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Transcontinental Gas Pipe Line Company
One Williams Center
Tulsa, OK 74172
(405) 626-1785

May 27, 2021

Mr. Gregory Ochs
Director, Central Region
Pipeline and Hazardous Material Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: CPF 3-2021-020-NOA

Mr. Ochs;

On April 28th, 2021, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment (NOA) to Williams (dba Transcontinental Gas Pipe Line Company), for alleged inadequacies of Pipeline Safety Regulations that were identified during the Control Room Management Initiative inspection of Williams Houston control room that occurred between May 4th and May 8th, 2020.

Williams is fully committed to maintaining the safety of its operations. Williams has reviewed the alleged inadequacies and has already addressed the findings identified in the Notice of Amendment as detailed in the responses below. Williams elects not to contest the items listed in the NOA.

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.

PHMSA alleges that Williams Control Room Management Plan was inadequate because it did not provide guidance or structure to determine which of its facilities are control rooms. In addition, PHMSA suggests Williams consider including Pipeline Controller home based operations in the control room determination process. Williams has updated the Control Room Management Plan to add clarity around this concern. The updated plan defines a control room as "A control center [that] is staffed by operator qualified personnel charged with the responsibility of remotely monitoring and controlling through a SCADA system and controlling DOT regulated pipelines that extend outside the facility's physical boundaries. Controlled badge access allows a limited number of Company employees to access the Pipeline Control centers as determined by Pipeline Control management." The plan goes on to give addresses of control centers Williams has identified that meet this criterion.

In addition, Williams has determined that controllers operating out of remote locations (including home based locations) will only be utilized in emergency situations. Williams requires a Deviation of the Control Room Management Plan for each specific instance of remote operation. Williams has addressed this concern in section 700.200 Definitions of the attached Control Room Management Plan, Revision 15, that was published to the company standards library on April 1st, 2021.

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.**

PHMSA alleges that Williams Control Room Management Plan is inadequate because it does not clearly provide the roles and responsibilities for others with authority to direct or supersede the specific technical actions of a controller. Williams has addressed this concern in section 700.304 Direct and Supersede of the attached Control Room Management Plan, Revision 15, that was published to the company standards library on April 1st, 2021.

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.**

PHMSA alleges that Williams Control Room Management Plan 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 reasonable be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Williams has addressed this concern in section 700.901 Training Program Elements, Team Training of the attached Control Room Management Plan, Revision 15, that was published to the company standards library on April 1st, 2021.

Williams is committed to safeguarding our people, our neighbors, the environment, and our assets and looks forward to working with PHMSA to correct the assertions in this letter. Please feel free to contact me at 405-626-1785 if you have any questions or concerns about the provided solutions to the PHMSA concerns in this letter.

Respectfully,



Clint Ratke
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Enclosures (1): Control Room Management Plan, Revision 15

cc: Dave Keylor - Vice President, Central Services
Mark Cluff - Vice President, Safety & Operational Discipline
Tye Ragle - Director, Pipeline Control
Amy Shank - Director, Pipeline Safety & Asset Integrity