



Southern Star Central Gas Pipeline, Inc.
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May 27, 2022

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Central Region Office
901 Locust Street, Suite 480
Kansas City, Missouri 64106

Mr. Greg Ochs,

RE: Response to Notice of Amendment (CPF 3-2022-044-NOA)

On April 28, 2022 you issued a letter to Southern Star Central Gas Pipeline, Inc (Southern Star) outlining a Notice of Amendment (NOA) based upon an inspection, which was performed pursuant to Chapter 601 of 49 United States Code. In the NOA, PHMSA has identified the items found within Southern Star's plans or procedures, as summarized below:

- Item 1 – Southern Star's procedure must be amended to include a process and criteria to consistently determine if the facility is capable of independently controlling and monitoring assets rendering the facility a control room.
- Item 2 – The procedure needs to be amended to define the various controller levels and their related roles, responsibilities, and authority when two controllers are on shift at independent consoles.
- Item 3 – The procedure needs to be amended to provide a method of recording shift changes with instruction to consistently incorporate the discussion points from the procedure.
- Item 4 – The procedure needed to be amended to define the roles and responsibilities for those authorized to supersede the actions of a controller, as well as the controller when that occurs. Additionally, the training needed to be amended to be consistent with the procedure. The operator provided amendments to procedures that satisfactorily addressed the issues in this item. Additionally, the training document was amended 01/25/2022 to be consistent with the procedure regarding who can direct or supersede the technical actions of a controller. No further action required for this specific requirement.
- Item 5 - The procedure needs to be amended to define SCADA system additions, expansions or replacements with examples of each. Amendments to the procedure must also include the process to verify compliance with sections 1, 4, 8, 9, 11.1 and 11.3 of API 1165.
- Item 6 - The procedure needs to be amended to include all safety related points including calculated points as well as instructions to complete the form and additional verification and documentation requirements. It also must disallow changing the set point value for testing purposes and test to the established set point value in SCADA.
- Item 7 - The procedure needs to be amended to provide a detailed plan to manually operate the system safely as well as a process to test the plan.
- Item 8 - The procedure needs to be amended to include the practice requirement of supervisor refresher fatigue training as well as to capture and record all fatigue training provided to controllers and supervisors.
- Item 9 - The procedure needs to be amended to include a process to provide a method and tools to report, document, track, review, and promptly correct deficiencies identified in through the implementation of paragraphs (e)(1) through (e)(5) of this section. This must include the roles and responsibilities for reporting,

documenting, tracking, reviewing, and correcting these deficiencies. The procedure also needs to include appropriate considerations when points affecting safety should be taken off-scan, have alarms inhibited or points and alarms placed in forced or manual. Where appropriate, the procedure must include language discouraging or disallowing alarms to be ignored.

- Item 10 - The procedure needs to be amended to include the process for what information will be evaluated, analyzed, reviewed, and documented. KPIs need to be developed and established for criteria to indicate performance of alarm management. The procedure also needs to include who is responsible (individual or team) for the process. This process must connect to the alarm tracking process identified in Item 9.
- Item 11 - The procedure needs to be amended to define the process using the operators selected tool to rationalize alarms consistently and thoroughly. The procedure must include metrics related to severity, impact, and response time for alarm conditions to establish priority and set points for safety related alarms. The priorities must be consistent with the established priorities in the Alarm Management Plan
- Item 12 - The procedure needs to be amended to include a method to identify all tasks/work activity performed by the controller as well as a path to review the task list and update as needed. All documents related to the review must also be documented and maintained as part of the record that was used to measure the content and volume of general activity being directed to an individual controller.
- Item 13 - The procedure needs to be amended to detail the commissioning process and consider how the MOC will be used to make sure a more in-depth look at how the change will affect control room operations. Additionally, the MOC process should be all encompassing to evaluate how any change can affect the control room, even if the initiation of the change does not start with the commissioning process. The process must also address the controller training and communication elements.
- Item 14 - The procedure must be amended to reference the SSCGP Emergency Response Evaluation Form B and provide guidance on when and how to complete the form. The operator did provide amended forms that include a structure to evaluate controller fatigue and the control room requirements in § 192.631(g)(1). References to procedure modifications were not provided.
- Item 15 - The procedure needs to be amended to include the training completion and assessment forms and documents, as well as the requirement to retain these documents for review and inspection. The procedure also needs to include the operator qualification (OQ) requirement for the Gas Controllers.

Southern Star has revised its procedures to address each of the Notice of Amendment items. See table below and associated attachments.

NOA Item #	Response Attachment #	Southern Star Procedure	Revised Sections
1	Attachment 1	40.18.00 - Control Room and SCADA Access Policy	Section 2.1.1
2	Attachment 2	40.01.01 - Roles and Responsibilities During Normal Operating Procedures, 40.01.02 - Roles and Responsibilities During Abnormal Emergency Operating Procedures and 40.14.01 - Gas Controller Training Procedure	Defined throughout 40.01.01/40.01.02 and section 6.1.1 in 40.14.01
3	Attachment 3	40.11.01 - Shift Rotation and Fatigue Education Procedure	Section 4.0
4	N/A	Document previously provided - PHMSA listed as no further action required	N/A
5	Attachment 4	40.05.01 - SCADA Displays Standards Procedure and 40.12.01 - Alarm Management System Procedure	Section 6.0 in 40.05.01 and section 3.1 in 40.12.01
6	Attachment 5	40.12.00 - Alarm Management System and Point-to-Point Verification Policy 40.12.02 - Point-to-Point Verification (PPV) Procedure	Section 1.4 in 40.12.00 and section 4.0/5.0 in 40.12.02

NOA Item #	Response Attachment #	Southern Star Procedure	Revised Sections
7	Attachment 6	40.08.1 - Manual Operations Plan Procedure	Sections 5.0 and 7.0
8	Attachment 2	40.14.01 - Gas Controller Training Procedure	Section 5.2.1
9	Attachment 4	40.12.01 - Alarm Management System Procedure	Section 11.0
10	Attachment 4	40.12.01 - Alarm Management System Procedure	Section 9.0
11	Attachment 4	40.12.01 - Alarm Management System Procedure	Section 5.0
12	Attachment 4	40.12.01 - Alarm Management System Procedure	Sections 10.1.3 & 13.1.2
13	Attachment 7	40.12.02 - Alarm Management System Procedure and 40.15.01 - Change Management Procedure	Section 4.0 in 40.12.02 and section 7.2 in 40.15.01
14	Attachment 8	EPPM DOT Emergency Response Procedure	Section 5.8.1.9 and 9.0
15	Attachment 2	40.14.01 - Gas Controller Training Procedure	Sections 5.1.3 and 5.2

Southern Star is committed to operating a safe and reliable pipeline and will continue to take measures daily to protect those individuals who live and work along our system.

Sincerely,

/s/ 

V.P. & Chief Operations Officer