Midstream Pipeline Safety
525 Milam St.
Shreveport, Louisiana 71101

May 15, 2014

R. M. Seeley, Director Southwest Region
PHMSA Pipeline Safety
8701 S. Gessner Dr.
Suite 1110
Houston, TX 77074
713-272-2859

Re: Response of EGT/EMRT
CPF 4-2014-1005M

Dear Mr. Seeley,

This letter, along with the attachments to this letter, constitutes the response of Enable Gas Transmission, LLC ("EGT") to the Notice of Amendment in Docket No. CPF 4-2014-1005M. On September 9-10, 2013, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Enable Gas Transmission, LLC (EGT)/Enable Mississippi River Transmission, LLC (EMRT), formerly CenterPoint Energy Gas Transmission Co. and Mississippi River Transmission Co., procedures for Control Room Management in Houston, Texas. For reference below, the operator will be referred to as Enable.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within the Enable Gas Transmission plans or procedures, as described below:

1. §192.631Control 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.

§192.631 Control room management.
(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:
(4) A method of recording controller shift-changes and any hand- over of responsibility between controllers.

The Enable Control Room Management Program Procedure PS-08-01-226 System Control-Shift Change Procedure section 2.1 Responsibilities and section 2.3 Shift Change for Controller Breaks contains conflicting statements. The procedure must be amended to eliminate this conflict.

PHMSA reviewed the procedure and found that sections 2.1 and 2.3 are in conflict. Section 2.1 states,

"Under no circumstances should the console be left unattended, even if a fatigue hours of service limitation is exceeded. "

The conflict arises in section 2.3 which states,

"In some instances, there will not be a qualified person that can assume responsibility for the pipeline and provide a break; for example, during night shift when there is only one controller in on shift for the EMRT pipeline. In cases like this, if the controller must get something to drink, go to the restroom, use a fatigue countermeasure (See PS-08-01-232,"Fatigue Management Procedure"), or be away from the console for any reason, the controller should take the system control cell phone and limit the time away.

Enable must modify the procedure PS-08-01-226 System Control - Shift Change Procedure to eliminate the conflict that exists.

Enable Response
The following modifications were made to PS-08-01-226 System Control - Shift Change Procedure:

> *Changed “System Control Management” to “On-Call Manager” throughout the procedure.*
>
> *Changed "Controller on shift" to "On-Shift Controller" throughout the procedure.*
>
> *Section 2.1 Responsibilities - Changed last bullet item from: "Under no circumstances should the console be left unattended, even if a fatigue hours of service limitation is exceeded. “ to "Under normal circumstances the console will not be left unattended, with the exceptions described in the Break section below or the PS-08-0 1-208, "System Control Evacuation, Backup Scenarios, and Disaster Plan.."*
>
> *Section 2.4 Shift Change When Relocating to a Different Control Room- changed "new" to "incoming"*
>
> *Section 2.5.1 EGT Shift Change Documentation- added "shall" in first paragraph. In second paragraph changed “day crew" to “Controller" and added "/night" to first sentence.*

Section 2.5.1 EMRT Change Documentation- changed "the controller coming on duty" to "the incoming controller" and added "incoming" to last sentence of first paragraph. Added "and/or System Control Data Center for" to last paragraph.

Section 4.0 Definitions: added definitions for System Control On-Call Manager and On-Shift Controller.

2. §192.63l(a)(l)(i-ii) Control room management. (See Item 1)

§192.631 Control room management.
(c) Provide adequate information. Each operator must provide its controllers 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:
(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months;

and The Enable Control Room Management Program Procedure PS-08-01-208 System Control Evacuation, Backup Scenarios, and Disaster Plan fails to clearly define who is responsible for making the decision to transfer pipeline control to the backup SCADA system, and restoring control from backup to normal operations.

PHMSA reviewed the EGT Procedure PS-08-01-208 System Control Evacuation, Backup Scenarios, and Disaster Plan, section 2.1.3 Return to Normal Operations which states,

"System Control Management will determine when operational authority and control of the pipeline changes from any location to another, including temporary locations. "

Enable informed the PHMSA inspection team that System Control Management was composed of the System Control Director, and three System Control Managers. There are four individuals in System Control Management and numerous scenarios to perform the task of transferring system control to the backup SCADA system. PHMSA expects the operator to clearly define who is responsible for making the decision to transfer pipeline control to the backup SCADA system, and restoring control from backup to normal operations. This decision-making process must be a part of the annual testing.

Enable must amend the procedure to clearly define the one responsible for making the decision to transfer pipeline control and include the decision making process in the annual training.

Enable Response
The following amendments were made to PS-08-01-208 System Control - Evacuation, Backup Scenarios, and Disaster Plan Procedure:

Section 2.1.1 Planned Evacuation- added "in the gulf"; changed language from "System Control Management" to "the System Control On-Call Manager" as the person responsible for making decisions.

Section 2.1.2 Unplanned Evacuation- added language to identify the person responsible for making the decision on when to evacuate the primary System Control Center and

their roles and responsibilities. A "System Control Unplanned Evacuation Checklist" was added. Clarified and rearranged language to identify roles and responsibilities for on shift contoller(s) and manager(s) if present for establishing a temporary location for taking phone calls and monitoring the system remotely.

Section 2.1.3 Return to Normal Operations - added language to clarify the person responsible for making the decision on when to return to the primary or functioning backup location System Control Center and directing the controllers when to return to normal operations.

Section 2.2 Internal Communications Plan/ Loss of SCADA- added "System Control power outage"; identified roles and responsibilities for the on-shift controller and the on-call manager. Changed "Pipeline field management" to "The Operations Directors".

Section 2.2.1 System Control Use of the Plan- changed "System Control personnel or controller" to "The on-shift Controller". Added language to clarify roles and responsibilities for on-call SCADA Support Engineer.

Section 2.2.2 Field Technician use of the plan- clarified roles and responsibilities. Section 2.2.3 Testing of the Internal Communication Plan- added language to clarify roles and responsibilities. Section 2.3 Communications between System Control and the Field- changed "System Controller" to "the On-shift Controller" and defined the role and responsibility of the Operations Director.

Section 2.5 changed "System Control Management" to The System Control On-Call Manager. Section 2.6 changed "controller on shift" to On-Shift Controller. Section 2.7 added "System Control"; deleted "listed Section 2.1, a SCADA technician" and added "the On-Call SCADA Suppm1 Engineer.

Section 2.8 added language to identify the party responsible for making the decision to test the backup site and when to transfer control to the backup site. Added "qualified controllers and functionality" to third bullet. Added fifth bullet "The decision making process was followed without issues.

Section 4 Definitions - added a definition for the System Control On-Call Manager; System Control Management; On-shift Controller; and On-call SCAD Support Engineer.

3. §192.631(a)(l)(i-ii) Control room management. (See Item 1)

§192.631 Control room management.
(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) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations;

The Enable Control Room Management Program Procedures PS-08-01-202 EGT System Control Alarm Management and PS-08-01-252 EMRT System Control Alarm Management Plan fail to include requirements for the provisions for maintaining pipeline control if there is alarm malfunctions.

PHMSA reviewed procedure PS-08-01-202 EGT System Control Alarm Management, section 2.11Maximum Maintenance Period which states,

"The maximum maintenance period recommended to restore an individual point back to normal service is sixty (60) days, allowing time to order and secure the necessary materials, as well as the scheduling of manpower to complete the job. "

Procedure PS-08-01-252 EMRT System Control Alarm Management, section 2.9 Monthly Safety Point Review, Maximum Maintenance Period states,

"The maximum maintenance period recommended to restore an individual point back to normal service is sixty (60) days. This is to allow for the ordering and securing of the necessary parts and materials, as well as the scheduling of manpower to complete the job. If the point cannot be returned to normal service within the 60 day period, the reasons for the delay should be documented and saved with the review documentation."

The inspection team questioned Enable about malfunctioning 'safety-related' points and the 60-day repair interval. PHMSA expects the procedure to include requirements for prompt correction of alarm malfunctions. If 60 days are required for repair due to the acquisition of replacement parts, the procedure must contains provisions for maintaining pipeline control in the absence of the alarm.

Enable must amend the procedure to include requirements for provisions for maintaining pipeline control in the absence of the alarm.

Enable Response
The following amendment were made to PS-08-01-252 System Control - Evacuation, Backup Scenarios, and Disaster Plan Procedure:

> *Section 2.9 Monthly Safety Point Review - the below language was added: "When a safety related point is taken off scan, manually overwritten or disabled and the point was not eliminated from the system, the On-Shift Controller will monitor points upstream and downstream of the location to ensure the safe operations of the pipeline. In cases where there are no other points to view upstream or downstream of the location the Internal Communication Plan will be implemented."*

4. §192.631(a)(l)(i-ii) Control room management. (See Item 1)

§192.631 Control room management.
(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:

(3) Verify the correct safety-related alarm set-point values and alarm descriptions at least once each calendar year, but at intervals not to exceed 15 months;

The Enable Control Room Management Program Procedure PS-08-01-202 EGT System Control Alarm Management, section 2.9 SCADA Alarm Limit Changes is confusing and fails to clearly address the process by which a controller can change alarm limit setpoints.

According to the procedure, a controller, seeking an alarm limit change, prepares an email describing the change and sends the email to System Control management. The second step in the process states that an email will be sent to the SCADA Group to enter the alarm limit change. Then the SCADA employee making the change is to complete the Change Management form, entering all the required information, and have it approved and signed by System Control management prior to making the change. The third step in the process states the Manager of Gas Control, Director of System Control, Manager of Compliance, or the SCADA Coordinator approves or denies the change and signs the form.

The procedure for changing the alarm limits makes reference to: System Control management, the SCADA Group, and the four individuals (Manager of Gas Control, Director of System Control, Manager of Compliance, and SCADA Coordinator). The procedures do not define System Control management and the SCADA Group.

Enable must amend the procedure to eliminate the confusion and clearly define their process used to make alarm limit changes.

Enable Response
The following amendments were made to PS-08-01-202 System Control - Alarm Management Procedure:

> *Below are changes to be consistent with the definitions that were added to the document: Changed "gas controller" to "On-Shift Controller' throughout the document*
> *Changed "Controller" to "On-Shift Controller" throughout the document*
> *Changed "operator" to "On-Shift Controller" as applicable*
> *Changed "SCADA Engineer" to On-Call SCADA Support Engineer" throughout the document*
>
> *Section 2.7 Yearly Alarm Management Plan Review- paragraphs 1 and 2 changed the word "may" to "will"*
>
> *Section 2.8 Paragraphs 1 and 2 deleted EGT from EGT System Control Management; paragraph 3 changed "Manager of Compliance and Pipeline Maintenance" to "Manager Compliance"*
>
> *Section 2.9 SCADA Alarm Limit Changes- amended this section to eliminate the confusion and defined the process used to make alarm limit changes.*
>
> *Section 2.10 - Alarm Limit Modifications added "The alarm limit changes made in SCADA will be verified by a member of System Control Management; once the verification has been completed the SCADA Change Record Form will be completed, signed and filed for five (5) years in the System Control Office.*

Section 2.11 Maximum Maintenance Period- the following language was added: "When a safety related point is taken off scan, manually overwritten or disabled and the point was not eliminated from the system, the on shift controller will monitor points upstream and downstream of the location to ensure the safe operations of the pipeline. In cases where there are no other points to view upstream or downstream of the location the Internal Communication Plan (reference the proper procedure) will be implemented." Last sentence: deleted "copied and forwarded to the appropriate field personnel and to all system controllers. The review will also be" added "and documented"; deleted replaced with "replaced with "in the"; added "office',

Section 3.4 Forms and Attachments: Added last bullet "SCADA Change Record Form"

Section 4.0 Definitions: added definition for clarification of Roles and Responsibilities (System Control On-Call Manager; System Control Management; On-Shift Controller; On-Call SCADA Support Engineer

EGT have always stressed, and will continue to stress, the importance of pipeline safety. Our actions specified in this letter show our commitment to addressing safety issues. We are continually working to improve the effectiveness of our Pipeline Safety Program.

If you have any questions, please feel free to give me a call.

Sincerely,

Chris Bullock
Director DOT Compliance

Enclosures – 4 documents
CC:

Walter Ferguson, EGT & EMRT
Christopher Ditzel, EGT & EMRT
Scott Terbrock, EGT & EMRT
Johnny Cavitt, EGT & EMRT