

Kuparuk Transportation Company

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Ben Stevens
President
Kuparuk Transportation Company

July 22, 2021

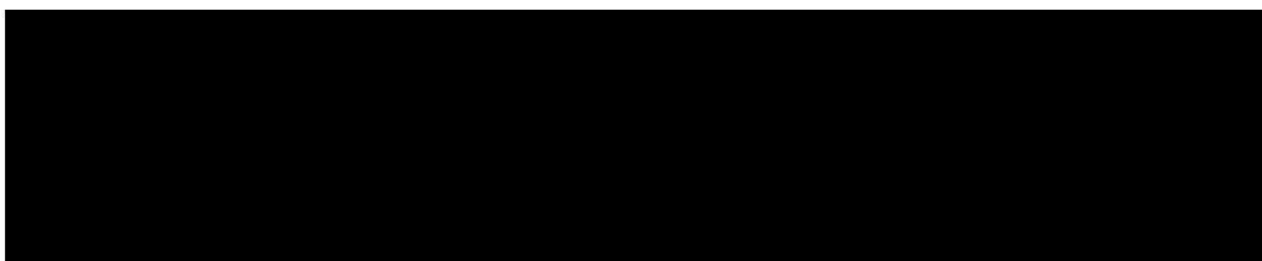
Mr. Dustin B Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Re: Notice of Amendment CPF 5-2021-017-NOA

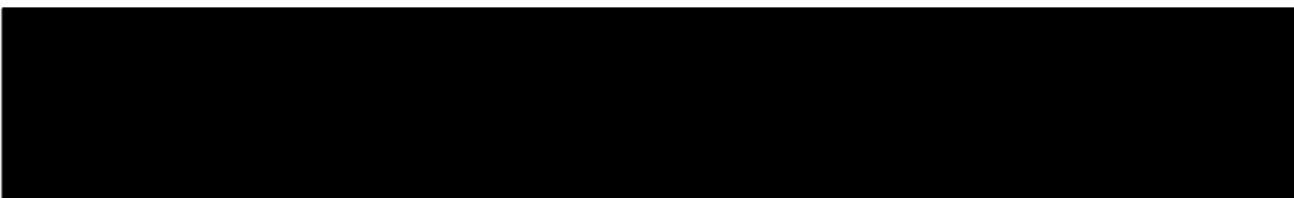
Dear Mr. Hubbard:

Pursuant to 49 C.F.R. § 190.206, the Kuparuk Transportation Company (KTC) respectfully responds to the Notice of Amendment (NOA) set forth in your letter dated June 22, 2021. The NOA contained eight alleged inadequacies of 49 C.F.R. § 195.446 *Control Room Management*. KTC will not contest alleged inadequacies and is providing further explanation and procedure updates as described below.

1. 49 C.F.R. § 195.446(a) *General*



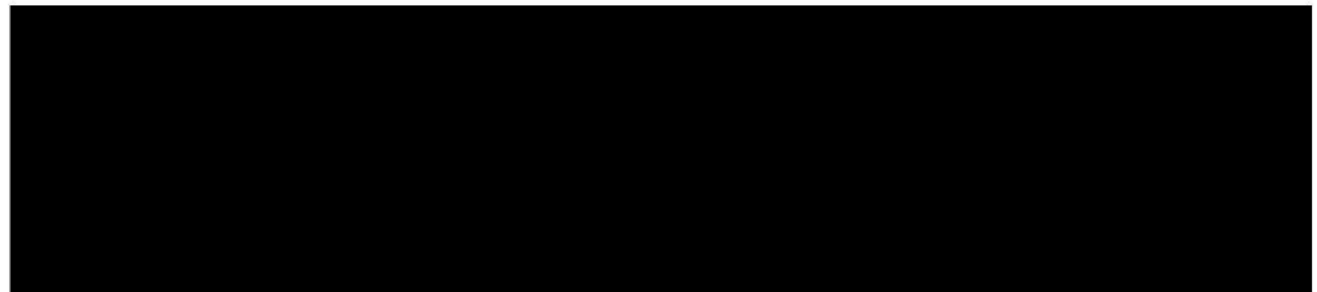
2. 49 C.F.R. § 195.446(b) *Roles and Responsibilities*



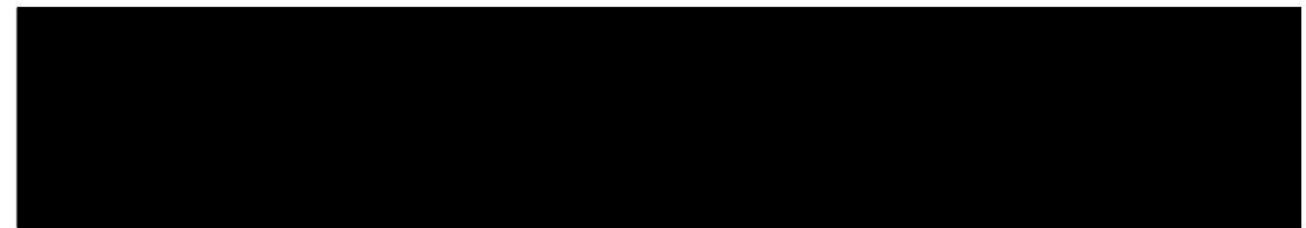
3. 49 C.F.R. § 195.446(c)(5) *Procedure for a different controller assuming Responsibility*



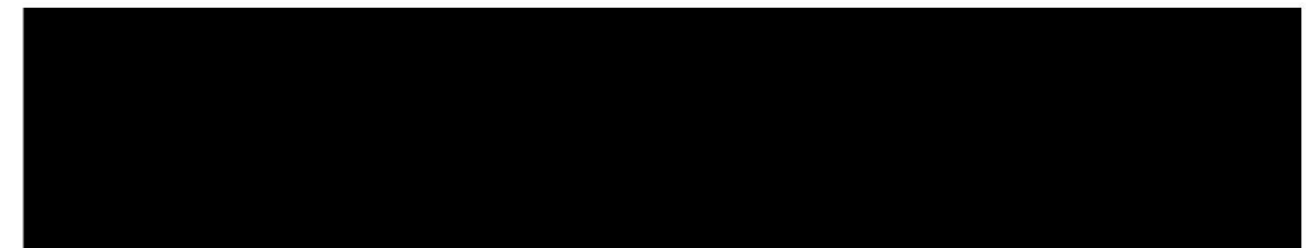
4. 49 C.F.R. § 195.446(d)(1) *Fatigue Mitigation*



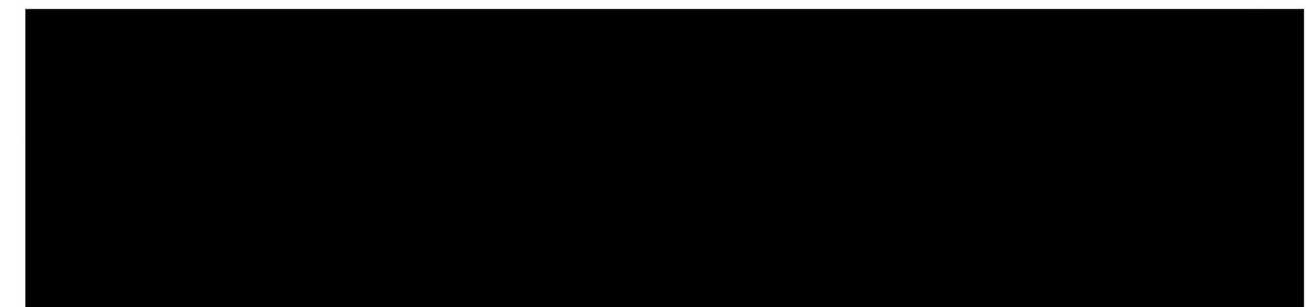
5. 49 C.F.R. § 195.446(e)(5) *Alarm Management*



6. 49 C.F.R. § 195.446(g)(1) *Operating Experience*



7. 49 C.F.R. § 195.446(h) *Training*



[REDACTED]

8. 49 C.F.R. § 195.446(h)(6) *Team Training*

[REDACTED]

Under 5 U.S.C. 552(b)(4), KTC requests that this letter and the attached documents and contents be treated as confidential and not be made publicly available. This request is being made as the information pertains to our internal policies, processes and practices regarding critical infrastructure, which includes trade secret and commercial information.

KTC requests that the Office of Pipeline Safety (OPS) close case CPF 5-2021-017-NOA. If OPS concludes that the corrections outlined above and provided in the attached procedures do not meet the cited regulation, KTC respectfully requests the opportunity to discuss further to understand where a procedure is out of compliance. KTC strives to meet the intent of the regulatory requirements and is committed to continuous improvement in its pipeline operations.

Sincerely,



Ben Stevens
President, Kuparuk Transportation Company

Attachment 1: NSPL-0000-PL-5405 *Controller Roles and Responsibilities*
Attachment 2: NSPL-0000-PL-5407 *Controller Shift Management*
Attachment 3: NSPL-0000-PL-4906 *SCADA and Alarm Management*
Attachment 4: NSPL-0000-PL-5404 *Controller Training Program*
Attachment 5: NSPL-0000-PL-5120 *Incident Investigation*