

February 2, 2015

Via Certified Mail Return Receipt Requested

Mr. Rod Seeley, Director
Southwest Region, Pipeline Hazardous Materials and Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074

Re: CPF No. 4-2014-5037M

Dear Mr. Seeley,

On January 6, 2015, Magellan Pipeline Company, L.P. ("Magellan") received a Notice of Amendment in regards to CPF 4-2014-5037M. In response to the Notice of Amendment, Magellan hereby submits the requested documentation as defined in the Notice.

Please see the attached response and documentation verifying completion of each item in the Notice of Amendment:

ITEM #1 195.210 Pipeline Location

- (b) No pipeline may be located within 50 feet (15 meters) of any private dwelling or any industrial building or place of public assembly in which persons work, congregate, or assemble, unless it is provided with at least 12 inches (305 millimeters) of cover in addition to that prescribed in 195.248.

Magellan's procedures do not have a requirement that does not allow pipelines to be located within 50 ft of any dwelling, unless it is provided with at least 12 inches of cover.

Magellan's Pipeline Construction Ditching procedure includes Code requirements for depth of cover, but does not include the Code distance requirements from private or public dwellings. Magellan's procedure needs to be revised to include the Code requirements as referenced.

MAGELLAN RESPONSE:

Magellan has revised the Pipeline Construction Ditching procedure, Section 11, and the Pipeline Design procedure, Section 12, to include the requirement that no pipeline may be located within 50 ft of any private or public dwellings, unless at least 12 inches of cover are added in addition to that prescribed in 195.248.

The revised procedures have been included in Attachment A.

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.

195.446 Control room management

- (c) *Provide adequate information.* Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:
- (1) Implement API RP 1165 (incorporated by reference, see 195.3) whenever a SCADA system is added, expanded or replaced, unless the operator demonstrates that certain provisions of API RP 1165 are not practical for the SCADA system used;

Magellan's Control Room Management Program Procedure SIP 9.02-ADM-078, section 9.3 – *Operator Interface Standard* does not include all display attributes for each control room console.

PHMSA reviewed the procedure and found inconsistencies between display attributes contained in procedures and actual attributes contained within the console displays.

Section 9.3.1.4 states,

“Communication failure or non-update is indicated with an “X” attributed and a blue background.”

Section 9.3.1.8 states,

“Controls for a point can be tagged to prevent commands or data from being transmitted to field devices. This typically occurs when a field device is temporarily placed out of service for maintenance. Points with tagged controls are indicated with a “CT” attribute.”

Magellan must revise SIP 9.02-ADM-078 – *Operator Interface Standard*, section 9.3 to maintain consistency within the procedure and the attribute displays for each control room console.

MAGELLAN RESPONSE:

Magellan has modified procedure SIP 9.02-ADM-078 Operator Interface Standard to clarify in Section 9.3.1.4 to state “*When communication is lost to a remote, the SCADA system is no longer receiving updated data from the remote. Communication failure, or non-update, is indicated with a blue background.*”

Magellan modified procedure SIP 9.02-ADM-078 Operator Interface Standard in Section 9.3.1.8 to state “*Controls for a point can be tagged to prevent commands for data from being transmitted to field devices. This typically occurs when a field device is temporarily placed out of service for maintenance. Points with tagged controls are indicated with a “CT” attribute {consoles 5, 6, 8 only} or a blue foreground with yellow background {consoles 1-4, 7, 9 only}*”.

The revised procedure has been included in Attachment B.

ITEM #3 195.446 Control room management.

(See Item 4)

195.446 Control room management.

(d) *Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller’s ability to carry out the roles and responsibilities the operator has defined:

(2) Educate controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue;

Magellan’s Control Room Management Program Procedure SIP 9.02-ADM-027 – *The Supervisor of Operations Control shall:* does not contain provisions for Ops. Supervisors to be trained on fatigue mitigation.

Magellan’s Fatigue Awareness module is the basis for the fatigue/training. At the time of the inspection, Magellan’s Operations Control Training Requirement matrix indicated that only new controllers are required to take Fatigue Awareness training. Procedures do not indicate where control room supervisors are required to go through Fatigue Awareness Training.

Magellan’s Operations Control Training Requirement matrix has been revised to include provisions that will require annual Fatigue Awareness training for Operations Control Supervisors.

MAGELLAN RESPONSE:

Magellan has revised form 09-FORM-1127 Operations Control Site Specific Controller and Supervisor Training Matrix to reflect the annual requirement for fatigue awareness training for Operations Control Supervisors.

The revised form has been included in Attachment C.

If you have any questions or need additional information, please contact me by phone at (918) 574-7332 or e-mail at jason.smith@magellanlp.com to discuss.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Smith".

Jason Smith
Director, Asset Integrity

Cc: Michael Pearson, Vice President, Technical Services, Magellan