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May 10, 2021

Government Letter No. 47144
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Mr. Dustin Hubbard, Western Region Director
Pipeline and Hazardous Materials Safety Administration
U.S Department of Transportation
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228

Subject: Response to CPF 5-2021-014-NOA and CPF 5-2021-016-WL

Dear Mr. Hubbard,

This letter serves as a response to the Notice of Amendment (CPF 5-2021-014-NOA) and Warning Letter (CPF 5-20210016-WL) sent by the Pipeline and Hazardous Materials Safety Administration (PHMSA) to Alyeska Pipeline Service Company (Alyeska) on April 14, 2021. These notices were regarding the virtual control room inspection performed by PHMSA on August 17-21, 2020.

As outlined in the Notice of Amendment (CPF 5-2021-014-NOA), PHMSA identified an inadequacy in Alyeska procedure DO-14-2, *Trans-Alaska Pipeline System Controller Operating Manual*, Section 3, Controller Authority, Roles, and Responsibilities [herein referred to as DO-14-2], which was submitted to PHMSA on December 1, 2020 via Government Letter 46088. Alyeska submitted a revision to DO-14-2 during the inspection to clarify roles and responsibilities of individuals who have the authority to supersede the technical actions of a controller; however, PHMSA determined that the updated procedure was still unclear on this topic and additional changes were needed. Alyeska has updated this procedure again for clarity and the revised version of DO-14-2 is enclosed.

PHMSA's Warning Letter (CPF 5-20210016-WL) alleged a probable violation related to team training requirements per 49 CFR 195.446(h)(6). Alyeska is committed to continuous improvement and appreciates the insights gained from the inspection. Actions taken to address this concern during the inspection were summarized in Government Letter 46088 submitted on December 1, 2020. These actions included:

1. Revisions to Alyeska manual CRM-001-10, *OCC Training and Qualification* including adding a requirement that Alyeska Form 7047, *Training Roster* be used to document all OCC training participants.
2. The addition of three new attachments to CRM-001-10, *OCC Training and Qualification* to better align with the team training requirements. These attachments include:
 - a. Attachment A - Team Training and Exercise Outline
 - b. Attachment B - Team Training and Exercise Documentation
 - c. Attachment C - Post Functional Team Training and Exercise Evaluation

Please direct any written response to the following address:

Allison Iversen
HSEC Director
Alyeska Pipeline Service Company
P O Box 196660, MS 502
Anchorage, Alaska 99519-6660

If you have questions or comments regarding this information, please contact Alyssa Sweet at (907) 787-8960.

Sincerely,



Enclosure: DO-14-2, *Trans-Alaska Pipeline System Controller Operating Manual*, Section 3, Controller Authority, Roles, and Responsibilities (Edition 9, Revision 3)

cc: Dave Hassell, PHMSA
Diana Fehling, PHMSA
PHP-WRADMIN@dot.gov