

June 28, 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 1-2023-027-NOPV

Dear Mr. Burrough:

Please find the Eastern Gas Transmission and Storage, Inc. (EGTS) response to Notice of Probable Violation CPF 1-2023-027-NOPV, dated June 1, 2023. Specifically, PHMSA noted the following probable violations:

1. § 192.631 Control Room Management.

(a) ...

(j) Compliance and deviations. An operator must maintain for review during inspection:

(1) Records that demonstrate compliance with the requirements of this section; and

EGT&S failed to maintain records that demonstrate compliance with § 192.631(h)¹. Specifically, EGT&S failed to maintain documentation of a training program for training each controller to carry out their defined roles and responsibilities.

During the inspection, PHMSA requested documentation of a training program for each controller to carry out their roles and responsibilities pursuant to the requirements of § 192.631(h). EGT&S was unable to provide any record of training the controllers to carry out their roles and responsibilities. Additionally, no records were provided to demonstrate how controllers are operator qualified for the covered tasks associated with being a controller.

Therefore, EGT&S failed to maintain records demonstrating compliance with § 192.631(h) as required pursuant to § 192.631(j)(1).

EGTS Response:

EGTS appreciates the opportunity to improve the existing Controller Training Program to ensure its controllers are qualified to perform the duties associated with their roles and responsibilities. However, for the reasons detailed in this response, a withdrawal of the proposed violation and associated civil penalty is requested. EGTS respectfully disagrees with PHMSA's statement that "Additionally, no records were provided to demonstrate how controllers are operator qualified for

¹ Section 192.631(h) requires that an operator's controller training program must provide for training each controller to carry out the roles and responsibilities defined by the operator.

the covered tasks associated with being a controller.” EGTS notes that a Controller Training Program existed when the inspection was conducted on November 15-19, 2021 and required the controllers to be operator qualified for covered tasks L04.1371 Operate Gas Pipeline – System Control Center Operations and M11.5751 Recognize and React to Generic Abnormal Operating Conditions. L04.1371 and M11.5751 are designated by EGTS as the covered tasks associated with being a controller. The PHMSA inspectors reviewed the existing Controller Training Program during the inspection conducted on November 15-19, 2021, and requested a copy of it, which was provided by EGTS on November 19, 2021. The existing Controller Training Program specified that completion of an online course, test, and performance evaluation was required for a controller to obtain qualification for L04.1371 and completion of an online course and test was required for a controller to obtain qualification for M11.5751. Those requirements remain in effect in the current Controller Training Program. The PHMSA inspectors also reviewed training records documenting the successful completion of L04.1371 and M11.5751 by a selected sample of the controllers during the inspection conducted on November 15-19, 2021 and requested copies of those training records which were provided by EGTS on November 19, 2021. EGTS contends that the presence of L04.1371 and M11.5751 in the existing Controller Training Program, specifically the specified requirements for completion of L04.1371 and M11.5751, and the associated training records documenting the successful completion of L04.1371 and M11.5751 by a selected sample of the controllers sufficiently demonstrated how controllers are operator qualified for the covered tasks associated with being a controller.

Additionally, EGTS notes that the Controller Training Program that existed when the inspection was conducted on November 15-19, 2021 included the following training elements which collectively provided training for the controllers to carry out their defined roles and responsibilities:

- GC-IL-00150 Gas Control Controller Fatigue Training – Initial
- GC-IL-00200 Gas Control Controller Fatigue Refresher
- GC-IL-SCENARIO1 Gas Control AOC Simulation Trainer Scenario 1
- GC-IL-SCENARIO2 Gas Control AOC Simulation Trainer Scenario 2
- GC-ON-00010 Gas Control Site Specific Emergency Plan – Backup Center
- GC-ON-00011 Gas Control Guidelines
- GC-ON-00012 Gas Control Training – Work Procedures
- GC-ON-00013 Gas Control Training – SOP’s
- GC-ON-00050 Control Room Management Team Training
- GC-ON-00075 Controller Training
- DOT-ON-00080 Emergency Plan Training
- DOT-ON-00090 Standard Operating Procedures Training
- SAF-ON-01220 Emergency Plan – White Oaks
- WP-ON-032A-G Start Up, Shut Down, Isolating, and Blowdown of Any Part of the Pipeline
- L04.1371 Operate Gas Pipeline – System Control Center Operations
- M11.5751 Recognize and React to Generic Abnormal Operating Conditions

As communicated in the response to the Post-Inspection Written Preliminary Findings that was submitted by EGTS to PHMSA on August 15, 2022, EGTS reviewed and updated the Controller

Training Program for the purposes of process improvement following the inspection conducted on November 15-19, 2021 which included taking the following actions:

- Developed and implemented a checklist (GC-IL-00301 Gas Controller Working Knowledge of the Pipeline Checklist) and associated test (GC-OL-00300 Gas Control Working Knowledge of the Pipeline Test) which require the controllers to demonstrate proficiency and working knowledge of the EGTS pipeline system. GC-IL-00301 includes over 200 items specific to the EGTS pipeline system. GC-OL-00300 includes an established pass / fail criteria (a score of 80% or higher is required) and an established limit to the number of times (a maximum of 3) it can be retaken before additional training is required.
- Both GC-IL-00301 and GC-OL-00300 were incorporated in the Controller Training Program and need to be completed before an individual is considered to be a qualified controller going forward.
- GC-IL-00301 and GC-OL-00300 were completed retroactively by all currently qualified controllers.

See the updated Controller Training Program and GC-IL-00301 which are included as attachments to this response.

Based on the provided information, EGTS requests a withdrawal of the proposed violation and associated civil penalty.

2. § 192.631 Control Room Management.

(a) ...

(j) Compliance and deviations. An operator must maintain for review during inspection:

(1) Records that demonstrate compliance with the requirements of this sections; and

EGT&S failed to maintain records that demonstrate compliance with § 192.631(f)(2)². Specifically, EGT&S failed to maintain documentation demonstrating that field personnel contacted the control room when making field changes that affect control room operations.

During the inspection, EGT&S was asked to produce documentation of field inspections in accordance with EGT&S's WP071GL-Inspecting, Maintaining & Lubricating Valves pursuant to the requirements of § 192.631(f)(2). During review of the records provided, it was noted that the records did not indicate that field personnel notified Gas Control and obtained permission to operate any valve as required by Step 2 of WP071GL. EGT&S's inspection forms did not contain a requirement or data field to document the contacting of the control room before operating any valve, which is a field change that affects control room operations pursuant to § 192.631(f)(2).

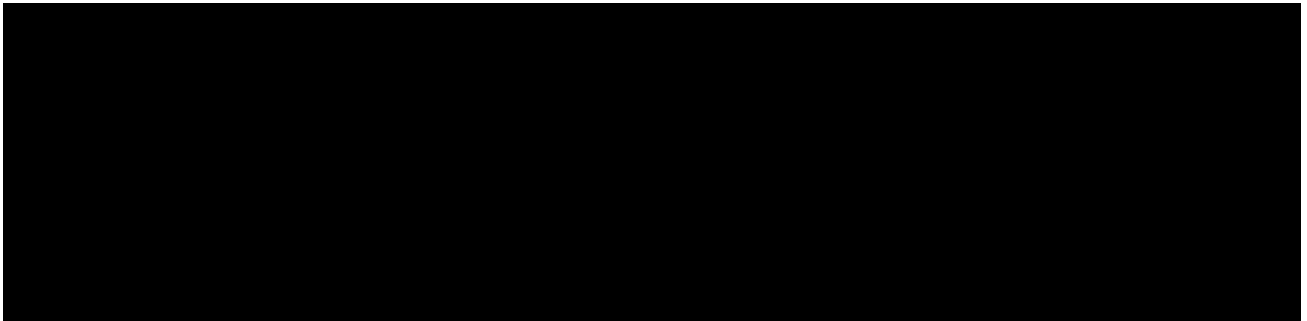
Therefore, EGT&S failed to maintain records that demonstrate compliance with § 192.631(f)(2) as required pursuant to § 192.631(j)(1).

² Section 192.631(f)(2) requires that field personnel contact the control room when emergency conditions exist and when making field changes that affect control room operations.

EGTS Response:

Following the inspection conducted on November 15-19, 2021, EGTS modified the critical valve inspection record template in the electronic inspection management system to include the following two questions for which completion is mandatory to close the inspection:

- Was Gas Control notified before the inspection was completed to obtain permission to operate the valve?
- Was Gas Control notified after the inspection was completed to verify the valve position?



If you have any questions, concerns, or should require additional information, please contact Dan Stahl at 681-842-3365 (office) [REDACTED]

Respectfully,



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