

NOTICE OF AMENDMENT

VIA E-MAIL TO MR. DAVID HART

September 7, 2022

Mr. David Hart
Operation Manager
Eni US Operating Co., Inc
3800 Centerpoint Drive, Suite 300
Anchorage, AK 99503

CPF 5-2022-027-NOA

Dear Mr. Hart:

From August 2 through 6, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Eni US Operating Co., Inc's (Eni) procedures for control room management in Anchorage and North Slope Borough, Alaska.

On the basis of the inspection, PHMSA has identified the following apparent inadequacies found within Eni's plans or procedures, as described below:

1. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures

required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph...

ENI's control room management (CRM) procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(c)(2) because it did not contain a process for defining and identifying safety related points. SCADA Points affecting the safe operation of the pipeline safety must be defined to allow the operator to maintain operations within the defined MOP.

In practice, ENI uses multiple methods, including Level of Protection analysis and Process Hazard Analysis, for determining which points are safety related. Eni must amend the CRM procedures to include the process by which it defines and identifies safety related points.

2. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's CRM procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(b)(1). ENI CRM, Section 3.5 Impromptu Change in Responsibility, did not define the terms "short break" and "extended period of time." Eni must amend its CRM procedures to quantitatively define the terms "short break" and "extended period of time."

3. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's CRM procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(b)(5). ENI CRM, Section 3.8, did not clearly define the roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers. ENI CRM Section 3.8 was ambiguous with respect to who has authority to supersede the actions of the controller. ENI must amend its CRM procedures to clarify the roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers.

4. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(c)(2). ENI CRM, Section 4.4 Point-to-Point Verification, did not reference CRM, Section 6 Alarm Management Plan. ENI's CRM, Section 6.1.3 Safety-related Alarm Table 4 - Safety-related Points and Alarms, contained the list of points and alarms that require point-to-point verification.

CRM, Section 6.12 Implementation, however, did reference Section 4.4. Eni must amend its procedures to include the appropriate section references within its CRM Plan.

5. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's CRM procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of Section § 195.446(e)(1). ENI CRM, Section 6.1.4 Handling Stale Data (Bad PV), failed to instruct the pipeline controller how to identify stale data. ENI CRM, Section 6.1.4 Handling Stale Data (Bad PV), instructed the pipeline controller to take notice of points providing stale data but did not provide guidance on how to identify stale data. Eni must amend its procedures to provide clear guidance on how to recognize stale data within the SCADA system.

6. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's CRM procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(e)(3). ENI CRM, and associated Defeated Safety Device Log Procedure, failed to establish when a safety device (or alarm) may be defeated (inhibited). The ENI CRM referenced in several places the "Defeated Safety Device Log." The Defeated Safety Device Log Procedure is a separate procedure from the CRM. The ENI CRM did not indicate where to obtain the Defeated Safety Device Log Procedure. Eni must amend its procedures to provide a process establishing when a safety device (or alarm) may be defeated (inhibited).

7. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's CRM procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(h). ENI CRM, Section 9 Pipeline Controller Training, did not provide clear requirements for the training of controllers. In practice, ENI maintained an integrated training program with the production plant. To be considered for an opening as a pipeline controller, a candidate must first be fully qualified as a plant operator.

Additionally, the abnormal operating condition training required the controller to pass a test showing competency, but ENI did not specify a pass/fail criterion for the test. Eni must amend its procedures to provide clear requirements for the training of controllers.

8. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An

operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's CRM procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(h)(6). Eni CRM Manual did not have procedures for providing team training to controllers and other individuals who would reasonably be expected to operationally collaborate with controllers during normal, abnormal or emergency situations. Eni must amend its procedures to comply with § 195.446(h)(6).

9. § 195.446 Control room management.

(a) General. 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. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.

ENI's CRM procedures were inadequate to assure safe operation of a pipeline facility. Specifically, ENI's written CRM procedures did not implement the requirements of § 195.446(i). ENI CRM, Section 10, provided that it must submit its procedures to PHMSA upon request, but did not address responses to State agencies. Eni must amend its procedures to provide that it must submit its procedures to appropriate State agencies.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Eni maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Dustin Hubbard, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2022-027-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*

cc: PHP-60 Compliance Registry
PHP-500 J. Dunphy (#21-201439)