NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 1, 2014

Pete Kirsch
Sr. VP, Pipeline Operations and Engineering
Enable Gas Transmission, LLC
Enable Mississippi River Transmission, LLC
1111 Louisiana Street
Houston, TX 77002

CPF 4-2014-1005M

Dear Pete Kirsch:

On September 9-10, 2013, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Enable Gas Transmission, LLC (EGT)/Enable Mississippi River Transmission, LLC (EMRT), formerly Centerpoint Energy Gas Transmission Co. and Mississippi River Transmission Co., procedures for Control Room Management in Houston, Texas. For reference below, the operator will be referred to as Enable.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within the Enable Gas Transmission 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:

(i) Distribution with less than 250,000 services, or

(ii) Transmission without a compressor station, the operator must have and follow written procedures that implement only paragraphs (d)

(regarding fatigue), (i) (regarding compliance validation), and (j) (regarding compliance and deviations) of this section.

§192.631 Control room management.

(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:

(4) A method of recording controller shift-changes and any hand- over of responsibility between controllers.

The Enable Control Room Management Program Procedure PS-08-01-226 *System Control - Shift Change Procedure* section 2.1 *Responsibilities* and section 2.3 *Shift Change for Controller Breaks* contains conflicting statements. The procedure must be amended to eliminate this conflict.

PHMSA reviewed the procedure and found that sections 2.1 and 2.3 are in conflict. Section 2.1 states,

> *"Under no circumstances should the console be left unattended, even if a fatigue hours of service limitation is exceeded."*

The conflict arises in section 2.3 which states,

> *"In some instances, there will not be a qualified person that can assume responsibility for the pipeline and provide a break; for example, during night shift when there is only one controller in on shift for the EMRT pipeline. In cases like this, if the controller must get something to drink, go to the restroom, use a fatigue countermeasure (See PS-08-01-232, "Fatigue Management Procedure"), or be away from the console for any reason, the controller should take the system control cell phone and limit the time away.*

Enable must modify the procedure PS-08-01-226 *System Control - Shift Change Procedure* to eliminate the conflict that exists.

2. §192.631(a)(1)(i-ii) Control room management.
(See Item 1)

§192.631 Control room management.

(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months; and

The Enable Control Room Management Program Procedure PS-08-01-208 *System Control Evacuation, Backup Scenarios, and Disaster Plan* fails to clearly define who is responsible for making the decision to transfer pipeline control to the backup SCADA system, and restoring control from backup to normal operations.

PHMSA reviewed the EGT Procedure PS-08-01-208 *System Control Evacuation, Backup Scenarios, and Disaster Plan*, section 2.1.3 *Return to Normal Operations* which states,

> *"System Control Management will determine when operational authority and control of the pipeline changes from any location to another, including temporary locations."*

Enable informed the PHMSA inspection team that *System Control Management* was composed of the System Control Director, and three System Control Managers. There are four individuals in System Control Management and numerous scenarios to perform the task of transferring system control to the backup SCADA system. PHMSA expects the operator to clearly define who is responsible for making the decision to transfer pipeline control to the backup SCADA system, and restoring control from backup to normal operations. This decision-making process must be a part of the annual testing.

Enable must amend the procedure to clearly define the one responsible for making the decision to transfer pipeline control and include the decision making process in the annual training.

3. §192.631(a)(1)(i-ii) Control room management.
(See Item 1)

§192.631 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:

(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations;

The Enable Control Room Management Program Procedures PS-08-01-202 *EGT System Control Alarm Management* and PS-08-01-252 *EMRT System Control Alarm Management Plan* fail to include requirements for the provisions for maintaining pipeline control if there is alarm malfunctions.

PHMSA reviewed procedure PS-08-01-202 *EGT System Control Alarm Management*, section 2.11 *Maximum Maintenance Period* which states,

> *"The maximum maintenance period recommended to restore an individual point back to normal service is sixty (60) days, allowing time to order and secure the necessary materials, as well as the scheduling of manpower to complete the job."*

Procedure PS-08-01-252 *EMRT System Control Alarm Management*, section 2.9 *Monthly Safety Point Review, Maximum Maintenance Period* states,

> *"The maximum maintenance period recommended to restore an individual point back to normal service is sixty (60) days. This is to allow for the ordering and securing of the necessary parts and*

materials, as well as the scheduling of manpower to complete the job. If the point cannot be returned to normal service within the 60 day period, the reasons for the delay should be documented and saved with the review documentation."

The inspection team questioned Enable about malfunctioning 'safety-related' points and the 60-day repair interval. PHMSA expects the procedure to include requirements for prompt correction of alarm malfunctions. If 60 days are required for repair due to the acquisition of replacement parts, the procedure must contains provisions for maintaining pipeline control in the absence of the alarm.

Enable must amend the procedure to include requirements for provisions for maintaining pipeline control in the absence of the alarm.

4. §192.631(a)(1)(i-ii) Control room management.
(See Item 1)

§192.631 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:

(3) Verify the correct safety-related alarm set-point values and alarm descriptions at least once each calendar year, but at intervals not to exceed 15 months;

The Enable Control Room Management Program Procedure PS-08-01-202 *EGT System Control Alarm Management*, section 2.9 *SCADA Alarm Limit Changes* is confusing and fails to clearly address the process by which a controller can change alarm limit setpoints.

According to the procedure, a controller, seeking an alarm limit change, prepares an email describing the change and sends the email to System Control management. The second step in the process states that an email will be sent to the SCADA Group to enter the alarm limit change. Then the SCADA employee making the change is to complete the Change Management form, entering all the required information, and have it approved and signed by System Control management prior to making the change. The third step in the process states the Manager of Gas Control, Director of System Control, Manager of Compliance, or the SCADA Coordinator approves or denies the change and signs the form.

The procedure for changing the alarm limits makes reference to: System Control management, the SCADA Group, and the four individuals (Manager of Gas Control, Director of System Control, Manager of Compliance, and SCADA Coordinator). The procedures do not define System Control management and the SCADA Group.

Enable must amend the procedure to eliminate the confusion and clearly define their process used to make alarm limit changes.

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 Enable Gas Transmission, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2014-1005M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

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