



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 5-2021-024-NOPV

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 Probable Violation (NOPV) and Proposed Compliance Order (PCO) letter, received in our offices on June 11, 2021, regarding the December 14 through 18, 2020 inspection of the Olympic Pipeline system.

BP is not contesting the NOPV or PCO but wishes to submit additional information to clarify the alleged findings and PCO remedial requirements and timeframes. For ease of response, the code citation and DOT's statements have been copied below in italics and are followed by the BP response.

Probable Violations

1. §195.446 Control room management.

(a) . . .

(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:

(1)...

(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;

Finding:

Olympic failed to test and verify its internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months. Olympic could not produce documentation that its internal communication plan had been tested at the requisite intervals, nor did its procedures even require such testing.

BP Response:

In the event of a system-wide SCADA and/or communications failure, OPL will initiate an emergency shut down of the system and will not operate the system manually. The OPL OMER Manual Book 2 contains the emergency shut down procedure.

OMER Book 1 Section P-195.446 does contain BP's procedure (excerpt below) requiring annual testing of the communication plan that would be executed in the event of a SCADA and/or communications failure.

Test and Verify

After every actual communication/SCADA failure event a review is conducted that determines if the control room controllers followed the proper procedure. Problems identified during the actual event should be corrected immediately. Corrective actions should be presented prior to the next actual or simulated event. Actual events are used to meet testing requirements. In the case where an actual event does not occur, a desktop test must be scheduled and conducted to meet the requirements for testing every calendar year not to exceed 15 months.

OPL did not previously conduct annual testing of the SCADA/Communications loss communication plan based upon its interpretation of PHMSA FAQ C.09 (text below) that "only procedures to safely perform a controlled shutdown and maintain and monitor pipeline integrity need to be in place". Based upon the recent guidance provided by PHMSA, OPL will begin annual testing or drilling of the procedures located in OPL OMER Book 2.

C.09 In the event of a SCADA failure, what is meant by an adequate means for manual operation of the pipeline safely?

If an operator does not intend to continue operating the pipeline in the event of a catastrophic SCADA failure, then only procedures to safely perform a controlled shutdown and maintain and monitor pipeline integrity need to be in place.

2. § 195.402 - Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to ensure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Finding:

Olympic failed to follow its procedural manual while conducting reviews of the workloads of its pipeline controllers in 2019. Specifically, Olympic's Control Center Controller General Activity Review Document Number: FCTRL-ADM-061-001 dated 07/13/2020, Section 8.1 Evaluation, requires that "(c)ontroller performance should be sampled, and reviews should be conducted on weekdays, nights, weekends, Holiday etc." Records from the 2019 Control Center Controller General Activity Review indicated that the review of controller activity was conducted only on weekday and weekend day shifts. There were no night or holiday shifts included in the 2019 evaluation, despite Olympics' procedures requiring reviews during these times.

BP Response:

BP will retrain personnel directly involved with the controller performance reviews with the emphasis to conduct the reviews across all shifts (weekdays - days/nights, weekends - days/nights,

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and holidays). BP did appreciate Mr. Dunphy's (Western Region) recommendation of increasing the evaluation period, to which the procedure will be amended to reflect a 1-hour observation.

Proposed Compliance Order

Regarding the Proposed Compliance Order for Item 1, BP does not have any additional comments. OPL will test and verify the internal communication plan within 30-days of the receipt of the Final Order.

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.