Master Meter and Small LPG Distribution Integrity Management - Plan Implementation

1. Plan Implementation - Implement Date (confirm) *Was the plan written and implemented per the requirement of 192.1015 by 08/02/2011?* (MMLPGIM.QA.PLANIMPLEMENT.P) (confirm)						
192.1015(a)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

Master Meter and Small LPG Distribution Integrity Management - Knowledge of the System

1. System Knowledge - Information Considered (confirm) *Does the plan include an explanation of the mechanisms or procedures to address how the operator will demonstrate knowledge of its pipeline which, to the extent known, should include the approximate location and material of its pipeline?* (MMLPGIM.RA.INFORMATION.P) (confirm)						
192.1015(b)(1)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

2. System Knowledge - Gaps (confirm) *Does the plan include an explanation of the mechanisms or procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?* (MMLPGIM.RA.GAPS.P) (confirm)						
192.1015(b)(1)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

3. System Knowledge - Information Needed (confirm) *Do the written mechanisms or procedures specify the means to collect the additional information over time through normal activities conducted on the pipeline (e.g. design, construction, operations or maintenance activities)?* (MMLPGIM.RA.INFONEEDS.P) (confirm)						
192.1015(b)(1)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

4. System Knowledge - Information Needed (detail) *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?* (MMLPGIM.RA.INFONEEDS.R) (detail)

192.1015(b)(1)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

5. System Knowledge - New Pipe Data (confirm) *Do the written mechanisms or procedures require the capture and retention of data on any new pipeline installed?* (MMLPGIM.RA.NEWPIPEDATA.P) (confirm)

192.1015(c)(3)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

6. System Knowledge - New Pipe Data (detail) *Does the captured and retained data on any new pipeline include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?* (MMLPGIM.RA.NEWPIPEDATA.R) (detail)

192.1015(c)(3)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

7. System Knowledge - Understanding (confirm) *Has the operator demonstrated an adequate understanding of the system, which, to the extent known, should include the approximate location and material of its pipelines?* (MMLPGIM.RA.DEMOUNDERSTANDING.R) (confirm)

192.1015(b)(1)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

Master Meter and Small LPG Distribution Integrity Management - Identify Threats

1. Identify Threats - Threats Considered (confirm) *In identifying threats, do the written mechanisms or procedures include consideration of all of the required categories of threats to each gas distribution pipeline?* (MMLPGIM.RA.THREATCATEGORIES.P) (confirm)

192.1015(b)(2)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

2. Identify Threats - Information Considered (detail) *Did the operator consider the information that was reasonably available to identify existing and potential threats?* (MMLPGIM.RA.INFOCONSIDERED.R) (detail)

192.1015(b)(2)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

3. Identify Threats - Implementation (confirm) *Do records demonstrate implementation of the element "Identify Threats"?* (MMLPGIM.RA.IMPLEMENTTH.R) (confirm)

192.1015(b)(2)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

Master Meter and Small LPG Distribution Integrity Management - Evaluate and Rank Risk

1. Rank Risk - Methodology (confirm) *Do the written mechanisms or procedures contain the method(s) used to determine the relative importance of each threat and estimate and rank the risks posed?* (MMLPGIM.RA.RISKRANKING.P) (confirm)

192.1015(b)(3)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

2. Rank Risk - Validation (confirm) *Were the results generated by the risk evaluation model/method validated?* (MMLPGIM.RA.RESULTSVALIDATION.R) (confirm)						
192.1015(b)(3)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

3. Rank Risk - Implementation (confirm) *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?* (MMLPGIM.RA.IMPLEMENTRR.R) (confirm)						
192.1015(b)(3)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

Master Meter and Small LPG Distribution Integrity Management - Identify and Implement Measures to Reduce Risk

1. Measures to Reduce Risk - Identification (confirm) *Do the written mechanisms or procedures identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?* (MMLPGIM.PM.IDENTIFYMEASURES.P) (confirm)						
192.1015(b)(4)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

2. Measures to Reduce Risk - Identification (confirm) *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?* (MMLPGIM.PM.IDENTIFYMEASURES.R) (confirm)						
192.1015(b)(4)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

3. Measures to Reduce Risk - Implementation (confirm) *Do records demonstrate implementation of those measures to reduce risk required by Part 192 Subpart P?* (MMLPGIM.PM.IMPLEMENTPM.R) (confirm)						
192.1015(b)(4)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

Master Meter and Small LPG Distribution Integrity Management - Measure Performance and Evaluate Effectiveness

1. Measure Performance - Monitoring (detail) *Does the plan contain written mechanisms or procedures for how the operator monitors the performance measure "number of leaks eliminated or repaired on its pipeline and their causes"?* (MMLPGIM.QA.PERFMEASUREMONITOR.P) (detail)						
192.1015(b)(5)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

2. Measure Performance - Implementation (confirm) *Did the operator monitor the performance measure "number of leaks eliminated or repaired on its pipeline and their causes"?* (MMLPGIM.QA.PERFMEASUREMONITOR.R) (confirm)						
192.1015(B)(5)	**Sat+**	**Sat**	**Concern**	**Unsat**	**NA**	**NC**
Notes						

Master Meter and Small LPG Distribution Integrity Management - Periodic Evaluation

1. Periodic Evaluation - Evaluation Period (confirm) *Do the written mechanisms or procedures provide for determination of the appropriate period for conducting IM program evaluations based on the complexity of its pipeline and changes in factors affecting the risk of failure, not to exceed 5 years?* (MMLPGIM.CA.EVALUATIONPERIOD.P) (confirm)

192.1015(b)(6)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

2. Periodic Evaluation - Performance Monitoring (confirm) *Do the written mechanisms or procedures consider the results of the performance monitoring in the periodic IM program evaluation?* (MMLPGIM.CA.PERIODICEVALUATION.P) (confirm)

192.1015(b)(6)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

3. Periodic Evaluation - Implementation (confirm) *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?* (MMLPGIM.CA.PERIODICEVALUATION.R) (confirm)

192.1015(b)(6)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

Master Meter and Small LPG Distribution Integrity Management - Records Required to be Kept

1. Records - IM Plans (detail) *Are there written mechanisms or procedures specifying that a written IM plan in accordance with 192.1015, including superseded IM plans, will be maintained for at least 10 years?* (MMLPGIM.QA.PLANRETENTION.P) (detail)

192.1015(c)(1)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

2. Records - Requirements (detail) *Are there written mechanisms or procedures specifying that documents demonstrating compliance to support threat identification will be maintained for at least 10 years?* (MMLPGIM.QA.THREATIDRECORDS.P) (detail)

192.1015(c)(2)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

3. Records - System Records (detail) *Are there written mechanisms or procedures specifying that documentation will be maintained for at least 10 years showing the location and material of all pipe and appurtenances that are installed after the effective date of the operator's IM program and, to the extent known, the location and material of all pipe and appurtenances that were existing on the effective date of the operator's program?* (MMLPGIM.QA.SYSTEMRECORDS.P) (detail)

192.1015(c)(3)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

4. Records - Implementation (confirm) *Has the operator maintained the required records?* (MMLPGIM.QA.RECORDREQUIREMENTS.R) (confirm)

192.1015(c)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

DIMP – MMLPGIM IA Program Information Form

Plan Implementation - Products Used			
No.	Rule	Text	Result (Fully, Partially, Not at all)
1	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?	
Considerations		1. Document commercial product(s)/template's name if used, and extent of use (fully or partially). 2. This informational question is intended to discern which, if any, commercially available products were used to write the plan. 3. Operators who use commercial products must adapt the basic materials with operator specific information. 4. Examples of commercial products that can be used to develop DIMP plans include, but are not limited to: SHRIMP - Simple Handy Risk Integrity Management Program; GPTC Guide Material Appendix G192-8 DIMP; MEA Distribution Integrity Management Plan Preparation Aid; NGA/SGA DIM Framework Document and User's Guide.	
Comments			

System Knowledge – Information Sources			
No.	Rule	Text	Result (Electronic, Paper, SME, All of the above)
2	Information Only	Do the written mechanisms or procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge?	
Considerations		1. Document which types of records were used for particular information sets (electronic, paper, SME). 2. The purpose of this question is to identify the sources of information that an Operator is using to understand the adequacy and relevancy of the information for making assumptions, decisions, etc. If the source of the data is questionable, the data becomes questionable. 3. It is helpful if operators list the format and location of the document in the information source list. 4. If data is stored in an electronic format, it may be readily usable for trending historic data. Operators should document the dataset which was used to develop knowledge of the system. 5. While this question is for information only, the answer may guide the inspector to a need to investigate further responses to other questions regarding knowledge of the system, identifying threats, and evaluating and ranking risks. For example, this question can be used as an opportunity to examine the qualifications of Subject Matter Experts. Inadequate qualifications of SMEs can affect the quality of information generated by those experts for use in developing or implementing DIMP.	
Comments			

Measures to Reduce Risk – Table		
No.	Rule	Text
3	192.1015(b)(4)	Complete the table: Threat Addressed, Measure to Reduce Risk, and Performance Measure
Considerations		1. The inspector should complete the following table describing measures to reduce risk that the operator has or is planning on implementing along with identifying the threat that the measure is addressing and the performance measure that will be used to evaluate the implemented measure's effectiveness. This data will be analyzed by NAPSR and PHMSA to generate information available to stakeholders. The statements input into the table by the Inspector should be concise but convey enough information to be able to draw conclusions from it.
Comments		

Threat Addressed, Measure to Reduce Risk, and Performance Measure

For the top five highest ranked risks from the operator's risk ranking list the following:

- Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns)
- Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #)
- Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk)
- Associated performance measure

Rank	Primary Threat Category*	Threat Subcategory, as appropriate	Measure to Reduce Risk	Performance Measure
1.				
	Comments			
2.				
	Comments			
3.				
	Comments			
4.				
	Comments			
5.				
	Comments			

* Corrosion, Natural Forces, Excavation Damage, Other Outside Force Damage, Material or Weld, Equipment Failure, Incorrect Operation, Other Concerns

Rank Risk – Model			
No.	Rule	Text	Result (Fully, Partially, Not at all)
4	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool?	
Considerations		1. Document commercially available tool's name, if used, and the extent of use (fully or partially). 2. While this is an information-only question, it may guide the depth to which an inspector must investigate following questions. For example, use of SHRIMP has been determined to address successfully certain portions of the regulation. 3. The operator may have used several methods or tools to evaluate risk. The procedure may have included use of commercially available tools, operator developed tools, and/or subject matter experts. For example, the operator may have used a commercial tool to develop their replacement program but used subject matter experts to evaluate risks with different measure to address risk. Select all applicable boxes which reflect their procedure. 4. Examples of commercial products that can be used for risk evaluation include, but are not limited to: SHRIMP - Simple Handy Risk Integrity Management Program; GPTC Guide Material Appendix G192-8 DIMP; MEA Distribution Integrity Management Plan Preparation Aid; NGA/SGA DIM Framework Document and User's Guide; Optimain DS Software. Note that Operators may have used these products for portions of their DIMP plan even when the plan was nominally developed in-house. 5. SHRIMP: The application contains a risk evaluation tool.	
Comments			