

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR 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.

Operator: NORTH SHORE GAS CO	Operator ID#: 13660
Inspection Date(s): 2/4/2014, 2/5/2014, 2/6/2014, 2/7/2014	Man Days: 8
Inspection Unit: Mundelein, Transmission, Waukegan	
Location of Audit: Waukegan	
Exit Meeting Contact: Mark Kinzle	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Steve Canestrini, Matt Smith	
Company Representative to Receive Report: Tom Webb	
Company Representative's Email Address: TJWebb@peoplesgasdelivery.com	

Headquarters Address Information:	3001 W. Grand Avenue Waukegan, IL 60085 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Willard Evans Phone#: (000) 000-0000 Email:	
Inspection Contact(s)	Title	Phone No.
Eddie Morrow	Senior Engineer	
Kevin Kerber	Production Supervisor	
Steve Lipka	General Supervisor	(847) 263-4658
Mark Kinzle	General Manager	(847) 263-4679
Glannie Chan	Supervisory Engineer	

Gas System Operations	Status
<u>Category Comment:</u>	
<i>The operator is not required to file the annual report until March 15th. Staff will review this report once submitted.</i>	
Gas Transporter	Not Checked
Annual Report (Form 7100.1-1) reviewed for the year:	Not Checked
Unaccounted for Gas	Not Checked

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Number of Services		Not Checked
Miles of Main		Not Checked
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)		Satisfactory
General Comment:		
<i>The operator stated they are maintaining documentation pertaining to their MAOP.</i>		
Operating Pressure (Feeder)		250
Operating Pressure (Town)		100
Operating Pressure (Other)		45
MAOP (Feeder)		Not Checked
MAOP (Town)		Not Checked
MAOP (Other)		Not Checked
Does the operator have any transmission pipelines?		Yes
Regulatory Reporting Records		Status
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
General Comment:		
<i>The operator did not experience an incident that required a report to the NRC.</i>		
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Applicable
General Comment:		
<i>The operator did not experience an incident that required a report to the NRC.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Applicable
General Comment:		
<i>The operator did not experience an incident that required a report to the NRC.</i>		
Did the operator have any plastic pipe failures in the past calendar year?		No
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		Not Applicable
General Comment:		
<i>The operator did not have any PE failures in 2013.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
General Comment:		

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<i>The operator did not have any safety related conditions that required to be reported in 2013.</i>		
[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
<u>General Comment:</u>		
<i>The operator did not have any safety related conditions that required to be reported in 2013</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Satisfactory
<u>General Comment:</u>		
<i>Integrys Section 1550, Customer Notification.</i>		
DRUG TESTING		Status
<u>Category Comment:</u>		
<i>Not inspected as part of this audit. This is a separate review conducted independent of the records audit.</i>		
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
TEST REQUIREMENTS		Status
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Unsatisfactory
<u>NOPV Comment:</u>		
<i>At 3713 Atlantic Ave, Gurnee, Work Request 1231443. On 7/15/2013, a North Shore crew replaced a 2" valve on a 2 inch steel main. The crew installed (2) 1 1/8 service tees to use as a bypass. They also installed a 2" S.A.V. valve, 2" valve, and a 2" weld insulator. Pressure test documentation only indicated a soap test was performed.</i>		
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
<u>General Comment:</u>		
<i>Reviewed as part of the main and service repair orders. On orders where the service line was temporarily disconnected from the main, it was documented that testing was performed.</i>		
UPRATING		Status
<u>Category Comment:</u>		
<i>The operator does not normally conduct uprating of their system, and does not have any plans in the near future of doing so.</i>		
[192.555][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

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[192.557][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
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Unsatisfactory
<u>NOPV Comment:</u>		
<i>From the documentation provided, twenty four (24) O&M procedures were not reviewed on an annual basis in 2013.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Yes
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u>		
<i>The operator's system maps are available using the Navigate system, using their mobile computers.</i>		
[192.603(b)][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?	Satisfactory
<u>General Comment:</u>		
<i>The CMG group has the responsibility to perform this task, They have increased the number of audits conducted compared with 2012. They continue to transition from using contractors to employees for auditors. They have stream-lined the number of activities to bring more focus for each activity. They has also added field verifications, which can be performed for certain activities after the employee has completed the task. The CMG group has met with Ameren to review best practices between the companies. They have also held classes presented by GTI.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Unsatisfactory
<u>NOA Comment:</u>		
<i>Staff could not locate a procedure to review continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection and other unusual operating and maintenance conditions.</i>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
<u>General Comment:</u>		
<i>The operator does not have any cast iron in their system.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable

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<u>General Comment:</u>		
<i>The operator does not have any cast iron in their system.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
<u>General Comment:</u>		
<i>The operator does not have any cast iron in their system.</i>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
<u>General Comment:</u>		
<i>The operator does not have any cast iron in their system.</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
<u>Category Comment:</u>		
<i>Not inspected as part of this audit. This review is conducted separate from this audit.</i>		
Refer to operator Qualification Inspection Forms and Protocols		Not Checked
DAMAGE PREVENTION RECORDS		Status
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Satisfactory
<u>General Comment:</u>		
<i>The operator provided this information in an electronic format for the past 3 years.</i>		
Has the number of damages increased or decreased from prior year?		Same percentage
[192.603(b)][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
<u>General Comment:</u>		
<i>The operator maintains a list for each third party that has caused excavation damage. In addition, the operator also tracks damage caused by their employees.</i>		
[192.603(b)][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
<u>General Comment:</u>		
<i>North Shore Gas Damage Prevention Program. Discusses the use of JULIE for notification, and the use of materials for markings</i>		
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Yes
Do pipeline operators include performance measures in facility locating contracts?		Yes

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[[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/	Satisfactory
<u>General Comment:</u>		
<i>The operator reported 8 instances of third party damage to JULIE enforcement in 2013.</i>		
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Yes
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Applicable
<u>General Comment:</u>		
<i>The operator has adopted the Common Ground Alliance Best Practices.</i>		
EMERGENCY PLANS		Status
[192.603(b)][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>Each employee has access to the Emergency Plan through a computer either at their office or in the vehicle</i>		
[192.603(b)][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>North Shore Gas management employees receive annual refresher training, and the test results are documented. Field employees receive training every three years, and refresher training yearly as part of the OQ refresher.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u>		
<i>North Shore Gas did not encounter incidents or accidents requiring an investigation. The Emergency Plan has a formal process for review of policies and procedures following an emergency.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Satisfactory
<u>General Comment:</u>		
<i>The local operations supervisor meets with each local emergency department to review their emergency plan. Then, if the local department request additional training, the Technical Training area will provide a class.</i>		
[192.603(b)][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>		

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The operator received 5,221 odor complaints in 2013. Of this number, 17 calls exceeded a 60 minute response time. Each order that exceeds 60 minutes is reviewed to determine the cause.

PUBLIC AWARENESS PROGRAM - RECORDS

Status

Category Comment:

Not inspected as part of this audit. This is reviewed separate from the records audit.

Refer to Public Awareness Program Inspection Forms and Protocols

Not Checked

ODORIZATION OF GAS

Status

[192.603(b)][192.625(f)]

Has the operator maintained documentation of odorant concentration level testing using an instrument?

Satisfactory

General Comment:

The operator performs daily checks, (Monday thru Friday) at the Waukegan and Mundelein office locations. In addition, the operator has 12 pre-determined points on their system, where monthly odorant checks are performed. The operator uses a Heath Odorator to perform the odorant concentration checks. All concentration level checks were performed as required, and odorant reads met the code.

[192.603(b)][192.625(e)]

Has the operator maintained documentation of odorizer tank levels?

Not Checked

General Comment:

This question will be reviewed at the Peoples Gas G.O. records audit at a later date.

[192.603(b)][192.625(f)(1)]

Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?

Not Applicable

General Comment:

The operator is not a master meter operator.

[192.603(b)][192.625(f)(2)]

Has the master meter operator maintained documentation of sniff tests performed as required by this section?

Not Applicable

General Comment:

The operator is not a master meter operator.

PATROLLING & LEAKAGE SURVEY

Status

Category Comment:

North Shore Gas self-reported a variety of leak surveys which exceeded, or appeared to exceed the compliance date. Following, are the conditions identified; Newly found main, Changed from Residential to Business, Reactivated service, Newly partitioned main, Conversion to electronic records, and Delay in the As-Built process.

Staff does have a concern pertaining to the delay in the As-Built process, which is addressed within the audit.

[192.603(b)][192.721(b)(1)]

Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?

Satisfactory

General Comment:

Reviewed a sample of patrols. With the exception of 4 surveys completed late due to a training issue for one quarter, all surveys completed within the required timeframe.

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[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Satisfactory
General Comment: <i>Reviewed a sample of patrol records. All were completed within the required timeframe.</i>		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Unsatisfactory
NOA Comment: <i>There were 3 instances where the delay in the As-Built process caused missed leak survey instances. As an example, facility# 30000011855, which was coded as a Business survey. The service was installed on 6/16/2011. The As-Built posted to the FMDR system on 5/23/2013. The survey was completed on 10/18/2013. Two leak survey instances were missed as a result of the delay.</i>		
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Satisfactory
General Comment: <i>Reviewed a sample of leak surveys outside of business districts and exposed piping. All were completed within the required timeframe.</i>		
YARD LINES - RESIDENTIAL		Status
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Satisfactory
General Comment: <i>The operator has a list of meter locations greater than three feet from the wall.</i>		
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Satisfactory
General Comment: <i>The operator worked with the locations where meters are located more than three feet from the building. The customer has cathodically protected the lines.</i>		
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Satisfactory
General Comment: <i>As the operator has ensured the customer lines are cathodically protected, the operator can leak survey these premises on a 5 year schedule.</i>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected	Satisfactory

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	from all sources and supplies of gas, and purged of gas?	
General Comment:		
<i>Reviewed as part of the main and service repair orders. As part of the completion information, the operator will mark that the service was disconnected from any source of supply.</i>		
[192.603(b)][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?	Satisfactory
General Comment:		
<i>Reviewed as part of the main and service repair orders. As part of the completion information, the operator will mark that the service was disconnected from any source of supply.</i>		
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Satisfactory
General Comment:		
<i>Reviewed as part of the main and service repair orders. As part of the completion information, the operator will mark that the service was disconnected from any source of supply.</i>		
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory
General Comment:		
<i>Reviewed as part of the main and service repair orders. As part of the completion information, the operator will mark that the service was disconnected from any source of supply.</i>		
[192.727(g)][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
General Comment:		
<i>The operator did not abandon any pipelines on a commercially navigable waterway.</i>		
PRESSURE LIMITING AND REGULATION		Status
[192.603(b)][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>Reviewed the regulating station surveys. The operator completed the inspections within the required timeframe.</i>		
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient	Unsatisfactory

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	capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	
<u>NOPV Comment:</u>		
<i>Records were not provided to indicate an annual review was conducted of the calculations to determine sufficient capacity for the relief devices.</i>		
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	Satisfactory
<u>General Comment:</u>		
<i>For any system that is fed by more than one regulating station, telemetering devices have been installed.</i>		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Not Applicable
<u>General Comment:</u>		
<i>The operator did not experience any abnormal conditions.</i>		
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Yes
<u>General Comment:</u>		
<i>The operator does not have overpressure protection at all locations. They are working on a plan to address this issue.</i>		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Satisfactory
VALVE MAINTENANCE		Status
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
<i>Reviewed a sample of valve inspections across North Shore Gas territory. All were completed within the required timeframe.</i>		
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u>		
<i>All of the operator's vaults are less than 200 cubic feet.</i>		
Investigation Of Failures		Status
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable
<u>General Comment:</u>		

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The operator did not experience any accidents or failures, which required analysis by a third party,

WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Satisfactory
General Comment: <i>North Shore Gas Welding Manual, sections 8 and 9.</i>		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification documentation as required?	Satisfactory
General Comment: <i>Staff inspected welding qualifications for Peoples Gas, North Shore gas and Contractor employees engaged in welding of pipelines.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Satisfactory
General Comment: <i>Staff inspected NDT Certifications of personnel performing radiographic tests conducted on pipelines to ensure qualifications were maintained.</i>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Satisfactory
General Comment: <i>Staff inspected NDT testing performed for pipelines including the radiographic inspection report for semi-annual qualifications of welders</i>		
JOINING OF MATERIAL OTHER THAN WELDING		Status
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Satisfactory
General Comment: <i>Reviewed a sample of qualification records. Employees reviewed are qualified in the joining tasks. Staff also observed if an employee did not pass on the first attempt, documentation was included to show when the employee retook the test.</i>		
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Satisfactory
General Comment: <i>If an employee is qualified in joining, they are qualified to inspect the joints.</i>		
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Satisfactory
General Comment: <i>North Shore Gas procedures 5.000, thru 5.800, cover the qualified joining procedures.</i>		
CORROSION CONTROL RECORDS		Status
[192.491(a)][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

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General Comment: <i>All cathodic records are stored in the Navigate system, which is the electronic map system in use by the operator.</i>		
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Unsatisfactory
NOPV Comment: <i>On 7/22/2013, a Meade crew was abandoning a main on Cambridge Ct, in Highland Park, (W.R. 1204077). The crew did not document the condition or coating on the exposed portion of the main.</i>		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
General Comment: <i>Reviewed a sample of the reads completed in 2013. All reads observed were completed within the required timeframe. For mains less than 100 feet and isolated services, the operator has changed the read schedule to check these on an 8 year schedule to ensure that at least 10% are checked.</i>		
[192.491][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?	Satisfactory
General Comment: <i>The operator has two rectifiers installed on their system. Reviewed the inspections sheets. Both rectifiers were inspected within the required timeframe.</i>		
[192.491][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 and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Applicable
General Comment: <i>The operator does not have any critical bonds within their system. However, they do inspect the non-critical bonds 6 times per year.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Satisfactory
General Comment: <i>The operator is performing remedial action to correct any deficiencies within the required timeframe. The operator has 3 pending remedial actions from 2013 to complete the program.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Satisfactory
General Comment: <i>This is performed as an Exposed Pipe survey, which were reviewed under the leak survey section. Found the records that were reviewed were performed within the required timeframe.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Satisfactory
General Comment:		

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<i>The operator provided an electronic spreadsheet which listed the inspections for isolation at casings.</i>		
[192.491][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?	Satisfactory
<u>General Comment:</u> <i>The operator is currently in the process of reviewing the number of contact points to determine cathodic protection.</i>		
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Satisfactory
<u>General Comment:</u> <i>The operator will determine whether the test leads are needed to provide cathodic reads. If there are a sufficient number, the operator will retire that test point. Otherwise, the test leads are repaired.</i>		
[192.491][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?	Satisfactory
<u>General Comment:</u> <i>On locations where the operator is aware of other metallic structures near their facilities, they are inspecting those locations 6 times per year.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
<u>General Comment:</u> <i>The operator does not transport corrosive gas.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
<u>General Comment:</u> <i>Reviewed as part of the leak repair orders. Internal surface inspections are documented when a section of pipe is removed.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
<u>General Comment:</u> <i>The operator does not transport corrosive gas in their system.</i>		
[192.491][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>		

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

<i>This was reviewed as part of the Exposed Pipe survey. They are initially checked with the 5 year leak survey. Then on the third year, the operator performs the exposed pipe survey. Of the records reviewed, all were completed within the required timeframe.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
<u>General Comment:</u> <i>The operator provided a list in an electronic format, which listed the follow-up repairs identified corrective action needed after atmospheric corrossions was discovered.</i>		
[192.491][192.483(a), 192.483(b), 192.483(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?	Satisfactory
<u>General Comment:</u> <i>Reviewed with the main and service ticket repair orders. If the pipe was replaced due to corrosion, either a new PE service was installed, or coated cathodically protected pipe was installed.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<u>General Comment:</u> <i>Reviewed training documentation for various job classifications. Training records are maintained, along with the grade and date taken.</i>		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Satisfactory
<u>General Comment:</u> <i>Reviewed various employee records across different job classifications. Training includes verbal and on the job training based on the task.</i>		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u> <i>The operator is not a municipal 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>The Standardization group is responsible for maintaining and updating any procedures.</i>		

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