

WITHDRAWAL of NOTICE LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 5, 2018

Mr. Don Sorenson
Senior Vice President, Logistics
Tesoro Alaska Pipeline Company LLC
19100 Ridgewood Parkway
San Antonio, TX 78259

CPF 5-2018-6008M

Dear Mr. Sorenson:

On March 16, 2018, Tesoro Alaska Pipeline Company LLC was issued a Notice of Amendment letter for the case number referenced above. This Notice cited Tesoro Alaska Pipeline Company LLC for:

1. **§ 195.446 Control Room Management.**
 - (a) ***General.*** 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402.
 - ...
 - (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:

Tesoro's Preventative Maintenance (SAP) system inventory was inadequate for not listing the safety-related point for the pressure transmitter, PT 002a located at the Anchorage terminal. PT

002a was not part of the SAP system inventory. There are four safety-related points in the system, at the time of the inspection, only the three Nikiski Terminal safety-related points were listed in the SAP system inventory. Operational procedures must insure that preventative maintenance tasks for safety related points are completed and tracked in a comprehensive, reliable, and repeatable manner. The tracking of preventative maintenance tasks for the three safety related points at the Nikiski facility in one system separate from the system used for the single Anchorage safety related points increases the likelihood that the four points will not be maintained in a like manner.

2. **§ 195.446 Control Room Management.**

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402.

...

(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 Tesoro document, WP123, specifies that alarm reviews will be completed by the alarm review team which includes, as one of its members, the Alarm System Coordinator. Section 6 of WP123 identifies specific roles and responsibilities of the Alarm System Coordinator; however, the document fails to identify which Tesoro staff positions or personnel are deemed competent to fill this role.

3. **§ 195.446 Control Room Management.**

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by §195.402.

....

(j) Compliance and deviations. An operator must maintain for review during inspection:

(1) Records that demonstrate compliance with the requirements of this section; and
(2) Documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of the pipeline facility.

Tesoro CRM Procedure 10.2 identifies the following key personnel required for completion of the Tesoro CRM Annual Review Form:

DOT Compliance Manager

Logistics Regional Manager

Shift Leaders

Controller

The Tesoro procedures do not demonstrate a link between the Logistics Regional Manager and what person/position fills that role at the Nikiski location. Further, the signature blocks of the Tesoro Control Room Management Review form do not identify the four staff positions (DOT Compliance Manager, Logistics Regional Manager, Shift Leaders, and Controller) for the persons placing their signatures as reviewers.

On June 7, 2018 Tesoro Alaska Pipeline Company LLC responded that they had listed the pressure transmitter located at the Anchorage terminal in the preventative maintenance (SAP) system for the Nikiski facility. Although the Tesoro Alaska Pipeline Company LLC previously tracked this pressure transmitter separately from safety-related points in the Nikiski facility, all four safety-related points in the system are now listed in the SAP system inventory. Tesoro Alaska Pipeline Company LLC responded that they have amended the Annual Control Room Management (“CRM”) and Alarm Management Plan review forms to identify the functional titles (e.g., Alarm System Coordinator) of the personnel conducting the review and signing the form. This will enable a reader to identify both the name and staff position of each of the four reviewers required by the Tesoro Alaska Pipeline Company’s CRM procedure. My staff reviewed the amended forms that Tesoro Alaska Pipeline Company LLC provided.

This letter is to inform you that PHMSA hereby withdraws the Notice and that the case is now closed.

Sincerely,

Kim West
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 M. Chard (#155158)