

March 31, 2023

Mr. Robert Burrough
Director, Eastern Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, New Jersey 08628

Re: CPF-2023-016-WL

Dear Mr. Burrough:

Please find the Eastern Gas Transmission and Storage, Inc. (EGTS) response to Warning Letter CPF 1-2023-016-WL, dated February 23, 2023. Specifically, PHMSA noted the following probable violations:

1. § 195.446 Control Room Management.

- (a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...**

EGTS failed to follow its written control room management procedures. Specifically, EGTS failed to verify the correct safety-related alarm set-point values when associated field instruments were calibrated or changed in accordance with its Hastings Extraction Plant Control Room Management Plan, 7.3 SCADA Point Review 195.446(e)(2) 195.446(e)(3), Revision 5, 5/31/2021 (Set Point Procedure) and § 195.446(e)(3)¹.

During the inspection, PHMSA requested EGTS' records to demonstrate compliance with its procedures and § 195.446(e)(3) when field instruments were calibrated or changed during 2019 – 2021, such as SCADA control transmitters or other equipment. EGTS identified that its inspection and calibration records did not indicate that safety-related alarm set point values were verified at these times. However, the Set Point Procedure required the NGL Operations to verify the correct safety related alarm set-point values and alarm descriptions once each calendar year at intervals not exceeding 15 months, and whenever the associated field instruments are calibrated or maintained.

¹ § 195.446 Control Room Management.

(a)...

(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) ...

(3) Verify the correct safety-related alarm set point values and alarm descriptions when associated field instruments are calibrated or changes and at least once each calendar year, but at intervals not to exceed 15 months:

Therefore, EGTS failed to verify safety-related alarm set-point values in accordance with its Set Point Procedure and pursuant to § 195.446(e)(3).

EGTS Response:

Following the control room management inspection, EGTS developed and implemented a new inspection in its electronic inspection management system to track and document the verification of the correct safety-related alarm set-point values and alarm descriptions during the annual reviews of the Alarm Management Plan. The verification of the correct safety-related alarm set-point values and alarm descriptions was then completed on November 8, 2021 and November 8, 2022 for calendar years 2021 and 2022, respectively.

In response to this probable violation, EGTS developed and implemented a process and associated means of documenting the verification of the correct safety-related alarm set-point values when associated field instruments are calibrated or changed.

2. § 195.446 Control Room Management.

- (a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...**

EGTS failed to follow its written control room management procedures. Specifically, EGTS failed to determine the effectiveness of its alarm management plan at least once each calendar year, but at intervals not exceeding 15 months in accordance with its Hastings Extraction Plant Control Room Management Plan, Alarm Management Plan Review 195.446(e)(4), Revision 5, 5/31/2021 (Alarm Management Review Procedure) and § 195.446(e)(4)².

During the inspection, PHMSA asked EGTS to produce records that demonstrate that its alarm management plan was reviewed at least once each calendar year, but at intervals not exceeding 15 months to determine the effectiveness of the plan. EGTS referred to Section 7.4 of its Alarm Management Review Procedure which required a review of the plan but did not contain details for determining the effectiveness of the plan, such as metrics. This section also stated that the reviews would be documented in EGTS' electronic inspection management system. However, EGTS provided its Section 13 Control Room Management Plan Revision Log, Revision 13, 5/31/2021 as its record of the annual reviews. A review of the Revision Log from 2018 to 2020 did not demonstrate that a review was completed or that the effectiveness of the plan was determined.

² § 195.446 Control Room Management.

(a)...

(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 to exceed 15 months, to determine the effectiveness of the plan.

Therefore, EGTS failed to review its alarm management plan to determine its effectiveness in accordance with its Alarm Management Review Procedure and as required by § 195.446(e)(4).

EGTS Response:

EGTS notes that in addition to the Control Room Management Plan Revision Log, during the control room management inspection PHMSA reviewed the record of the annual review of the alarm management plan for 2020 in the electronic inspection management system.

Following the control room management inspection, EGTS developed metrics for determining the effectiveness of the alarm management plan and accordingly revised the Control Room Management Plan, Section 7.4 (Alarm Management Plan Review 195.446(e)(4)) to include these metrics. The revised Control Room Management Plan, Section 7.4 (Alarm Management Plan Review 195.446(e)(4)) was submitted to PHMSA for review on August 23, 2021. Also following the control room management inspection, EGTS enhanced the existing inspection in the electronic inspection management system for tracking and documenting the annual review of the alarm management plan to include a prompt and an associated attachment for compiling the metrics for determining the effectiveness of the alarm management plan. The annual review of the alarm management plan, including the compilation of the metrics for determining the effectiveness of the alarm management plan, was then completed on December 21, 2021 and November 17, 2022 for calendar years 2021 and 2022, respectively.

If you have any questions, concerns, or should require additional information, please contact Dan Stahl at 681-842-3365 (office) or 304-266-6062 (mobile).

Respectfully,



John M. Lamb
Vice President, Eastern Pipeline Operations
Eastern Gas Transmission and Storage, Inc.
BHE Gas Transmission and Storage, Inc.