

Distribution Integrity Management Program (DIMP)

Inspection Form

For Operators of Gas Distribution Systems

For Requirements of 192.1005 – 192.1011

Version 9/23/2011

This inspection form is for the evaluation of a gas distribution integrity management program for all operators of gas distribution except operators of master meter or small liquefied petroleum gas (LPG) systems. The form contains questions related to specific regulatory requirements and questions which are strictly for informational purposes. The questions which are related to specific regulatory requirements are preceded by the rule section number which prescribes the applicable code citation for the question. The cell preceding informational questions states “information only”.

S/Y stands for “Satisfactory” or “Yes”, U/N stands for “Unsatisfactory” or “No”, N/A stands for “Not Applicable”, and N/C stands for “Not Checked”. If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section.

Some inspection questions contain examples to further clarify the intent of the question. For example, question 5 asks, “Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?” The list following “e.g.” is not meant to be all inclusive or that all the items are required. Some of the items may not be applicable to an individual operator’s system.

Some States require the operator to notify and send the State regulatory authority any changes to operator’s plans and procedures. Operators in these states should also notify and send revisions of the DIMP plan to the State regulatory authority.

Operator Contact and System Information — Operator Information:

Name of Operator (legal entity):	MidAmerican Energy Company
PHMSA Operator ID(s) Included in this Inspection:	30750
Type of Operator:	<input checked="" type="checkbox"/> Investor Owned <input type="checkbox"/> Municipal <input type="checkbox"/> Private <input type="checkbox"/> LPG <input type="checkbox"/> Other (e.g. cooperative)
States(s) included in this inspection:	IL,IA,NE,SD
Headquarters Address:	4299 Northwest Urbandale Dr., Urbandale, IA 50322
Company Contact:	Jeffery J. Gust
Phone Number:	515-252-6429
Email:	jigust@midamerican.com
Date(s) of Inspection:	2/28/2012 TO 3/1/2012
Date of Report:	Click here to enter a date.

Persons Interviewed:

Persons Interviewed <i>(List the DIMP Administrator as the first contact)</i>	Title	Phone Number	Email
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192.1005 What must a gas distribution operator do to implement this subpart?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
1	.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? <u>OR</u> For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Project lists for each area demonstrate implementation. o Signatures OK. o MEC no longer has propane peak shaving. o Farm taps are included in the plan. Recommendations: o Clarify what an accelerated leak survey is in AA lists. o Put letter of support and signature sheet in management section of plan (1.20-1) o Delete latest edition reference to incorporated documents to plan. o Tie changes in an incorporated document to management of change section so the effect on the DIMP plan is reviewed when there is a change.				
2	Information Only	Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Fully <input type="checkbox"/>	Partially <input checked="" type="checkbox"/>		Not at all <input type="checkbox"/>	
		Commercial product(s)/templates name if used: GPTC, MEA materials were used as reference during plan development.				
Inspector's Comments						
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Yes - Plan section D 10.				
4	.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline:				
		<ul style="list-style-type: none"> • Design (e.g. type of construction, inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<ul style="list-style-type: none"> • Operating Conditions (e.g. pressure, gas quality, etc.)? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<ul style="list-style-type: none"> • Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspector's Comments	General Comments: o Sources are listed in the description of each threat in section 70.20. Recommendations: o Add form #'s o Be specific on the edition of the plan
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192.1007(a) Knowledge of the System

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
5	.1007(a)(2)	Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in plan sections 70.20 & 70.10.. Recommendations: o Add form #'s o Make sure list in 70.10 matches 70.20 o Reword following phrase from 70.10-2 "the following will be used to make assumptions when facility data is unavailable"				
6	Information Only	Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)?				
		Electronic <input checked="" type="checkbox"/>	Paper <input checked="" type="checkbox"/>	SME <input checked="" type="checkbox"/>		
Inspector's Comments		Newer records are electronic, older records paper, plan also uses much SME input				
7	.1007(a)(3)	Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in plan section 70.10-2.				
8	.1007(a)(3)	Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o The plan did not identify any substantive information gaps but some mapping and data cleanup needs are listed in Implementation plan 2-1-&2-2.				
9	.1007(a)(3)	Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in Implementation section 2-1. Recommendations: o Incorporate or reference the support document " DIMP mapping data cleanup team proposal".				
10	.1007(a)(5)	Do the written procedures require the capture and retention of data on any new pipeline installed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in plan section 70.10-2. Recommendations: o Revise bottom paragraph of 70.10-2 paragraph to include all system components not just pipe.				
11	.1007(a)(5)	Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspector's Comments		General Comments: o Found in section 70.10-2. o Compliance met assuming Appendix D5.0 attribute tables include pipe and appertenances..				
12	.1007(a)	Does the documentation provided by the operator demonstrate implementation of the element "Knowledge of the System"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in section 60.30-2 Recommendations: o Create a procedure and criteria for SME selection. o State each SME's expertise (skill sets)				
13	.1007(a)	Has the operator demonstrated an understanding of its system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

192.1007(b) Identify Threats

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
14	.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline? <ul style="list-style-type: none"> • Corrosion • Natural Forces • Excavation Damage • Other Outside Force Damage • Material or Welds • Equipment Failure • Incorrect Operation • Other Concerns 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector's Comments		General Comments: o Found in section 70.20. o MEC categories are a little different from DIMP categories because of their transmission system leak classification system but the data can be converted to meet DIMP requirements. o Section 70.20-2 incorrect operations section covers release from inadequate procedures. o Overpressurization is covered under failure to follow correct procedure under incorrect operations or under equipment failure, etc. o Overemphasis on release. o Incomplete description of overpressurization o "Third Party" in headings may be misleading as content includes MEC personnel and contractors Recommendations: o Look at all other events that affect integrity but don't result in release. Example - pipe coating damage				
15	.1007(b)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in 70.20-2. o Overbuilds under 3 rd party section. o Directional drilling under 3 rd party. o Cross bores under construction. o Have CFO that covers checking pipe under buildings - MEC is not taking credit for this under DIMP o Washouts under weather. o Aldyl "A" 1 inch fusion not allowed - this is a current measure to reduce risk AA not included in the DIMP plan.				
16	Information Only	Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o All categories subdivided using MEC specific categories.				
17	.1007(b)	In identifying threats did the information considered include any of the following? <ul style="list-style-type: none"> • Incident and leak history <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Corrosion control records <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Continuing surveillance records <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Patrolling records <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Maintenance history <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Excavation damage experience <input checked="" type="checkbox"/> yes <input type="checkbox"/> no • Other – Describe nothing significant _____ <input type="checkbox"/> yes <input checked="" type="checkbox"/> no 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

Inspector's Comments		General Comments: o Found in section 70.10-1			
18	Information Only	Does the plan categorize primary threats as either "system-wide" or "localized"?			
		All System-wide <input type="checkbox"/>	All Localized <input type="checkbox"/>	Some of Both <input checked="" type="checkbox"/>	Not Identified <input type="checkbox"/>
Inspector's Comments		General Comments: o SME form 40-50-2 lists threats and has other area column. o Form has geographic specific section.			
19	Information Only	Do the written procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in section 40.50-6 which is the SME form. o Also covered in 20.20-1 Recommendations: o Insert link between pages 40.50-6 and 20.20-1. o Flesh out triggered review in 20.20-1 and provide link to Form 65-39.			
20	.1007(b)	Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments					

192.1007(c) Evaluate and Rank Risk

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
21	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool?				
		Fully <input type="checkbox"/>	Partially <input checked="" type="checkbox"/>	Not at all <input type="checkbox"/>		
		Commercial tool name if used:MRP method from GL Noble Denton used for steel pipe only				
Inspector's Comments		General Comments: o Use SME's and manual method's - ex Plastic Pipe study, list of recent failures. o No algorithms used to rank these items. They tried but couldn't adequately rank SME's input.				
22	.1007 (c)	Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Procedure in 70.30-4. o There is a lack of documentation on the method to determine the relative importance of each threat Recommendations: o Add intermediate procedure steps to explain how risk is evaluated and ranked. o Include the output of the risk ranking as part of the plan in a table similar to Table 1 of the inspection form. o Also include on the new table which measure is a new measure and which is a continuing measure to reduce risk.				

			Corrosion	Natural Forces	Excavation Damage	Other outside Force Damage	Material or Welds	Equipment Failure	Incorrect Operation	Other Concerns
		For questions 23 – 25, do the written procedures to evaluate and rank risk consider:								
23	.1007 (c)	Each applicable current and potential threat?	S	S	S	S	S	S	S	S
24		The likelihood of failure associated with each threat?	S	S	S	S	S	S	S	S
25		The potential consequence of such a failure?	S	S	S	S	S	S	S	S
		Mark each box above with one of the following: S for "Satisfactory", U for "Unsatisfactory", N/A for "Not Applicable" and N/C for "Not Checked".								
Inspector's Comments		General Comments: o Question 24 - Found in section 70.30-1 procedure. Recommendation: o Risk ranking should be a more structured process for Likelihood of Failure and Consequence of Failure.								
26	.1007 (c)	If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach.					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Plan includes subdivision by area and material.								
27	Information Only	Is the method used to evaluate and rank risks reasonable?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o No risk ranking available to review and no risk ranking procedure available with enough detail to determine risk ranking process. Recommendations: o Risk ranking needs to address all threats.								
28	.1007(c)	Are the results of the risk ranking supported by the risk evaluation model/method?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o No risk ranking available to review and no risk ranking procedure available with enough detail to determine risk ranking process. Recommendations: o Risk ranking needs to address all threats.								
29	.1007(c)	Did the operator validate the results generated by the risk evaluation model/method? Briefly describe.					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o SME validation by service center. Recommendations: o Provide additional procedure details to clarify process (see question 22 comments). o Use SME's to validate risk ranking not to generate the risk ranking.								
30	.1007(c)	Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?					<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Unsatisfactory because of questions 22 & 28.								

192.1007 (d) Identify and implement measures to address risks

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
31	.1007 (d)	Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Operator considers SME process to be trigger point. Recommendations: o Need to show whether AA's are new or continuations of existing programs.				
32	.1007 (d)	When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Recommendations: o Need to show whether AA's are new or continuations of existing programs.				
33	.1007 (d)	Complete the table at the end of this form: <i>Threat Addressed, Measure to Reduce Risk, and Performance Measure</i>				
Inspector's Comments						
34	.1007 (d)	Does the plan include an effective leak management program (unless all leaks are repaired when found)				
		1. Locate the leaks in the distribution system; <input checked="" type="checkbox"/> 2. Evaluate the actual or potential hazards associated with these leaks; <input checked="" type="checkbox"/> 3. Act appropriately to mitigate these hazards; <input checked="" type="checkbox"/> 4. Keep records; and <input checked="" type="checkbox"/> 5. Self-assess to determine if additional actions are necessary to keep people and property safe. <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Using GPTC leak guide. o Found in section 70.40-1. o SME process reviews leaks. o Leak group evaluates program and sends infor back to supervisors with trends. o Leak guidance issued in Tips to Employees newsletter. o MEC does not do field audits of leak technicians to determine grading uniformity o Contractors self audit. Recommendations: o Add a little more detail on leak program effectiveness evaluation. o Include review of leak causes as part of the leak management program.				
35	.1007(d)	Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments						

192.1007(e) Measure performance, monitor results, and evaluate effectiveness

Question No.	Rule §192	Description					S/Y	U/N	N/A	N/C
	.1007(e)		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	ii) Number of excavation damages?	iii) Number of excavation tickets received by gas department ?	iv) Total number of leaks either eliminated or repaired categorized by cause?	v) Number of hazardous leaks either eliminated or repaired, categorized by material?	vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?		
36	Does the plan contain written procedures for how the operator established a baseline for each performance measure?	S	S	S	S	S	S	S		
37	Does the plan establish a baseline for each performance measure?	S	S	S	S	S	S	S		
38	Does the operator have written procedures to collect the data for each performance measure?	S	S	S	S	S	S	S		
39	Do the written procedures require the operator to monitor each performance measure?	U	U	U	U	U	U	U		
Mark each box above with one of the following: S for "Satisfactory", U for "Unsatisfactory", N/A for "Not Applicable" and N/C for "Not Checked".										
Inspector's Comments		General Comments: o Question 36 is addressed in section 70.50-1. o MEC picked one year 2010 because it is closest to DIMP implementation year. o MEC believes 2010 is a representative year suitable for baseline measurement. o Question 37 - baseline data in found in 40.40-1-9. o If the plan does not contain a reference or link to where the completed 40.40 forms are kept, please add that information to the plan. Recommendations: o Question 39 - In section 70.50-2 first sentence change "should" to "shall".								
40	.1007 (e)	When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in 70.50-2. o Compliance is achieved with the change from "should" to "shall" from question 39.								
41	Information Only	Can the performance measures identified by the operator in the plan be counted, monitored, and supported?					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspector's Comments		General Comments: o All numerical measurements. o Found in Form # 65-40.				
42	.1007(e)	Does the documentation provided by the operator demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		Recommendations: o Add performance measure for each AA form 40.50-7 o Develop table like Table 1 of the inspection form. o Add existing measures to reduce risk to table like table 1 in inspection form. o In section 70.50-2, paragraph 2, first line, replace performance measure with accelerated action. o Modify the bullet list in 70.50-2 as required. See 70.60-1.				

192.1007(f) Periodic Evaluation and Improvement

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
43	.1007 (f)	Do the written procedures for periodic review include: <ul style="list-style-type: none"> a. Frequency of review based on the complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years? b. Verification of general information (e.g. contact information, form names, action schedules, etc.)? c. Incorporate new system information? d. Re-evaluation of threats and risk? e. Review the frequency of the measures to reduce risk? f. Review the effectiveness of the measures to reduce risk? g. Modify the measures to reduce risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)? h. Review performance measures, their effectiveness, and if they are not appropriate, refine/improve them? 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Inspector's Comments		Recommendations: o Move bullets in 70.50-2 to 70.60-1. o Retain in 70.50-2 only those bullets relevant to Evaluating Effectiveness.				
44	Information Only	Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in section 50.30-2				
45	Information Only	Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o None in place. o None required. -				
46	.1007(f)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector Comments						

192.1007(g) Report results

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
47	.1007(g)	Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in section 70.70-1				
48	Information Only	When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in section 70.70-1. Recommendations: o Cross reference regulatory agency contact information.				
49	.1007(g)	Has the operator submitted the required reports?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o All states have 2010 reports.				

192.1009 What must an operator report when mechanical fittings fail?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
50	.1009	Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		General Comments: o Found in section 70.70-1.				

192.1011 What records must an operator keep?

Question No.	Rule §192	Description	S/Y	U/N	N/A	N/C
51	.1011	Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Inspector's Comments	<p>General Comments:</p> <ul style="list-style-type: none"> o Found in section 40.10-1 o Records retention in G70 shows indefinite retention of electronic records for O & M manual which meets DIMP requirements o A response as to the correct interpretation of FAQ C.6.2 will be provided to MEC sometime in the near future after the PHMSA-NAPSR DIMP Implementation Team addresses the issue that arose from this inspection. <p>Recommendations:</p> <ul style="list-style-type: none"> o Coordinate O& M and other plan records retention to DIMP records retention. 					
52	.1011	Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		<p>General Comments:</p> <ul style="list-style-type: none"> o Found in section 40.10-1. 				
53	.1011	Has the operator maintained the required records?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inspector's Comments		<p>General Comments:</p> <ul style="list-style-type: none"> o All maintained electronically. o NA because this is first inspection. 				

Table 1: Threat Addressed, Measure to Reduce Risk, and Performance Measure

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

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

	Primary Threat Category	Threat Subcategory, as appropriate	Measure to Reduce Risk	Performance Measure
1	Third Party Damage/Mechanical Damage	Excavation damage	Third Party Damage Prevention Program.	Number of excavation damages.
2	Other	Cast iron pipe that has served it’s useful life.	Cast iron replacement program starting in 2012.	Number of miles of cast iron.
3	External Corrosion	Bare steel systems protected Bare steel systems unprotected Coating deterioration	Main replacements per MRP model, failed asset replacements, misc. replacements.	Number of leaks caused by corrosion.
4	Weather-Related/other Outside Force	Flooding Frost heave Wash outs	Patrols/Surveys	Number of leaks caused by weather-related/other outside force.
5	Equipment	Failed seals, gaskets, packing, O-rings Mechanical fitting failure	Material Failure tracking and corresponding material standards changes.	Number of leaks caused by equipment.

Other Inspector	
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Comments	
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STATE OF NEBRASKA



Notice of Probable Violation

Dave Heineman
Governor

STATE FIRE MARSHAL
John Falgione
Fire Marshal

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 2, 2012

Mr. Dennis Olsen
Gas Standards Supervisor
MidAmerican Energy Company
401 Douglas
P.O. Box 778
Sioux City, IA 51102-0778

Subject: Natural Gas Pipeline Safety Inspection – #20120502-N

On March 1, 2012 representatives of the Nebraska State Fire Marshal's Office, Pipeline Safety Division, pursuant to Chapter 601 of 49 United States Code, conducted an inspection of MidAmerican Energy Company's Distribution Integrity Management Plan with supporting records in Sioux City, IA.

As a result of this inspection it appears that you have committed a probable violation, of pipeline safety regulations Title 49, Code of Federal Regulations, Part 192. The item in black is the regulation specifically stating the requirement which is followed by the violation of the regulation in blue.

§192.1007(c) What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements...

(c) Evaluate and rank risk. An operator must evaluate the risks associated with its distribution pipeline. In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline. This evaluation must consider each applicable current and potential threat, the likelihood of failure associated with each threat, and the potential consequences of such a failure. An operator may subdivide its pipeline into regions with similar characteristics (e.g., contiguous areas within a distribution pipeline consisting of mains, services and other appurtenances; areas with common materials or environmental factors), and for which similar actions likely would be effective in reducing risk...

□ MAIN OFFICE
□ DISTRICT A
246 South 14th Street
Lincoln, NE 68508-1804
(402) 471-2027

□ DISTRICT B
438 West Market
Albion, NE 68620-1241
(402) 395-2164

□ DISTRICT C
200 South Silber
North Platte, NE 69101-4219
(308) 535-8181

■ FUELS DIVISION
□ FLST ■ Pipeline
246 South 14th Street
Lincoln, NE 68508-1804
(402) 471-9465

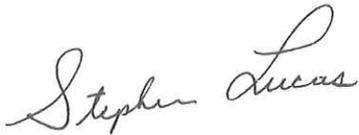
□ TRAINING DIVISION
2410 North Wheeler Avenue
Suite 112
Grand Island, NE 68801-2376
(308) 385-6892

The MidAmerican Energy "Distribution Integrity Management Program" procedure D70.30 did not produce a list of threats ranked by risk.

Whenever the State Fire Marshal has reason to believe any person is violating any provision of subsection (1) of section 81-545 of the Nebraska Natural Gas Pipeline Safety Act of 1969 or any regulation under the Nebraska Natural Gas Pipeline Safety Act of 1969, the State Fire Marshal may request the Attorney General of Nebraska to bring an action under section 81-547 of the Nebraska Natural Gas Pipeline Safety Act of 1969 in the district court of the county in which the defendant's principal place of business is located. The district court may impose a civil penalty not to exceed ten thousand dollars for each violation for each day that such violation persists, except that the maximum civil penalty shall not exceed five hundred thousand dollars for any related series of violations. The district court shall have jurisdiction to restrain violations of the Nebraska Natural Gas Pipeline Safety Act of 1969 including the restraint of transportation of gas or the operation of a pipeline facility

Please respond to this Notice of Probable Violation within 30 days with a plan to correct this violation of pipeline safety regulations. When the required actions are completed notify the State Fire Marshal, Fuels Safety Division, Pipeline Section in writing. In your correspondences with our office please reference **#20120502-N** and send you reply to Nebraska State Fire Marshal, Fuels Safety Division, Pipeline Section, 246 South 14th Street, Lincoln, Nebraska, 68508-1804.

If we can answer any questions or be of any assistance, please contact us at (402) 471-9664.



Stephen Lucas, Deputy
Fuels Safety Division, Pipeline Section
Nebraska State Fire Marshal



Clark Conklin, Chief Deputy
Fuels Safety Division
Nebraska State Fire Marshal

cc: Mr. Jeffery J. Gust
Vice President, Compliance & Standards
MidAmerican Energy
4299 Northwest Urbandale Drive
Urbandale, IA 50322

Mr. Brian Phelps
Compliance and Support Manager
MidAmerican Energy Company
602 D Avenue NW
Cedar Rapids, IA 52405



MidAmerican Energy
4299 Northwest Urbandale Dr.
Urbandale, IA 50322
515 252-6429 Telephone
515-242-3084 Fax
jjgust@midamerican.com

Jeffery J. Gust
Vice President
Compliance & Standards

June 1, 2012

Clark Conklin, Chief Deputy
Fuels Safety Division, Pipeline Section
Nebraska State Fire Marshal
246 South 14th Street
Lincoln, NE 68508-1804

Re: Natural Gas Pipeline Safety Inspection - #20120502-N
Distribution Integrity Management Plan

Dear Chief Conklin:

MidAmerican Energy Company (MidAmerican) provides the following response to the Notice of Probable Violation dated May 2, 2012. The inspection covered MidAmerican's Distribution Integrity Management Program (DIMP) and was completed by Deputy Stephen Lucas and Deputy Arnie Bates from February 28 through March 1, 2012.

Notice of Probable Violation

§ 192.1007(c) What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements...

(c) Evaluate and rank risk. An operator must evaluate the risks associated with its distribution pipeline. In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline. This evaluation must consider each applicable current and potential threat, the likelihood of failure associated with each threat, and the potential consequences of such a failure. An operator may subdivide its pipeline into regions with similar characteristics (e.g., contiguous areas within a distribution pipeline consisting of mains, services and other appurtenances; areas with common materials or environmental factors), and for which similar action likely would be effective in reducing risk...

The MidAmerican Energy "Distribution Integrity Management Program" procedure D70.30 did not produce a list of threats ranked by risk.

Chief Clark Conklin

June 1, 2012

Page 2

MidAmerican Response

MidAmerican will change its current process for evaluating and ranking risks to its natural gas distribution system to a more procedural and quantifiable process. Since receiving comments from inspectors from Illinois, Iowa, South Dakota and Nebraska, MidAmerican has begun modifying the DIMP plan risk ranking process for all current and potential threats. These modifications will include quantifiable steps that will:

- Demonstrate the methods used to establish the likelihood of failure associated with each threat.
- Demonstrate the methods used to establish the potential consequence of failure.
- Indicate the overall risk of failure for each threat.
- Produce a risk ranking table similar to PHMSA DIMP inspection form, Table 1.
- Provide validation of the risk rankings with the SME's.
- Determine appropriate mitigation measures for each risk ranked threat.
- Identify each mitigation measure as existing or accelerated.

MidAmerican will also develop a system of reference materials (e.g. matrices, tables and questionnaires) to support the risk ranking process. The risk ranking process and reference materials will be included in the revised DIMP plan by the fourth quarter of 2012.

MidAmerican agrees with the Fire Marshal's report and will modify the risk ranking procedures and develop the required risk ranking table. These changes, along with other changes identified during the four-state joint inspection, align with our goals to improve the DIMP plan and reduce risk on our distribution pipeline systems. MidAmerican will provide you a copy of the fully revised DIMP plan on or before December 31, 2012.

Please feel free to contact Brian Phelps at (319) 298-5168 if you should have any questions.

Sincerely,

/s/ Jeffery Gust

Vice President, Compliance and Standards

cc: Deputy Stephen Lucas, Nebraska State Fire Marshal
Tom Hutchins, Vice President, Gas Delivery, MidAmerican Energy Company



MidAmerican Energy
4299 Northwest Urbandale Dr.
Urbandale, IA 50322
515 252-6429 Telephone
515-242-3084 Fax
jjgust@midamerican.com

Jeffery J. Gust
Vice President
Compliance & Standards

December 13, 2012

Clark Conklin, Chief Deputy
Fuels Safety Division, Pipeline Section
Nebraska State Fire Marshal
246 South 14th Street
Lincoln, NE 68508-1804

Re: Natural Gas Pipeline Safety Inspection - #20120502-N
Distribution Integrity Management Plan

Dear Chief Conklin:

MidAmerican Energy Company (MidAmerican) provides the following updated response to the Notice of Probable Violation dated May 2, 2012. The inspection covered MidAmerican's Distribution Integrity Management Program (DIMP) and was completed by Deputy Stephen Lucas and Deputy Arnie Bates from February 28 through March 1, 2012.

Due to significant changes within the DIMP Plan (Plan), MidAmerican is providing revised responses to each of the original inspection findings based upon the new Plan, Revision 1, and Effective 12/31/2012 (attached). Additionally, if it is agreeable with all four state regulatory agencies, MidAmerican would also like to propose that a joint review meeting be scheduled so that we may walk through the changes with your staff and be able to answer or resolve any additional questions that may arise.

Notice of Probable Violation

§ 192.1007(c) What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements...

(c) Evaluate and rank risk. An operator must evaluate the risks associated with its distribution pipeline. In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline. This evaluation must consider each applicable current and potential threat, the likelihood of failure associated with each threat, and the potential consequences of such a failure. An

operator may subdivide its pipeline into regions with similar characteristics (e.g., contiguous areas within a distribution pipeline consisting of mains, services and other appurtenances; areas with common materials or environmental factors), and for which similar action likely would be effective in reducing risk...

The MidAmerican Energy "Distribution Integrity Management Program" procedure D70.30 did not produce a list of threats ranked by risk.

MidAmerican Response (June 1, 2012)

MidAmerican will change its current process for evaluating and ranking risks to its natural gas distribution system to a more procedural and quantifiable process. Since receiving comments from inspectors from Illinois, Iowa, South Dakota and Nebraska, MidAmerican has begun modifying the DIMP plan risk ranking process for all current and potential threats. These modifications will include quantifiable steps that will:

- Demonstrate the methods used to establish the likelihood of failure associated with each threat.
- Demonstrate the methods used to establish the potential consequence of failure.
- Indicate the overall risk of failure for each threat.
- Produce a risk ranking table similar to PHMSA DIMP inspection form, Table 1.
- Provide validation of the risk rankings with the SME's.
- Determine appropriate mitigation measures for each risk ranked threat.
- Identify each mitigation measure as existing or accelerated.

MidAmerican will also develop a system of reference materials (e.g. matrices, tables and questionnaires) to support the risk ranking process. The risk ranking process and reference materials will be included in the revised DIMP plan by the fourth quarter of 2012.

MidAmerican Response (December 13, 2012)

MidAmerican has produced a risk ranking table similar to PHMSA DIMP inspection form, Table 1. The table includes all threats and is populated with rankings based upon the data and evaluations completed in 2011. The risk ranking table can be found in Appendix, D App.5.0 DIMP 5 – Ranked List of Threats.

Additional information as noted in the above bullet points can be found in the following locations:

- Section D 70.30 has been expanded to include an evaluation process for each current and potential threat; the likelihood of failure and the consequence of failure. Additionally, details on the risk ranking calculations are now included as Appendix, D App.6.0 Risk Rank Calculator Requirements, Process and Calculations.

Chief Clark Conklin

December 13, 2012

Page 3

- Page D 70.30-2, SME Validation, has been revised to “The DIMP Manager shall arrange risk review meeting with SME’s to discuss the results of the initial ranked list of threats...”
- Development of all mitigation actions for each threat subcategory is completed on form DIMP3C – Mitigation (starting on page 14 of Appendix, D App.3.0 DIMP 3 – Risk Review Meeting Documentation).
- Designation of existing and accelerated mitigation actions is now included in the DIMP5 risk ranking table.

MidAmerican believes the above changes further clarify and strengthen our DIMP program and aligns with our goals to reduce risk on our distribution pipeline systems. We would like to thank you and your staff for the discussions and recommendations that have been made.

Please feel free to contact Brian Phelps at (319) 298-5168 if you should have any questions or would like to discuss options for a possible joint review meeting.

Sincerely,

/s/ Jeffery Gust

Vice President, Compliance and Standards

cc: Deputy Stephen Lucas, Nebraska State Fire Marshal
Tom Hutchins, Vice President, Gas Delivery, MidAmerican Energy Company

**NEBRASKA STATE FIRE MARSHAL - PIPELINE SAFETY SECTION
FOLLOW-UP INSPECTION:**

Name of Operator:	MidAmerican Energy	SFM ID #: 14-00-000
Operator Address: 602 D Ave NW Cedar Rapids, IA 52405	Phone Number: (319) 298-5168 Fax Number: (319) 298-5164 Emergency Number: 1-800-595-5325	
Persons Interviewed	Title	Phone No.
BrianPhelps	Compliance and Support Manager	(319) 298-5168
Persons conducting Inspection	Date: 5-28-2013	
Stephen Lucas		
Description:	Code 192.1007(c) Date of Letter: 5-2-2012 Type: NOPV Disposition: Closed	
Portion of Unit Inspected:	Distribution Integrity Management Plan	

Comments:

found a list of risks ranked by risk.

STATE OF NEBRASKA



Letter of Approval

Dave Heineman
Governor

Jim Heine
Fire Marshal

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 29, 2013

Mr. Dennis Olsen
Gas Standards Supervisor
MidAmerican Energy Company
401 Douglas
P. O. Box 778
Sioux City, IA 51102-0778

Subject: Notice of Probable Violation – #20120502-N

On May 2, 2012 a notice of probable violation was issued as a result of an inspection conducted on March 1, 2012.

As a result of your actions addressing this situation and a follow-up inspection conducted by this office on May 28, 2013 the following issues raised in this "Notice of Probable Violation" is resolved.

§192.1007(c) What are the required elements of an integrity management plan?

If you have any questions regarding the substance or propriety of this notice, please contact our office at, Nebraska State Fire Marshal, Pipeline Safety, 246 South 14th Street, Lincoln, NE, 68508-1804 or telephone 402-471-9465.

Stephen Lucas, Deputy
Fuels Division, Pipeline Section
Nebraska State Fire Marshal

THANKS, DENNIS!

Clark Conklin, Chief Deputy
Fuels Division
Nebraska State Fire Marshal

cc: Mr. Jeffery J. Gust
Vice President, Compliance & Standards
MidAmerican Energy Company
4299 Northwest Urbandale Drive
Urbandale, IA 50322

Mr. Brian Phelps
Compliance and Support Manager
MidAmerican Energy Company
602 D Avenue Northwest
Cedar Rapids, IA 52405

MAIN OFFICE

DISTRICT A

246 South 14th Street
Lincoln, NE 68508-1804
(402) 471-2027

DISTRICT B

438 West Market
Albion, NE 68620-1241
(402) 395-2164

FUELS DIVISION

FLST Pipeline
246 South 14th Street
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(402) 471-9465

TRAINING DIVISION

2410 North Wheeler Avenue
Suite 112
Grand Island, NE 68801-2376
(308) 385-6892