



Sunoco Logistics



Sunoco Pipeline L.P.
4041 Market St
Aston, PA 19014-3197

October 31, 2013

VIA FEDEX
Mr. Byron Coy
Director, Eastern Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

Re: NOA / CPF 1-2013-5020M / Control Room Management Inspection – 2011 – Montello, PA

Dear Mr. Coy:

Sunoco Pipeline L.P. (SPLP) is in receipt of the Notice of Amendment (NOA) dated September 30, 2013, regarding the above referenced inspection led by PHMSA's Eastern Region. With regard to items 1, 2, 7, 8 and 9, SPLP wishes to resolve the NOA fully and finally and will not contest the Compliance Order in those items so long as the schedule provided herein is acceptable to PHMSA. Alternatively, with regard to items 3, 4, 5, and 6, SPLP's response appears below. With regard to these items, SPLP feels that the purported inadequacies identified by PHMSA are already adequately addressed in the Manual; nonetheless, we are open to further discussion on these items and reserve our right to request a hearing should there exist a disagreement between the parties after PHMSA's review of this letter.

Although SPLP contends that the Control Room Management Manual was adequate in complying with the regulatory requirements, SPLP will revise existing procedures to be more detailed and to improve the Manual consistent with our understanding of the with the amendments requested in items 1, 2, 7, 8, and 9. Specifically, we will: specify the criteria by which Sunoco determines which of its facilities are control rooms under 195.446(a); include a reference to the approved, effective procedures in use; provide a list of training "requirements;" modify procedure on how control room actions will be evaluated to determine if they contributed to an event; and include training pipeline controllers on disaster recovery. These changes are expected to involve considerable coordination with our Control Centers' personnel in Pennsylvania and Texas. We thereby plan to have the required procedural changes completed and implemented by no later than January 31, 2014. We will also be prepared to submit required documentation to your office on or before that date. Please advise if this proposed schedule is acceptable.



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In regards to items 3 to 6, please find our response below.

PHMSA Finding:

3. §195.446 (a) Control Room Management;

The Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011, was inadequate because it did not address the limitations and expectations for coverage while a Pipeline Controller (PC) is absent from the console during his/her breaks, in accordance with §195.446(b)(4).

SPLP RESPONSE: During the inspection, Sunoco presented the PHMSA representative the Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011. The Roles and Responsibilities Rule of the plan under page 12, D, reads: D. Responsible to follow all Control Center Normal, Abnormal and Emergency procedures.

The same document, page 13, H, reads: The PCs are to maintain Shift Turnover documentation, and Work Plans as appropriate, detailing the location of personnel working on the Company's Pipeline systems.

Sunoco presented the PHMSA representative with the Shift Turnover Procedure and all the Normal, Abnormal, and Emergency Procedures. Specifically, the Shift Turnover Procedure (attachment 2)

The Shift Turnover documentation is detailed on the "Normal, Abnormal, and Emergency Procedures". On page 9 of the procedure, section III. Transferring Responsibilities – Interim basis" provides limitations and expectations for coverage while a Pipeline Controller (PC) is absent from the console during his/her breaks.

PHMSA Finding:

4. §195.446 (a) Control Room Management;

The Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011, was inadequate because it did not specify that a Pipeline Controller (PC) must alert management that s/he is unable or unfit for duty because of illness, fatigue, or other certain issues, in accordance with §195.446(b)(4).

SPLP RESPONSE: During the inspection, Sunoco presented the PHMSA representative the Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011. The Roles and Responsibilities Rule of the plan under page 12, D, reads: D. Responsible to follow all Control Center Normal, Abnormal and Emergency procedures.

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Sunoco presented the PHMSA representative with the Shift Turnover Procedure and all the Normal, Abnormal, and Emergency Procedures. Specifically, the Shift Turnover Procedure (attachment 2)

The Shift Turnover documentation is detailed on the “Normal, Abnormal, and Emergency Procedures”. On page 7 of the procedure, item 5 reads: If for any reason a reporting Pipeline Controller is unable to assume responsibility, the departing Pipeline Controller shall notify management. The Pipeline Controller on shift shall retain responsibilities at the specific console until relieved by a Pipeline Controller and/or Qualified Individual.

PHMSA Finding:

5. §195.446 (a) Control Room Management;

The Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011, was inadequate because it did not specify that the Pipeline Controller (PC) retains responsibility for the console until properly relieved, in accordance with §195.446(b)(4).

SPLP RESPONSE: During the inspection, Sunoco presented the PHMSA representative the Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011. The Roles and Responsibilities Rule of the plan under page 12, D, reads: D. Responsible to follow all Control Center Normal, Abnormal and Emergency procedures.

The same document, page 13, H, reads: The PCs are to maintain Shift Turnover documentation, and Work Plans as appropriate, detailing the location of personnel working on the Company’s Pipeline systems.

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PHMSA Finding:

6. §195.446 (a) Control Room Management;

The Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011, was inadequate because it did not specify a limit on the number of Pipeline Controllers (PCs) that can be on break at the same time, in accordance with §195.446(b)(4).

SPLP RESPONSE: During the inspection, Sunoco presented the PHMSA representative the Sunoco Pipeline L.P. & Affiliates Control Room Management Manual that was issued on October 1, 2011, updated on November 30, 2011. The Roles and Responsibilities Rule of the plan under page 12, D, reads: D. Responsible to follow all Control Center Normal, Abnormal and Emergency procedures.



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Sunoco presented the PHMSA representative with the Shift Turnover Procedure and all the Normal, Abnormal, and Emergency Procedures. Specifically, the Shift Turnover Procedure (attachment 2)

The Shift Turnover documentation is detailed on the "Normal, Abnormal, and Emergency Procedures". On page 10 of the procedure, item 4 reads: A maximum of 1 Pipeline Controller, per adjacent console may leave the console they are operating at any given time, except during an emergency situation.

While SPLP is providing the above description to provide further clarification on the findings with the expectation that it will resolve these items, we nonetheless welcome the opportunity to discuss any additional reasonable improvements to this procedure with a PHMSA representative at a mutually agreed time and place, if necessary. Should you have any questions or require further information please contact Paul Kreder at our Sinking Spring office at 610-670-3469.

Sincerely,

David Chalson
VP, Operations
Sunoco Pipeline L.P.

cc: Mr. Paul Kreder, Manager Product Movements, Sunoco Pipeline LP
Mr. Kevin Dunleavy, Chief Counsel, Sunoco, Inc.
Mr. Leif Jensen, Manager, Asset Integrity, Sunoco Pipeline LP