

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: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 2/17/2015, 2/18/2015, 2/19/2015	Man Days: 3
Inspection Unit: Tuscola	
Location of Audit: Tuscola	
Exit Meeting Contact: Dallas Jett	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Aaron McElravy	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: (800) 755-5000 Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
Dallas Jett	Superintendent Quality Assurance	(217) 556-2605

Gas System Operations	Status
Gas Transporter	Panhandle, Trunkline, NGPL
<u>General Comment:</u> <i>The Tuscola inspection unit has three gas suppliers.</i>	
Annual Report (Form 7100.1-1) reviewed for the year:	Satisfactory
<u>General Comment:</u> <i>On April 14, 2014 Staff completed a review of Ameren's distribution Annual Report for calendar year 2013 on Inspection # 2014-P-00163. The information was obtained from Ameren's 2013 annual report submitted on March 12, 2014, Staff will complete a review of the 2014 annual report once submitted.</i>	
Unaccounted for Gas	0.32%
Number of Services	824016

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Miles of Main		16941
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)		Satisfactory
Operating Pressure (Feeder)		Various
Operating Pressure (Town)		Various
Operating Pressure (Other)		Various
MAOP (Feeder)		Various
MAOP (Town)		Various
MAOP (Other)		Various
Does the operator have any transmission pipelines?		Yes
Regulatory Reporting Records		Status
<u>Category Comment:</u>		
<i>The records associated with Regulatory Reporting, plastic pipe failures and customer notification are inspected during the Pawnee record audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Checked
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Checked
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Checked
Did the operator have any plastic pipe failures in the past calendar year?		Not Checked
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		Not Checked
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Checked
[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 Checked
[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?	Not Checked
DRUG TESTING		Status
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u>		
<i>The Drug and Alcohol Testing records are maintained in St. Louis, MO. Staff will complete an inspection of the Plan at a later date.</i>		

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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?	Satisfactory
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
UPRATING		Status
[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 Checked
General Comment: <i>The records associated with the uprating of pipelines operating at 30% or more of SMYS are reviewed during the Transmission Record Audit conducted at Decatur Plaza. The last Transmission Record Audit was conducted January 23, 2014 on Inspection # 2014-P-00013.</i>		
[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
General Comment: <i>Ameren did not uprate systems in the Tuscola inspection unit in calendar years 2012-2014.</i>		
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?	Not Checked
General Comment: <i>The records for the review of the O&M and OQ Plans are inspected during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
General Comment: <i>The records for the review of the O&M and OQ Plans are inspected during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
General Comment: <i>The field employees have access to byers mapping system and the Operations and Maintenance Manual electronically.</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?	Not Checked
General Comment:		

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The records associated with the review of personnel's work to determine the effectiveness of normal O&M procedures are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.

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?	Not Checked

General Comment:

The continuing surveillance records are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.

[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
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General Comment:

Ameren does not operate or maintain cast iron pipelines.

[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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General Comment:

Ameren does not operate or maintain cast iron pipelines.

[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
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General Comment:

Ameren does not operate or maintain cast iron pipelines.

[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
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General Comment:

Ameren does not operate or maintain cast iron pipelines.

QUALIFICATION OF PIPELINE PERSONNEL		Status
Refer to operator Qualification Inspection Forms and Protocols		Not Checked

General Comment:

The records associated with Operator Qualification are reviewed at Pawnee. Staff completed an inspection of the Operator Qualification Plan and associated records on February 19, 2014 on Inspection #2014-P-00078.

DAMAGE PREVENTION RECORDS		Status
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<u>Category Comment:</u>		
<i>The Damage Prevention Records are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[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?	Not Checked
[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?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[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 Checked
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		Not Checked
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Checked
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>Ameren's emergency plan can be obtained electronically and in paper form.</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?	Not Applicable
<u>General Comment:</u>		
<i>The records associated with the review of emergency plans, training, employee reviews, liaison, odor/leak complaints and response times are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</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?	Not Applicable
<u>General Comment:</u>		
<i>The records associated with the review of emergency plans, training, employee reviews, liaison, odor/leak complaints and response times are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		

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[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?	Not Applicable
General Comment:		
<i>The records associated with the review of emergency plans, training, employee reviews, liaison, odor/leak complaints and response times are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</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?	Not Applicable
General Comment:		
<i>The records associated with the review of emergency plans, training, employee reviews, liaison, odor/leak complaints and response times are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
General Comment:		
<i>The Public Awareness Plan and associated records are reviewed at Pawnee. Staff completed an inspection of the Plan during the record audit conducted on February 20, 2014 on Inspection #2014-P-00078.</i>		
ODORIZATION OF GAS		Status
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Satisfactory
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Satisfactory
[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:		
<i>Ameren is not a master meter.</i>		
[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:		
<i>Ameren is not a master meter</i>		
PATROLLING & LEAKAGE SURVEY		Status
[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
[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
[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	Satisfactory

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	were those surveyed?	
[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
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
[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
[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
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 from all sources and supplies of gas, and purged of gas?	Satisfactory
[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
[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
[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?	Not Applicable
General Comment:		
<i>Ameren did not conduct purging activities requiring the use of air during calendar years 2012-2014.</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 Checked
General Comment:		
<i>The record for the reporting of the abandonment of pipelines that cross over and under a navigable waterway are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		

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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
[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 capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
[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?	Not Checked
General Comment:		
<i>The records associated with telemetering and recording gauges are inspected during the Gas Control Record Audit. The last audit was completed on November 6, 2014 on Inspection #2014-P-00462.</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 Checked
General Comment:		
<i>The records associated with telemetering and recording gauges are inspected during the Gas Control record audit. The last audit was completed on November 6, 2014 on Inspection #2014-P-00462.</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?	No
General Comment:		
<i>Ameren has identified locations requiring additional modification and the installation of overpressure protection downstream of the supplier. Ameren has a 5 year plan and is providing updates regarding the progress.</i>		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Applicable
General Comment:		
<i>Overpressure protection is not provided by the supplier.</i>		
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
[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
General Comment:		

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Ameren does not contain vaults at this location.

Investigation Of Failures		Status
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Checked
<p>General Comment: The records associated with analysis of failures are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</p>		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Not Checked
<p>General Comment: Welding procedures are reviewed during the Operations and Maintenance Manual Plan review in Pawnee. The last O&M review was conducted on November 13, 2013 on Inspection #2013-P-00353.</p>		
[192.603(b)][192.227, 192.229]	Does the operator have documentation of welder qualification as required?	Not Checked
<p>General Comment: The records associated with welder qualification are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</p>		
[192.807]	Does the operator have documentation of welder OQ records?	Not Checked
<p>General Comment: The records associated with welder qualification are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</p>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
<p>General Comment: The NDT records were reviewed during a record audit at Decatur Plaza. The Last audit was conducted January 23, 2014 on Inspection #2014-P-00013.</p>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
<p>General Comment: The NDT records were reviewed during a record audit at Decatur Plaza. The Last audit was conducted January 23, 2014 on Inspection #2014-P-00013.</p>		
JOINING OF MATERIAL OTHER THAN WELDING		Status
<p>Category Comment: The records associated with the joining of materials other than by welding are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</p>		
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Not Checked

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[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Not Checked
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Not Checked
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
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Satisfactory
[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
[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
[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>Ameren's Tuscola inspection unit does not contain critical or non-critical bonds.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Satisfactory
[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?	Not Applicable
General Comment:		
<i>The Ameren Tuscola inspection unit does not contain unprotected pipelines.</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
[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
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Satisfactory
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not	Satisfactory

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	affecting adjacent underground metallic structures?	
[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 Ameren Tuscola inspection unit 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
[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 Ameren Tuscola inspection unit does not transport corrosive gas.</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
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
[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
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Not Checked
<u>General Comment:</u>		
<i>The records associated with training are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
<u>General Comment:</u>		
<i>The records associated with training are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i>		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u>		
<i>Ameren is not a municipal operator.</i>		

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[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Not Checked
<p><u>General Comment:</u> <i>The records associated with training are reviewed during the Pawnee Record Audit. The last record audit at Pawnee was concluded on February 20, 2014 on Inspection #2014-P-00078.</i></p>		

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