



U.S. Department
Of Transportation
**Pipeline and
Hazardous Materials
Safety Administration**

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.989.2171

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

July 18, 2013

Mr. Shawn Patterson
President, Engineering & Product Development
Columbia Gas Transmission Corporation
1700 MacCorkle Ave., SE,
Charleston, WV 25314

CPF 1-2013-1011M

Dear Mr. Patterson:

From November 14, 2011 to November 18, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected NiSource Gas Transmission & Storage (NiSource) procedures for Control Room Management in Charleston, WV. The NiSource companies that fall under their Control Room Management procedures include: Columbia Gas Transmission Corp (OpID 2616); Columbia Gulf Transmission (OpID 2620); Crossroads Pipeline (OpID 993).¹

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within NiSource's plans or procedures, as described below:

1. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the plan was under development but not adequate at the time of inspection. The Management of Change (MOC) portion of the operator's Control Room Management Plan did not include a change log to track changes as prescribed in §192.631(a)(2).

¹ The deadlines for pipeline operators to implement certain control room management procedures are prescribed in §192.631(a)(2). At the time of this inspection, pipeline operators had to have implemented most procedures. Implementation of all related requirements was due no later than August 1, 2012.

2. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the operator had not adequately established procedures to define and identify the circumstances which require that a point-to-point verification be performed. Section 4.2 of the operator's Control Room Management Plan refers to O&M Plan 220.09.01 for SCADA point-to-point verification – to be published no later than 8/1/2012. The essence of the process (framework) needs to be established as of 10/1/2011 as prescribed in §192.631(a)(2).

3. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the operator had not established an adequate procedure for the thoroughness of the point-to-point verification. The operator advised that this procedure would be published no later than 8/1/2012. The essence of the process (framework) needs to be established as of 10/1/2011 as prescribed in §192.631(a)(2).

4. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the operator had not developed an adequate procedure for defining when the point-to-point verification must be completed and does not declare expediency of completion as prescribed in §192.631(c)(2). The operator advised that this procedure would be published no later than 8/1/2012. The essence of the process (framework) needs to be established as of 10/1/2011 as prescribed in §192.631(a)(2).

5. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the operator did not factor in Commute time into fatigue management consideration. Shift lengths must provide controllers off-duty hours sufficient to achieve eight hours of continuous sleep as prescribed in §192.631(d)(1).

6. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the operator did not factor in Commute time for on-call activation into the on-duty hours calculation. Operators must provide controllers off-duty hours sufficient to achieve eight hours of continuous sleep as prescribed in §192.631(d)(1).

7. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the procedure, Section 10.7 Annual Training Requirements, specifies Control Room Training "will be reviewed once per calendar year" as opposed to once per calendar year, not to exceed 15 months as prescribed in §192.631(h).

8. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control &

Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because Section 1.9 Deviation From CRM Plan, the operator's procedure for approving deviations from the maximum HOS limits needs to incorporate a space in the Deviation Form (Section 2.4) to record the reason why an exception to the Plan was required as prescribed in §192.631(j)(2).

9. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because Section 5.5 Annual SCADA Point Review, Figure 5.3 Example Annual SCADA Set Point Verification Review form stipulates "Annual SCADA Set Point Verification Review" as opposed to at least once each calendar year, but at intervals not to exceed 15 months as prescribed in §192.631(e)(3).

10. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because the program does not have a means of determining that the controller has sufficient time to analyze and react to incoming alarms. Much of this activity is being performed but not formalized in the plan, thresholds should be quantified as prescribed in §192.631(e)(5).

11. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because Section 5.10 Addressing Alarm Management Deficiencies lacks sufficient detail with respect to a timeliness qualifier as prescribed in §192.631(e)(6).

12. §192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

NiSource's written control room management procedures, Commercial Operations, Gas Control & Monitoring Center, Control Room Management Plan, dated August 1, 2011 and revised September 30, 2011, were inadequate because Section 10.3 Specific CRM Training Requirements does not include a subset list of AOCs required to make training more specific and meaningful as prescribed in §192.631(h).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **45** days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Columbia/NiSource maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to, as well as any correspondence relating to this Notice to: Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 1-2013-1011M** on each document you submit, and please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to Byron.Coy@dot.gov. Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Sincerely,

Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*