



Operations, Maintenance, & Emergency Plan Audits

Samuel Copeland July 2025













- Inspection Format
 - Inspection Agenda
 - Inspection Forms
 - Covered Sections
- Executive Closing Meeting
- Operators Plan Of Correction Process





- Inspection Schedule
- Opening Meeting
- Procedural Review
- Documents & Records

Inspection Forms



- RRC Form 8.1 Gas Transmission OMandE Evaluation
- RRC Form 8.2 Gas Distribution OMandE Evaluation
- RRC Form 8.3 Hazardous Liquid OMandE Evaluation

Programs and Scope

- OPID, P-5, T-4
- System Types & Commodities
- Company Official
- Regulated Miles
- OM&E Subdivided
- Total number of Services, Suppliers
- Review Advisory Bulletins

Operations



- Regulated (rural) Gathering & Conversion of Service (Subpart A)
- Pressure Testing Procedure
- Normal Operations & Maintenance Procedures
- Abnormal Operation Procedures
- Safety Related Condition Reporting Procedures
- MAOP Reconfirmation Procedures
- RMV's and Potential Rupture (Gas)

Maintenance

- Welding / Joining
- Corrosion Control
- Assessments Outside High Consequence Areas
- Analysis of Predicted Fail Pressures (PFail)

- Potential Rupture 195.417
- RMV's 195.418-.419
- Breakout Tank 195.432
- Over Pressure Safety Devices 195.428



Emergency / Records



- Emergency Procedure 192.615 / 195.402
- Annual Reports 191.11
- Emergency Activity Review 192.615(c)/195.402(e)
- OPID 191.22
- P-5 8.51 / T-4 8.1
- Supervisory Leak Complaint Review 8.205
- NPMS Submission 191.2
- Safety-Related Condition 191.23-25
- O&M Manual Annual Review 192.605/195.402(a)
- Effectiveness Review (normal procedures) 192.605(b)(8)/195.402(c)(13)
- Effectiveness Reviews (abnormal operations) 192.605(c)(4)/195.402(d)(5)
- PS-95 Submission [8.210]
- Emergency Plan Effectiveness Review 192.615(b)(3)/195.402(e)(9)

Executive Closing



- Any alleged findings will be discussed.
- Company representative in PIPES will receive an Official Letter/ Email.

Operators Plan Of Correction Process

- The POC is a two-step process.
- Documentation is required to approve the corrective action.
- Extension Request.





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