

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: alan.armstrong@williams.com and edgar.x.rodriguez@williams.com

April 28, 2021

Mr. Alan Armstrong
President & CEO
Transcontinental Gas Pipeline Company
One Williams Center
PO Box 2400
Tulsa, OK 74102-2400

CPF 3-2021-020-NOA

Dear Mr. Armstrong:

From May 4 through 8, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) and New York State Department of Public Service pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected your Control Room Management Plan and Control Room Records in Houston, TX. The inspection pertained to OPID's 19750/Transcontinental Gas Pipeline Company, 31565/Gulf Stream Management & Operating Services, LLC, 32684/Pine Needle Operating Company, LLC and 32657/Cardinal Operating Company, LLC.

This Notice is in response to PHMSA's Control Room Management (CRM) Initiative, which is a national level program that includes inspectors from every region. As a result, you may have received this Notice from a different Regional Director than typical because the CRM Initiative inspections are currently separate from the standard inspection program. Notices and correspondence from other types of inspections will remain unchanged.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Transcontinental Gas Pipeline Company's (TransCo) plans or procedures, as described below:

1. § 192.631 Control room management.

(a) General. (1) 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, except that for each control room where an operator's activities are limited to either or both of:

(i) Distribution with less than 250,000 services, or

(ii) Transmission without a compressor station, the operator must have and follow written procedures that implement only paragraphs (d) (regarding fatigue), (i) (regarding compliance validation), and (j) (regarding compliance and deviations) of this section.

TransCo's procedure titled, *Williams Control Room Management Plan Revision 14 Effective 2/11/2020* (CRM Plan), is inadequate because it did not provide guidance or structure to determine which of its facilities are control rooms. During the inspection, TransCo indicated that internal discussions were held and a review was made to determine which facilities qualified as control rooms. The results of this study were not available for review during the inspection. TransCo also stated that the main criteria for control room determination was "if the location operated assets outside the fence." However, this criteria was not found in the CRM Plan.

In addition to the identified control rooms that include backup and interim facilities, TransCo states in its procedure, 07.71.007-OG Control Room Evacuation Procedures Step 1.5, "[t]he on-call Pipeline Control person will remotely operate the pipeline, or perform manual operations until the Backup Control Center or Interim Site, or Control Room is operational." The intent of this procedure is for supervisors and managers to log on to SCADA and operate remotely from their homes until a controller is relocated to the backup center or has access to the control room. Because the on-call controller can operate from his/her home, TransCo needs to consider this in its control room determination process. All control rooms, regardless of location, are subject to the CRM regulations, as well as all procedures related to control room operations.

TransCo's CRM Plan must be amended to include guidance and structure for a consistent process of control room determination.

2. § 192.631 Control room management.

(a)

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1)

(5) The roles, responsibilities and qualifications of others with the authority to direct or supersede the specific technical actions of a controller.

TransCo's CRM Plan is inadequate because it does not clearly provide the roles and responsibilities for others with the authority to direct or supersede the specific technical actions of a controller. While the CRM Plan offers a process for superseding a controller, it does not support the described or expected process, as described by TransCo personnel during the inspection.

TransCo's CRM Plan stated that only qualified controllers can supersede a controller. TransCo has recently qualified individuals as "reserve" controllers to serve as pandemic backup staffing. However,

according to TransCo personnel, these individuals would never be considered someone who could supersede a controller. The CRM Plan did not prohibit “reserve” controllers from directing or superseding controllers. TransCo personnel described the process of shift-change to requires a “verbal shift turnover” and “log onto the SCADA system”, however, there is no process in the CRM plan that covers the requirements for a “verbal shift turnover” during a shift change. The CRM plan does not contain any requirements for what should be covered during the verbal shift turnover, or how the directing or superseding documentation should be recorded and maintained.

TransCo must review its process related to superseding a controller and update its CRM Plan to include specific guidance for prohibitions on “reserve” controllers from being able to direct or supersede the specific technical actions of a controller; to include requirements for what is to be reviewed during the shift turnover, and how the shift change process is to be documented.

3. § 192.631 Control room management.

(a)

(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator’s program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

(1)

(6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018.

TransCo's CRM Plan process is inadequate because the procedure does not clearly define the content for control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. While TransCo provides controllers training for Smart Communications, the procedure does not lay out any requirements for soft skills training. Additionally, the procedure states, “[i]ndividuals who may collaborate with the control room may participate in annual team trainings.” The procedure is missing requirements that the training program must include team training that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers.

The procedure must be amended to include the content for team training, and require both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations participate in team training.

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 Enforcement 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 30 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 that TransCo maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2021-020-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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

cc: Edgar X. Rodriguez, Regulatory Compliance Specialist Sr. edgar.x.rodriguez@williams.com