



Gary M. Saenz
Team Leader

Chevron Pipe Line
Global Gas
4800 Fournace Place
Bellaire, TX 77401-2324
Tel (713) 432-3332
garysaenz@chevron.com

May 29, 2012

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W, Dakota Ave., Suite 110
Lakewood, CO 80228

**RE: Chevron Pipe Line Company - CPF No. 5-2012-5012M
Response to Notice of Amendment**

Dear Mr. Hoidal:

This letter is Chevron Pipe Line Company's ("CPL's") written response to Pipeline and Hazardous Materials Safety Administration ("PHMSA's") Notice of Amendment ("NOA") CPF No. 5-2012-5012M, received May 1, 2012, relating to the control room management audit conducted by PHMSA the week of December 5, 2011.

The NOA provides that CPL must notify the Regional Director that we have completed the terms outlined in the NOA. Set out below is CPL's response to the specific actions set forth in the NOA CPF 5-2012-5012M. The text of the NOA is shown below in italics, immediately followed by CPL's response:

NOA Item 1

§ 195.446 Control room management.

(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011 and implement no later than February 01, 2013.

CPL's Control Room Management Plan (CRMP) Program manual does not ensure that procedures for making written CRM procedures are available to all pipeline controllers, as required by 195.446(c) did not include guidance informing controllers that hard copies of these processes and procedures were available at each console. Procedure 3.3 of the CRMP Processes and Procedures stated "The CRMP references associated processes and procedures for compliance with §192.631 and §195.466 which are located on the CRMP intranet site." During the inspection CPL informed our PHMSA representative that they also keep a paper copy of processes and procedures including O&M and Emergency Response manuals at each control console. CPL controllers interviewed were unaware that CRMP was available, and must amend their CRMP procedures to clearly state that hard copies of processes and procedures, including O&M and Emergency Response manuals, are maintained at each console.

PHMSA Mr. Chris Hoidal
May 29, 2012

CPL Response

Approved Control Room Management (“CRM”) documentation is published electronically on the Control Center’s CRM SharePoint site. All critical electronic document sources are backed up through the business continuity disaster recovery procedure for Global SharePoint Services (GSPS). During the annual review of CRM manuals, hyperlinks to external references are verified. Changes to CRM documents will be communicated to controllers through use of Authorized Change Form (ACF).

PHMSA Final Rule (“FR”) “Control Room Management/Human Factors” published in the federal register on December 3, 2009, page 63314, [Docket ID PHMSA-2007-27954], section IV “Summary of Final Rule” requires the pipeline operators to have written control room management procedures. The FR does not state the required media the operator must use for procedures but only to have written procedures. All existing CPL Control Center Controllers were provided direction as to the applicability of CRMP and its location on the GSPS sharepoint site in the email notice sent on September 29, 2011. This email is also stored permanently on the CPL CC CRMP sharepoint site. All new controllers are also trained on applicability, content and location of the CPL CC CRMP.

Please review Attachment 1 for the CRMP Notification to CPL Staff for October 1, 2011 implementation and CRMP document location.

NOA Item 2

§ 195.446 Control room management.

(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011 and implement no later than February 01, 2013.

CPL’s CRM-117 Pipeline Controller Training Program did not provide adequate specificity for process that will be used to review the CPL controller training program as required by §195.446(b). Section 4 Measurement and Verification of CRM-117 explains that one of the metrics that will be used to confirm the effectiveness of their controller training program will be improved controller competency. The measurement of improved controller competency will be by the use of competency assessments. Interviews with CPL personnel indicated that each controller will be assessed by a competency board. However, CRM-117 provides no guidance as to who will perform a competency assessment or how that competency assessment will be made. CPL’s procedures must be amend to fully describe the controller competency assessment process including the makeup of the competency assessment board as well as a detailed description of a competency assessment.

CPL Response

CPL reviewed and revised CRM 117 to address PHMSA’s concerns noted in NOA Item 2. See Attachment 2.

NOA Item 3

§ 195.446 Control room management.

(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate,

with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011 and implement no later than February 01, 2013.

CPL's CRM manuals did not describe how Chevron ensures controllers can accurately perceive SCADA display object characteristics (e.g., color, shape, text) that indicate safety related alarms used in the operator's SCADA system. §195.446(e) requires that an operator have a written alarm management plan to provide for effective controller response to alarms. As part of that plan an operator must ensure its operators can accurately perceive various alarm indicator sound and colors. Interviews indicated that CPL gives color blindness and hearing tests to applicants for controller positions to ensure that controllers can accurately perceive various alarm indicators sounds and colors. However, the process of screening operators for color blindness and hearing capabilities was not in any CPL CRM manuals and procedures. CPL must include the process used for ensuring their controllers can accurately perceive alarm colors and sounds, within their CRM procedures.

CPL Response

CPL CC's hiring process for all new controllers includes test for eyesight, color blindness, and hearing capabilities. Passing requirements are included in controller specific CPL GO-308 Fit for Duty test requirements (see Attachment 3). This process is referenced in the CPL CC CRMP Roles and Responsibilities CRM 101. It ensures all controllers are capable to perceive SCADA display objects and audible alarms.

NOA Item 4

§ 195.446 Control room management.

(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011 and implement no later than February 01, 2013.

CPL CRM procedures did not describe how controller hours of service are monitored to ensure that both established shift lengths and the maximum controller hours of service are adhered to as required by §195.445(d)(1) and (d)(4). Interviews with CPL personnel revealed that CPL monitored controller hours of service through the use of a time clock. CPL must amend their CRM procedures to better describe the system used to monitor controller hours of service.

CPL Response

Appendix F Hours of Service Tabulation, to CRM-109 Fatigue Risk Management System, has been updated to include a better description of how controller hours of service are captured and analyzed for compliance. Included in the update is a description of the badge in – badge out process required of controllers as well as an explanation of the various reports generated by the analysis. See Attachment 4 to review the updated Appendix.

NOA Item 5

§ 195.446 Control room management.

(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate,

PHMSA Mr. Chris Hoidal
May 29, 2012

with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011 and implement no later than February 01, 2013.

CPL procedure CRM-108 SCADA Redundancy and Backup Testing Section 3.2 required that CPL test its Midland, Texas Strategic Backup Site (SBS) once each calendar year but did not require that this testing interval not exceed by 15 months as required by §195.446(c)(4). CPL must amend their procedure to require the SBS be tested once each calendar year at intervals not to exceed 15 months.

CPL Response

CPL's CRMP leadership team has reviewed each CRMP program element and made this change where appropriate to include the terminology "...tested once each calendar year at intervals not to exceed 15 months."

NOA Item 6

§ 195.446 Control room management.

(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011 and implement no later than February 01, 2013.

CPL CRM procedures did not describe safeguards used for protecting electronically stored records from loss or damage. As required by §195.446(j)(1) and (j)(2), CPL must maintain records that demonstrate compliance with requirements of §195.446. Any deviation from the procedure required by this section that was necessary for the safe operation of the pipeline facility also must be demonstrated. Because CPL control room management program is heavily dependent on electronically stored records, CPL must have a process for protecting the integrity of those electronic records. CPL must amend their CRM procedures to include what measures CPL takes to protect the integrity of its control room management electronic records to comply with §195.446(j).

CPL Response

All critical electronic document sources are backed up through the business continuity disaster recovery procedure for Global SharePoint Services (GSPS). During the annual review of CRM manuals, hyperlinks to external references will be verified. Changes to CRM documents will be communicated to controllers through use of Authorized Change Form (ACF).

If you should have any questions concerning this response, please feel free to contact me at (713) 432-3332.

Respectfully,



Attachments