



CERTIFIED MAIL

June 25, 2020

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CPF 1-2020-1020W Warning Letter

Dear Mr. Burrough,

This letter is a formal response by Dominion Energy Transmission, Inc. (DETI) to Warning Letter CPF 1-2020-1020W, dated May 28, 2020. Specifically, PHMSA noted the following probable violation:

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:

Dominion failed to follow its written control room management procedures that implemented the requirements of § 192.631(d)(3)¹. Specifically, Dominion failed to follow its Fatigue Mitigation Plan Procedure, Revision Number 12/21/2015, (Fatigue Mitigation Plan) by not training a controller to recognize the effects of fatigue.

Dominion's Control Room Management Plan, Revision 4, 1/23/2018 referenced a document called Fatigue Mitigation Plan. The Fatigue Mitigation Plan stated, in part:

"The controllers will be required to take an initial Fatigue Training course through Circadian Technologies where they will be educated on the risks of fatigue and practical tips for managing on the job."

During the onsite inspection from June 5 to 7, 2018, the PHMSA inspector reviewed initial Fatigue Training course records which included certificates to show that a controller had completed the course. The PHMSA inspector noticed that Dominion did not have a certificate for one controller. This individual had assumed a position as a controller on January 5, 2015, and thus should have received the training by that time. The PHMSA inspector requested Dominion to provide that controller's initial training record, but Dominion could not. Dominion did not present any documentation to show that controller attended or completed its initial Fatigue Training course.

Therefore, Dominion failed follow its written control room management procedures for training controllers to recognize the effects of fatigue.



After PHMSA's on-site inspection, Dominion provided a record to show that that controller completed the initial fatigue training on June 15, 2018 and received a certificate.

DETI Response:

The controller in question in the Warning Letter completed the CIRCADIANTM fatigue training and received the certificate on June 15, 2018. A copy of this fatigue training certificate and an accompanying explanation was then submitted to PHMSA.

Following the inspection, DETI made the following changes to its procedures:

- DETI included confirmation of the fatigue training certificate in the onboarding checklist for gas controllers.
- DETI examined the instructions for the mechanism in the Learning Management System (LMS) that internally tracks completion of the CIRCADIANTM fatigue training and revised the instructions to ensure that gas controllers submit a copy of the fatigue training certificate to Technical Training.
- DETI modified the configuration of the mechanism in the LMS that internally tracks completion of the CIRCADIANTM fatigue training to require that the fatigue training certificate is submitted to Technical Training prior to closure.

If you have any questions, concerns, or should require additional information, please do not hesitate to contact Dan Stahl at 681-842-3365.

Respectfully,

A handwritten signature in blue ink, appearing to read "John M. Lamb".

John M. Lamb
Vice President, Eastern Pipeline Operations
Dominion Energy, Inc.