



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

VIA E-MAIL TO MR. MARK CLUFF

March 3, 2021

Mr. Mark Cluff
VP Safety & Operational Discipline
Williams Field Services
One Williams Center
Floor 43
Tulsa, OK 74172

CPF 5-2021-010-WL

Dear Mr. Cluff:

During the week of July 20 through 24, 2020, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), performed a virtual inspection of the Williams Field Services control room located in Tulsa, Oklahoma. The inspection covered procedures, records, and virtual observations.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

- 1. § 195.446 - 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) ...

(4) Review the alarm management plan required by this paragraph at least once each calendar year, but at intervals not exceeding 15 months, to determine the effectiveness of the plan;

Williams did not review their alarm management plan required by § 195.446(e) to determine the effectiveness of the plan at least once each calendar year, but at intervals not exceeding 15 months. The Williams alarm management plan identifies four bulleted items that are required as part of the annual review to determine the plan's effectiveness. These four items are listed on pages 27 and 28 of Section 700.604 - Control Room Management Plan (revision 14, effective date 4/01/2020).

The third bullet item requires a review of the safety-related alarm key performance indicators (KPIs) to determine the effectiveness of the alarm management plan.

The operator failed to complete the annual review of the safety-related alarm KPIs during the 2017, 2018, and 2019 annual review to determine effectiveness in accordance with their procedures.

During the inspection, the operator agreed that while they did review the alarm management plan in 2017, 2018, and 2019, they failed to complete the review properly by not following the entirety of the procedure which required them to review the KPI information and to determine the effectiveness of the alarm management plan.

2. § 195.446 - Control room management.

(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator.

Williams controller training program did not provide for training each controller to carry out the roles and responsibilities defined by the operator. During the inspection, Williams stated that leak detection training is conducted annually but the training program did not identify leak detection as a training element.

Williams could not provide records that leak detection training was conducted in 2019. Williams has subsequently revised their Training Program (Section 700.900, Rev. 5, effective 9/20/2020) to include the leak detection training element.

Additionally, a review of controller training records failed to record a pass/fail for the January 30, 2019, Control Room Management Plan (CRMP) refresher training for one of the employees.

Per the training program, controllers are required to take a pass/fail examination for all training courses, where a passing score is 80%. The program states that a pass/fail criterion for all training elements must be recorded, but it was not recorded for this controller.

3. § 195.446 - Control room management.

(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator...

Williams did not establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. Williams did not follow their training procedures within their control room management plan for completing annual reviews of the training requirements which required documenting when identified improvements were implemented.

The records associated with the operator's annual review of the training program content for calendar years 2017, 2018, and 2019 were presented during the inspection.

The October 2018 record indicated that “on the job” training will be revised and formalized within the next year. However, revisions do not appear to have been completed as no follow up documentation or revisions were included in the records.

Additionally, the November 2017 record included comments to update the training program to include team training, but no resolution date was identified and there were no records indicating that the team training was revised.

4. § 195.446 - Control room management.

(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

(1)...

(6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph no later than January 23, 2018.

Williams training program did not include control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal,

abnormal or emergency situations. Williams did not comply with the team training requirements under this paragraph by January 23, 2018. Training records reviewed during the inspection do not demonstrate that team training was conducted and involved other personnel who would have been required to attend to meet the regulatory requirement.

The operator only sent out an email notification to employees stating that a new team training requirement would be implemented, however, no actual training was performed.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Williams Field Services being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2021-010-WL**. 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).

Sincerely,

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 D. Fehling (#20-173103)