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National Fuel

John R. Pustulka
President

June 28, 2013

Byron Coy
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road
Suite 103
West Trenton, NJ 08628

Response to Notice of Amendment CPF 1-2013-1008M

Dear Mr. Coy:

National Fuel Gas Supply Corporation (National Fuel) received Notice of Amendment CPF 1-2013-1008M (Notice) dated May 30, 2013 regarding inadequacies in National Fuel's procedures for Control Room Management that were identified during PHMSA's June 2012 inspection.

National Fuel does not contest the findings stated within the Notice and has amended the written control room management procedures, *Control Room Management Plan*, to address the four inadequacies identified. These amendments were made on June 5, 2013, as described below (new language is underlined):

1. National Fuel has amended the first paragraph of Section 5.4 of the *Control Room Management Plan* to include a timeline for testing the internal communication plan, as prescribed in §192.631(c)(3).

Original language:

“National Fuel GCOC will participate in an internal communication plan test to provide adequate means for manual operation of the pipeline safely.”

Amended language:

“National Fuel GCOC will participate in an internal communication plan test to provide adequate means for manual operation of the pipeline safely.

The test will be completed once each calendar year, not to exceed 15 months.”

2. National Fuel has amended Appendix 7 of the *Control Room Management Plan* to include “status of scheduled and unscheduled maintenance activities” in the list of agenda items to be discussed during shift turnover, to more adequately address §192.631 (c)(5).

Original language:

“When responsibility for operating the Pipeline System is changed, Out-Going Controllers and Gas System Supervisors should prepare for this event by documenting pertinent information that is required for On-Coming Controllers and Gas System Supervisors to safely and effectively assume responsibility for operating that section of Pipeline System.

The agenda items must include, but are not limited to the following topics:

Abnormal Operating Conditions

Compressor Status

Emergencies

Incidents

Management of Change Issues

Operational Issues

Line Shutdown Permits

Telemetric Issues

Telephone Tickets

Storage Status

Current Alarms”

Amended language:

“When responsibility for operating the Pipeline System is changed, Out-Going Controllers and Gas System Supervisors should prepare for this event by documenting pertinent information that is required for On-Coming Controllers and Gas System Supervisors to safely and effectively assume responsibility for operating that section of Pipeline System.

The agenda items must include, but are not limited to the following topics:

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Current Alarms

Status of Scheduled and Unscheduled Maintenance Activities

3. National Fuel has amended paragraph four of Section 6.1 of the *Control Room Management Plan* to eliminate the discrepancy with Appendix 17 in the stated time interval for educating/training controllers on fatigue recognition and mitigation strategies.

This change provides consistency throughout the procedures in addressing §192.631 (d)(2) and (d)(3).

Original language:

“Controllers and Gas System Supervisors will be educated on fatigue mitigation strategies and recognition of the effects of fatigue once each calendar year. A member of GCOC management trained in fatigue mitigation, or a vendor that specializes in this field will conduct this training. *(see appendix 17)*”

Amended language:

“Controllers and Gas System Supervisors will be educated on fatigue mitigation strategies and recognition of the effects of fatigue once each calendar year, not to exceed 15 months. A member of GCOC management trained in fatigue mitigation, or a vendor that specializes in this field will conduct this training. *(see appendix 17)*”

4. National Fuel has amended paragraph two of Section 12.1 of the *Control Room Management Plan* to directly state that documentation of deviations from the plan will include when and why the deviations are necessary “for the safe operation of the pipeline facility,” as prescribed in §192.631 (j)(2).

Original language:

“If deviations from this plan occur, National Fuel will document when and why the deviations were necessary. Deviations will be made in accordance with National Fuel’s “NFG CRM Plan Deviation Procedures” *(see appendix 1)*”

Amended language:

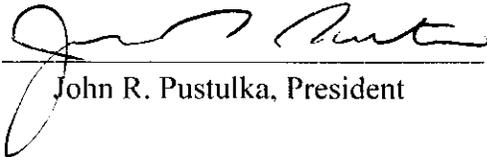
“If deviations from this plan occur, National Fuel will document when and why the deviations were necessary for the safe operation of the pipeline facility. Deviations will be made in accordance with National Fuel’s “NFG CRM Plan Deviation Procedures” *(see appendix 1)*”

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National Fuel believes the amendments to the *Control Room Management Plan* described above address any and all inadequacies identified in the Notice of Amendment CPF 1-2013-1008M.

Sincerely,

NATIONAL FUEL GAS SUPPLY
CORPORATION

By: 
John R. Pustulka, President