 Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |

Evaluator Notes:

Reviewed files and compared to annual reports for accuracy. There should be only 54 Intrastate Transmission units instead of 55. Compared with Attachment 3 which has the correct number. In the future, NCUC needs to review numbers entered in the Progress Report before submitting to assure they are accurate.

- | | | |
|---|---|---|
| 2 Review of Inspection Days for accuracy - Progress Report Attachment 2 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|

Evaluator Notes:

Reviewed record keeping/database for accuracy of progress report. No issues with data.

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|---|---|---|
| 3 Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|

Evaluator Notes:

Verified operator list with annual reports and PDM. Data seemed to be accurate. No issues with data submitted.

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|---|---|---|
| 4 Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|

Evaluator Notes:

There were three incidents reported in the PDM which are all listed in Attachment 4. Reviewed for accuracy. No issues with Attachment 4.

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|---|---|---|
| 5 Accuracy verification of Compliance Activities - Progress Report Attachment 5 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|

Evaluator Notes:

Reviewed NCUC database which tracks the non compliance issues to verify the data submitted in Attachment 5. There are no issues with Attachment 5.

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|--|---|---|
| 6 Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|--|---|---|

Evaluator Notes:

Yes, files are well organized and accessible.

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|---|---|---|
| 7 Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|

Evaluator Notes:

Verified inspector training with SABA to verify attachment 7.

- | | | |
|--|---|---|
| 8 Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|--|---|---|

Evaluator Notes:

State adopts new rules within 30 days of PHMSA adoption of new rules and regulations.

- 9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, the state describes there accomplishments in their progress report. The NCUC completed all Drug and Alcohol inspections of each operator. Will continue DIMP follow up inspections.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The NCUC is mainly complying with Part A of the evaluation. Only mistake was on Attachment 1 in which the number of intrastate transmission units was incorrect. There should be 54 instead of 55. In the future, NCUC needs to review numbers entered in the Progress Report before submitting to assure they are accurate.

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



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes Section V of Procedures addresses inspection procedures which give guidance to inspectors and include pre and post inspection activities.

- | | | | |
|---|--|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes Section V of Procedures addresses inspection procedures which include pre and post inspection activities.

- | | | | |
|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes Section V of Procedures addresses OQ inspection procedures which give guidance to inspectors and include pre and post inspection activities. There is a need to amend procedures to give further guidance to conduct OQ Program inspections.

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|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes Section V of Procedures addresses Damage Prevention inspection procedures which include pre and post inspection activities.

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| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes Section V of Procedures addresses Operator Training inspection procedures which include pre and post inspection activities.

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| 6 | Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes Section V of Procedures addresses Construction inspection procedures which include pre and post inspection activities.

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|---|---|---|---|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? | 6 | 6 |
|---|---|---|---|

Yes = 6 No = 0 Needs Improvement = 1-5

- | | | | |
|--|--------------------------------------|--------------------------|---|
| a. Length of time since last inspection (Within five year interval) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| 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) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes, inspection priorities are outlined in section IV.B. of procedures.

- a. Time since previous inspection is a priority.
- b. Leakage, incident and compliance history is data used for prioritizing inspections.
- c. Yes, operator history is reviewed.
- d. HCA locations are used to prioritize inspections.
- e. Corrosion, leaks, age of pipe, type of pipe and incident history is in procedures to identify high risk units.
- f. Yes, units are broken down by size and operating areas

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The NCUC is mainly complying wit Part B of the Evaluation. It was suggested that the NCUC needs to give more detail on each type of inspection (OQ, Drug and Alcohol, Public Awareness) in Section V of their procedures. For example the procedure has all types of inspections performed but only a a few of them give full detail on how to conduct the inspection with enough guidance for an inspector. More detail on each type of inspection would help and give more guidance to a inspector, specifically new hires.

Total points scored for this section: 13
Total possible points for this section: 13



PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
720.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 5.90 = 1298.00

Ratio: A / B
720.00 / 1298.00 = 0.55

If Ratio \geq 0.38 Then Points = 5, If Ratio $<$ 0.38 Then Points = 0
Points = 5

Evaluator Notes:

The inspection person days to total person days ratio was acceptable. Reviewed data submitted and database to assure numbers are accurate.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

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|---|--------------------------------------|--------------------------|---|
| a. Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Yes verified lead inspectors were qualified.
- b. Yes reviewed SABA and inspection reports to assure all DIMP leads are qualified.
- c. Several inspectors have completed the Root Cause Training course.
- d. One inspector took a Drug and Alcohol training course.
- e. Verified all lead inspectors were qualified to lead each type of inspection.

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

Evaluator Notes:

Yes, the program manager is knowledgeable of the PHMSA program and regulations.

- 4 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 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, letter was sent on January 30, 2018 and received response on March 27, 2018.

- 5 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, last seminar was on April 2016. Have one planned for October 2018.

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| 6 | 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 | 3 |
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Evaluator Notes:

The NCUC has not conducted OQ Program Evaluations and PAPEI within their established 5 year interval. PAPEI inspections were last conducted in 2012 and only about 7 (have 28 operators) OQ Program inspections have been conducted since 2011.

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| 7 | 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 Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

NCUC utilizes PHMSA forms to conduct inspections. Reviewed inspections to assure all applicable portions of form are being completed.

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| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1 Yes = 1 No = 0 | 1 | NA |
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Evaluator Notes:

There is no known cast iron pipeline in the state of North Carolina. NCUC still verifies with operators to assure no cast iron has been found.

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| 9 | Did the state review 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) (NTSB) Chapter 5.1 Yes = 1 No = 0 | 1 | NA |
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Evaluator Notes:

There is no known cast iron pipeline in the state of North Carolina. NCUC still verifies with operators to assure no cast iron has been found.

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| 10 | Did the state review 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? (NTSB) Chapter 5.1 Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, the question is on their inspection forms and is verified during inspections.

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| 11 | Did the state review 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? Chapter 5.1 Yes = 1 No = 0 | 1 | 1 |
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Evaluator Notes:

Yes, review incidents during inspections and during accident investigations to assure operator is responding appropriately.

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| 12 | 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 NCUC reviews annual reports and tracks the data to analyze from year to year.

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| 13 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission? Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, the NCUC verifies with operator during inspections to assure changes are updated in NPMS database. Question is on the Transmission inspection form.

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| 14 | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199 Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, the NCUC dedicated one inspector to conduct all D&A inspections for all operators in 2017.

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| 15 | 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 determined in the operators plan. 49 CFR 192 Part N Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
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Evaluator Notes:

There were no OQ program inspections conducted in 2017 due to not having enough inspectors qualified to conduct OQ Program inspections. OQ program inspections have exceeded the 5 year inspection interval as established in their procedures.

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| 16 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart 0 Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, the NCUC have conducted IMP inspections to monitor operator programs and remedial actions.

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|----|--|---|---|
| 17 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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Evaluator Notes:

Yes, the NCUC have conducted DIMP inspections to monitor operator programs and remedial actions.

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| 18 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616 Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|----|---|---|---|

Evaluator Notes:

The NCUC has not conducted Public Awareness Program inspections since 2012. Even though they do complete the portion of Public Awareness in their inspection forms during standard inspections PAPEI should be conducted in accordance with their procedures. They are scheduled to perform all PAPEI inspections in 2018.

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| 19 | 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). Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, the NCUC website is available to public which has information available. All cases have docket numbers which can be viewed by the public.

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| 20 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, communicated with the Southern Region to assure the NCUC is following up on SRCR. There was no issue with follow up information submitted to the Southern Region. Only issue is that the NCUC does not keep any records of the SRCR. In the future, the NCUC should keep copies in their own files on every SRCR submitted along with follow up information on intrastate operators that are jurisdictional.

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|-----------|---|---|---|
| 21 | Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

The NCUC communicates with states during inspections, seminars, and meetings on the issue of plastic pipe and components defects. There is no record kept so instructed/suggested that the NCUC add the question to their inspection form or create a form to document all ADB and NTSB recommendation questions.

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| 22 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA? Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes, Steve Wood responds to surveys and requests by NAPSRS and PHMSA.

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| 23 | 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. No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

There was a waiver granted to Duke Energy(Docket E-2 Sub 1105) in 2017 which involved the reassessment of a transmission pipeline that was going to be purged and deactivated. The NCUC issued the waiver and granted Duke the exemption of performing the reassessment for a pipeline running from DEP's Asheville Power Plant to a pipeline operated by Public Service Company of North Carolina. The pipeline was purged and deactivated on October 11, 2017. Even though the pipeline is purged and deactivated, the NCUC must keep in mind that the pipeline is still a regulated pipeline and should still be inspected by the NCUC to assure it is in compliance with the regulations.

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| 24 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
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Evaluator Notes:

Yes, the NCUC attended the National NAPSRS meeting.

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- | | | | |
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| 25 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Discussed the rise in 3rd party hits per 1,000 tickets. The state met with city and excavators to discuss problem of rise in 3rd party hit due to the installation of fiber optics and Google lines. The city reduced the working days on the permits to not allow working on Sundays to encourage safer digging. There is also an upward trend on the total number or repaired leaks per 1,000 miles. An analysis should be conducted to verify the source of the increase.

The 2017 Performance Metrics are not on the PRIMIS website as of the date of the Evaluation.

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| 26 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data? No = 0 Yes = 1 | 1 | 1 |
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Evaluator Notes:

Discussed the total number of inspection days calculated by the SICT with Steve Wood. The number is higher than the previous years total number of inspection days and may have been due to assigning the wrong inspection interval for large operators. Steve Wood will work on getting more accurate numbers utilizing the SICT.

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| 27 | Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04 Needs Improvement = .5 No = 0 Yes = 1 | 1 | 1 |
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Evaluator Notes:

Discussed with the NCUC that the question applies to Gas Transmission operators and need to be asked of the operators. It was suggested that all ADP and NTSB recommendation questions be added to the inspections form or create a form to include the questions.

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|-----------|--|-----------|-----------|
| 28 | General Comments: Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

C.6-The NCUC has not conducted OQ Program Evaluations and PAPEI within their established 5 year interval. PAPEI inspections were last conducted in 2012 and only about 7 (have 28 operators) OQ Program inspections have been conducted since 2011.

C.15-There were no OQ program inspections conducted in 2017 due to not having enough inspectors qualified to conduct OQ Program inspections. OQ program inspections have exceeded the 5 year inspection interval as established in their procedures. The NCUC needs to conduct OQ Program Inspections to verify operators OQ Programs are up to date and in compliance with the regulations.

C.18-The NCUC has not conducted Public Awareness Program inspections since 2012. Even though the NCUC does complete the portion of Public Awareness in their inspection forms during standard inspections the NCUC still needs to conduct PAPEI. They are scheduled to perform all PAPEI inspections in 2018.

C.23-There was a waiver granted to Duke Energy(Docket E-2 1105) in 2017 which involved the reassessment of a transmission pipeline that was going to be purged and deactivated. The NCUC still needs to assure that the pipeline is being inspected in accordance with their procedures since it is still jurisdictional and not abandoned.

Total points scored for this section: 43
Total possible points for this section: 47

PART D - Compliance Activities

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | 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 = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Procedures regarding closing outstanding probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Yes the NCUC has procedures to identify steps to be taken from discovery to resolution of a probable violation. Section Q, R and S.

- a. Yes Section Q states that a company officer will be notified of non compliance issues.
- b. Yes, Section Q, R, and S has guidance for reviewing the progress of compliance files.
- c. Yes, Procedures state that the operator will receive compliance letter that give them the opportunity to correct or object to the NOPV. The NCUC conducts follow up inspections to close cases if necessary.

- | | | | |
|----------|--|---|---|
| 2 | 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 Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- a. Yes, reviewed inspection reports to assure compliance actions were sent to company officials.
- b. All probable violations were documented in reports and in compliance actions.
- c. Probable violations were resolved in accordance with procedures.
- d. NCUC routinely reviews progress of compliance actions.
- e. Yes the NCUC conducts post inspection briefing (exit interview) with operators within 30 days.
- f. Yes, the NCUC provides the operator with findings within 90 days. The NCUC needs to amend their procedure to include the 90 day requirement.

- | | | | |
|----------|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered? Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes, all probable violations found during inspections were issued compliance actions.

- | | | | |
|----------|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary. Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

Yes, compliance letter gives the operator a chance to respond to the NOPV and how to object and request a hearing.

- | | | | |
|----------|---|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) | 2 | 2 |
|----------|---|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the NCUC issued a civil penalty in 2017 and the program manager is familiar with the process. The NCUC should amend their procedures to include when a civil penalty should be considered. For example, repeat violations, violations which may have contributed to an incident, violations which cause a hazardous condition. This was an issue in 2016 but the NCUC did not receive our letter until after procedures were amended in the end of 2017.

| | | | |
|---|--|---|---|
| 6 | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations? | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes, the NCUC issued a civil penalty to an operator for not being in compliance with the IMP regulations.

| | | | |
|---|-------------------|-----------|-----------|
| 7 | General Comments: | Info Only | Info Only |
|---|-------------------|-----------|-----------|

Info Only = No Points

Evaluator Notes:

D.5-Yes, the NCUC issued a civil penalty in 2017 and the program manager is familiar with the process. The NCUC should amend their procedures to include when a civil penalty should be considered. For example, repeat violations, violations which may have contributed to an incident, violations which cause a hazardous condition. This was an issue in 2016 but the NCUC did not receive our letter until after procedures were amended in the end of 2017.

D.2(f) The NCUC needs to amend their procedure to include 90 day requirement for notifying operator of written preliminary findings.

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



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, Procedures in Section VI address the actions taken by the NCUC in an event of an incident/accident.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2
Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes, the NCUC have an adequate mechanism to receive and respond to incidents. The state keeps records of incidents received.

- a. Yes the NCUC is aware of the MOU between NTSB and PHMSA.
b. Yes the NCUC is aware of federal/state cooperation in case of an incident.

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The NCUC conducted an on site investigation on all reportable incidents.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 3
Yes = 3 No = 0 Needs Improvement = 1-2
a. Observations and document review Yes ☒ No ☐ Needs Improvement ☐
b. Contributing Factors Yes ☒ No ☐ Needs Improvement ☐
c. Recommendations to prevent recurrences when appropriate Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

Yes all incidents were thoroughly investigated and documented. There is one incident that is still open and still under review for non-compliance.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1
Yes = 1 No = 0

Evaluator Notes:

There is one incident investigation that is still ongoing that may initiate a compliance action. (NRC 20170097)

- 6 Did the 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? (validate report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There was no assistance with incidents requested by PHMSA in 2017.

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: 1 1
at NAPS SR Region meetings, state seminars, etc)
Yes = 1 No = 0

Evaluator Notes:

Yes, share lessons learned during the Regional NAPS SR Meeting and seminars.

- 8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

The NCUC is mainly complying with Part E of the Evaluation.

Total points scored for this section: 11
Total possible points for this section: 11



PART F - Damage Prevention

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Has the state reviewed 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? NTSB Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Directional boring is discussed during inspections but there is no documentation on the inspection form. There is no record kept so instructed/suggested that he NCUC add the question to their inspection form or create a form to document all ADB and NTSB recommendation questions.

- | | | | |
|---|--|---|---|
| 2 | Did the state inspector verify pipeline operators are following their written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, the inspector reviews the operators one call procedures and how they handle notifications and marking of pipelines.

- | | | | |
|---|--|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.) Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, attend UCC meetings and promote April is damage prevention month. Governor signed proclamation for dig safely month.

- | | | | |
|---|--|---|---|
| 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? (This can include DIRT and other data shared and reviewed by the pipeline safety program) Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Use annual reports to gather data to analyze and trend. Also the N. Carolina 811 website publishes the Supermega spreadsheet from 811 which has data analysis of number of hits.

- | | | | |
|---|--|-----------|-----------|
| 5 | General Comments: Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

F.1-There is no record kept of question being asked during standard inspections so instructed/suggested that he NCUC add the question to their inspection form or create a form to document all ADB and NTSB recommendation questions.

Total points scored for this section: 8
Total possible points for this section: 8

PART G - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only
Info Only = No Points

Name of Operator Inspected:

Piedmont Natural Gas

Name of State Inspector(s) Observed:

Brooks Tate- Lead Inspector

Location of Inspection:

Goldsboro, NC

Date of Inspection:

April 26, 2018

Name of PHMSA Representative:

Agustin Lopez

Evaluator Notes:

Evaluated Mr. Brooks Tate conduct an inspection on Piedmont Natural Gas transmission pipeline. Brooks was very professional and opened up the inspection with an introduction. He reviewed records and performed a field inspection of the pipeline facilities.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, operator was notified with enough time to have representatives present.

- 3 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:

Yes, inspector used the PHMSA Form as a guide/checklist during the inspection.

- 4 Did the inspector thoroughly document results of the inspection? 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the form was used to document the results of the inspection.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) 1 1
Yes = 1 No = 0

Evaluator Notes:

Yes, the operator operated valves and checked CP with the appropriate equipment.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) 2 2
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures ☒

b. Records ☒

c. Field Activities ☒

d. Other (please comment) ☒

Evaluator Notes:

Brooks Tate reviewed records and specific procedures of Piedmont's 161 transmission pipeline. The review included the following records; patrolling, cp, leak surveys, maop records, valve maintenance, etc.

- | | | | |
|---|---|---|---|
| 7 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, Mr. Brooks Tate has been with the NCUC since 2016 and is very knowledgeable of the pipeline safety rules and regulations. For only being an inspector for about 2 years he performed an excellent inspection. He has industry experience that helps him excel as an inspector.

- | | | | |
|---|---|---|---|
| 8 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Yes, the inspector conducted an exit briefing with the operator to notify them of any issues and summarize the inspection.

- | | | | |
|---|---|---|---|
| 9 | During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

The inspector closed the inspection with the operator which did not identify any probable violations. There were some items that the inspector requested to complete the inspection.

- | | | | |
|----|---|-----------|-----------|
| 10 | General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other. Info Only = No Points | Info Only | Info Only |
|----|---|-----------|-----------|

- | | | |
|----|-----------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input checked="" type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input checked="" type="checkbox"/> |
| f. | Casings | <input checked="" type="checkbox"/> |
| g. | Cathodic Protection | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input checked="" type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input checked="" type="checkbox"/> |
| m. | Line Markers | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials | <input checked="" type="checkbox"/> |
| o. | Leak Surveys | <input checked="" type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input checked="" type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input type="checkbox"/> |
| t. | Navigable Waterway Crossings | <input checked="" type="checkbox"/> |
| u. | Odorization | <input type="checkbox"/> |
| v. | Overpressure Safety Devices | <input checked="" type="checkbox"/> |
| w. | Plastic Pipe Installation | <input type="checkbox"/> |
| x. | Public Education | <input type="checkbox"/> |
| y. | Purging | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. | Repairs | <input type="checkbox"/> |
| B. | Signs | <input checked="" type="checkbox"/> |

- | | | |
|----|-----------------------------|-------------------------------------|
| C. | Tapping | <input type="checkbox"/> |
| D. | Valve Maintenance | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance | <input type="checkbox"/> |
| F. | Welding | <input type="checkbox"/> |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input checked="" type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

Mr. Brooks Tate performed and excellent job for only being with the NCUC for a short period of time. He identified issues during the records review that needed clarification and handled himself very professionally. He performed a field inspection of the pipeline and facilities and was very observant in the field. He is a great asset to the NCUC.

Total points scored for this section: 12
Total possible points for this section: 12



PART H - Interstate Agent State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|--|---|----|
| 1 | Did the state use the current federal inspection form(s)? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The NCUC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The NCUC is not an interstate agent.

- | | | | |
|----------|--|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The NCUC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 4 | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The NCUC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The NCUC is not an interstate agent.

- | | | | |
|----------|--|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The NCUC is not an interstate agent.

- | | | | |
|----------|---|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The NCUC is not an interstate agent.

- | | | | |
|----------|--|-----------|-----------|
| 8 | General Comments: Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

The NCUC is not an interstate agent.

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

PART I - 60106 Agreement State (If Applicable)**Points(MAX) Score**

- | | | | |
|----------|--|---|----|
| 1 | Did the state use the current federal inspection form(s)? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The NCUC does not have a 60106 Certification.

- | | | | |
|----------|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The NCUC does not have a 60106 Certification.

- | | | | |
|----------|---|---|----|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The NCUC does not have a 60106 Certification.

- | | | | |
|----------|---|---|----|
| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

The NCUC does not have a 60106 Certification.

- | | | | |
|----------|--|---|----|
| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The NCUC does not have a 60106 Certification.

- | | | | |
|----------|--|---|----|
| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

The NCUC does not have a 60106 Certification.

- | | | | |
|----------|--|-----------|-----------|
| 7 | General Comments: Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

The NCUC does not have a 60106 Certification.

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