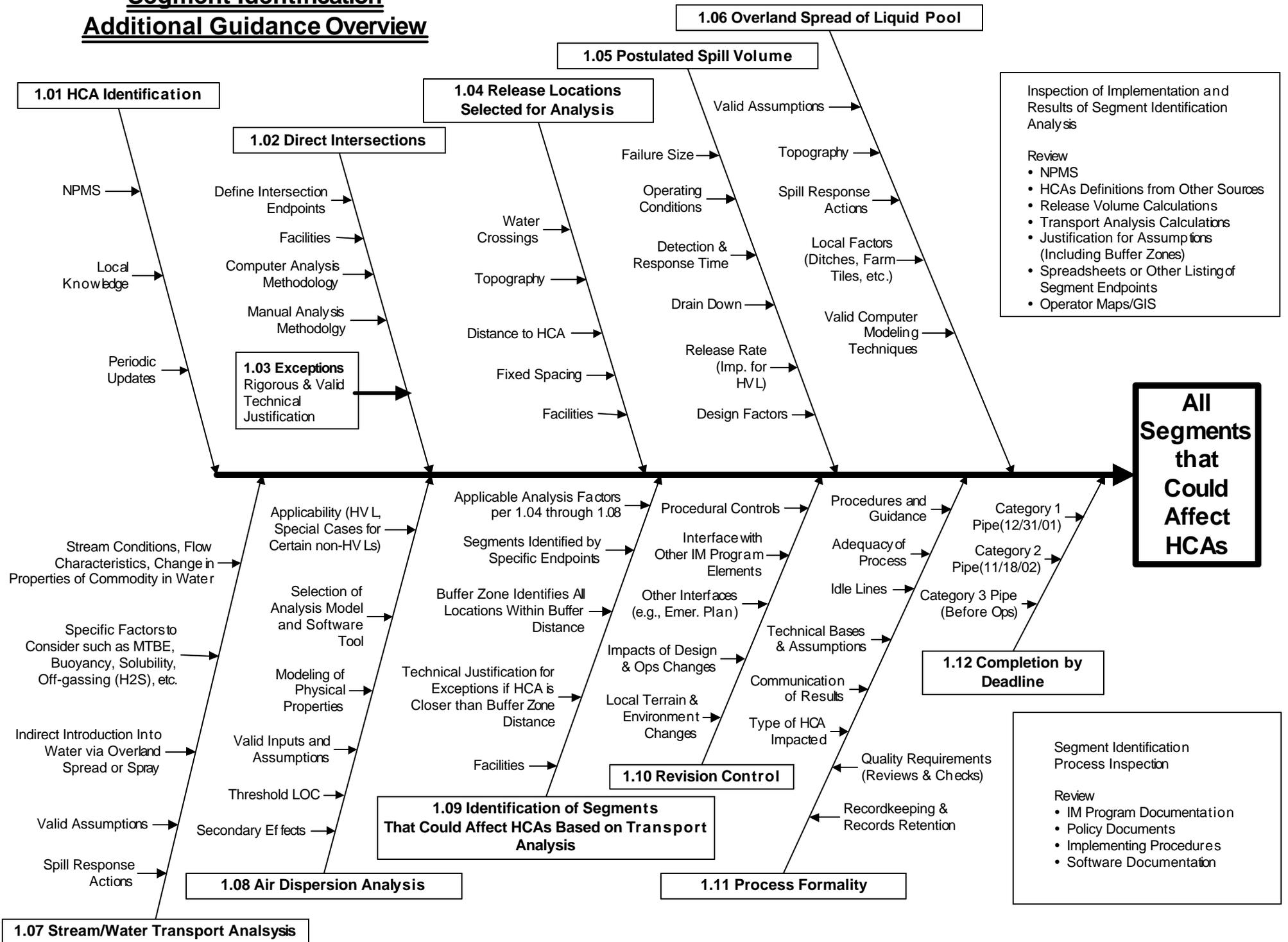


# Segment Identification Additional Guidance Overview



**All Segments that Could Affect HCAs**

Inspection of Implementation and Results of Segment Identification Analysis

Review

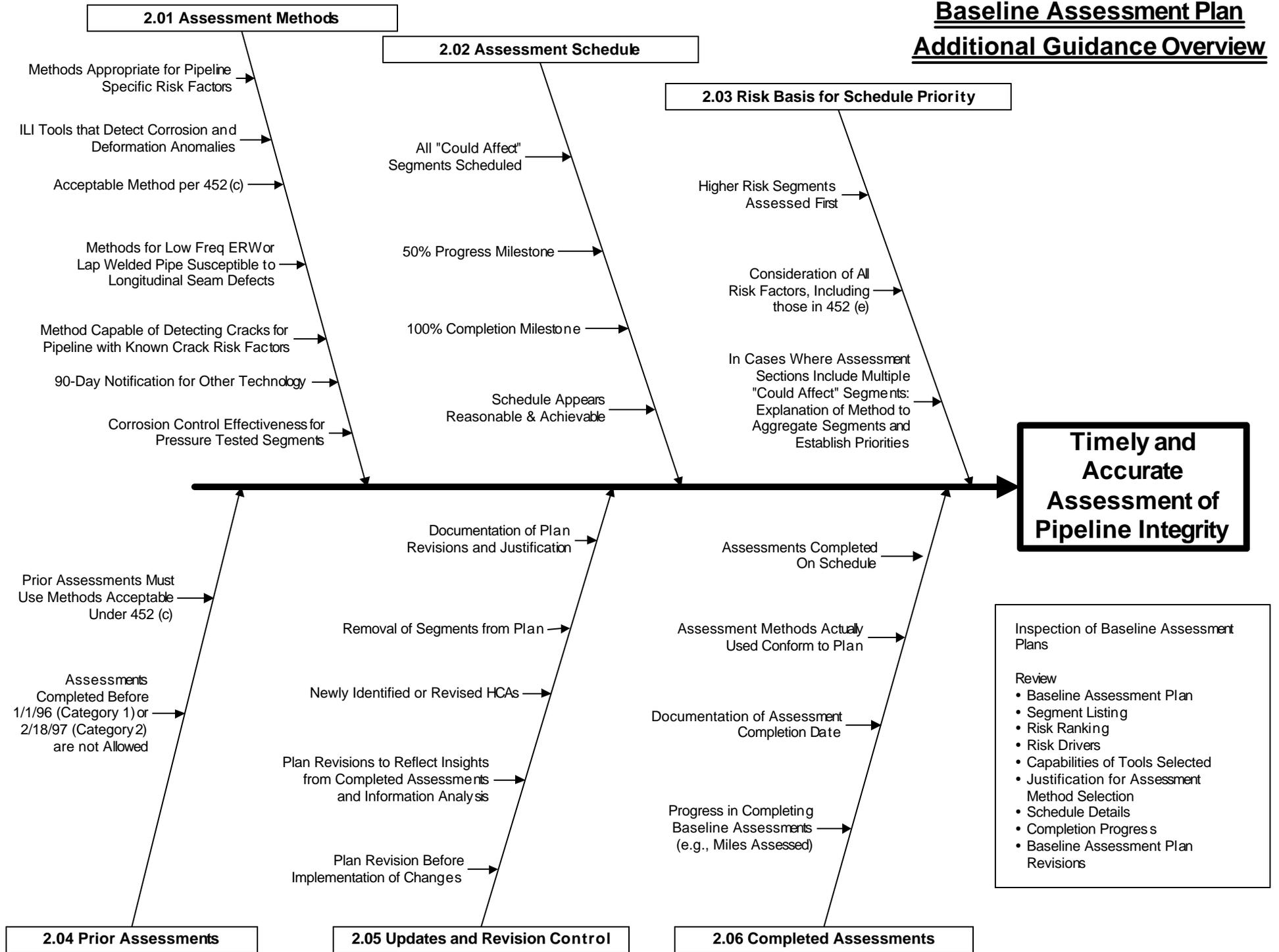
- NPMS
- HCAs Definitions from Other Sources
- Release Volume Calculations
- Transport Analysis Calculations
- Justification for Assumptions (Including Buffer Zones)
- Spreadsheets or Other Listing of Segment Endpoints
- Operator Maps/GIS

Segment Identification Process Inspection

Review

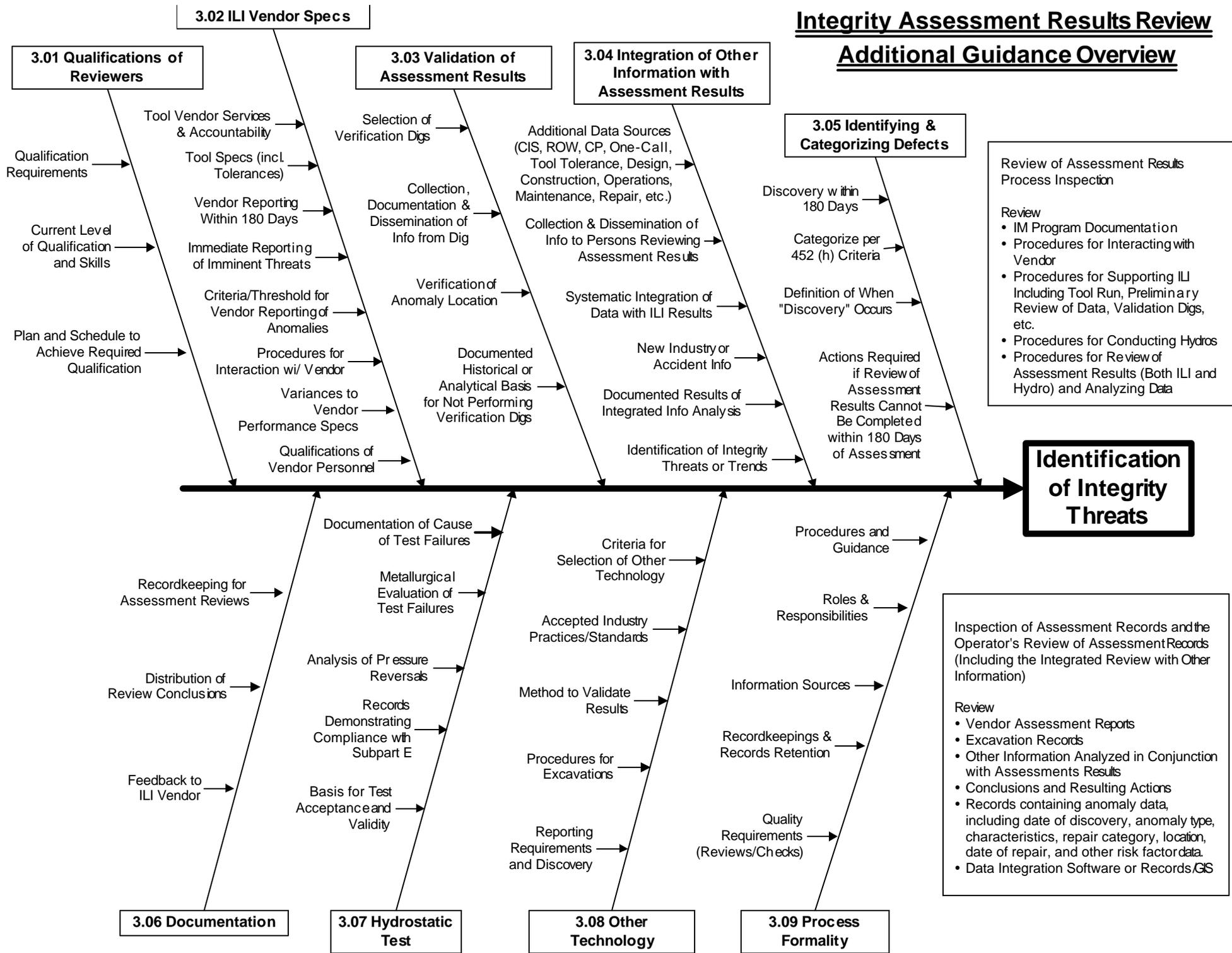
- IM Program Documentation
- Policy Documents
- Implementing Procedures
- Software Documentation

# Baseline Assessment Plan Additional Guidance Overview



**Integrity Assessment Results Review**

**Additional Guidance Overview**



Review of Assessment Results Process Inspection

Review

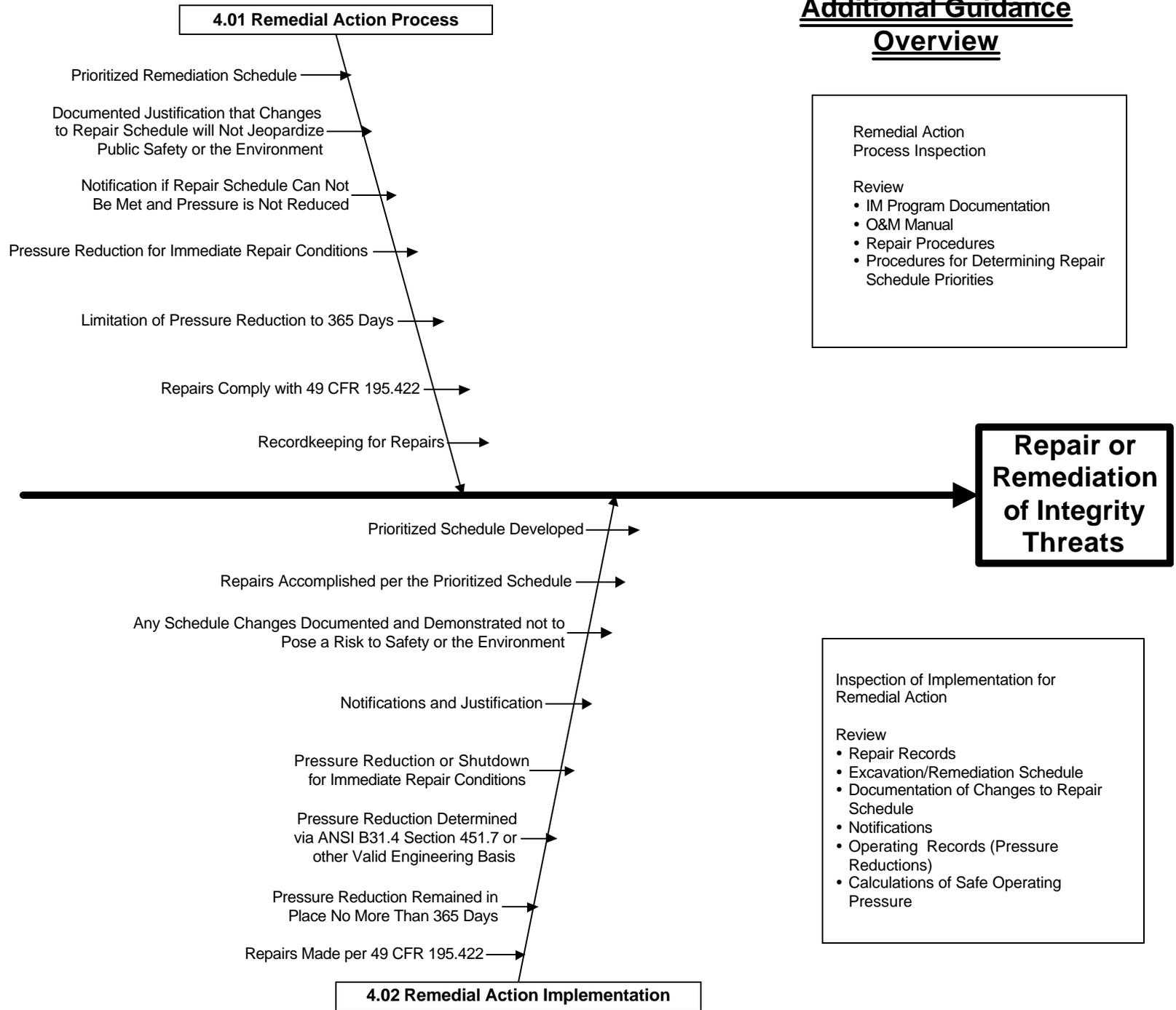
- IM Program Documentation
- Procedures for Interacting with Vendor
- Procedures for Supporting ILI Including Tool Run, Preliminary Review of Data, Validation Digs, etc.
- Procedures for Conducting Hydros
- Procedures for Review of Assessment Results (Both ILI and Hydro) and Analyzing Data

Inspection of Assessment Records and the Operator's Review of Assessment Records (Including the Integrated Review with Other Information)

Review

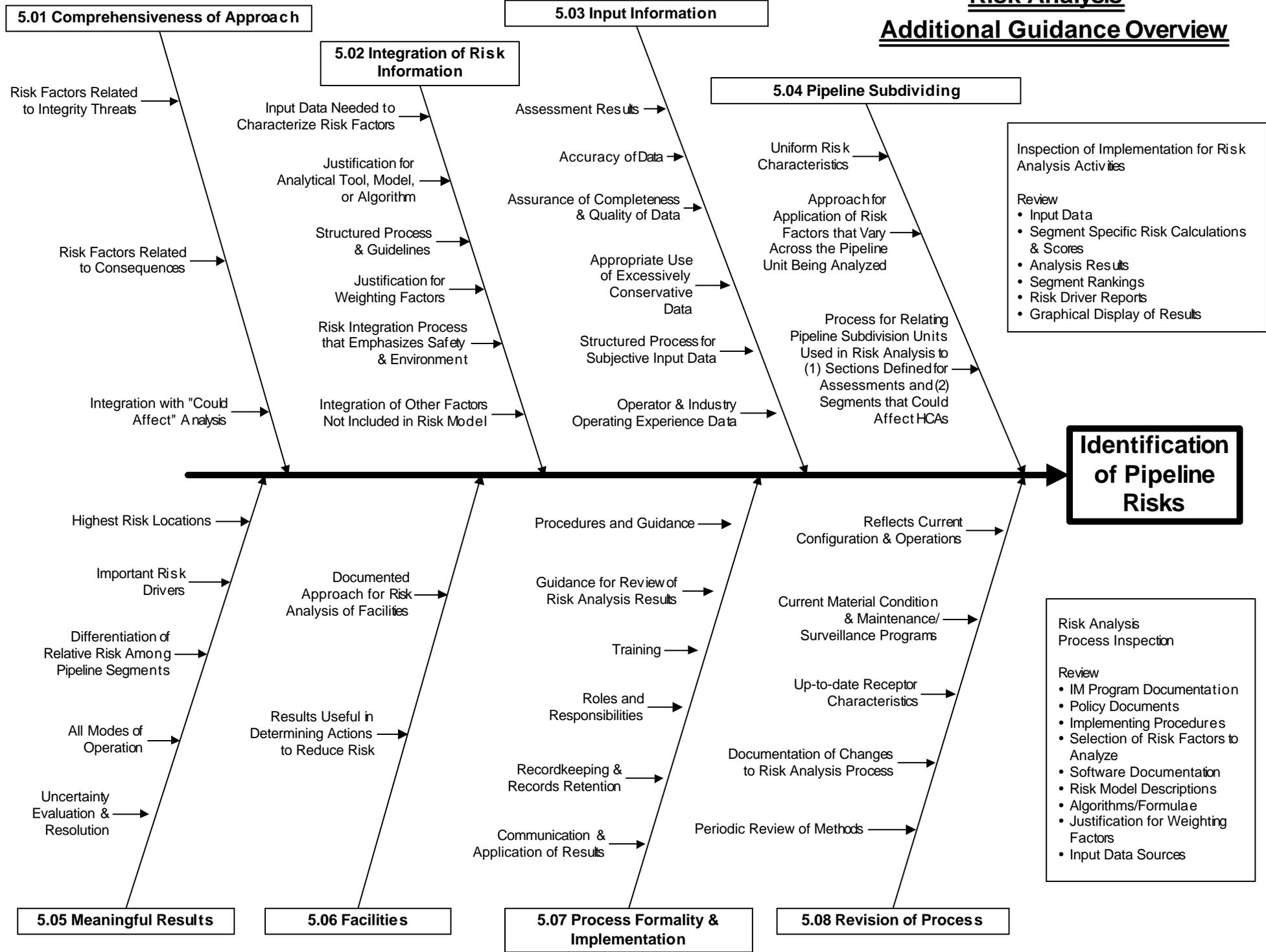
- Vendor Assessment Reports
- Excavation Records
- Other Information Analyzed in Conjunction with Assessments Results
- Conclusions and Resulting Actions
- Records containing anomaly data, including date of discovery, anomaly type, characteristics, repair category, location, date of repair, and other risk factor data.
- Data Integration Software or Records/GS

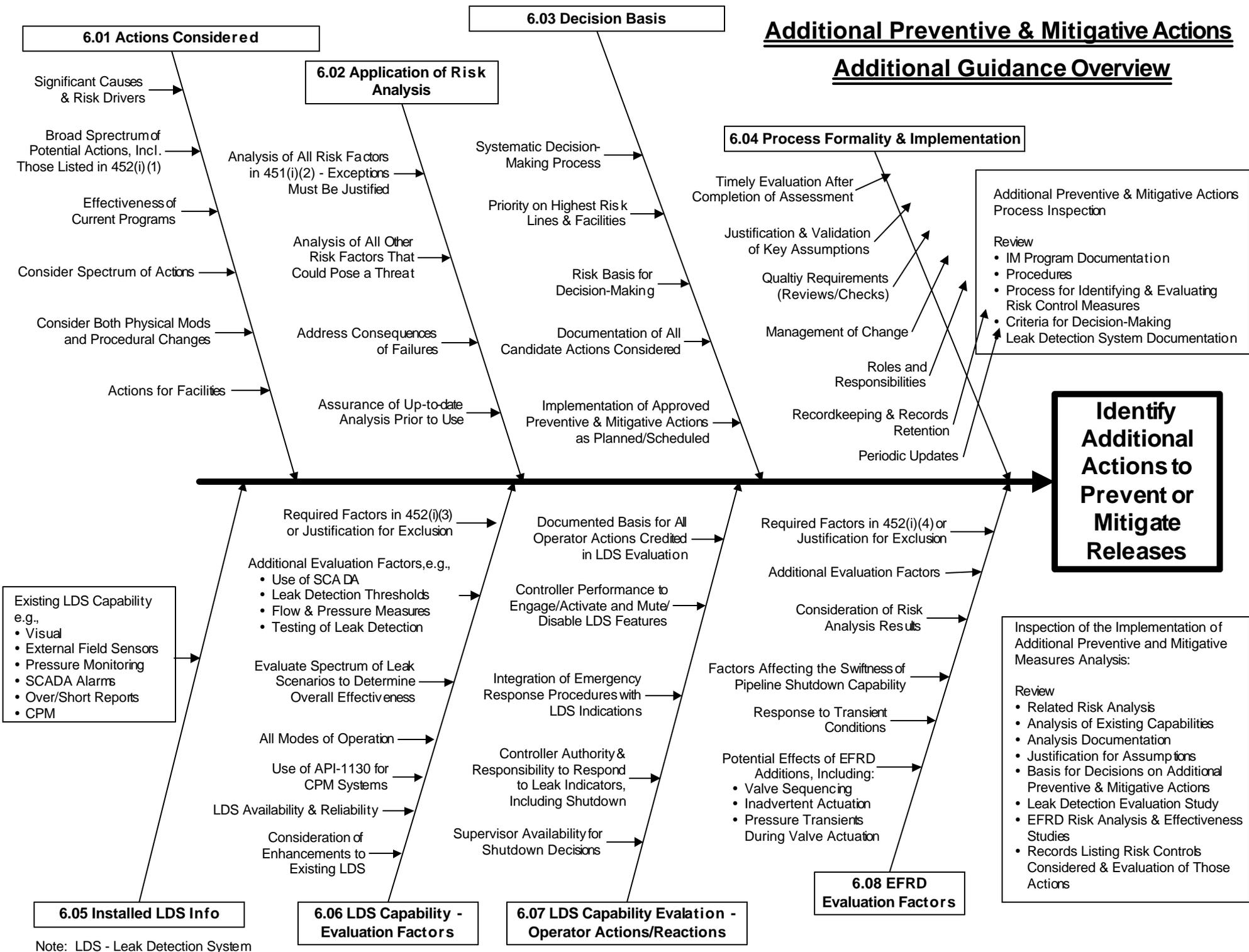
## Remedial Action Additional Guidance Overview



# Risk Analysis

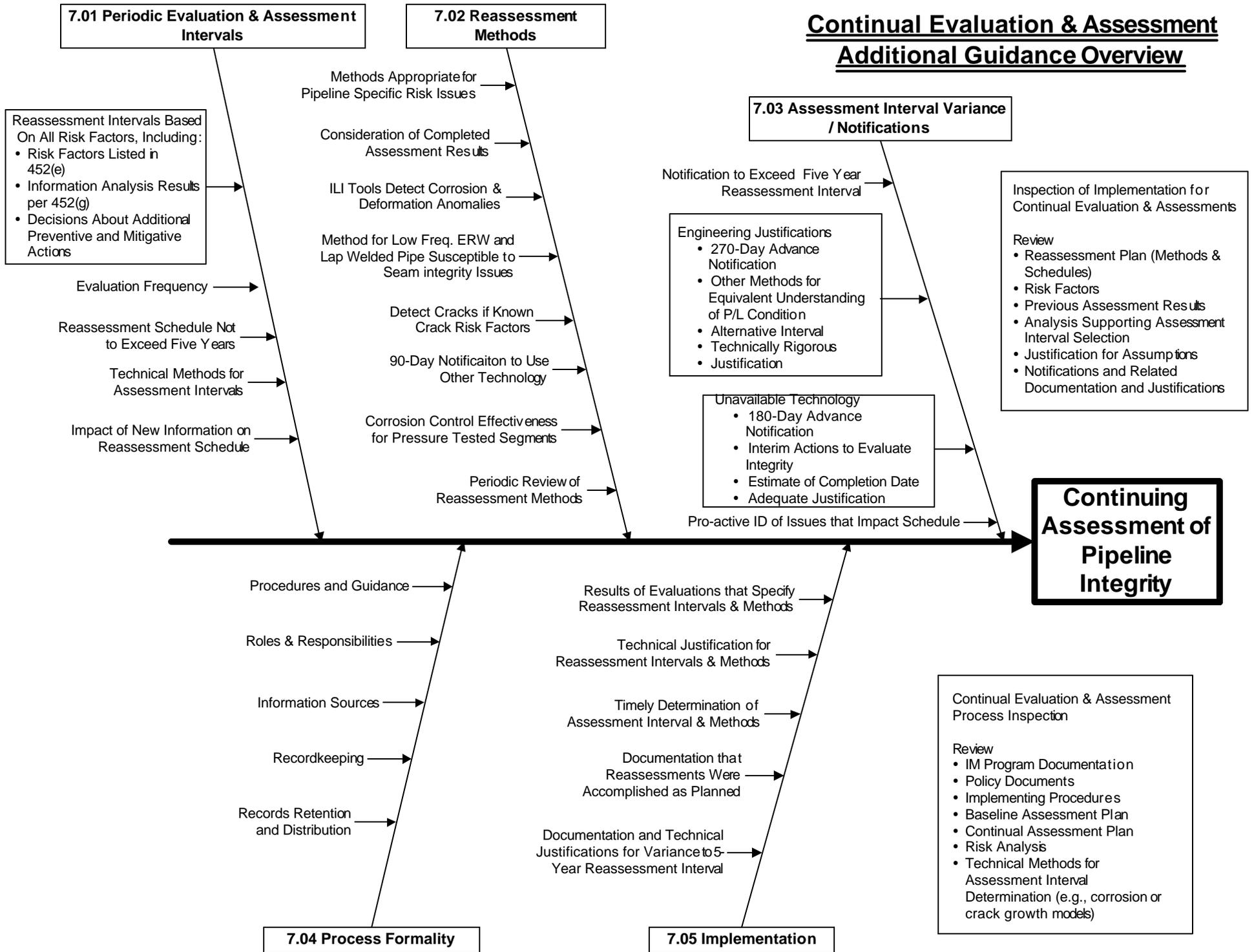
## Additional Guidance Overview





Note: LDS - Leak Detection System

# Continual Evaluation & Assessment Additional Guidance Overview



# Performance Measures & Program Evaluation

## Additional Guidance Overview

### 8.01 Process Approach

- Self Assessments, Audits, Management Reviews
- Scope & Timing of Periodic Evaluations
- Performance Goals & Objectives
- Roles and Responsibilities
- Recordkeeping, Including How Recommendations are Dispositioned
- Review & Followup of Findings
- Maintain Up-to-date Performance Measures

### 8.02 Performance Metrics

- Type & Frequency
- Program Implementation Metrics
- Threat Specific Metrics
- Defined Performance Goals
- Benchmark Performance Against Industry Performance
- Trending of Performance Metrics
- Trending of Near Misses

### 8.03 Communication of Results

- Preparation & Distribution of Periodic Reports
- Communication of Company's Integrity Performance & Actions Taken
- Management Followup to Address Significant Integrity Issues

- Performance Measures & Program Evaluation Process Inspection
- Review
- IM Program Documentation
  - Policy Documents
  - Implementing Procedures
  - Method for Performance Metric Analysis & Trending
  - Root Cause Analysis Methodology Documentation
  - Self-Assessment or Internal Audit Process



## IM Program Improvement

- Rigorous & Thorough Analysis of Problems and Integrity Events
- ID, Tracking, & Followup of Recommendations & Corrective Actions
- Communication of Lessons Learned from Root Cause Analysis

### 8.04 Root Cause Analysis

- Verify Performance Data Collection
- Identified Performance Problems, Trends, and Improvements
- Completion of Self Assessments & Management Audits
- Actions Implemented or Scheduled
- Periodic Management Review of Performance
- Adequate Supporting Documentation including Data Sources, Assumptions, Results, & Actions
- Communication of Integrity Performance to Employees

### 8.05 Implementation

- Inspection of Implementation of Performance Measurement Program
- Review
- Performance Metrics & Data
  - Target Performance Objectives
  - Root Cause Analyses Results
  - Audits/Self Assessment Reports
  - Corrective Action Tracking System
  - Implementation Records for Selected Corrective Actions