



# CPN PIPELINE COMPANY

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NYSE CPN VIA FEDEX AND EMAIL

August 17, 2022

Mr. Dustin B Hubbard  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

RE: Response to Notice of Amendment

CPF 5-2022-009-NOA

Dear Mr. Hubbard,

CPN Pipeline Company (CPN) hereby responds to your letter dated July 18, 2022, and the inspection of the written procedures for control room management by representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), from November 15 through 17, 2021. PHMSA identified two (2) items in the referenced Notice of Amendment (NOA).

Each of the NOA responses are set forth below:

- #1        **§ 192.605 - Procedural manual for operations, maintenance, and emergencies.**
- (a) ...
  - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
- (12) **Implementing the applicable control room management procedures required by § 192.631.**

CPN's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, CPN's Control Room Management Plan (Aug. 2020), Section 3.11.2 Good Practice Guidelines for Work Environment note that consideration should be given to "Allow time for communication at shift handovers."<sup>1</sup> CPN's procedures, however, fail to establish what should be communicated during shift handovers. Shift change procedures that explain what information must be exchanged between outgoing and incoming controllers promotes alertness and enhances capabilities for effective decision-making. CPN must amend its Control Room Management Plan to establish and implement procedures for when a different controller assumes responsibility, including the content of information to be exchanged. The procedures should also note that shift changes are documented in CPN's Geo. SCADA Journal.

## CPN Response:

Section 3.7.4 *Shift Change Procedure* has been added, including details of how a shift handover occurs, and what information must be conveyed and documented. See Section 3.7.4 *Shift Change Procedure* in attached Exhibit A – *Control Room Management Plan*.

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<sup>1</sup> See also Section 1.7 Definitions, noting that a controller's "general activity" includes but is not limited to "conducting shift change."

- #2      § 192.605 - Procedural manual for operations, maintenance, and emergencies.
- (a) ...
  - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
    - (1) ...
    - (8) **Periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found....**

CPN's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, CPN's manual does not include procedures for periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found, as required by §192.605(b)(8). CPN's Control Room Management Plan (Aug. 2020) Section 3.13 Effectiveness of Training does not contain adequate metrics to measure fatigue mitigation program efficacy or a requirement to improve the program if deficiencies are found. Although Section 3.13 lists certain metrics, such as reports of increased fatigue and increased use of fatigue mitigation tactics, the procedures do not describe how many reports of increased fatigue are problematic, or when the use of fatigue mitigation tactics becomes concerning and requires additional action. CPN must amend its procedures to establish data measurement methods for the fatigue management program review, including a requirement to identify deficiencies, and make modifications when deficiencies are found.

**CPN Response:**

Section 3.13 *Effectiveness of Training* of attached Exhibit A has been revised to include details of the annual review process. Additionally, a new effectiveness metrics evaluation process has been developed, as shown in attached Exhibit B - F-3.13 **Fatigue Review and Training Effectiveness Metrics Evaluation Form.**

We hope these updates to our procedures have addressed your concerns. If you have additional questions, or would like to discuss these revisions, please contact me at 707-374-1505.

Respectfully,



Scott Vickers  
Compliance Manager

Cc: Lyle Fedje – Director – CPN Pipeline  
Kurt Seel, Calpine Senior Counsel

Enclosures: Exhibit A - Control Room Management Plan - Draft  
Exhibit B - F-3.13 Fatigue Review and Training Effectiveness Metrics Evaluation Form