



Tennessee Gas Pipeline
Company, L.L.C.
a Kinder Morgan company

June 23, 2021

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Attn: James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region
230 Peachtree Street N.W., Suite 2100
Atlanta, GA 30303

Re: CPF 2-2021-001-NOA

Dear Mr. Urisko:

Tennessee Gas Pipeline Company, L.L.C. (TGP) acknowledges receipt of PHMSA's referenced Notice of Amendment and responds as follows.

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



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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.

TGP Response: TGP wishes to clarify that it has always included the false alarms on the daily logs and daily shift reports for management review. By doing this on a daily basis, TGP was exceeding the regulatory requirement to review this information monthly. Nevertheless, because the inclusion of the false alarm data on the daily report and not the monthly report caused confusion, TGP has amended its procedure and its monthly report so the false alarm information now appears in the monthly report as well as the daily reports. The attached Exhibit A includes the amended Alarm Management Plan Appendix C and Appendix D and an example of the new monthly report.

TGP is fully committed to pipeline safety and proper control room management and appreciates the opportunity to clarify its procedures. Please contact me by phone (713-420-5229) or email (rob_perkins@kindermorgan.com) should you have any questions or concerns about TGP's response.

Sincerely,

Rob Perkins
Vice President, Gas Control

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enclosures