



295 Chipeta Way  
Salt Lake City, Utah 84108

APR - 5 2016

April 1, 2016

Via E-Mail and Federal Express

Mr. Allan C. Beshore  
Director, Central Region, OPS  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Suite 462  
Kansas City, Missouri 64106-2641

**Re: Williams Mid-Continent Fractionation and Storage, LLC - Response to PHMSA Notice of Amendment Letter, CPF 3-2016-5002M**

Dear Mr. Beshore:

Williams is in receipt of your March 16, 2016 letter and Notice of Amendment (NOA) (revision dated March 18, 2016) provided in response to the June 22-30, 2015 PHMSA inspection conducted at Williams' Conway, Kansas storage field and associated pipeline facilities. The inspection included a review of records and procedures associated with operations, maintenance, integrity management, and control room management. The NOA recommends several modifications relating to the Control Room Management Plan.

Williams has reviewed the NOA and has chosen to revise the corresponding procedures as necessary to address the noted inadequacies. The attached table identifies each item noted in the letter along with a corresponding response and corrective action. The revised procedures are also included on the enclosed CD. The revisions described have been highlighted in each document.

Regarding the safety improvement costs for fulfilling the NOA (preparation/revision of plans, procedures) that you have requested, we have estimated a total cost of \$6,000 for procedure/plan revisions, review and approval, and submission for publication and implementation.

We appreciate the inspector's evaluation of the CRM Plan and communication of the identified inadequacies. We believe the procedure revisions will clarify and improve the effectiveness of the Williams CRM Plan.

We hope this response adequately addresses the issues noted in the NOA letter. Should you have any questions or require additional information, please call me at 801-584-6539.

Respectfully,

Jared Ellsworth  
Manager Pipeline Safety  
Williams West

Attachments: NOA Findings and Williams Response Table  
Enclosures: One compact disc containing updated procedures

cc: Stephanie Timmermeyer, Williams, VP Safety and Regulatory Compliance  
John Suchar, Williams, Director Employee Safety  
Randy Heinrichs, Manager Conway Operations

## NOA Findings and Williams Response

DOT Code Reference	PHMSA NOA Finding	Williams Resolution
<p>195.446(b)(1)</p>	<p>(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) A controller's authority and responsibility to make decisions and take actions during normal operations;</p>	<p>MidCon's CRM procedure on defining what the controllers do during temporary impromptu changes in responsibilities requires more detail. The procedure on page 9 indicates that if a controller needs to leave for any reason (i.e.; breaks), a controller at another console will only observe and listen for the alarms at the vacant console, and then notify the absent controller in the event of an abnormal operating condition. However, Conway personnel indicated that the notification to the other controller will be done on all alarms. Procedure must be changed to reflect what Conway actually does.</p>
<p>195.446(d)(2)</p>	<p>(d) Fatigue mitigation. Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:            (2) Educate controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue</p>	<p>The Control Room Management Plan (CRMP) has been changed to reflect that alarms are annunciated on the console - Pg 10 of 36:            "The Controllers do not send SCADA commands or acknowledge alarms on the other console, but will contact the other Controller in the event an alarm is annunciated on the console."  <b>See "Control Room Management Plan"</b></p> <p>The following example topics were added to the CRM plan pg. 23 of 36:  <b>Fatigue Training</b>            New Controllers complete courses during initial Pipeline Control training. As refresher training, each Pipeline Controller, Pipeline Control Team Lead, Supervisor, Pipeline Control, and Manager, Pipeline Control, will receive a minimum of one fatigue training session annually to reinforce fatigue mitigating strategies and how off-duty activities can contribute to fatigue. An example of topics included in Pipeline Control Management fatigue training include:</p> <ul style="list-style-type: none"> <li>• Scheduling to help prevent fatigue</li> <li>• Staffing levels that help prevent fatigue</li> <li>• Detecting fatigue in controllers</li> <li>• Signs of fatigue</li> <li>• Consequences of fatigue</li> <li>• Fatigue mitigation techniques</li> <li>• Control Room features that help prevent fatigue</li> <li>• Williams' policy regarding fatigue management</li> <li>• Options for handling a Controller who is too fatigued to work or drive home</li> <li>• Fatigue mitigation resources</li> </ul> <p>An example of topics included in Controller fatigue training include:</p> <ul style="list-style-type: none"> <li>• Fatigue mitigation strategies (napping, snacking, exercise, caffeine, etc.)</li> <li>• Circadian rhythms</li> <li>• Sleep disorders</li> <li>• Fatigue symptoms</li> <li>• Fatigue consequences</li> </ul>

			<ul style="list-style-type: none"> <li>Options for handling fatigue (taxi ride, hotel, ask for a replacement)</li> <li>Daytime sleep strategies</li> <li>Family communication strategies</li> </ul> <p><b>See "Control Room Management Plan"</b></p>
195.446(e)(1)	<p>(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:</p> <p>(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations;</p>	<p>MidCon's Alarm Management Philosophy contains different types of alarms and defines the priorities. However, synthetic or calculated alarms are not addressed in the alarm management plan. MidCon must provide written procedures on synthetic or calculated alarms including a process for review to ensure these alarms are accurate and support safe pipeline operations.</p>	<p>The definition of "calculated alarm" has been included in section 1.0 of the new combined Alarm Philosophy Document (APD). Calculated Alarm - alarm generated from a calculated value instead of a direct process measurement. Include in section 7.0, Training, of the new combined APD - Overview training of the Alarm Management Program will be provided for personnel involved in the alarm management process. In addition to the Alarm Management Program overview training, personnel will also receive training for:</p> <ul style="list-style-type: none"> <li>Changes to the alarm system, as required by MOC</li> <li>Rules for inhibiting Safety-Related alarms during a shift</li> <li>Rules for setting/changing analog points</li> <li>Calculated Alarms – Currently, the only Safety-Related Alarms identified as calculated alarms are leak detection and cavern overfill alarms. The controllers are trained to recognize the priority of the alarm and react accordingly</li> </ul> <p><b>See "CRMP Attachment B - Williams Pipeline Control Alarm Management Plan"</b></p>
195.446(e)(6)	<p>(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:</p> <p>(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.</p>	<p>MidCon's CRM plan does not have procedures on how they are going to address the deficiencies identified within the alarm management plan. The CRM procedures must be expanded to better define how and when they are going to correct deficiencies identified within the plan reviews.</p>	<p>Revise Procedure 07.71.008-OG, Pipeline Control Safety-Related Alarm Management, in Overview &amp; Applicability "This procedure establishes a standardized method for analyzing, managing, and resolving safety-related alarm issues." Add a step in each section to read, "Immediately troubleshoot non-functional alarms and take appropriate action to return the alarm to service in a timely manner." Add step 1.13 in Section 1.0 monthly; add step 2.26 in Section 2.0 Annual Analysis of SR Alarms; add step 3.9 in Section 3.0 Other Safety-Related Alarm Analysis.</p> <p><b>See "Pipeline Control Safety-Related Alarm Management" document.</b></p>