



610 W. Second Street
P.O. Box 20008
Owensboro, KY 42304

May 7, 2021

Mr. Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: **CPF 3-2021-016-NOPV**
*Explanation of Texas Gas Transmission, LLC ("Texas Gas") to
Notice of Probably Violation, Proposed Civil Penalty, and Proposed Compliance
Order ("Notice")*

Dear Mr. Ochs,

On April 8, 2021, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued the above-referenced Notice in association with the inspection of Texas Gas's Control Room Management Program procedures and records in Owensboro, KY, conducted remotely from June 15 through June 19, 2020.

Texas Gas is not contesting the allegations in the Notice, but is providing the following explanations with respect to the probable violations:

1. Training Procedures (§ 192.631 (a) (2)).

Texas Gas is consolidating its various training programs under one unified structure, the Learning Management System ("LMS"). LMS will house, among other things, substantive syllabi and objectives for all training courses, training schedules, trainee progress, and completed training rosters, such as those that were provided to PHMSA during the subject audit. The LMS will include identification-specific training content, web-based or instructor led training, assessments for training courses and periodic progress, and definitions of competency for all positions defined in the control room who will maintain Operator Qualification ("OQ") to operate a console for either assigned shift rotation or to fill a temporary vacancy. The use of LMS will allow for efficient administration and review of the Control Room Management ("CRM") training program. Texas Gas' CRM Plan will be updated to incorporate the LMS training structure.

Texas Gas is also hiring a specialized Control Room Senior Analyst who will be responsible for the CRM training program, including but not limited to: managing CRM reviews; enhancing metrics to ensure plan effectiveness; creating and assigning controller training in LMS; incorporating new regulations, policies, and lessons learned into the training program; coordinating and documenting team training activities for mock drills; generating and maintaining annual documentation for completed training and training effectiveness with associated metrics;

overseeing completion of OQ requirements for Control Room personnel in accordance with regulations; and facilitating change management for CRM related processes and procedures to ensure compliance.

Texas Gas will be reviewing and expanding its OQ requirements in an effort to standardize and clarify the requirements necessary to operate the Control Room. The CRM Plan will be updated based upon these objective OQ requirements, and the Plan will remove potentially subjective references to “fundamental” or “functional” knowledge for these purposes.

Upon close of the 180-day period provided by PHMSA, Texas Gas will provide the total costs to complete the implementation of the safety improvements associated with fulfilling the Proposed Compliance Order.

2. Alarm Management (§ 192.631 (e)(2)).

Texas Gas immediately remediated the alarm management issue addressed in the Notice during the subject audit. This remediation included refinement of the alarm reporting process for both forced or manual SCADA values; improvement of the alarm management plan’s effectiveness by reducing the number of safety related alarms and critical alerts; and ensuring consistency in the SCADA point-to-point validation process. The alarm management changes were implemented in June 2020. Since that time, Texas Gas has been and continues to be in compliance with the applicable regulation. Texas Gas has updated its CRM Plan to ensure continued compliance and periodic review of alarm management.

Texas Gas requests that PHMSA consider this Explanation in making findings and issuing its Final Order, as well as considering whether to reduce or eliminate the penalty amount proposed in the Notice.

Respectfully Submitted,

Texas Gas Transmission, LLC

Tony G. Rizk, P.E.
Vice President of Technical Services

Cc: Mrs. Tina Baker – Boardwalk Pipelines