

STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE RECORD AUDIT

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: NORTHERN ILLINOIS GAS CO.	Operator ID#: 13710
Inspection Date(s): 11/15/2012	Man Days: 1
Inspection Unit: Ancona Storage	
Location of Audit: Ancona	
Exit Meeting Contact: Mario Morrell	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Jim Watts	
Company Representative to Receive Report: Leticia Quezada	
Company Representative's Email Address: lquezad@aglresources.com	

Headquarters Address Information:	P. O. Box 190 Rt. 59 & I-88 Aurora, IL 60507 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Ralph Cleveland Phone#: (000) 000-0000 Email:	
Inspection Contact(s)	Title	Phone No.
George Wilson	Supervisor Storage Operations	(815) 854-2961
Mario Morrell	Manager Storage Operations	(815) 854-2950
Ron Schulz	Supply Operations Supervisor	

Gas System Operations	Status
Gas Transporter	Nicor Transmission
Miles of Main	37.9 at Ancona
Confirm Operator's Potential Impact Radius Calculations	Not Checked
<u>General Comment:</u>	
<i>The Ancona Storage Field Office (Station 70) has been determined to be an identified site due to the number of personnel present on a daily basis and the baseline survey was conducted earlier in 2012 at Ancona. The High Consequence Area/Identified Site is reported being approximately .76 miles in length. The Potential impact Radius (PIR) data was reviewed during the Transmission Pipeline Integrity Management audit performed earlier in 2012 at Nicor Naperville</i>	

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Headquarters as they are the keeper of the Pipeline Integrity documentation for Nicor. The PIR information is not maintained at the storage field and was not reviewed during the Ancona record audit.

Annual Report (Form 7100.1-1) reviewed for the year:	Not Checked
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General Comment:

The 2011 annual report was not reviewed as part of this audit. Staff reviewed the annual report when received from the operator earlier in 2012.

Regulatory Reporting Records	Status
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Category Comment:

No reportable incidents or safety related conditions occurred on the Ancona Storage facility piping in 2011. There are no customers directly served from the storage facility so the Customer Notification requirement is not applicable to this inspection.

191.5	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
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191.15(a)	Was a DOT Incident Report Form F7100.2 submitted within 30 days after detection of an incident?	Not Applicable
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191.15(b)	Were there any supplemental incident reports when deemed necessary?	Not Applicable
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191.23(a)(2),191.23(a)(5),191.23(a)(6),191.23(a)(8)	Did the operator report Safety Related Conditions?	Not Applicable
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191.25	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
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192.16(c),192.16(d)	Customer Notification: Has the operator notified each customer after the customer first receives gas at a particular location?	Not Applicable
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DRUG TESTING	Status
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Refer to Drug and Alcohol Inspection Forms and Protocols	Not Checked
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General Comment:

The Drug and Alcohol Plan was not reviewed during this audit. The station supervisor was selected for a random drug test on the morning of this audit proving a random testing provision is in place. The EAP number and Company Drug Policy is posted at the Ancona Storage facility Office.

TEST REQUIREMENTS	Status
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192.505,192.507,192.509,192.511(c)	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
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General Comment:

Staff reviewed the pressure charts for hydro tests performed in 2011 during the system replacements. No issues were observed during the review.

In 2011 piping for the Sulpha Treat system was pressure tested as required. This piping operates at a pressure that results in the piping being stressed to a yield factor of less than 20% specified minimum yield strength (SMYS).

192.511,192.509,192.513	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
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<u>General Comment:</u>		
<i>Testing of segments of piping installed due to the removal of the Stretford Process and the installation of the new Sulfa Treat process were tested as required.</i>		
192.515(b)	Did the operator maintain documentation establishing that the test medium was disposed of in a manner that minimized danger to the environment?	Satisfactory
<u>General Comment:</u>		
<i>Hydro test water is disposed of in the saline water pits at Ancona Storage.</i>		
UPRATING		Status
<u>Category Comment:</u>		
<i>No uprating was performed on pipelines associated with the Ancona Storage Facility in 2011.</i>		
192.555	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
192.557	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
192.605(a)	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Satisfactory
<u>General Comment:</u>		
<i>The O and M was reviewed as required.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
<u>General Comment:</u>		
<i>The operator qualification plan was not reviewed as part of this audit. It is under the jurisdiction of the Nicor Training Department and is reviewed during a separate audit.</i>		
192.605(b) (3)	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u>		
<i>Any as-built plans for new installations or piping revisions are maintained by Ancona with a copy being sent to engineering for review and mapping.</i>		
192.605(b) (8)	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Not Applicable
<u>General Comment:</u>		
<i>No issues were identified with the normal O and M procedures during the review of personnel's work in 2011.</i>		

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192.605(c)(1) (i)	Does the operator maintain documentation for responding to, investigating, and correcting the cause of unintended closure of valves or shutdowns?	Not Applicable
<u>General Comment:</u> <i>No unintended closure of valves occurred in 2011 at Ancona Storage.</i>		
192.605(c)(1)(ii)	Does the operator maintain documentation for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside normal operating limits?	Not Applicable
<u>General Comment:</u> <i>Pressure alarms reported by Gas Control were responded to and corrected as required. During review of the station log book Staff observed that the actions taken were documented and Gas Control was informed of the actions taken to correct the issues identified.</i>		
192.605(c)(1)(iii)	Does the operator maintain documentation for responding to, investigating, and correcting the cause of loss of communications?	Satisfactory
<u>General Comment:</u> <i>Periods where loss of communications was reported by Gas Control were documented in the station log. Staff's review observed the corrective actions that were taken to correct the issue were documented and were also communicated with Gas Control.</i>		
192.605(c)(1)(iv)	Does the operator maintain documentation for responding to, investigating, and correcting the cause of operation of any safety device?	Satisfactory
<u>General Comment:</u> <i>Compressor alarms and relief activations were documented in the station log book. Corrective actions were reported to Gas Control and documented in the Station Log.</i>		
192.605(c)(1)(v)	Does the operator maintain documentation for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property?	Satisfactory
<u>General Comment:</u> <i>No issues were documented in the log book as having occurred due to personal error. Component malfunctions were documented in the station log book along with the actions taken to correct the issue.</i>		
192.605(c) (2)	Does the operator maintain documentation of checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?	Satisfactory
<u>General Comment:</u> <i>Corrective actions were well documented in the station log when abnormal operations were reported by gas control.</i>		

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192.605(c) (3)	Does the operator maintain documentation of notifying responsible operator personnel when notice of an abnormal operation is received?	Satisfactory
General Comment: <i>Station log book is utilized to document abnormal operations reported by gas control and the corrective actions taken. The log book was reviewed to ensure reported issues were corrected. Staff observed no issues with the corrective actions taken.</i>		
192.605(c) (4)	Does the operator maintain documentation for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found?	Satisfactory
General Comment: <i>Duty Supervisors are notified when Gas Control identifies issues at Ancona Storage. They Duty Supervisor then notify the proper employees to respond and perform the investigations and take the necessary corrective actions. Corrective actions taken by the responding personnel are recorded in the station log book and are reported back to the Duty Supervisor when requested.</i>		
192.619,192.621,192.623	Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Satisfactory
General Comment: <i>The MAOP for Ancona Storage is 1260 psig. Nicor is currently performing MAOP validation to ensure they have sufficient documentation to establish system MAOP's.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
192.613(a)	Has the operator reviewed continuing surveillance records for class location changes?	Not Applicable
General Comment: <i>Class location surveys are completed by Nicor Pipeline Integrity Department and are currently a Class 1-2. There were no changes in Class Location at Ancona Storage in 2011.</i>		
192.613(a)	Has the operator reviewed continuing surveillance records for failures?	Satisfactory
General Comment: <i>A leak on a drip detected during the 2011 leak survey was excavated and reviewed by Nicor's corrosion department who determined the cause of the leak being due to internal corrosion on two inch pipe. Due to this finding Nicor has increased the wall thickness on the two inch piping used to construct new drips being installed at the Ancona Storage Field.</i>		
192.613(a)	Has the operator reviewed continuing surveillance records for leak history?	Satisfactory
General Comment: <i>Leak history documentation is maintained at the Ancona Storage facility and is reviewed as part of continuing surveillance.</i>		
192.613(a)	Has the operator reviewed continuing surveillance records for corrosion?	Satisfactory
General Comment: <i>Atmospheric corrosion and internal pipe inspections are performed as required to determine if corrosion is taking place. Indications of corrosion were observed during internal inspections and were repaired as required.</i>		

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192.613(a)	Has the operator reviewed continuing surveillance records for changes in cathodic protection requirements?	Not Applicable
General Comment: <i>No changes to the cathodic protection requirements in 2011.</i>		
192.613(a)	Has the operator reviewed continuing surveillance records for other unusual operating and maintenance conditions?	Not Applicable
General Comment: <i>No unusual operating and maintenance conditions were identified in 2011.</i>		
CLASS LOCATION CHANGE		Status
192.609	Does the operator maintain documentation when the class location changes for a segment of pipe operating at a hoop stress that is more than 40% SMYS?	Satisfactory
General Comment: <i>Class location survey is performed by Nicor Transmission Pipeline Integrity department. There were no changes in the class location at Ancona in 2011.</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
Refer to operator Qualification Inspection Forms and Protocols		Not Checked
General Comment: <i>The Operator Qualification plan was not reviewed as part of this inspection because the plan and records are maintained by the Nicor Training Department.</i>		
DAMAGE PREVENTION RECORDS		Status
191.17(a)	Did the operator track the number of damages per 1000 locate requests for the previous years?	Satisfactory
General Comment: <i>The company maintains this total for company wide numbers but does not break the numbers down by inspection units. There were no third party hits in 2011 on the Ancona Storage piping system.</i>		
Has the number of damages increased or decreased from prior year?		Same 0
192.617	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Satisfactory
General Comment: <i>The operator does track accidents due to excavation but no damages occurred in 2011.</i>		
192.614(c) (3)	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Satisfactory
General Comment: <i>Locating is performed by storage personnel at Ancona. Nicor is initiating an automated process for documenting locates in 2013 using tough book computers</i>		

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<i>and a new notification processes. Staff reviewed locates performed in 2011 and determined the locates were responded to, marked where required and the excavator was notified if the dig area was clear.</i>		
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Yes
<u>General Comment:</u> <i>Quality Assessments are performed on the locating personnel at the Ancona storage field.</i>		
Do pipeline operators include performance measures in facility locating contracts?		Not Applicable
<u>General Comment:</u> <i>Locates at the Ancona Storage facility are performed by company employees not contract locators.</i>		
IL ADM. CO.265.100(b)(1)	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Applicable
<u>General Comment:</u> <i>No reports were sent to JULIE enforcement due to there being no hits on storage field piping.</i>		
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Yes
<u>General Comment:</u> <i>The operator has been given copies of the recommended practices and is reviewing the Common Ground Alliance Best Practices to see what is applicable.</i>		
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Applicable
<u>General Comment:</u> <i>The operator is reviewing the best practices to see what is applicable.</i>		
EMERGENCY PLANS		Status
192.615(b) (1)	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>The Storage Field Office has a current copy of the emergency plan. The supervisors are also provided copies of the emergency plan annually and they are available on the Nicor intranet.</i>		
192.615(b) (2)	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
<u>General Comment:</u> <i>The Ancona Station employees were provided training on the emergency plan in 2011.</i>		
192.615(b) (3)	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Not Applicable

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<u>General Comment:</u>		
<i>No activity reviews were required due to an employee's response to an emergency in 2011. Nicor does have a procedure in place that requires a review to be performed after an emergency.</i>		
192.615(c)	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Not Checked
<u>General Comment:</u>		
<i>Nicor community relations personnel perform liaison with the appropriate fire and police and public officials. This was reviewed during the public awareness plan audit completed earlier in 2012.</i>		
192.615(a) (3)	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Satisfactory
<u>General Comment:</u>		
<i>Call outs were responded to in a timely manner. Times are recorded in the Station Log for after hour call outs.</i>		
Did documentation reviewed define when emergency response time intervals exceeded established operator parameters for time interval between received and dispatched?		Satisfactory
<u>General Comment:</u>		
<i>Ancona maintains Duty Supervisor Log sheets reviewed indicated the response times from received to when the supervisor made contact with a qualified person to respond.</i>		
Did documentation reviewed define when emergency response time intervals exceeded established operator parameters for time interval between dispatched and arrival?		Satisfactory
<u>General Comment:</u>		
<i>Arrival times are for after hour call outs are recorded in the Ancona Station Log Book.</i>		
192.615(a) (11), 192.631	Has the operator maintained documentation of actions that were required to be taken by a controller during and emergency?	Satisfactory
<u>General Comment:</u>		
<i>The Station log book indicates the actions taken by Gas Control controllers when alarms are observed at Ancona and includes the documentation of the corrective actions taken due to the alarm notification.</i>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
<u>General Comment:</u>		
<i>The public awareness plan was not reviewed during this audit. Staff performed an evaluation of the Nicor Public Awareness plan earlier in 2012 during a separate audit.</i>		
ODORIZATION OF GAS		Status
<u>Category Comment:</u>		
<i>Nicor South Zone transmission maintains the bypass odorizer utilized for plant use only at Ancona Storage. Gas leaving the Ancona Storage Field is not odorized.</i>		

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192.625(f)	Where required, has the operator maintained documentation of odorant concentration level testing?	Not Applicable
192.625(a) (f)	Where required, is the operator using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable? (at 1/5th the LEL)	Not Applicable
192.625(e)	Where required, has the operator maintained documentation of odorizer tank levels?	Not Applicable
PATROLLING & LEAKAGE SURVEY		Status
192.705	Does the operator maintain documentation of a patrol program as required?	Satisfactory
General Comment:		
<i>Patrols were performed twice annually as required for Class 1-2 locations at road and railroad crossing within the field and were leak surveyed during the patrols. The remainder of the storage field is patrolled during the annual leak survey and during daily operations.</i>		
192.706	Does the operator maintain documentation of leakage survey(s) performed on a transmission pipeline?	Satisfactory
General Comment:		
<i>Review of leak survey documentation revealed leak surveys were performed twice annually at road and railroad crossings and on piping within the compressor station using leak detection equipment. The storage field is surveyed once annually using leak detection equipment. Nicor also performs aerial photo surveys to determine areas of possible leakage by evaluating crop color and condition for possible damage or affects from leakage. Crop damage was observed in 2011 in the area gas migration that is collected by the shallow gas wells.</i>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
Category Comment:		
<i>No piping was abandoned in place in 2011. When piping is taken out of service it is purged prior to being removed. There are no crossings of navigable waterways in the Ancona system.</i>		
192.727(b)	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Not Applicable
192.727(c)	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Applicable
192.727(e)	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Not Applicable
192.727(g)	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
COMPRESSOR STATION		Status

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192.731(a)	Has the operator maintained documentation of the compressor station relief devices at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Relief inspections reviewed indicate the reliefs were tested as required and set to operate at the proper pressures.</i>		
192.731(c)	Has the operator maintained documentation compressor station emergency shutdown at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>The Ancona ESD system was tested April 18, 2011. Gas Control received the required alarms.</i>		
192.736(c)	Has the operator maintained documentation of the compressor stations – detection and alarms?	Satisfactory
General Comment: <i>Notifications received from Gas Control are documented in the station log book. Corrective actions are also documented in the same location.</i>		
PRESSURE LIMITING AND REGULATION		Status
192.739(a)	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Review of operator and monitor regulator inspection reports indicate the inspections were completed at the required intervals and set to operate within acceptable limits.</i>		
192.743(a)	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Not Applicable
General Comment: <i>There are no reliefs on the Ancona Compressor Station piping that are used for the primary source of overpressure protection. They are used to blow down/evacuate gas from the station piping when the Emergency Shutdown Device (ESD) is activated due to a compressor malfunction, fire, or a manual operation of the ESD. Compressor shutdowns or operator monitor regulators are utilized as the primary overpressure protection.</i>		
192.743(b)	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Not Applicable
General Comment: <i>No reliefs are utilized for primary source of overpressure protection. Capacity Calculations are not required.</i>		
192.743(a)(b), 192.195(b)(2)	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Not Applicable
General Comment: <i>Gas supplied to Ancona Storage Field is received from Nicor Transmission pipelines. Overpressure protection is provided for the station and field piping utilizing monitor regulators located on the station inlet piping upstream of the metering equipment and compressor inlets and other associated station piping. The monitor regulators also protect the station and field piping located downstream of the compressors when the compressors are off line and gas is being free flowed into storage.</i>		

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192.743(a)	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Applicable
General Comment: <i>Nicor provides for overpressure protection as the storage field is supplied by their pipeline.</i>		
VALVE MAINTENANCE		Status
192.745(a) (b)	Did the operator inspect and partially operate transmission valves that might be required during any emergency at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Staff's review of completed valve inspections indicate the valves were inspected as required.</i>		
192.749	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
General Comment: <i>There are no vaults located in the Ancona System meeting these requirements.</i>		
Investigation Of Failures		Status
192.617	Did the operator experience accidents or failures requiring analysis?	Satisfactory
General Comment: <i>Nicor's corrosion department performed an inspection of piping on a leak on a drip that was detected during the leak survey. The leak was due to internal corrosion on the 2 inch piping on the drip. Due to the findings of the inspection Nicor is now using heavier wall pipe on new drips being installed during the system replacement.</i>		
WELDING OF STEEL PIPE		Status
192.225(b)	Does the operator have documentation for their qualified welding procedure?	Satisfactory
General Comment: <i>Nicor has established welding procedures for use during the system replacement.</i>		
192.277,192.229	Does the operator have documentation of welder qualification documentation as required?	Satisfactory
General Comment: <i>Welder qualification documentation is maintained by the Nicor Welding Department and was not reviewed as part of this inspection. A separate inspection of the welding records was performed by ICC Staff earlier in 2012 at the Nicor Naperville Office.</i>		
192.243(b) (2)	Does the operator have documentation of NDT personnel qualification as required?	Satisfactory
General Comment: <i>NDT Qualification documentation is maintained by Nicor at Ancona Storage.</i>		
192.243(f)	Does the operator have documentation of NDT testing	Satisfactory

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	performed?	
General Comment:		
<i>Nicor maintains documentation of NDT tests performed at Ancona Storage.</i>		
CORROSION CONTROL RECORDS		Status
Category Comment:		
<i>Corrosion control records indicated below as not checked were reviewed by ICC Staff who completed the Nicor Sycamore audit performed earlier in 2012. These documents were not reviewed as part of this audit.</i>		
192.491(a)	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system	Satisfactory
General Comment:		
<i>Staff established that Nicor maintains maps of the cathodic protections systems utilized in the storage fields. As the new piping is being installed rectifiers are being revised where necessary and new maps are being created from the as built maps provided by the inspectors and engineers involved with the new piping installations. As the maps are revised by Nicor engineering, new maps are issued to the storage field office for review once approved they are made available for field use.</i>		
192.459	Has the operator maintained documentation of examination when buried pipe was exposed?	Not Checked
General Comment:		
<i>Exposed pipe reports are sent to the corrosion department and are retained by that department. These documents were not reviewed during this audit.</i>		
192.465(a)	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months?	Not Checked
192.465(a)	Has the operator maintained documentation of inspections or tests of isolated services or short sections of main less than 100 feet?	Not Applicable
General Comment:		
<i>No piping within the storage fields are being inspected on a ten year interval for levels of cathodic protection. All pipe to soil measurements are performed on an annual basis.</i>		
192.465(b)	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Not Checked
192.465(c)	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months?	Not Checked
192.465(c)	Has the operator maintained documentation of each interference bond, reverse current switch, diode, etc. inspections at a minimum of 1 per year/ 15 months?	Not Checked
192.465(d)	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Checked

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192.465(e)	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Applicable
General Comment: <i>There is no jurisdiction piping located in the storage fields that is classified as unprotected piping. All buried piping downstream of the well installations is coated and cathodically protected piping.</i>		
192.467(d)	Has the operator maintained documentation of inspections or tests for electrical isolation including casings?	Not Checked
192.469	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Not Checked
192.471	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Checked
192.473(b)	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Not Checked
192.475(a)	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Satisfactory
General Comment: <i>In 2011 Nicor initiated a ten year inspection/replacement program that includes a majority of the piping in all of their storage fields. This includes piping from the wells to the gas processing equipment located at the storage facilities. The program was initiated due to the determination that internal corrosion was the root cause of the pipe failure that occurred in 2010 at the Pontiac Storage Facility. The new piping is being reconfigured using heavier wall piping where applicable, designed to allow for maintenance pigging that will aid in removing liquids and solids that are present or accumulate in the piping as the gas is removed from the aquifer storage. The revisions will also allow for internal inspection to be conducted to aid in establishing the true corrosion rates using inline inspection and other applicable processes.</i>		
192.475(b)	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
General Comment: <i>Nicor's corrosion department performs internal inspections on the piping being removed due to the storage piping replacement program.</i>		
192.476(d)	Has the operator maintained documentation of written procedures supported by as-built drawings or other construction records?	Not Checked
192.477	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Checked
192.479	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Not Checked

STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.

If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<u>General Comment:</u>		
<i>The operator has completed the recommended repairs at Ancona as requested due to the ENEngineering atmospheric corrosion survey performed in 2010.</i>		
192.481	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
<u>General Comment:</u>		
<i>Atmospheric corrosion inspections were performed in 2010 at Ancona with corrective actions being taken on the items recommended due to the findings of the inspections performed by ENEngineering.</i>		
192.483(a)(b)(c)	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Applicable
<u>General Comment:</u>		
<i>No piping was removed or replaced due to external corrosion in 2011.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
520.10(a)	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
<u>General Comment:</u>		
<i>Staff reviewed the training records maintained at the Ancona Storage field. The remainder of training and qualification records is retained at the Nicor training Center in Naperville, Illinois and was reviewed during a separate audit performed during the week of October 1, 2012 at the Nicor Naperville Training Headquarters.</i>		
520.10(a)	Do training records include verbal instruction and/or on the job training for each job classification?	Not Applicable
<u>General Comment:</u>		
<i>No on the job training was performed in 2011. When new employees are brought on they work with a trainer to learn specific tasks and these records are maintained in the Naperville Training Center and were not reviewed as part of this inspection.</i>		
520.10(b)	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u>		
<i>Municipal training requirement is not applicable to this operator.</i>		
520.10(a)(5)	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<u>General Comment:</u>		
<i>No new procedures or processes were incorporated in 2011 that required training.</i>		

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.