



Marius A. Greene, Vice President & Manager

March 20, 2015

Mr. Wayne T. Lemoi
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street Ste. 600
Atlanta, GA 30303

Re: CPF 2-2014-5004W and CPF 2-2014-5005W

Dear Mr. Lemoi,

From April 28, 2014, through September 12, 2014, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Southern Region, Office of Pipeline Safety inspected the Wolverine Pipe Line Company (Wolverine) operations and maintenance program at Portage, Michigan, pursuant to Chapter 601 of 49 United States Code.

As a result of the inspection, Wolverine received two Warning Letters (CPF 2-2014-5004W on 9/15/14 and CPF 2-2014-5005W on 10/20/14). Wolverine would like to provide the following information and response for your review. First, Wolverine wants to reassure PHMSA that Wolverine is committed to maintaining thorough and comprehensive operations and maintenance procedures and records. In regards to the three specific items referenced in the Warning Letters, I would like to briefly summarize how each item has been addressed.

Following in bold print are excerpts from the PHMSA Warning Letters and Wolverine's responses to each of the three areas of concern noted in the Warning Letters.

1. § 195.446 Control room management.

... (e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

... (5) Monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms; and

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Wolverine did not monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months.

That is, Wolverine did not present to the OPS inspector records to demonstrate that it had monitored the content and volume of general activity being directed to, and required of, each controller in calendar year 2013.

Wolverine has implemented a documented process to analyze the content and volume of the general activity being directed and required of each controller each calendar year at intervals not to exceed 15 months. This review has been completed utilizing a workload study combining the NASA TLX method and the PRCI workload study. An annual Maintenance Connection Work Order is generated as a reminder to complete annual reviews and is documented on a review form. The review process includes monitoring and reviewing our alarms, commands, phone calls, texts and Controller feedback concerning these matters.

2. § 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:

Wolverine did not review the training program content at least once each calendar year, but at intervals not exceed 15 months, to identify potential improvements.

That is, Wolverine did not present to the OPS inspector records to demonstrate that it had reviewed the training program content in calendar year 2013 to identify potential improvements.

Wolverine has implemented a process that documents the review of the controller training program content at least once each calendar year at intervals not to exceed 15 months. An annual Maintenance Connection Work Order is generated as a reminder to complete annual reviews and is documented on a review form.

1. §195.428 Overpressure safety devices and overfill protection systems.

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 ½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

Wolverine did not, at intervals not exceeding 15 months, but at least once each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it was adequate from the standpoint of capacity and reliability of operation for the service in which it was used.

Wolverine operates and maintains approximately 629 miles of pipeline along with five breakout tanks at Stockbridge, Michigan.¹ The Wolverine Operations Control Center located in Portage, Michigan, monitors the overpressure protection for the pipeline system consisting of 15 relief valves and the overfill protection system for each breakout tank.

Wolverine field technicians provided records to document the annual inspection and testing of the 15 relief valves. However, the technicians did not present records to document that Wolverine had determined its 15 relief valves were adequate from the standpoint of capacity and reliability of operation for the service in which they were used in calendar years 2012 and 2013.

Wolverine has records for all calendar years except for 2013, which was completed late. Wolverine's engineering review has shown that no significant changes occurred between the 2012 surge study review and the 2014 review. Accordingly, no changes to the surge relief systems are required at this time. As a process improvement to prevent a re-occurrence the Local Risk Management Team calendar has been updated to include the annual review requirement in November of each year and the forms have been updated to include date of review and signature of engineer performing the review.

Finally, I want to personally assure you that Wolverine and PHMSA share a common goal of safe and flawless operations in full compliance with all the laws, rules and regulations applicable to our operations.

Respectfully,



Marius A. Greene