



**U.S. Pipelines and Logistics**

**BP Pipelines (North America) Inc.  
30 S. Wacker Drive, 9th Floor  
Chicago, Illinois 60606**

July 08, 2021

**VIA EMAIL**

Mr. Dustin Hubbard  
Director, Western Region  
U.S. Department of Transportation  
PHMSA, Office of Pipeline Safety  
12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

**Re: CPF 5-2021-018-NOA**

Dear Mr. Hubbard:

BP Pipelines (North America) Inc. (BP), operator of Olympic Pipe Line Company (OPL), is writing in response to the referenced Notice of Amendment (NOA) letter, received in our offices on June 11, 2021, regarding the December 14 through 18, 2020 inspection of the Olympic Pipe Line system.

For ease of response, the code citation and DOT's statements have been copied below in italics and are followed by the BP response.

***§195.446 Control room management.***

***(a)...***

***(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:***

***(1) ...***

***(5) The roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers.***

***DOT Statement:***

***Olympics' control room management procedures are inadequate to assure safe operation of a pipeline facility. Specifically, its procedures fail to adequately define the roles, responsibilities, and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers during normal, abnormal, and emergency operating conditions.***

*Olympics' Control Room Management Procedure # P-195.446, Pipeline Control Room Personnel Roles, Authorities and Responsibilities does not define the roles, responsibilities and qualifications of the "Shift Leader," an individual who has authority to direct or supersede the specific technical actions of controllers. Olympic must define the roles, responsibilities, and qualifications of the Shift Leader(s) in the Control Room Management Procedure # P-195.446, Pipeline Control Room Personnel Roles, Authorities and Responsibilities.*

**BP Response:**

Please be advised that the referenced O&M procedure, P-195.446 - *Control Room Management*, has been revised to address the concerns identified in CPF 5-2021-018-NOA. The following is a summary of the revisions:

- The phrase "and operator qualified Shift Leaders" has been added to the Roles and Responsibilities section B. 1.

Procedure P-195.446 Control Room Management now depicts:

**B. Roles and Responsibilities 195.446 (b)**

**1. Pipeline Control Room Personnel Roles, Authorities and Responsibilities**

Physical domain of Responsibility

The physical domain of responsibility resides solely at the assigned or completed operator qualification tasks associated with a console within the control room facility. This responsibility does not change unless the controller cross-trains upon another console and has completed the required operator qualification task associated with that additional console.

Console Qualified Individuals

Only those operator qualified Controllers **and operator qualified Shift Leaders** who have completed initial-OQ or OQ requalification on each pipeline system can log in and operate the pipeline systems associated with their assigned console. SCADA log in is restricted to only the assigned controller for that workstation. Non-qualified shift leaders, Team leaders or other control center individuals are prohibited from issuing any SCADA command upon the console activities.

Temporary or Impromptu changes to responsibilities

The operator qualified Controllers **and operator qualified Shift Leaders** maintains a select set of pipeline system(s) operator qualification task, assigned accordingly. There are no temporary or impromptu changes to their responsibilities that currently exist nor allowed.

Role and Responsibilities during normal operations 195.446(b)(1)

The operator qualified Controllers **and operator qualified Shift Leaders** have the authority to call out field personnel to conduct and/or lead normal operational procedures such as startups, shutdowns, tank changes, meter proving etc., and have the overall authority to shut down or "stop work" any operation deemed un-safe, or potentially which will result in an incident. They are accountable and have the authority

to monitor and control any or all remote functions or task remotely from the control center or by instructing the field operator to perform a task “by direction”. Operator qualified Controllers **and operator qualified Shift Leaders** roles for startup, shutdown and for normal operations are located in their specific system OMER Book 2 procedures or affiliate equivalent.

Role and Responsibilities during abnormal operations 195.446(b)(2)

The operator qualified Controllers **and operator qualified Shift Leaders** have the authority and will call out field personnel to conduct and/or lead abnormal operations response procedures such as emergency shutdowns etc. and have the overall authority to shut down or “stop work” any operation deemed un-safe, or potentially which will result in an incident. Operator qualified Controllers **and operator qualified Shift Leaders** responsibilities for abnormal operations are defined in P-195.402(d) and OMER Book 2 Paragraph H. of each facility description or affiliate equivalent.

Role and Responsibilities during emergency operations 195.446(b)(3)

The operator qualified Controllers **and operator qualified Shift Leaders** have the authority and will call out field personnel to conduct and lead emergency response such as coordinating field strategy; call outs, etc., and have the overall authority to shut down or “stop work” any operation deemed un-safe, or potentially which will result in further compounding the incident. Operator qualified Controllers **and operator qualified Shift Leaders** responsibilities for emergencies and accident reporting are defined in P-195.402(e) and OMER Book 2 Paragraph I. of each facility description or affiliate equivalent.

Shift-change and hand-over responsibilities 195.446 (b)(4)

Operator qualified Controllers **and operator qualified Shift Leaders** shift – changes must occur whenever one officially relinquishes his/her duties of console operator to another. Handover of responsibility can occur during official rest breaks or during emergencies when they are called away from the console. Operator qualified Controllers and operator qualified Shift Leaders will conduct a documented turnover of information in accordance with API RP 1168 Section 5 Guidelines for Shift Turnover. US T&P control rooms will use the local control center FCTRL-OPS-463-004 Shift Turnover procedure.

Others with Authority to direct/supersede controller actions

Operator Qualified (OQ'd) Shift Leaders within the control center organization are qualified to direct or supersede controller actions. The pipeline controller has overall authority of the pipeline control room operations, however, in certain situations the OQ'd Shift Leader may override controller technical actions if current operations could compromise safety. The qualified Shift Leader will announce that they are superseding, taking over responsibility. The controller who has been relieved must not interfere with the actions of the Shift Leader.

Note: No authority, to include management can direct a controller to start up a pipeline system against their sound judgement for any time. Only the operator qualified controller, with all relevant information, necessary schedule

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instructions, known equipment failures repaired, restart authorization as required, line fill refill calculations made, etc. will make the decision to start up a pipeline system.

BP believes that the practices and actions taken as described in the response herein address the issues identified in the Notice of Amendment. BP would be happy to run through these procedural changes with PHMSA staff, if desired.

Should you have any questions or require any further information, please free to contact me at (331) 239-9745.

Sincerely,

*Timothy J.R. Smith*

Timothy J.R. Smith  
Compliance Manager  
BP Pipelines (North America) Inc.

cc: John D'Andrea - Vice President, BP Pipelines (North America) Inc.