



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas State Program Evaluation

for

GEORGIA PUBLIC SERVICE 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



2009 Natural Gas State Program Evaluation -- CY 2009
Natural Gas

State Agency: Georgia

Agency Status:

Date of Visit: 04/24/2010 - 04/28/2010

Agency Representative: Bruce Morgan, Facilities Protection Unit Supervisor

PHMSA Representative: Dale Bennett, State Evaluator

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

Name/Title: Lauren McDonald, Chairman

Agency: Georgia Public Service Commission

Address: 244 Washington Street, SW

City/State/Zip: Atlanta, Georgia 30334

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 2009 (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.

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.

Scoring Summary

PARTS

Possible Points Points Scored

A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	31	31
C	Interstate Agent States	7	7
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	10	10
H	Miscellaneous	3	3
I	Program Initiatives	9	9

114 114

TOTALS

State Rating 100.0

PART A - General Program Qualifications

Points(MAX) Score

- | | | | |
|----------|--|-------------------------------------|---|
| 1 | 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
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:

No errors were found in the GPSC'S certification attachment. All information was supported with documentation.

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| 2 | 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
Yes = 1 No = 0 | 1 | 1 |
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SLR Notes:

Operators must telephonically report incidents to the GPSC. Reported incidents are logged into the electronic database maintained by the GPSC. The damage reporting level is \$5000.00. All other requirement are the same as the federal requirements.

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| 3 | 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
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

The GPSC holds a pipeline safety seminar annually that involves PHMSA'S Training and Qualification instructors. The last seminar was held in April of 2010.

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

SLR Notes:

The GPSC maintains a database that contains electronic copies of all inspections. The hard copy files of various records and documents were organized in file cabinets that are protected by a security intrusion alarm for the facilities protection office area.

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| 5 | 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes. Danny McGriff, Facilities Protection Director, has been involved in pipeline regulation and a state pipeline safety program manager for some time. Danny is very knowledgeable on the requirements contained in the Guidelines and the pipeline safety regulations

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| 6 | 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
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

No items were highlighted in the Chairman's letter that required a response.

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| 7 | 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 | 1 | 1 |
|----------|--|---|---|

Yes = 1 No = 0

SLR Notes:

There were actions required related to issues raised in the Chairman's letter.

Personnel and Qualifications

- | | | | |
|----------|--|---|---|
| 8 | 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 | 3 | 3 |
|----------|--|---|---|

Yes = 3 No = 0

SLR Notes:

Yes. The GPSC inspectors have either met the 3 year training requirement or are making adequate progress in meeting the requirements.

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- | | | | |
|----------|--|-----------|-----------|
| 9 | Brief Description of Non-TQ training Activities: | Info Only | Info Only |
|----------|--|-----------|-----------|

Info Only = No Points

For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

SLR Notes:

The GPSC staff was not able to attend training other than T and Q

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- | | | | |
|-----------|---|---|---|
| 10 | 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 | 1 | 1 |
|-----------|---|---|---|

Yes = 1 No = 0

SLR Notes:

The OQ training shown on the 2010 Certification and the OQ database were reviewed. It appears that all OQ inspections contained in the database were conducted by inspectors that completed the 299 Course listed on the 2010 Certification. Training and Qualification records for attendance or completion of the 299 course should be reviewed.

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| 11 | 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 | 1 | 1 |
|-----------|--|---|---|

Yes = 1 No = 0

SLR Notes:

The Office of Training and Qualifications records provided in January, 2009 indicated that the GPSC did not have anyone qualified to lead an IMP inspection. Some inspectors had completed three of the required courses but not the in line inspection course. The in line inspection course by the affected inspectors has now been completed.

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- | | | | |
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| 12 | 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 | 5 | 5 |
|-----------|---|---|---|

Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

1009.00

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

220 X 8.00 = 1760.00

Ratio: A / B

1009.00 / 1760.00 = 0.57

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0

Points = 5

SLR Notes:

Yes. The GPSC's 2010 Certification showed 1009 inspection person days spent inspecting operators during 2009. The GPSC had assigned staff to the program that equated to 8.00 Inspection Person Years which resulted in 1558.3 inspection person days assigned to the program. The resulting ratio of inspection person days spent to inspection person days assigned was .87 which exceeded the minimum of .38.

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

SLR Notes:
There have been no changes to pipeline safety inspectors. The GPSC has included its Georgia Underground Facilities Protection Act employees in its pipeline safety program as indicated by its 2010 Certification.

14 Part-A General Comments/Regional Observations Info Only Info Only
Info Only = No Points

SLR Notes:
There were no issues or concerns that prevented the GPSC from being the full amount of possibel points in Part A of this evaluation

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:

The GPSC published a written inspection plan?

- 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:

The GPSC considers the four concerns a through d. The GPSC also considers the following concerns: a. ration of coated steel main mileage to total steel main mileage; b. ratio of cathodically protected steel mains mileage to total steel main mileage; c. leaks per mile of pipeline; d. unaccounted for volumes and percentages; e. incident or facility failure history; f. cast iron main footage; g. compliance history of the operator.

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:

The GPSC's written procedures do not require that operators and units be inspected on time defined frequency. The GPSC reviews the risks associated with each operator and unit based upon predetermined risk criteria.

- 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:

The GPSC's form uses the PHMSA Inspection Forms revised for the addition of more stringent requirements in the GPSC's rules. Upon a review of randomly selected inspections, the latest revision date form was used for the inspection.

- 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:

Upon a review of randomly selected 2009 inspection reports, all inspection forms contained in the inspection report files were completed appropriately

- 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:

There were no safety related condition reports filed by operators in Georgia during 2009.

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|----------|---|-----------------|----|
| 7 | 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 | .5 | .5 |
| | | Yes = .5 No = 0 | |

SLR Notes:

The GPSC pipeline safety rules require operators to examine cast iron mains that have been exposed. If graphitization is found, the pipeline effected segment must be replaced.

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|----------|--|-----------------|----|
| 8 | 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 | .5 | .5 |
| | | Yes = .5 No = 0 | |

SLR Notes:

Yes. This issue is addressed during each standard inspection conducted by the GPSC. The GPSC reviews leak repair records during its standard inspection. Leak repair records for cast iron pipe are reviewed. The GPSC requires operators to track leak history on cast iron mains.

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| 9 | 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 | .5 | .5 |
| | | Yes = .5 No = 0 | |

SLR Notes:

Yes. This issue is checked when the GPSC reviews operators' Operation and Maintenance Procedures. The GPSC also addresses this issue when reviewing operators' leak repair records during standard inspections.

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| 10 | 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 | 1 | 1 |
| | | Yes = 1 No = 0 | |

SLR Notes:

Yes. The GPSC reviews operators' records for incidents and failures during its standard inspection. The GPSC covers this issue when reviewing and completing the inspection form portion covering 192.617. The GPSC has a rule that operators must respond to reported incidents or failures within a given timeframe.

Compliance - 60105(a) States

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|-----------|---|---------------------------------------|---|
| 11 | Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 | 1 | 1 |
| | | Yes = 1 No = 0 Needs Improvement = .5 | |

SLR Notes:

Upon a review of randomly selected 2009 inspection reports, probable violations noted in the reports were well documented in the reports and inspection forms.

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|-----------|---|---------------------------------------|---|
| 12 | 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 | 1 | 1 |
| | | Yes = 1 No = 0 Needs Improvement = .5 | |

SLR Notes:

Yes. The GPSC's rules contain procedures that outline the steps that are taken after the discovery of a probable violation. Verbal and written communication is provided to the operators of the alleged probable violation(s). Operators are given the opportunity to respond to the written notification. Follow up steps are defined for the correction of probable violations and verification that correction has taken place. The GPSC or operator may request a "show cause hearing" to present their case and ask for a ruling from the Commission.

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| 13 | 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 | 1 | 1 |
| | | Yes = 1 No = 0 Needs Improvement = .5 | |

SLR Notes:

Yes. The GPSC's procedures state that operators must be provided with verbal communication prior to concluding the inspection and written notification of any probable violations following the conclusion of the inspection. These procedures are contained in the Commission's rules.

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|----|---|---|---|
| 14 | 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 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

The GPSC's rules require that operators respond to any written notification of probable violations within 30 days of receiving the notification. The GPSC's data base has a built in capability to identify unresolved probable violations. The GPSC's inspection reports document any previous unresolved probable violations so that progress can be documented.

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| 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:

Upon a review of randomly selected 2009 inspection reports, all reports that identified probable violations had written notification letters in the files.

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|----|---|---|---|
| 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:

Upon a review of randomly selected 2009 inspection reports, the GPSC had documentation of the follow up actions taken until corrections were verified. The GPSC's database tracks probable violations that have not been resolved

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| 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:

The GPSC did not have an occasion during 2009 that required a request to the Commission for a "show cause hearing".

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|----|---|---|---|
| 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:

Yes. All 2009 inspection reports that were reviewed had documentation indicating if a previous probable violation(s) reported to the operator had not been corrected.

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|----|---|----|----|
| 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:

Upon a random selection of 2009 inspection files, all compliance letters reviewed were addressed to a company officer or appropriate individual of a non-private operator.

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|----|--|---|---|
| 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:

The GPSC rules allow operators to respond to probable violations alleged by the GPSC. Operators can request "show cause hearings" before the Commissioners if they do not feel as though they received just determination by the GPSC.

Compliance - 60106(a) States

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

SLR Notes:

yes

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

SLR Notes:

yes

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

SLR Notes:

yes No probable violatins were referred to PHMSA

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

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

SLR Notes:

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

SLR Notes:

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|----|--|-----------|-----------|
| 27 | Part B: General Comments/Regional Observations | Info Only | Info Only |
|----|--|-----------|-----------|
- Info Only = No Points

SLR Notes:

There were no issues identified that resulted in the full amount of points not to be given in Part B.

Total points scored for this section: 31
Total possible points for this section: 31



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

The GPSC is not an interstate agent.

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

SLR Notes:

The GPSC is not an interstate agent.

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| 3 | 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
Yes = 1 No = 0 | 1 | 1 |
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SLR Notes:

The GPSC is not an interstate agent.

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| 4 | 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
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

The GPSC is not an interstate agent.

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

SLR Notes:

The GPSC is not an interstate agent.

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

SLR Notes:

The GPSC is not an interstate agent.

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

SLR Notes:

The GPSC is not an interstate agent.

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

SLR Notes:

The GPSC is not an interstate agent.

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

PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

Yes. The GPSC is aware of the requirements for cooperation in the event of an incident. The GPSC provided the Southern Region Office with its investigation progress during the incidents investigated during 2009.

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|----------|---|----|----|
| 2 | 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
Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

Yes. Both the Director and the Supervisor exhibited knowledge of the understandings outlined in the MOU between PHMSA and the NTSB

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

SLR Notes:

There were five reported gas distribution incidents during 2009. The incidents were documented in the GPSC's database

- | | | | |
|----------|--|---|---|
| 4 | 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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

There were five reportable incidents that occurred during 2009. The GPSC conducted an onsite investigation on two of the incidents. The other three incidents, caused by third party excavation, were investigated telephonically to obtain the necessary information. The incident report file appeared to have a sufficient amount of information to complete the incident report

- | | | | |
|----------|---|---|---|
| 5 | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total
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:

There were five reportable incidents that occurred in 2009. Incident reports were completed for the five incidents. The reports met expectations for the completion of an investigation report. The GPSC could improve its reports by providing recommendations to operators on actions that could prevent future incidents related to the cause determined in the report.

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

SLR Notes:

One of the five incident investigations resulted in probable violations being found. The GPSC issued a written notification to the operator for the failure to follow its written procedures. The GPSC followed up with the operator until corrections were initiated.

- | | | | |
|----------|--|----|-----|
| 7 | 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
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes. The GPSC provided follow up and recommendations on the closure of written incident reports. The information was very helpful in allowing the closure of several incident reports in PHMSA's ODES system.

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

SLR Notes:

The GPSC could improve its formal reports by providing recommendations to operators on actions that could prevent future incidents related to the cause determined in the report.

Total points scored for this section: 7

Total possible points for this section: 7



PART E - Damage Prevention Initiatives

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? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. The GPSC reviews operators' procedures each year. The GPSC reviews procedures related to 192.614, Damage Prevention. The GPSC covers this damage prevention issue when it reviews the procedures

- | | | | |
|----------|--|---|---|
| 2 | 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
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. The GPSC reviews office records that document operators' actions taken to comply with damage prevention programs required in 192.614.

- | | | | |
|----------|---|---|---|
| 3 | 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes. The GPSC strongly supports the incorporation of CGA Best Practices into operators' damage prevention programs. The GPSC has communicated a recommendation to operators that they should be incorporated.

- | | | | |
|----------|---|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes. The GPSC maintains data and trend charts related to damage of all underground utility facilities in addition to pipeline damages. The GPSC could improve this information by keeping data separated for pipeline damages.

- | | | | |
|----------|--|---|---|
| 5 | 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?
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. The GPSC reviews operators' records related to damages to pipelines as part of its standard inspection covering Part 192.617 failure investigation requirements. The GPSC strives to identify ways for operators to improve their procedures and processes to avoid similar incidents from occurring. The GPSC also notes improvements that might be incorporated into its program that enforces the GUFPA law.

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

SLR Notes:

The GPSC received the full amount points possible in Part E. The GPSC has been on the fore front of adopting practices and authority to enforce the damage prevention law in Georgia.

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:

Atmos Energy Inc

Name of State Inspector(s) Observed:

Lynn Buffington

Location of Inspection:

Columbus, Georgia

Date of Inspection:

5/26/2010

Name of PHMSA Representative:

Dale Bennett

SLR Notes:

The GPSC began a standard inspection of the operators' operation and maintenance activities. The inspection was in progress when the observation visit took place. The GPSC inspector was reviewing operator's overpressure protection, pressure recording, and valve inspection records. The inspection was planned to continue for another two days after the day of observation. After office records were completed, the inspector planned to observe test readings for odorant levels and cathodic protection before concluding the standard inspection.

- 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:

The operator representative stated he was contacted more than two weeks before the inspection began. The operator was contacted by Lynn buffington.

- 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:

Yes. The inspector used the GPSC form that it uses for standard inspections. It was the latest revision of the form. The GPSC developed its form by using the federal form as its base and added to it for requirements that are more stringent in the GPSC rules

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

SLR Notes:

Mr. Buffington placed check marks in the columns as to whether the results were satisfactory, unsatisfactory, not covered or not applicable. While being observed, there were no unsatisfactory items that were found.

- 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:

Test readings in the field were performed during the day of observation. Also, office records were reviewed.

- 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:

The GPSC inspector was conducting a standard inspection on the day of observation. The inspection had begun prior to the day of observation. On the day of observation, the GPSC inspector was reviewing valve inspection records, over pressure equipment testing records and inspection of equipment test readings in the field were conducted.

- 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 | <input checked="" type="checkbox"/> |
| d. | Other (Please Comment) | <input type="checkbox"/> |

SLR Notes:

During the day of observation, the inspection focused on procedures and field testing.

- | | | | |
|----------|---|---|---|
| 8 | 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:

Yes. The inspector exhibited a good understanding of the pipeline safety regulations for the areas he covered during the day of observation.

- | | | | |
|----------|--|---|---|
| 9 | 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:

The GPSC inspector provided the operator's representatives with a briefing of the inspection results for the day that the inspector was observed. Mr. Buffington stated he will give a complete briefing at the conclusion of his inspection.

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

SLR Notes:

Mr. Buffington did not conclude that there were any probable violations during the day of observation. The operator was asked to provide some additional information on a couple of issues. It will not be known that a probable violation occurred until the information is reviewed. Mr. Buffington did provide recommendations as a result of his inspection this day.

- | | | | |
|-----------|--|-----------|-----------|
| 11 | 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:

This standard inspection will take the GPSC inspector at least five days to complete. During the day of observation, the inspection was in its third day. The field portion was scheduled for a time that was past the day of observation.

- | | | | |
|-----------|---|-----------|-----------|
| 12 | 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:

There were no best practices identified that warranted sharing with others.

- | | | | |
|-----------|---|-------------------------------------|-----------|
| 13 | 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 checked="" 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 checked="" type="checkbox"/> | |
| m. | Line Markers | <input checked="" type="checkbox"/> | |
| n. | Liaison with Public Officials | <input type="checkbox"/> | |
| o. | Leak Surveys | <input 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 type="checkbox"/>
u.	Odorization	<input checked="" 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"/>

SLR Notes:

One observation day is not long enough to observe a complete standard inspection of an operator the size of Columbus.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

The operator inspected is a private gas system operator that has over 30,000 service lines. A standard inspection for an operator this size takes five or more days to complete. The observation during this evaluation was one day toward the middle of the inspection. All inspection activities were not able to be reviewed.

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



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

- 1** Does state have process to identify high risk inspection units? 1.5 1.5
Yes = 1.5 No = 0

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:

The GPSC considers the four concerns A through D. The GPSC also considers the following concerns: a. ratio of coated steel main mileage to total steel main mileage; b. ratio of cathodically protected steel mains mileage to total steel main mileage; c. leaks per mile of pipeline; d. unaccounted for volumes and percentages; e. incident or facility failure history; f. cast iron main footage; g. compliance history of the operator.

- 2** Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes. The GPSC's inspection units were defined over the years of regulating pipeline safety. The GPSC used the methodology described in the Guidelines. A majority of the inspection units in Georgia are municipal operators with one distinct inspection unit.

- 3** Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only
Info Only = No Points

SLR Notes:

The DIMP rule is not final at the time of this evaluation.

- 4** Does state inspection process target high risk areas? .5 0.5
Yes = .5 No = 0

SLR Notes:

The inspections are scheduled based upon a risk ranking performed on an electronic spreadsheet using predetermined risk factors.

Use of Data to Help Drive Program Priority and Inspections

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

SLR Notes:

Yes. The GPSC does have data for damages to all underground facilities in Georgia. The GPSC should separate data on damages to pipeline facilities to identify the effectiveness in preventing damage to pipelines. The GPSC provides data for the DIRT program. The GPSC reviews information that is produced by the DIRT program.

- 6** Has state reviewed data on Operator Annual reports for accuracy? .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes. The GPSC rules require operators to submit a copy of their PHMSA Annual Report to the GPSC. The GPSC reviews the information submitted by the operators and provides feedback if errors are found.

- 7** Has state analyzed annual report data for trends and operator issues? .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes. The GPSC downloads information obtained from operators' annual reports into an electronic spreadsheet. The spreadsheet is designed to sort data for predetermined risk factors.

- 8** Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes. The GPSC requires incident reports be submitted by operators. The GPSC reviews all information on the inspection reports for accuracy. The GPSC follows up with operators when errors are found.

- | | | | |
|----------|---|----|-----|
| 9 | 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:

The GPSC has performance measures that is required by Georgia state government. Information is collected to report the GPSC's results in relation to its performance measures.

- | | | | |
|-----------|--|----|-----|
| 10 | 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 | 0.5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Upon a review of the OQ Database, the GPSC has done a thorough job in entering inspection results and follow up inspection information into the database. The GPSC has conducted and entered the results of OQ Protocol 9 inspections into the database.

- | | | | |
|-----------|--|----|-----|
| 11 | 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:

The GPSC did not receive any notifications that an operator had submitted a change to its Integrity Management Program.

- | | | | |
|-----------|---|----|-----|
| 12 | Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 | .5 | 0.5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes. A review of the IMP database shows that the GPSC has uploaded the results of six IMP inspection plans. There are six operators in Georgia that operate gas transmission pipelines.

- | | | | |
|-----------|---|----|-----|
| 13 | 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. The GPSC reviews operators' records documenting efforts to comply with Part 192.617. The GPSC questions operators about plastic pipe and fittings failures when reviewing these records.

- | | | | |
|-----------|--|----|-----|
| 14 | 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. The GPSC has not confirmed this information at this time.

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

Yes. The GPSC made a presentation at the NAPSRS Southern Region meeting in March, 2009. The presentation included incidents that occurred in Georgia since the last meeting in 2008.

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

SLR Notes:

Yes. The GPSC supports the DIRT program by submitting underground facility damage information. The GPSC has responded to any request for information related to incident data. The GPSC has also responded to requests by other states related to the GPSC's damage prevention enforcement program.

- | | | | |
|-----------|--|-----------|-----------|
| 17 | Does state have incident/accident criteria for conducting root cause analysis? | Info Only | Info Only |
| | Info Only = No Points | | |

SLR Notes:

No. The GPSC staff has not recieved the root cause analysis training.

18	Does state conduct root cause analysis on incidents/accidents in state?	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

No. The GPSC will not be able to conduct incident investigations utilizing root cause analysis until its staff receives the training.

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

SLR Notes:

The training has been requested but has not been scheduled by PHMSA's Office of Training and Qualifications.

Transparency - Communication with Stakeholders

20	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:

The GPSC attends local Utility Coordinating Committee Meetings. The GPSC has a page on the Commission's Website. The GPSC interfaces with the gas association in Georgia.

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

SLR Notes:

The GPSC provides enforcement information for the Commission's annual report to the Governor of Georgia. This information can be obtained but is not readily available as some form of communication that could be published on the Commission's website. It is recommended that the GPSC include enforcement information on its web page on the Commission's website. The Commission's website allows outside parties to access all information within docketed proceedings of the Commission. If a non compliance action is taken to a show cause hearing, the public would have access to that particular compliance action.

22	Part G: General Comments/Regional Observations	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

The GPSC has not confirmed that operators have completed their submissions to the National Pipeline System Database nor has the GPSC confirmed that operators have submitted revisions since their original submission. The GPSC provides enforcement information for the Commission's annual report to the Governor of Georgia. This information can be obtained but is not readily available as some form of communication that could be published on the Commission's website. It is recommended that the GPSC include enforcement information on its web page on the Commission's website.

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



PART H - Miscellaneous

Points(MAX) Score

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

SLR Notes:

The GPSC completed a very detailed and comprehensive review of all operators' operation and maintenance procedures. This review resulted in notifications to operators that their procedures were inadequate and needed to be amended. The GPSC discovered that more than one operator can have pipeline facilities in the same service area as other operators. In fact, it was discovered that there has been some cases where pipelines were mistakenly altered by an operator that did not own the pipeline. The GPSC initiated a program, called the County Wide Safety Plan, requiring actions to be taken by operators to prevent the potential for operators to mistakenly perform operation or maintenance activities on pipelines they do not own.

- | | | | |
|----------|--|----|-----|
| 2 | 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.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

See the information about County Wide Safety Plans described in H1.

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

SLR Notes:

The GPSC initiated a cast iron replacement program with Atlanta Gas & Light and other operators. The Atlanta Gas & Light program is nearing completion with a large amount of cast iron main replaced over a ten year period.

- | | | | |
|----------|--|---|---|
| 4 | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

The GPSC responded to surveys except for one related to excess flow valve installation in the state of Georgia.

- | | | | |
|----------|---|----|-----|
| 5 | Sharing Best Practices with Other States - (General Program)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

The GPSC presented an update of its activities at the NAPSR Southern Region meeting in 2009. The GPSC has consistently shared the initiatives that it initiated in Georgia. The GPSC has been visited by several other agencies to learn about the GUFPA program in Georgia.

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

SLR Notes:

There were no issues found that prevented awarding the full amount of points possible in Part H.

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)

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

SLR Notes:

Yes. The GPSC has inspected all operators' Drug and Alcohol Programs required by Part 199. The GPSC, as part of its standard inspection, periodically reviews whether an operator is complying with the requirements of its plan.

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

SLR Notes:

The GPSC checks operators' drug and alcohol testing records as part of its standard inspection. The GPSC reviews testing records to confirm that the operators meet the 25% random testing rate and that tests are performed on operator's personnel whose actions may have been involved in an incident.

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

SLR Notes:

Yes. The GPSC reviews the summary results of the operators' drug and alcohol testing. The GPSC questions operators on what actions have been taken when positive results are provided by the testing laboratory. The GPSC compares the actions to the operator's procedures documented in its program plan.

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

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

SLR Notes:

Yes. The GPSC has reviewed the written Operator Qualification Program plans for all operators. The GPSC began its OQ inspections in 2003.

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

SLR Notes:

Yes. The GPSC conducted its OQ inspections utilizing the OQ protocols. The results noted on the Protocol forms have been uploaded to the OQ database. The GPSC has performed Protocol 9 inspections to verify that operator personnel are qualified for the cover tasks they perform.

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

SLR Notes:

Yes. The GPSC has performed OQ inspections that review operators' OQ records. The GPSC has checked the qualification and requalification records to verify that persons performing covered tasks have passed qualification requirements.

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

SLR Notes:

Yes. In its OQ inspections, the GPSC has reviewed OQ requalification records and timeframes as outlined in the operators' OQ Program plans. This information is also checked when Protocol 9 inspections are performed.

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

- | | | | |
|----------|--|---|---|
| 8 | 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?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

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?

- | | | | |
|----------|--|----|-----|
| 9 | 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?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

The Gas IMP database shows that the GPSC has uploaded the protocol results of its IMP inspections. The protocol results shows that this portion of Subpart O requirements was reviewed by the GPSC.

- | | | | |
|-----------|--|----|-----|
| 10 | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes. The GPSC has performed IMP inspections for all six operators that are required to have IMP Program Plans. The results of the inspection have been uploaded into the IMP database.

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| 11 | 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?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
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SLR Notes:

The GPSC has performed inspections on operator's plans. The GPSC is reviewing operator's records to verify that operators are completing assessments and taking the required mitigation actions on anomalies found during assessments.

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| 12 | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|-----------|---|----|-----|

SLR Notes:

The GPSC has performed inspections on operator's plans. The GPSC is reviewing operator's records to verify that operators are documenting their reviews to identify new HCA's along the gas transmission pipelines.

Public Awareness (49 CFR Section 192.616)

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| 13 | 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)
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
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SLR Notes:

Yes. The GPSC has reviewed the results provided by the Public Awareness Clearinghouse. The GPSC has followed up with operators on any deficiencies noted by the Clearinghouse.

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

Yes. The GPSC opted to use the Public Awareness Clearinghouse for the initial review of operators' Public Awareness Plans.

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

Yes. As it conducts standard inspections of operators, the GPSC reviews operators' records related to the Public Awareness requirements in 192.616.

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

SLR Notes:

Yes. As it conducts standard inspections of operators, the GPSC reviews operators' records related to the Public Awareness requirements as described in RP1162.

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| 17 | Part I: General Comments/Regional Observations
<small>Info Only = No Points</small> | Info Only | Info Only |
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SLR Notes:

There were no deficiencies found that prevented awarding the full amount of points possible in Part I.

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