

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 26, 2021

Mr. Kenneth Grubb
Chief Operating Officer
Tennessee Gas Pipeline Company
1001 Louisiana Street, Suite 1000
Houston, TX 77002

CPF 2-2021-001-NOA

Dear Mr. Grubb:

From April 27, 2020 through May 1, 2020, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected Tennessee Gas Pipeline Company's (TGP) Control Room Management Program and records in Houston, Texas, pursuant to Chapter 601 of 49 United States Code. TGP is a subsidiary of Kinder Morgan (KM).

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within TGP's procedures, as described below:

1. **§ 192.631 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)
 - (2) **Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities;**

TGP's written alarm management plan (AMP) did not require, at intervals of at least once each calendar month, identification of points affecting safety that generated false alarms.

At the time of PHMSA's inspection, TGP incorporated Version 6.1 of KM's AMP, titled "Alarm Management Plan For Control Room Operations," dated March 10, 2020, which referenced multiple appendices including Appendix C, titled "Appendix C - SCADA Alarm Management Reports." Section VI of the AMP, titled "Alarm Audits," requires TGP personnel to, on a monthly basis, "review the alarm system to identify and address safety-related points that have been taken off scan, have been inhibited, have manual values or have had false alarms. (see Appendix C)." In Appendix C, TGP listed fourteen (14) different types of alarms to be analyzed for the above-referenced monthly reviews. The listed types of alarms to be analyzed did not include false alarms. During the inspection, PHMSA personnel provided an example of a false alarm: an alarm that can mislead a controller to believe a condition exists, but that does not exist due to field personnel conducting routine operations & maintenance without contacting the control room and which generated a safety alarm in the Control Room. TGP personnel agreed that this scenario would not be captured in any of its fourteen different types of alarms to be analyzed per Appendix C.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Compliance Proceedings. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Tennessee Gas Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Director, Office of Pipeline Safety, PHMSA Southern Region. In correspondence concerning this matter, please refer to

CPF 2-2021-001-NOA and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*