



Northern Natural Gas Company
P.O. Box 3330
Omaha, NE 68103-0330
402 398-7200

February 24, 2021

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

Re: CPF 3-2021-1001W; Warning Letter Response

Dear Mr. Ochs:

In accordance with the Warning Letter issued February 11, 2021, in the above referenced case, this letter contains Northern Natural Gas' written comments to the two outlined procedural inadequacies.

1. §192.605 Procedural manual for operations, maintenance, and emergencies.

- (a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

Northern Natural failed to review and update its Emergency Manual procedures at intervals not exceeding 15 months, but at least once each calendar year. At the time of the inspection, the PHMSA inspector performed a spot check of the hard copy Emergency Manual at the East Wakefield Compressor Station and discovered that sections 40.102 and 10.101 of the Manual were not updated and current.

Northern's Response:

The Wakefield compressor station ready for service date is listed as January 19, 2019 in Northern records. The inspectors arrived at the station in July 2019. Therefore, the station, and its emergency manual, were only seven months old. The manual has been updated and reviewed as required by Northern procedures. The local field operations team receives a maintenance control system task each year to remind them to update and review the manual. The manual was updated after the audit.

2. §192.631 Control room management.

- (b) . . .
- (c) **Provide adequate information. Each operator must provide its controllers**
- (d) **with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:**
 - (1) . . .
 - (4) **Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months; and**

Northern Natural failed to properly test any backup SCADA system as least once each calendar year, but at intervals not to exceed 15 months. Specifically, Northern Natural's 2016, 2017 and 2018 backup SCADA tests of its Des Moines, IA facility show that the company only tested the SCADA server performance and did not test the full SCADA system, which includes the HMI interface, phone transfer, printing, trending, alarms, etc. Northern Natural has two designated backup control centers: one in Johnston, IA and the other in Bellevue, NE (South Omaha). Neither facility has a SCADA server located on site. The SCADA server is located in another facility. The 2016, 2017, and 2018 back up test records described turning on the SCADA server in the secondary location and then going to South Omaha or Johnston, Iowa to perform the backup test. Northern Natural, however, did not run a separate test for both facilities each year. Tests were completed for the Bellevue location in 2017 and 2018 and in Johnson, Iowa in 2016. Northern Natural needs to test both backup locations each year and not only the backup server.

Northern's Response:

The Johnston location is not established as a readily available emergency backup location and has been removed from Northern's procedures. The specific backup location located in Bellevue, Nebraska, will remain in a ready state and be included in the annual backup testing.

3. §192.631 Control room management.

- (j) **Compliance and deviations. An operator must maintain for review during inspection:**
 - (1) **Records that demonstrate compliance with the requirements of this section; and**

Northern Natural failed to maintain records to demonstrate compliance with the requirements of § 192.631. Specifically, Northern Natural was unable produced records for the inspection years 2016, 2017 and 2018 during PHMSA's inspection. These missing records included annual reviews of the control room training program content, SCADA back up tests for the South Omaha and Des Moines, Iowa back up control centers, annual internal communication tests, and annual controller activity reviews. PHMSA requested these items on May 14, 2019, and Northern Natural subsequently provided some records, but not all the required records. Additionally, on September 21, 2019, PHMSA issued a Request for Specific Information (RFSI) to Northern Natural. In response to the RFSI, Northern Natural

provided one record for the 2017 Internal Communication Test and incorrect records for the annual activity review. Furthermore, several of the required Control Room records were not available in Northern Natural's records management system.

Northern's Response:

Northern agrees that some supplemental records (forms) for years 2016, 2017 and 2018 could not be found. Northern's official program for tracking the work performed is the maintenance control system (MCS). Using MCS, Northern could locate records the work was performed, when, and by whom. The missing forms are the supplemental records that contain details of the training program reviews, communications tests, controller activity reviews and SCADA backup testing. Since the inspection, Northern has revised procedures and forms to ensure that future records are completed as required by the regulations and procedures. In December 2020, Northern hired a CRM compliance manager to ensure procedural requirements are enhanced and the proper recordkeeping is maintained.

Additional training was provided on the control room management procedure records requirements and responsibilities have been further defined to prevent future records issues.

Should you have any further questions, please feel free to contact me directly at (402) 398-7715.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Correll", with a stylized, cursive script.

Tom Correll
Vice President, Pipeline Safety and Risk
Northern Natural Gas