

May 20, 2015

Mr. Rodrick Seeley  
Director, Southwest Region  
PHMSA Office of Pipeline Safety  
8701 South Gessner Suite 1110  
Houston, TX 77074



Re: **CPF 4-2015-1005M** – ANR Control Room Management Notice of Amendment

Dear Mr. Seeley:

On April 23, 2015, ANR Pipeline Company received the Notice of Amendment CPF 4-2015-1005M dated April 16, 2015. Pursuant to the requirements of 49 CFR 190 Subpart B, ANR Pipeline Company submits the following response to the Notice.

**§192.631 Control Room Management**

**(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**

**(4) A method of recording controller shift-changes and any hand- over of responsibility between controllers.**

**Control Room Procedures did not adequately address the responsibilities of the current controller and/or management to address the issue of an incoming controller that arrives late for the work shift or fails to report for duty.**

ANR has revised Control Room Management Procedure – Controller Scheduling Policy, Section 4.3 Emergencies to read as follows:

If a Controller fails to report to work as scheduled, the following process will be activated:

- The on-console Controller will:
  - Attempt to contact the absent Controller and notify the Control Room Manager
  - Remain on-console until relieved by a qualified Controller (record overtime of time report)
  - Notify Manager if the event reduces time-off between shifts to less than 10 hours

- The Control Room Manager will:
  - Attempt to contact the absent Controller
  - Review the Controller Schedule and Controller Scheduling Policy (consider hours-of-service and time-off requirements)
  - Determine which of the appropriately qualified Controllers to contact (based on fatigue risk) Request the replacement Controller to report to work in a timely (but safe) manner
  - Revise the Controller Schedule as necessary to document the event
  - Ensure all Controllers have ample opportunity for 8 hours of sleep between shifts (allowing for commute)

The revised Controller Scheduling Policy has been provided. If you have any questions or comments related to this matter please feel free to contact me at 832-320-5462.

Sincerely,



Ken Crowl  
Director, Regulatory Compliance