



May 1, 2015

Mr. Christopher Hoidal  
Director, Western Region, Office of Pipeline Safety  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
12300 West Dakota Ave, Suite 110  
Lakewood, CO 80228

RE: **CPF S-201S-1003M**  
**Notice of Amendment – Control Room Management Inspection**

Dear Mr. Hoidal:

In response to the inadequacies found during the inspection that occurred between November 4 and 8, 2013 of Tallgrass' Control Room Management (CRM) procedures required by §192.631 by Pipeline and Hazardous Materials Safety Administration inspection personnel a number of procedures have been modified. Each Item number designated in the Notice of Amendment received is listed under the appropriate company procedure revised.

**O&M Procedure 1100 – Control Room Management – Lakewood** has been amended to address Items 1, 4, and 12.

- Verbiage now clearly defines the authority and responsibility given to controllers in all conditions of operation under *Section 3.2. Roles and Responsibilities*, to satisfy Item 1.
- Item 4 asks that a procedure for API 1165 implementation be created and implemented for CRM. The Tallgrass SCADA system incorporates API 1165 requirements in the creation of Operations Control Center (OCC) displays for use by Tallgrass personnel. Language explaining this is included in *Section 2. Scope*.
- To satisfy Item 12, the *Documentation* section of this procedure, section 5, lists the department responsible, and accountable, for compliance with requests from PHMSA or other applicable agencies.

**OCC Business Resumption Plan** was revised to address Item 2. Roles and Responsibilities for individuals responsible for evacuating from the control room and resuming operations are described throughout the plan; initial recovery functions, which are most applicable to controllers, are detailed on pages 14 and 16. Short term and long term response scenarios have been consolidated into three specific time frames; roles and responsibilities do not change in each time frame, however the location of work may change.

Numerous sections of the **Tallgrass Operations Control Center (OCC) Shift Scheduling and Fatigue Management Plan** have been amended to address the inadequacies explained in Items 3,5, 6, and 7.

- Modifications were made to *Section 10. Shift Change/Handover of Responsibility* and *11. Control Room Shift Abnormal Situations*, to explain necessary actions that need taken when an alternative shift hand-over procedure needs conducted, due to varying situations, in order to satisfy Item 3.

- *Section 6. Fatigue: Definitions, Risks, Countermeasures* was incorporated into the Fatigue Management Plan to address the identification of fatigue, fatigue risks, and countermeasures to fight fatigue, which satisfies Item 5.
- Training to recognize the effects of fatigue has been an established practice by all OCC personnel, and is now specified in *Section 4. Roles and Responsibilities* of the Fatigue Management Plan to satisfy Item 6.
- The Hours of Service (HOS) analysis conducted quarterly by the Fatigue Risk Manager described under *Section 12. HOS Review* of the Fatigue Management Plan is aimed to satisfy Item 7. Currently, we do not mandate countermeasures after the 9<sup>th</sup> hour, but do clearly describe appropriate countermeasures that can be taken, and are available. If regulations require that fatigue countermeasures are mandated after the 9th hour clarification on where this is stated would be helpful.

The **Alarm Management Plan** has been modified to fulfill the inadequacies denoted in Items 8 and 9.

- Details pertaining to the methodology and process of alarm rationalization, alarm response prioritization (*Section 9 – Alarm Rationalization Process*), alarm response (*Section 4 – Foundation and Definitions*), and controller performance criteria (*Section 7 - Controller Performance*) applicable to safety related alarms are described in this plan. The review conducted of safety-related alarm operations is described under the Alarm Rationalization Process section as well, which targets the inadequacies explained in Item 8.
- The process of monitoring and analyzing general activity is now sufficiently defined in this plan. In response to comments shared during the inspection, the Alarm Management Plan has been rewritten to include the process for general activity, and criteria used to determine whether a controller has sufficient time to analyze and react to an alarm is identified under *Section 7 - Controller Performance* and *Section 8 - Alarm System Performance*.

**O&M Procedure 155 – Management of Change** has been revised to address Item 10. Language has been incorporated into the procedure to clearly state that the Operations Control Center (OCC) is notified of changes made through the company management of change process.

Modifications were made to **O&M Procedure 1902 – Abnormal Operation** in order to address Item 11. *Section 3.2. Simultaneous or Sequential Abnormal Operation* was added to the procedure to communicate simultaneous and sequential abnormal operations need considered.

All modified procedures can be accessed via the [Control Room Management Procedures](#) folder found on Dropbox. Please let me know if you have any questions or require further information.

Sincerely,



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