Pipeline Safety Program Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
49 CFR Part 192 — Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards
49 CFR Part 195 — Transportation of Hazardous Liquids by Pipeline
49 CFR 192 Subpart N — Qualification of Pipeline Personnel
49 CFR 192 Subpart O — Gas Transmission Pipeline Integrity Management
49 CFR Part 199 — Drug and Alcohol Testing
PHMSA Pipeline Safety Stakeholder Communications
PHMSA Online Data and Reporting Portal

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

Written Plans and Program Documentation

Audit Item	Expected Finding	Status	Notes / Evidence
Operations and maintenance plan	Written O&M procedures manual covers all pipeline operations including normal operations, abnormal operations, maintenance activities, and emergency procedures. Manual is current, reviewed periodically, and accessible to all operations personnel. Changes to procedures follow a documented management of change process. » *Ref: 49 CFR 192.605 / 195.402*		
Integrity management program	Written IMP exists for transmission pipelines in high consequence areas (HCAs) per Subpart O/§195.452. Program includes threat identification, risk assessment, baseline assessment plan, reassessment intervals (not exceeding 7 years for gas, 5 years for liquid), and repair criteria. Program is reviewed and updated when conditions change. » *Ref: 49 CFR 192.903-192.951 / 195.452*		
Distribution integrity management	If operating a gas distribution system, a written DIMP per Subpart P exists covering threat		

Audit Item	Expected Finding	Status	Notes / Evidence
	identification, risk ranking, performance measures, and continuous improvement. Annual performance reporting to PHMSA is completed. » Ref: 49 CFR 192.1001-192.1015 (Subpart P)		
Emergency response plan	Written emergency plan per §192.615 or §195.402 includes procedures for: gas/liquid leak response, fire/explosion, natural disaster, and notification of emergency responders. Plan includes contact information for local fire, police, hospitals, and the National Response Center. Plan is reviewed and updated annually. » Ref: 49 CFR 192.615 / 195.402(e)		

Operator Qualification

Audit Item	Expected Finding	Status	Notes / Evidence
OQ program documentation	Written operator qualification program per Subpart N (§192.801-809) or §195.505 identifies all covered tasks on the pipeline system. Each covered task has defined knowledge, skills, and abilities (KSAs). Qualification methods (written exam, performance evaluation, observation) are documented for each task. » Ref: 49 CFR 192.801-192.809 (Subpart N)		
Personnel qualification status	All individuals performing covered tasks are qualified per the OQ program before performing those tasks unsupervised. Qualification records are current and include date qualified, method of evaluation, and evaluator identity. Requalification intervals are defined and tracked. » Ref: 49 CFR 192.805(b)-(d) / 195.505		
Abnormal operating conditions	OQ program includes training and evaluation for recognizing and responding to abnormal operating conditions (AOCs). AOC training covers all conditions identified in the operator's procedures. Individuals who contribute to an incident may require requalification. » Ref: 49 CFR 192.805(h) / 195.505(e)		
OQ program auditing	OQ program is periodically reviewed and updated. Contractor and subcontractor OQ compliance is verified. Records demonstrate that unqualified individuals do not perform covered tasks except under the direct observation of a qualified individual. » Ref: 49 CFR 192.805(g) [best practice]		

Damage Prevention and Public Awareness

Audit Item	Expected Finding	Status	Notes / Evidence
Damage prevention program	Written damage prevention program includes participation in state one-call systems, pipeline marking/patrolling, excavation monitoring procedures, and public education. Operator responds to locate requests within required timeframes. Near-miss and damage events are tracked and analyzed.		

Audit Item	Expected Finding	Status	Notes / Evidence
	» Ref: 49 CFR 192.614 / 195.442		
Pipeline markers and signage	Pipeline markers are placed at required intervals per §192.707 or §195.410. Markers indicate operator name, emergency telephone number, and product transported. Markers are maintained in good condition and replaced when missing or damaged. » Ref: 49 CFR 192.707 / 195.410		
Public awareness program	Written public awareness program per §192.616 or §195.440 addresses all four required audiences: affected public, emergency officials, local government, and excavators. Communications are delivered at required intervals (annually for excavators, at least every two years for others). Program effectiveness is evaluated periodically. » Ref: 49 CFR 192.616 / 195.440		
Line patrol and surveillance	Pipeline right-of-way is patrolled at required intervals to detect leaks, construction activity, environmental changes, and encroachments. Patrol methods and frequencies are documented. Abnormal conditions found during patrol are investigated and resolved. » Ref: 49 CFR 192.705 / 195.412		

Inspection, Testing, and Maintenance

Audit Item	Expected Finding	Status	Notes / Evidence
Pipeline inspection records	Records of all inspections, tests, and maintenance activities are maintained per regulatory requirements. Records include date, type of inspection, findings, and corrective actions. Leak survey records are maintained for gas distribution and transmission systems. » Ref: 49 CFR 192.709 / 195.404		
Valve maintenance	Valves are inspected and operated at required intervals to ensure they function properly. Emergency shut-off valves are tested per established schedule. Valve maintenance records are current. » Ref: 49 CFR 192.745-192.747 / 195.420		
Corrosion control program	Cathodic protection system is monitored and maintained per §192.463-492 or §195.565-589. Annual cathodic protection surveys are conducted. Atmospheric corrosion inspections are performed at required intervals. Corrosion deficiencies are repaired within regulatory timeframes. » Ref: 49 CFR 192.451-192.491 / 195.551-195.589		
Pressure testing and records	Pipeline pressure tests are documented with test medium, test pressure, duration, and results. Maximum allowable operating pressure (MAOP) is established and documented for each pipeline segment. Any pressure exceedances are investigated and documented. » Ref: 49 CFR 192.503-192.517 / 195.302-195.310		

Reporting, Recordkeeping, and Drug/Alcohol Testing

Audit Item	Expected Finding	Status	Notes / Evidence
Incident reporting	Incidents meeting PHMSA reporting thresholds are reported via the National Response Center and followed up with written reports within 30 days using the appropriate form (PHMSA F 7100.1 for gas, F 7000-1 for liquid). Reporting thresholds and procedures are understood by all operations personnel. » *Ref: 49 CFR 191.5, 191.15 / 195.50, 195.54*		
Annual report submission	Annual reports are submitted to PHMSA by the required deadline (March 15 for gas, June 15 for liquid). Reports include total mileage, leak and repair data, and program information. Reports are submitted through PHMSA's online portal. » *Ref: 49 CFR 191.17 / 195.49*		
Drug and alcohol testing	Drug and alcohol testing program per 49 CFR Part 199 is implemented for all covered employees performing safety-sensitive functions. Pre-employment, random, post-accident, reasonable suspicion, return-to-duty, and follow-up testing are conducted per regulations. Testing records and MIS reports are maintained. » *Ref: 49 CFR Part 199*		
Record retention compliance	Records are maintained for the periods required by regulation: life of the pipeline for design/construction/testing records, five years for operating and maintenance records, period of employment plus five years for OQ records. Records management system ensures accessibility and protection from loss. » *Ref: 49 CFR 192.709, 192.805(j) / 195.404*		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review