

Kuparuk Transportation Company

Post Office Box 100360
Anchorage, Alaska 99510-0360
Phone: (907) 263-3700

Ben Stevens
President
Kuparuk Transportation Company

February 21, 2022

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 49 C.F.R. § 195.446(d)(1)

Dear Mr. Hubbard:

Pursuant to 49 C.F.R. § 190.206, the Kuparuk Transportation Company (KTC) hereby responds to the Notice of Amendment (NOA) dated December 29, 2021, CPF 5-2021-017-NOA. KTC does not contest the alleged inadequacies in Item 4 therein and provides the following information and procedural updates as described below:

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

Controller assignments are managed by Supervisors and Leads to adequately address employee readiness. *Controller Shift Management*, NSPL-0000-PL-5407, section titled “*Fatigue Mitigation*” is updated with additional mitigation measures intended to prevent travel fatigue for Controllers traveling to the North Slope worksite who are scheduled to work the first shift in the Controller role. These mitigation measures mirror options used by other North Slope control rooms. Mitigations include offering Controllers the following options:

- traveling to their work location or camp in advance of their scheduled shift to assure they are well rested before they begin their shift, or
- providing them a shorter first shift to mitigate any diminishing alertness as their shift progresses

The section, *Controller Transfers of Responsibilities*, now specifies that a second qualified Controller will be assigned to the related facility to serve as ‘Backup Controller’ if fatigue mitigating measures are needed by the primary Controller.

Appendix B, *Fatigue Mitigation Options for Controllers*, has been added as a tool for Controllers and Leads to use to document fatigue mitigations. This tool is also intended to improve Controller awareness regarding available mitigation measures. Appendix B requires a Controller to record utilized Travel Day fatigue mitigations. Recording of fatigue mitigations is always encouraged.

KTC recognizes the risk of travel fatigue and provides Controllers sufficient off-duty time to achieve eight hours of continuous sleep prior to the start of their first shift. KTC strives to meet the intent of the regulatory requirements, is committed to continuous improvement in its pipeline operations and believes the changes made to *Controller Shift Management*, NSPL-0000-PL-5407 will effectively mitigate the fatigue risks that your letter identifies.

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 directly associated with critical infrastructure, which includes trade secret and commercial information.

KTC respectfully requests that the Office of Pipeline Safety (OPS) close case CPF 5-2021-017-NOA.

Sincerely,

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Ben Stevens
President, Kuparuk Transportation Company

Attachment 1: NSPL-0000-PL-5407, *Controller Shift Management*