



October 26, 2020

Via Email

Ms. Mary McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Safety Materials Administration
8701 S. Gessner Rd; Suite 630
Houston, TX 77074

Re: ONEOK NGL Pipeline L.L.C. **Notice of Amendment CPF 4-2020-007 -NOA**


Ms. McDaniel:

On August 26, 2020, we received electronically the Notice of Amendment **CPF 4-2020-007-NOA** for ONEOK NGL Pipeline LLC (ONEOK), as a result of pipeline safety inspection that occurred March 23 - 27, 2020 of our Control Room Management Program.

Attached is documentation to amend procedures set forth in Items 1-5 of the Notice of Amendment.

If there are further questions, you can contact Gary Numedahl at 918-595-1546 or gary.numedahl@oneok.com

Sincerely,

DocuSigned by:

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Kevin Burdick
Executive Vice President and Chief Operating Officer
ONEOK NGL Pipeline, LLC

October 26, 2020

1. §195.446 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:

(1) . . .

(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others;

While the three plans [presented for inspection] reviewed address evacuation, the overall process appears disjointed and requires reference of three different procedures to define the roles, responsibilities, directions, and processes to leave the primary control room and start up the back up control room.

ONEOK must amend its procedure(s) to provide controllers with one clear procedure to reference that covers all the requirements to evacuate the control room and transition to the back up control room.

ONEOK Response

ONEOK has amended its Control Room Management plan (Section 6.5) to specifically reference the "Pipeline Control Center Evacuation and Manual Mode Operations Procedure" (Attachment A) which includes specific steps to evacuate from the primary to the back-up and tertiary Control Centers. The procedure has combined the essential elements of the CRM plan, the Business Continuity Plan and the Internal Communications plan and has replaced the Pipeline Control Evacuation (PCE) procedure in its entirety.

See Attachment A - "Pipeline Control Center Evacuation and Manual Mode Operations Procedure" pages 3-6- Evacuation Procedures (Plaza Lower Level and Corporate Woods)

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2. §195.446 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:

(1) . . .

(5) The roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers.

The ONEOK Level 2 CRM Plan is inadequate because it does not define the roles and responsibilities of the authorized individual(s) who can supersede the technical actions of a controller such as the conditions under which they may supersede, the required communication with a controller, and the documentation requirements when they do supersede the technical actions of the controller.

ONEOK must amend its procedure to provide clear guidance and process to address the inadequacies related to superseding a controller.

ONEOK Response

ONEOK has amended its Control Room Management Plan Section 11.4 and revised its Control Room Management Training Program (Attachment B) to include roles and responsibilities for "Qualified Individuals" (QI) if it becomes necessary to supersede a Controller's actions up to and including assuming full operational control of the operating console. ONEOK defines "Qualified Individuals" are defined as those employees with access to the control room and are qualified to supersede and/or directly intervene in a Controller's operational actions and decisions. Additionally, the procedure was updated to include conditions under which a QI would supersede a Controller's actions and how each occurrence will be documented/ recorded.

See Attachment B - "CRM Control Center Training Program" document pages 9-11- (Superseding Controllers' Actions/ Decisions; Qualified Individual's Roles and Responsibilities;

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3. §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:

(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months;

The ONEOK Level 2 CRM Plan is inadequate as it does not provide its controllers with information, tools, processes and procedures necessary for the controllers to carry out their roles and responsibilities when conducting the test of backup SCADA systems.

ONEOK must amend its procedure to provide clear guidance to address the inadequacies related to providing controllers with information, tools, processes, and procedures necessary for performing tests on backup SCADA systems.

ONEOK Response

ONEOK has amended its Control Room Management Plan Section 6.5 and its "Annual Testing of the Backup SCADA System Procedure" (Attachment C) to address the issues noted in the PHMSA CRM Inspection. The procedure has moved the responsibility for conducting the annual backup test to the Control Center personnel with assistance from the SCADA and IT teams as necessary to address any discovered issues. The amended procedure lists the steps necessary to switch operational control from the primary SCADA servers to the back-up servers (physically located at the Cityplex Towers location) and the steps to return to normal operations.

If evacuation to either the backup control center (Corporate Woods) or the lower level tertiary control center is part of the annual test or otherwise necessary, Controllers will refer to the Pipeline Control Center Evacuation and Manual Mode Operations Procedure (Attachment A).

See Attachment C - "Annual Testing of the Backup SCADA System Procedure" pages 1-3 (Procedure for Transferring/ Testing Operations to Backup Location; Intermittent Test Process- Flexible Schedule; Return to Normal Operations)

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4. §195.446 Control room management.

(h) *Training.* Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

The ONEOK Level 2 CRM Plan does not provide adequate procedures for reviewing the training program content to identify potential improvements as required by §195.446(h).

ONEOK must amend its procedure to address the inadequacies to ensure a thorough review of the training program content as discussed above is conducted.

ONEOK Response

ONEOK has revised its Control Center Training Program (Attachment B) to include the steps taken annually to ensure the training is effective and relevant. These revisions to improve the Program effectiveness include periodic reviews, reviews of past reportable incidents, and controller feedback. The pipeline control center leadership will be responsible to evaluate the results and make process improvements as needed.

See Attachment B - "CRM Control Center Training Program" document page 4 (Annual Effectiveness Review of Training Program Content)

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5. §195.446 Control room management.

(h) *Training.* Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

(1) . . .

(6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph no later than January 23, 2018.

The ONEOK Level 2 CRM Plan is inadequate because it does not describe the what, when and how of the team training for controllers and those who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations.

ONEOK must amend its procedure to address the inadequacies of the control room team training, especially as it relates to those that would be reasonably expected to operationally collaborate with controllers (control room personnel) during normal, abnormal, or emergency situations.

ONEOK Response

ONEOK has amended the "Control Center Team Training Program" (Attachment B) to include its training curriculum that addresses various aspects to ensure Controllers, Supervisors, Managers, and Others collaborate during normal, abnormal and emergency operating conditions to ensure public and environmental safety as well as pipeline system integrity. Additionally, team training is set to recur on an annual basis and includes

- Mock drills/ exercises
- Accident/ incident/ near miss reviews
- Interpersonal skills training including Organizational Development courses
- CBT courses

See Attachment B - "CRM Control Center Training Program" document pages 11-12 (Team Training)