



Eni US Operating Co. Inc.
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Response to Proposed Compliance Order and Notice of Amendments

VIA E-MAIL TO MR. DUSTIN B HUBBARD

September 20, 2022

Mr. Dustin Hubbard
Director, Western Regional, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Mr. Hubbard and PHMSA associates, this document is in response to the notice of probable violation and proposed compliance order Eni received on September 7, 2022. First off Eni Petroleum would like to thank PHMSA Inspectors Jason Dunphy and Diana Fehling for their fairness, professionalism, and willingness to teach. In September 20 of 2021 we received a Post-Inspection Written Preliminary Findings notification from Mr. Dunphy. Every item was reviewed and taken action on as appropriate to bring our facility into Regulatory Compliance. All of these new processes were added to our Control Room Management Program that was revised, approved, and implemented June 1 2022.

Section 1 of this document covers the Items 1, 2 & 6 which are applicable to the proposed compliance order. This includes in succession, reference to the Notice of Violation item, a summary of Eni's response, and supporting documentation proving the tasks related to the specific items had been performed. Section 2 of this document consists of references to Notice of Violation items that were classified as warnings with a description of how Eni petroleum resolved the issues and direct transcripts from our June 2022 Control Room Management Program update. Section 3 of this document consists of references to Notice Violation items that were issued with a description of how Eni petroleum resolved the deficiency and direct transcripts from our June 2022 Control Room Management Program update.

Thank you for taking the time to review and consider our response to the audit findings. Please reply with any questions or need for additional documentation or action.

Sincerely,

Larry Burgess SEQ Manager-Alaska

Section 3

Eni petroleum's Response to the PHMSA Notice of Amendments

NOTICE OF AMENDMENT ITEM 1.

Pertaining Regulation

§ 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...

Description of deficiency.

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.

Eni's' Reponeses to NOA Item 1

See amendment to our CRM Program below to show our process to define and identify safety related alarm points.

6.2.1 Defining Safety related Alarms

Safety Related alarm points are defined and identified by the Automations Supervisor considering the following 4 conditions.

- Is it examining a process variable related to a DOT regulated Pipeline?

- Is it necessary or effective in maintaining pipeline integrity or that could lead to the recognition of a condition that could impact the integrity of the pipeline, or a developing abnormal or emergency operating condition?
- Is it part of the SIS Safety Instrument System?
- Is it defined and documented as a safeguard in a Process Hazard analysis review?

Safety Related alarms are listed in table 4 of this CRM section

NOTICE OF AMENDMENT ITEM 2.

Pertaining Regulation

§ 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.

Description of deficiency.

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."

Eni's' Responses to NOA Item 2

See amendment to CRM Program below to quantitatively define the term "short break"

3.5 Impromptu Change in Responsibility

The physical domain of responsibility will only change during a shift if the Pipeline Controller needs to leave their console for a short break up to 30 minutes. If there is an unforeseen emergency or other need for the Pipeline Controller to be away from the console for an extended period or over 30 minutes, another qualified Pipeline Controller will be brought into the control room to cover, or DOT pipeline operations will be shut-in until a qualified Pipeline Controller can be obtained.

NOTICE OF AMENDMENT ITEM 3.

Pertaining Regulation

§ 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.

Description of deficiency

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.

Eni's' Responses to NOA Item 3

See amendment section of CRM Program below to clarify the roles, responsibilities and qualifications of others who have the authority to direct or supersede the specific technical actions of controllers.

3.2 Authority and Responsibility

The OPP control room controls both the OPP Production Facility and DOT regulated pipelines. There are two operating positions within the OPP control room, Operating Position 1 and Operating Position 2. Both are manned by a qualified Board Operator (Board Operator 1 and Board Operator 2, respectively) 24 hours per day. Board Operator 1, at Operating Position 1, is responsible for controlling production facility oil processing systems and DOT pipelines and is a qualified DOT Pipeline Controller. Board Operator 2, at Operating Position 2, is responsible for controlling production facility water processing systems and may or may not be a qualified DOT Pipeline Controller.

Both operating positions are capable of monitoring and controlling all production facility systems, as well as DOT pipelines, though DOT pipelines are controlled from operating position 1, by the qualified DOT Pipeline Controller, with the following exceptions:

1. During necessary Controller breaks if Board Operator 2 is a qualified DOT Pipeline Controller.
2. During hands-on Pipeline Controller training of Board Operator 2 under span of control of the qualified DOT Pipeline Controller (Board Operator 1).

The Pipeline Controller is responsible for monitoring and maintaining pipeline operating conditions within safe operating parameters, as well as identifying abnormal and emergency conditions and; taking appropriate actions to return the pipeline to safe operating conditions and protect personnel, the public, and pipeline integrity. The Pipeline Controller has the authority and responsibility to take appropriate actions, in accordance with operating procedures, necessary to maintain normal operating conditions and to return the pipeline to normal operating conditions during abnormal and emergency conditions. He/she has the authority to take actions necessary to ensure the safety of personnel and the public and to protect the integrity of the pipeline, up to and including shutting down the pipeline should he/she determine it necessary. The Pipeline Controller is responsible for immediately notifying the Lead Operator if the pipeline is shut down and the conditions which warranted the shutdown. The Lead Operator will notify the Production Supervisor. Once the condition is resolved, the Production Supervisor will give approval to restart the pipeline. If the Production Supervisor is not a qualified Pipeline Controller, the Pipeline Controller has authority to refuse the start-up direction, though the Pipeline Controller does not have authority to restart a pipeline which has been shut down in response to an emergency condition without approval from the Production Supervisor.

Eni prohibits anyone who has not been trained in the provisions of this manual and procedures referenced herein, along with any additional training mentioned within this manual from performing Pipeline Controller duties. Controllers in training are not permitted to perform Pipeline Controller duties without the direct oversight of a qualified Pipeline Controller until they have completed all required training described in Section 9 and have been deemed qualified by Eni management.

The Lead Operator or the Production Supervisor may instruct the Pipeline Controller to shut down a pipeline but not in the method or steps needed to do it.

All Eni O&M personnel have the authority to shut down the pipeline in the event of a perceived emergency AOC via ESD buttons mounted at the door of the Modules as well as on the Pipeline Pump Motor control center.

CPAI CPF3 Control Room Operator has the ability and authority to shutdown SDV 12021 in the event he perceives flow from the Nikaitchuq Sales oil Pipeline is a hazard to the condition of the CPAI pipeline.

CPAI CPF3 Control Room Operator and Alyeska Pipeline Supervision can direct the Pipeline Controller to prorate production or cause the necessity to divert to the slop oil tanks.

Eni Nakaitchuq production operators can manually and automatically operate Valves and Pumps under the direction of the Pipeline Controller.

NOTICE OF AMENDMENT ITEM 4.

Pertaining Regulation

§ 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.

Description of deficiency

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.

Eni's' Responses to NOA Item 4

See proposed amendment to our CRM manual for appropriate section reference 6.1.3-4.4

4.4 Point-to-Point Verification (195.446(c

Refer to Safety Related Alarm table 6.1.3 in this document for alarm points that apply to this section.

NOTICE OF AMENDMENT ITEM 5.

Pertaining Regulation

§ 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.

Description of deficiency

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.

Eni's' Responses to NOA Item 5

See amendment to our CRM Manual for guidance to pipeline controllers on how to recognize stale data

6.1.4 Handling Stale Data (Bad PV)

During alarm acknowledgement, the Pipeline Controller will take notice of points that are providing stale data or bad PV (process data). These will be promptly recorded in the Controller Log and reported to automation for prompt remediation to minimize adverse impact on safety-related alarm capabilities. In addition to reporting these alarms and scheduling remedial action, the cause of the problem will be determined and corrected. This may include, but not be limited to:

- Communication system errors.
- SCADA system errors.
- Operations practices to take points off-scan or inhibit alarms.
- Failure of instrumentation or loss of signal

Controllers are trained or mentored to notice stale alarms by the following indicators

- Different color on device face plate, pink or light blue instead of yellow or red.
- On tool bar an alarm point might say "not communicating contact automations".
- Indicating negative 24.1 or other indication outside of the expected range.
- Alarm process variable stuck at one point when adjacent related measurements are changing

NOTICE OF AMENDMENT ITEM 6.

Pertaining Regulation

§ 195.446 Control room management. 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

Description of deficiency

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).

Eni's' Responses to NOA Item 6

See amendment to our CRM Program for process establishing when a safety defeated device (or alarm) may be defeated (inhibited)

6.2.2 Taking Safety Related Alarms off Scan

Pipeline Controllers are permitted to take Safety Related Alarms off scan for the follow reasons.

- In order to perform approved preventive and corrective maintenance activities.
- For very short periods to prevent nuisance shutdowns during startup activities.
- If proven errant signals are causing disruption in normal pipeline operations.

Safety related alarms taken off scan during the controller's shift will be entered in the short-term Safety defeated Log. If required to remain off scan after the controllers shift it will be entered in the long-term Safety defeated log.

Safety Related alarms designated HH or LL are not adjustable by the Pipeline Controller and are set and documented on the P&ID drawings and the cause and effect matrixes. None controlling High and low warning alarms associated with the same transmitters can be adjusted by the pipeline controller for the purpose of earlier notification to take proactive measures to avoid an AOC condition.

NOTICE OF AMENDMENT ITEM 7.

Pertaining Regulation

§ 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.

Description of deficiency

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.

Eni's' Reponeses to NOA Item 7

See amendment to Eni's' CRM Program SECTION 9. Show specific training requirements for the Pipeline Controller position and minimum acceptable test scores. In addition section 9 was amended to describe the short service training program and operator progression requirements before a candidate can sit to be mentored and trained as pipeline controller.

9.3.3 Pipeline Controller Specific Training /Mentoring requirements

None evaluated training on EnergyU

Initial and 3-year renewal must achieve a minimum score of 80 percent to pass. The following courses are required. Results and status can be viewed on EnergyU and on the Eni secured N:\drive.

- Abnormal operating condition (AOC)
- Documentation and Reporting
- Fatigue Management *1-year renewal*

Evaluated training on EnergyU requiring performance evaluations;

Initial and 3-year renewal must achieve a score of at least 80 percent to pass. This qualification also includes a performance evaluation or work history per the Operator Qualification Program. The following courses apply prefaced by the Eni covered task number. Results and status can be viewed on EnergyU and on the Eni secured N:\drive.

- **103.04 Provide security for pipeline facilities** *MEA 195-3001*
- **105.01 Operate Liquids Pipeline System Control Center.** *ASME-1391*
- **105.04 Operations of pipeline system –shutdown Pipeline** *MEA 195-1414PS*

Procedure Competency on Truapp

Initial and 3-year renewal must achieve a score of at least 85 percent to pass. Results and status can be found on the Truapp Eni data base.

- Consequence of Deviation
- NPL Bypass Shutdown
- Abnormal Operating Conditions Procedure
- Diesel Base oil Transfer to Spy Island Procedure
- Pipeline Leak Detection Procedure

Controller roles and responsibility training on Truapp

Initial and 3-year renewal must achieve a score of at least 85 percent to pass. Results and status can be found on the Truapp Eni data base.

- Control Room Management Program Read/Review
- Abnormal Operating Conditions for Operators
- Pipeline Operator setups periodically but infrequently used.

Mentor/Supervisor Review on Truapp

The following courses include documented reviews on Truapp for Initial qualification only. Once Qualified and successfully functioning as a Pipeline Controller documented mentoring is no longer required.

- DeltaV SCADA Alarm Proficiency Mentor review
- Mentor training and review of procedure competency

- Board Operator Competency test and final Supervisor review

NOTICE OF AMENDMENT ITEM 8.

Pertaining Regulation

§ 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.

Description of deficiency

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).

Eni's' Reponeses to NOA Item 8

See amendment to Eni's' CRM Program for procedure for providing team training to controllers.

(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 no later than January 23, 2018.

Team training exercises involve Individuals who usually provide key information or decision-making input to controllers or otherwise influence operational control decisions during normal, abnormal, or emergency situations. This includes individuals with authority to direct or supersede the specific technical actions of a controller and individuals that interact with controllers remotely or face-to-face inside the control room. This includes the Lead operator, Field Production Operators, Operation Supervision and NOC Security and others as identified in planning scenarios.

The purpose of these training exercises is to provide individuals, and the team as a whole, with the skills necessary to address conditions that could occur in any operational mode (normal, abnormal, or emergency conditions). Important skills include, but are not limited to, teamwork, communication, situational awareness, decision-making, leadership, professionalism, understanding roles and responsibilities (including how company leadership and executive management are involved in operational decisions), recognition and appropriate responses to emergencies, resolution of data discrepancies, error diagnostics, error management, relevant procedures, and problem solving. Exercises should present realistic scenarios and situations sufficiently complex to challenge the team's collective decision-making skills. Exercises should include lessons learned from the operator's actual events and should consider applicable events that have occurred at other oil and gas industry facilities.

At least one fully qualified controller must participate in all exercises and scenario practice. However, traditional classroom training on team concepts and soft skills could be accomplished without specific controller participation.

DOT specific team training Exercises are performed every quarter at the OPP Control Room that address the requirements of the standard and enhance team communication and awareness of authorities and responsibilities. Records can be found on Eni's secured N:\ drive. The effectiveness of training is documented during the annual Production Supervisor Training review and considered when preparing future training and exercises.

NOTICE OF AMENDMENT ITEM 9.

Pertaining Regulation

§ 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.

Description of deficiency

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.

Eni's' Reponses to NOA Item 9

See amendment to Eni's' CRM Program for procedure to address state agencies.

Regulatory Requirements (49 CFR 195.446(i))

(i) Compliance validation. Upon request, operators must submit their procedures to PHMSA or, in the case of an intrastate pipeline facility regulated by a State, to the appropriate State agency.