Via Email to Gregory.Ochs@DOT.gov

September 18, 2023

Mr. Gregory Ochs
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106

RE: CPF No. 3-2023-015-NOA
Notice of Amendment Response

Dear Mr. Ochs,

Tallgrass Energy, LP (Tallgrass) has compiled the following responses for Items 1-4 listed in the Notice of Amendment (NOA) received on July 20, 2023, indicating apparent inadequacies found within the Tallgrass Control Room Management Plan (CRMP) during an inspection conducted from October 3rd-6th, 2022 and October 17th-21st, 2022.

Item 1:

PHMSA Allegation:

§ 192.631 Control room management (b)(5) Roles and Responsibilities

Tallgrass' procedure OM110_GL September 1, 2022 Section 3.6 was not adequate to define the qualifications of the Supervisor who was designated as having authority to direct or supersede the technical actions of a Controller. The procedure states, "[O]CC leads are trained and authorized through Operator Qualification to perform all duties assigned to controllers." It also states, "[T]he Leads and Supervisors have the expertise to know when conditions or situations warrant the necessity to use their authority to direct or supersede the technical actions of a Controller." The procedure was not clear if Supervisors are Operator Qualified. If the supervisors were not Operator Qualified, as Controllers, then Tallgrass needs to define what qualifications validate someone to have the expertise to direct or supersede the technical actions of a Controller.

The procedure must be amended to include the qualifications of the Supervisor who has the authority to direct or supersede the specific technical actions of a Controller.

Tallgrass Item 1 Response:

As an initial point of clarification, PHMSA is referencing a document numbered OM110_GL, September 1, 2022, and the actual document number is OM1100_GL. Tallgrass disagrees with PHMSA's assertion that the "procedure was not clear if Supervisors are Operator Qualified." OM1100_GL specifically states within it that that Supervisors are Operator Qualified to perform all duties assigned to Controllers. Tallgrass has included the relevant section as Attachment 1.

Nevertheless, Tallgrass has clarified the language in Section 3.6, Intervenor/Superseder to state "OCC Leads and **Supervisors** are trained and authorized through Operator Qualification to perform all duties assigned to controllers." The updated Section has been included as Attachment 2.

Item 2

PHMSA Allegation

§ 192.631 Control room management (c)(4) Test any back up SCADA systems at least once each calendar year, but at intervals not to exceed 15 months;

Tallgrass procedures OM1100_GL September 1, 2022 4.8.2 and 4.8.3 were not adequate to provide instructions for testing and documenting a thorough test of their SCADA backup systems. Step 4.8.2 stated, "[A]t a minimum, backup SCADA system testing will include command and set point entry processes and testing for the incoming telephone numbers that route to the OCC." Step 4.8.3 stated, "[Backup site test forms encompass many critical items to be tested but generally test at a minimum, the following items: Phones, Business Computers, SCADA equipment and server connection, Leak Detection function." 4.8.3 also directs the reader to document the tests using OCC Backup Site Checklist.

The records, provided for review, indicated the date but did not include the personnel performing the test or the start and end time of the test. It also did not include which control room (GT or HL) or which consoles were represented by the test. For each calendar year (2019, 2020 and 2021) the form changed and there were inconsistencies with how the form was to be completed between years. In 2020, the form was filled with checkmarks and handwritten notes. There was a note on the top of the form related to the local control room. It was unclear if this form was related to the offsite or local test. In 2021, there were no checkmarks, but there was a column that indicated the test or applications were functioning. The 2019 record also had "Y" in a column labeled "OK?" This column had no title in the 2020 and 2021 forms. Procedure OM1100_GL September 1, 2022 Section 4.8.2 and 4.8.3 stated, OCC backup tests "[w]ill be done using the OCC Backup Site Checklist and will be retained on the CRM SharePoint site and corrective actions will be implemented as needed."

It was noted during the 2020 test that TIGT business only had 1 monitor and the "back of PC doesn't have port for 2nd connection." In the 2021 testing record, a note stated, "Need a DVI to Display Port for second Business Monitor on TIGT Console." It appears this issue was not corrected, as required by the procedure, before the next test was performed. There was nothing on the form to document the follow-up.

CRM Plan 4.8.2 stated, "Point-to-Point activities conducted during daily operations in the Backup Control Room will be noted as suitable for fulfilling the annual SCADA system testing." The procedure required the OCC Backup Site Checklist be completed for all tests. It did not include documentation that indicated the event was actual, team training exercise or a point to point. Also completing the task in the compliance data file is not adequate documentation for compliance. Section 4.8.3 states that at a minimum phones, business computers, SCADA equipment and server connection and leak detection function were needed for a test. There is typically much more in a control room operation that must function. For example, the IT system for emails, scheduling nominations, one call notifications, procedure references phone lists, etc. Also other functions such as printers, lighting, alarm event logging, communications, etc. The check list includes many more items than the minimum, they are all important to the operation.

The procedure needs to be amended to provide more instruction to complete the form under the different scenarios and also to evaluate the critical functions that need to be tested. It should also include documentation related to follow-up on items identified as not functioning or in need of correction or repair.

Tallgrass Response:

The OCC Backup Site Checklist is completed, in full, for every scenario in which the checklist is utilized. The different scenarios listed do not require the form to be completed in a different manner. The September 1, 2022 version of OM1100_GL was not in place when the 2019, 2020, and 2021 when the backup testing was completed. Since 2021, Tallgrass had previously enhanced the process, procedure, and checklist in response to 2018 Liquids Control Room Management audit, which it delivered pursuant to the December 22, 2021 in response to CPF 3-2021-103-NOA. Additionally, Tallgrass has already enhanced the OCC Backup Checklist to include "documentation related to follow-up on items identified as not functioning or in need of correction or repair" and has included a blank version of the form as Attachment 3.

Tallgrass has further revised Sections 4.8.2 and 4.8.3 in OM1100_GL, to add clarity around backup control room and SCADA testing and resulting documentation. The OCC Backup Checklist is completed the same way no matter what scenario is used to verify function of backup control center. The equipment checked is already identified specifically in the OCC Backup Checklist, and, thus is not repeated in the OM1100_GL. The revised sections are included as Attachment 4.

Item 3

PHMSA Allegation

§ 192.631 Control room management (f)(1) Establish communications between control room representative, operator's management and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration;

Tallgrass's procedure OM110_GL September 1, 2022 Section 7 was not adequate because it did not reference and describe the Project Management In Service Process employed by Tallgrass to discuss projects. Tallgrass had a change management process for the control room and the corporate enterprise. Tallgrass also had a Project Management In Service Process group that meets weekly. A project management tool was developed, and the individual groups were identified on the tool. Control room leadership (director, supervisor, leads) attended these meetings to learn about new projects, update the group on progress and state their concerns. OM110_GL September 1, 2022 Section 7 did not describe or reference this process. Tallgrass indicated that when Maximo is implemented this Project Management In Service Process will not be used.

The procedure needs to be amended to include the Project Management In Service Process in CRM procedures, either as a referenced procedure or included in the CRM Plan. It must also include a description of the roles and responsibilities the control room leadership has in those weekly meetings. As Maximo is implemented into the system, that process needs to be developed to include how the control room will be notified of changes and how leadership interacts to effectively implement the changes.

Tallgrass Response

Tallgrass is unsure PHMSA's reference to "Project Management In Service Process" as Tallgrass does not have a procedure identified with that name. Tallgrass' notes from the 2022 inspection indicate that OM Form 100-15_GL, Management of Change (MOC) Review was shown to PHMSA. Per OM155_GL (now renumbered as TG002), Management of Change, the form may be used to ensure that all MOC documentation requirements are met and/or attached to the MOC request as supporting documentation. The form is not required to be completed as the official MOC documentation is executed and stored electronically.

Tallgrass' Project Management group issues a Project Management Weekly email which details upcoming projects that could affect the Control Room. Tallgrass has enhanced Section 6.4, Management of Change, in OM1100_GL, to clearly identify the Project Management Weekly email as an additional method, in addition to MOC, by which Tallgrass Control Room Leadership are informed of pending changes to pipeline assets. The revised section is included as Attachment 5.

Tallgrass believes that no additional implementation will be necessary as the process necessary to implement Maximo has already been articulated in the formalized process (OM155_GL Management of Change, now renumbered as TG002).

Item 4

PHMSA Allegation

§ 192.631 Control room management(h)(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.

Tallgrass's CRM procedure OM110_GL September 1, 2022 Section 9.15 was not adequate because it did not define the frequency of Team Training for individuals required to participate in the training. The procedure identified the job roles of those who collaborate with controllers as "others." There was discrepancy in the section language about when training is required. One sentence stated, "Depending on the training exercise scenario, the following non-OCC personnel may also be included in the training exercise: Field Operations, SCADA, Systems Engineering, Engineering, Measurement, NOC, EHS, and Media Relations." This could result in no one attending training, depending upon the criteria. Then, in the paragraph below, it stated, "Individuals identified above will participate in at least one team training exercise once per calendar year, not to exceed 15-months, thereafter." Since training is required annually, the operator would need to require all individuals identified as "others" participate in team training. If there is another frequency, for example every 3 years, then the procedure could support some percentage of "others" be trained each year, so all get trained in the course of the three years.

The procedure must be amended to clearly state the required interval for team training and require attendance for those identified who operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations.

Tallgrass Response

As stated in response to Item 1 above, PHMSA is referencing a document numbered OM110_GL, September 1, 2022, and the appropriate procedure number is OM1100_GL.

Tallgrass is enhancing the OCC Team Training Exercises, formerly Section 9.15 and now Section 8.16, identifying which groups of team members must be receive training yearly and at least once every three years. The updated section, 8.16.1, has been included as Attachment 6.

Sincerely,

Kale Stanton

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Enclosures: Attachment 1:
OM1100_GL Control Room Management Plan (CRMP), Dated September 1, 2022, Section 3.3.4 Excerpt
Attachment 2:
OM1100_GL Control Room Management Plan (CRMP), Dated September 6, 2023, Section 3.6 Excerpt
Attachment 3:
OCC Backup Checklist
Attachment 4:
OM1100_GL Control Room Management Plan (CRMP), Dated September 6, 2023, Sections 4.8.1 and 4.8.2
Attachment 5:
OM1100_GL Control Room Management Plan (CRMP), Dated September 6, 2023, Section 6.4.1 Notification of Change
Attachment 6:
OM1100_GL Control Room Management Plan (CRMP), Dated September 6, 2023, Section 8.16.1 OCC Team Training Exercise