



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2010 Natural Gas State Program Evaluation

for

COLORADO PUBLIC UTILITIES COMMISSION

## Document Legend

### PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Natural Gas State Program Evaluation -- CY 2010  
Natural Gas

**State Agency:** Colorado

**Agency Status:**

**Date of Visit:** 07/12/2011 - 07/14/2011

**Agency Representative:** Steve Pott, Program Manager

**PHMSA Representative:** Rex Evans

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

**Name/Title:** Joshua Epel, Chairman

**Agency:** Colorado Public Utilities Commission

**Address:** 1560 Broadway, Suite 250

**City/State/Zip:** Denver, CO 80202

**Rating:**

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

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**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 2010 (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 certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

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**Field Inspection (PART F):**

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 F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

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**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	25	25
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	11	11
G	PHMSA Initiatives - Strategic Plan	10	9
H	Miscellaneous	3	3
I	Program Initiatives	9	6

**TOTALS**

**100                      96**

**State Rating .....**

**96.0**

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## PART A - General Program Qualifications

Points(MAX) Score

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>1</b> | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each<br>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8                                   | 8 |
| a.       | State Jurisdiction and agent status over gas facilities (1)  | <input checked="" type="checkbox"/> |   |
| b.       | Total state inspection activity (2)  | <input checked="" type="checkbox"/> |   |
| c.       | Gas facilities subject to state safety jurisdiction (3)  | <input checked="" type="checkbox"/> |   |
| d.       | Gas pipeline incidents (4)   | <input checked="" type="checkbox"/> |   |
| e.       | State compliance actions (5)   | <input checked="" type="checkbox"/> |   |
| f.       | State record maintenance and reporting (6)   | <input checked="" type="checkbox"/> |   |
| g.       | State employees directly involved in the gas pipeline safety program (7)   | <input checked="" type="checkbox"/> |   |
| h.       | State compliance with Federal requirements (8)   | <input checked="" type="checkbox"/> |   |

### SLR Notes:

Data reviewed appears to be correct in all categories. State should double check

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

24/7 reporting. Phone system set up to forward to staff blackberry after hours

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Last held March 2010

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

### SLR Notes:

Improvement made in this issue versus previous year. All central files appeared complete, should make sure it's clear on where files are kept to all staff.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

No issues

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Response dated November 9

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Files organized as requested. Actions appear to have addressed issues. Staffing issue will be continued

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## Personnel and Qualifications

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10<br>Yes = 3 No = 0 | 3 | 3 |
|----------|--|---|---|

SLR Notes:

No issues

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- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>9</b> | Brief Description of Non-TQ training Activities:<br>Info Only = No Points<br><br>For State Personnel:<br>All staff went to welding course in CY2010<br><br>For Operators:<br><br><br>For Non-Operator Entities/Parties, Information Dissemination, Public Meetings: | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

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- |           |   |   |   |
|-----------|---|---|---|
| <b>10</b> | Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

SLR Notes:

No issues during transcript review

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- |           |  |   |   |
|-----------|--|---|---|
| <b>11</b> | Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Mark Schumann who was lead recently left. Steve Pott will need to finish curriculum and recommend others take necessary training. Steve needs to see if IM protocol test needs to be taken, along with finishing others needed. Provided information on remaining courses needed.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>12</b> | Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12<br>Yes = 5 No = 0<br><br>A. Total Inspection Person Days (Attachment 2):<br>370.10<br><br>B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):<br>220 X 3.50 = 770.00<br><br>Ratio: A / B<br>370.10 / 770.00 = 0.48<br><br>If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0<br>Points = 5 | 5 | 5 |
|-----------|--|---|---|

SLR Notes:

Met ratio. Explained did not meet person-days on certification which is at 4.5. They just lost an inspector and will need to hire as soon as possible.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>13</b> | Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Question B.13<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

SLR Notes:

see previous notes

**14** Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 26

Total possible points for this section: 26



## PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

### Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG 6.5 6.5  
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- |   |   |                                      |                          |   |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5)    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5)                      | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5)                   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5)           | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5)            | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1)     | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1)                 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

procedures revised recently

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2  
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- |   |  |                                      |                          |   |
|---|--|--------------------------------------|--------------------------|---|
| a | Length of time since last inspection   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc)                               | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Scheduling database takes care of this. Recommend note in procedures manual.

### Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2  
Yes = 2 No = 0

SLR Notes:

No issues found during file review.

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 1  
Yes = 1 No = 0

SLR Notes:

All requirements appear to be covered. Federal form used as base

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1  
Yes = 1 No = 0

SLR Notes:

No issues

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 .5 .5  
Yes = .5 No = 0

SLR Notes:

<b>7</b>	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) Previous Question B.7 Yes = .5 No = 0	.5	.5
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SLR Notes:

No issues

<b>8</b>	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) Previous Question B.8 Yes = .5 No = 0	.5	.5
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SLR Notes:

No issues

<b>9</b>	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) Previous Question B.9 Yes = .5 No = 0	.5	.5
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SLR Notes:

should be on checklist for verification

<b>10</b>	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? (NTSB) Previous Question B.10 Yes = 1 No = 0	1	1
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SLR Notes:

## Compliance - 60105(a) States

<b>11</b>	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Process greatly improved. No issues

<b>12</b>	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Steps are outlined in their procedures

<b>13</b>	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

no issues

<b>14</b>	Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

no issues, database helps assist

15	Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4	1	1
	Yes = 1 No = 0		

SLR Notes:

Yes, has issues with town of Walden and Xcel, both issued compliance actions

16	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

no issues

17	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6	1	1
	No = 0 Yes = 1		

SLR Notes:

opportunity for show cause was presented to operators, they chose to pay fine

18	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

Documentation appeared to be complete

19	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8	.5	.5
	Yes = .5 No = 0		

SLR Notes:

20	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

No issues

## Compliance - 60106(a) States

21	Did the state use the current federal inspection form(s)? Previous Question D(2).1	1	NA
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

22	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2	1	NA
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

23	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.) Previous Question D(2).3	1	NA
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:



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24	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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25	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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26	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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27	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) Info Only = No Points	Info Only	Info Only
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SLR Notes:

Civil penalties issued in two cases mentioned previously.

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28	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

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Total points scored for this section: 25  
Total possible points for this section: 25



## PART C - Interstate Agent States

Points(MAX) Score

- |          |   |   |    |
|----------|---|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? Previous Question D(3).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

SLR Notes:

- |          |  |   |    |
|----------|--|---|----|
| <b>2</b> | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

- |          |  |   |    |
|----------|--|---|----|
| <b>3</b> | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | 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.) Previous Question D(3).4<br>Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

- |          |  |   |    |
|----------|--|---|----|
| <b>6</b> | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

- |          |  |   |    |
|----------|--|---|----|
| <b>7</b> | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part C: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

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

## PART D - Incident Investigations

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2<br>Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state keep adequate records of incident notifications received? Previous Question E.3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

They have database, no issues

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Incident file kept information on all reportable, most recinded.

- |          |   |                                      |                          |   |
|----------|---|--------------------------------------|--------------------------|---|
| <b>5</b> | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total<br>Yes = 2 No = 0 Needs Improvement = 1 | 2                                    | 2                        |   |
| a.       | Observations and Document Review  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b.       | Contributing Factors  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c.       | Recommendations to prevent recurrences where appropriate  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Investigations appeared to be thoroughly documented and conclusions acceptable.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, town of Walden and Xcel, on separate incidents.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

No issues. Reviewed Pipeline Data Mart access to information.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part D: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 7  
Total possible points for this section: 7



## PART E - Damage Prevention Initiatives

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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? Previous Question B.11<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

on operator checklist for review. no issues

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Part of standard inspection

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Promotes at seminars, with UNCC, on inspection form. Very active in this partnership.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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? New 2008<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Modified state rules to make this mandatory reporting by operators.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

will be using UNCC reports

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part E: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

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

## PART F - Field Inspection

Points(MAX) Score

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

Name of Operator Inspected:

Xcel Energy

Name of State Inspector(s) Observed:

Fred Johnson, Joe Malloy

Location of Inspection:

Denver

Date of Inspection:

July 14, 2011

Name of PHMSA Representative:

Rex Evans

SLR Notes:

- 
- 2** Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 1 1  
Yes = 1 No = 0

SLR Notes:

No issues

- 
- 3** Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 2 2  
Yes = 2 No = 0

SLR Notes:

No issues

- 
- 4** Did the inspector thoroughly document results of the inspection? Previous Question F.3 2 2  
Yes = 2 No = 0

SLR Notes:

Yes, Fred was thorough in his observations

- 
- 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.) New 2008 1 1  
Yes = 1 No = 0

SLR Notes:

No issues

- 
- 6** What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only Info Only  
Info Only = No Points

SLR Notes:

This was a construction inspection - main replacement.

- 
- 7** Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2  
Yes = 2 No = 0 Needs Improvement = 1

a. Procedures

☒

b. Records

☒

c. Field Activities/Facilities

☒

d. Other (Please Comment)

☐

SLR Notes:

Fred was thorough. Procedures were reviewed along with OQ status of employees conducting covered tasks

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 | 2 | 2 |
|          | Yes = 2 No = 0  |   |   |

SLR Notes:

No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>9</b> | 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) Previous Question F.10 | 1 | 1 |
|          | Yes = 1 No = 0   |   |   |

SLR Notes:

No issues, this is an on going project. Issues were discussed at time of inspection. Discussion occurred about proper scraping of high density pipe

- |           |  |   |    |
|-----------|--|---|----|
| <b>10</b> | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 | 1 | NA |
|           | Yes = 1 No = 0   |   |    |

SLR Notes:

n/a

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>11</b> | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) | Info Only | Info Only |
|           | Info Only = No Points  |           |           |

SLR Notes:

See previous. Main and service line replacement of cast iron.

- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>12</b> | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) | Info Only | Info Only |
|           | Info Only = No Points   |           |           |

SLR Notes:

- |           |   |                                     |           |
|-----------|---|-------------------------------------|-----------|
| <b>13</b> | Field Observation Areas Observed (check all that apply) | Info Only                           | Info Only |
|           | Info Only = No Points                                   |                                     |           |
|           | a. Abandonment  | <input type="checkbox"/>            |           |
|           | b. Abnormal Operations                                  | <input type="checkbox"/>            |           |
|           | c. Break-Out Tanks                                      | <input type="checkbox"/>            |           |
|           | d. Compressor or Pump Stations                          | <input type="checkbox"/>            |           |
|           | e. Change in Class Location                             | <input type="checkbox"/>            |           |
|           | f. Casings  | <input type="checkbox"/>            |           |
|           | g. Cathodic Protection                                  | <input type="checkbox"/>            |           |
|           | h. Cast-iron Replacement                                | <input type="checkbox"/>            |           |
|           | i. Damage Prevention                                    | <input type="checkbox"/>            |           |
|           | j. Deactivation   | <input type="checkbox"/>            |           |
|           | k. Emergency Procedures                                 | <input type="checkbox"/>            |           |
|           | l. Inspection of Right-of-Way                           | <input type="checkbox"/>            |           |
|           | m. Line Markers   | <input type="checkbox"/>            |           |
|           | n. Liaison with Public Officials                        | <input type="checkbox"/>            |           |
|           | o. Leak Surveys   | <input type="checkbox"/>            |           |
|           | p. MOP  | <input type="checkbox"/>            |           |
|           | q. MAOP   | <input type="checkbox"/>            |           |
|           | r. Moving Pipe  | <input type="checkbox"/>            |           |
|           | s. New Construction                                     | <input checked="" type="checkbox"/> |           |
|           | t. Navigable Waterway Crossings                         | <input type="checkbox"/>            |           |

- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| u. | Odorization                       | <input type="checkbox"/>            |
| v. | Overpressure Safety Devices       | <input type="checkbox"/>            |
| w. | Plastic Pipe Installation         | <input checked="" 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 type="checkbox"/>            |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input type="checkbox"/>            |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |
| F. | Welding                           | <input type="checkbox"/>            |
| G. | OQ - Operator Qualification       | <input type="checkbox"/>            |
| H. | Compliance Follow-up              | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion             | <input type="checkbox"/>            |
| J. | Other                             | <input type="checkbox"/>            |

SLR Notes:

---

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

No issues found during field inspection. Activities viewed appeared to be thorough and thoughtful

---

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





## PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

### Risk base Inspections - Targeting High Risk Areas

- |          |   |     |     |
|----------|---|-----|-----|
| <b>1</b> | Does state have process to identify high risk inspection units?<br>Yes = 1.5 No = 0 | 1.5 | 1.5 |
|----------|---|-----|-----|

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

SLR Notes:

GPS database indicates scheduling factors which identifies high risk inspection units. Recommend referencing GPS database factors in Procedures.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | Are inspection units broken down appropriately? (see definitions in Guidelines)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

No issues

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>3</b> | Consideration of operators DIMP Plan? (if available and pending rulemaking)<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

SLR Notes:

Pending.

- |          |  |    |     |
|----------|--|----|-----|
| <b>4</b> | Does state inspection process target high risk areas?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, weights given to Denver metro area which has replacement projects ongoing

### Use of Data to Help Drive Program Priority and Inspections

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

with SDP Grant using UNCC research of database.

- |          |   |    |     |
|----------|---|----|-----|
| <b>6</b> | Has state reviewed data on Operator Annual reports for accuracy?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, information is loaded into state database for analysis

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Has state analyzed annual report data for trends and operator issues?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, see previous.

- |          |   |    |     |
|----------|---|----|-----|
| <b>8</b> | Has state reviewed data on Incident/Accident reports for accuracy?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, as they come in. Sent information to help navigate Pipeline Data Mart

<b>9</b>	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

Yes, development in process of annual report card, and county report card.

<b>10</b>	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15	.5	0
	Yes = .5 No = 0		

**SLR Notes:**

They need Element 9 inspections uploaded into database, none done for some time. Also recommend doing HQ evaluations on OQ programs since last completed over 6 years ago.

<b>11</b>	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

no issues, very rare

<b>12</b>	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0
	Yes = .5 No = 0		

**SLR Notes:**

No. They need to evaluate entire IM program for all operators. Referred Steve to information provided at NAPSRS Region meeting. Also reviewed information available on IMDB database and access options.

<b>13</b>	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? Previous Question B.18	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

Yes on checklist. State has communicated with TQ on 12" stopple fitting issue recently discovered with operator.

<b>14</b>	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

no issue

## Accident/Incident Investigation Learning and Sharing Lessons Learned

<b>15</b>	Has state shared lessons learned from incidents/accidents? (i.e. NAPSRS meetings and communications)	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

NAPSRS Region meeting communications. No issues

<b>16</b>	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
	Yes = .5 No = 0		

**SLR Notes:**

state database takes information. No issues

<b>17</b>	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
	Info Only = No Points		

**SLR Notes:**

<b>18</b>	Does state conduct root cause analysis on incidents/accidents in state?	Info Only	Info Only
-----------	---	-----------	-----------



## SLR Notes:

- 
- |           |  |    |     |
|-----------|--|----|-----|
| <b>19</b> | Has state participated on root cause analysis training? (can also be on wait list) | .5 | 0.5 |
|           | Yes = .5 No = 0  |    |     |

## SLR Notes:

---

## Transparency - Communication with Stakeholders

- |           |  |    |     |
|-----------|--|----|-----|
| <b>20</b> | Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.) | .5 | 0.5 |
|           | Yes = .5 No = 0  |    |     |

## SLR Notes:

Steve forwards various communications to industry via emails. DORA website

---

- |           |  |    |     |
|-----------|--|----|-----|
| <b>21</b> | Does state share enforcement data with public? (Website, newsletters, docket access, etc.) | .5 | 0.5 |
|           | Yes = .5 No = 0  |    |     |

## SLR Notes:

Yes, DORA website

---

- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>22</b> | Part G: General Comments/Regional Observations | Info Only | Info Only |
|           | Info Only = No Points                          |           |           |

## SLR Notes:

With resignation of Mark Schumann, many OQ and IMP efforts were placed on him. Time will need to be taken to backfill and ensure these efforts are continued and necessary information is uploaded into databases. I reviewed these processes with Steve.

---

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



## PART H - Miscellaneous

Points(MAX) Score

- |          |  |    |     |
|----------|--|----|-----|
| <b>1</b> | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPS Activities and Participation, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Databae redesign, website updated with link to mapping, gathering rule and rule updates. GPS database enhancements.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

making effort to enhance Master Meter and LPG operator training. REcommended seeking assistance from other states on how to handle these operators

- |          |  |    |     |
|----------|--|----|-----|
| <b>3</b> | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects,bare steel,third-party damage reductions, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

continual cast iron replacement in Denver

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Did the state participate in/respond to surveys or information requests from NAPS or PHMSA?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

no issues

- |          |   |    |     |
|----------|---|----|-----|
| <b>5</b> | Sharing Best Practices with Other States - (General Program)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Shares annually at region meeting. Reviewed meeting agenda

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part H: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

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

## PART I - Program Initiatives

Points(MAX) Score

### Drug and Alcohol Testing (49 CFR Part 199)

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Has the state verified that operators have drug and alcohol testing programs?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

yes, on inspection forms. Recommend review of any current inspection forms made available on PHMSA website.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

- |          |   |    |     |
|----------|---|----|-----|
| <b>3</b> | Is the state verifying that any positive tests are responded to in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

### Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

no issues, but recommend review and possible reevaluation of full program

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

see previous notes. No issues currently

- |          |  |    |     |
|----------|--|----|-----|
| <b>6</b> | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

no issues, again recommend full program reviews

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

no issues at present

### Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?<br>Yes = 1 No = 0 | 1 | 0 |
|----------|--|---|---|

SLR Notes:

No inspection results uploaded. Mark Schumann who was IM lead, resigned. They need to do a complete review on where they stand on IM inspections. Recommended Steve review information provided at NAPSIR region meeting as to expectations. only work done has been on XCel energy

- |          |  |    |   |
|----------|--|----|---|
| <b>9</b> | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?<br>Yes = .5 No = 0 | .5 | 0 |
|----------|--|----|---|

SLR Notes:

see previous.

- 
- |           |   |    |   |
|-----------|---|----|---|
| <b>10</b> | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)<br>Yes = .5 No = 0 | .5 | 0 |
|-----------|---|----|---|

SLR Notes:

See previous I8

- 
- |           |  |    |   |
|-----------|--|----|---|
| <b>11</b> | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP?<br>Yes = .5 No = 0 | .5 | 0 |
|-----------|--|----|---|

SLR Notes:

see previous I8

- 
- |           |  |    |   |
|-----------|--|----|---|
| <b>12</b> | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?<br>Yes = .5 No = 0 | .5 | 0 |
|-----------|--|----|---|

SLR Notes:

see I8

---

## Public Awareness (49 CFR Section 192.616)

- |           |  |    |     |
|-----------|--|----|-----|
| <b>13</b> | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters)<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

no issues at present. They will start using recently provided PA protocols

- 
- |           |  |    |     |
|-----------|--|----|-----|
| <b>14</b> | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

no issues at present. They will start using recently provided PA protocols

- 
- |           |  |    |     |
|-----------|--|----|-----|
| <b>15</b> | Is the state verifying that operators are conducting the public awareness activities called for in its program?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

no issues at present. They will start using recently provided PA protocols. They actively review PA activities.

- 
- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>16</b> | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

- 
- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>17</b> | Part I: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Close review and emphasis needs to be placed on IM programs and operators compliance with them.

---

Total points scored for this section: 6  
Total possible points for this section: 9