

NOTICE OF AMENDMENT

VIA E-MAIL TO MS. COLLEEN LARKIN BELL

December 19, 2022

Ms. Colleen Larkin Bell
President
Mountain West Pipeline, LLC
333 South State Street
P.O. Box 45360
Salt Lake City, UT 84145-0360

CPF 5-2022-049-NOA

Dear Ms. Bell:

From February 28 through March 4, 2022, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Mountain West Pipeline, LLC's (Mountain West, formerly Dominion Questar) procedures for Control Room Management in Salt Lake City, Utah.

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

1. § 192.631 Control room management.

(a)...

(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:

(1)...

(5) Establish and implement procedures for when a different controller assumes responsibility, including the content of information to be exchanged.

Mountain West's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, CRM Plan 2.8 *Shift Changes and Handover Responsibilities* fails to require that both outgoing and incoming controllers document the transfer of operational information on the DEQP Control Hand-over Sheet. Instead, CRM Plan 2.8 requires only that a verbal review of the DEQP Control Hand-over Sheet be conducted.¹ Mountain West must amend its procedures to provide for the documentation of the transfer of operational information on the DEQP Control Hand-over Sheet.

2. § 192.631 Control room management.

(a)...

(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:

(1)...

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays;

Mountain West's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, Mountain West's CRM Plan Section 1 does not define the term "point." Although Mountain West includes definitions for the terms "safety-related" and "safety-related alarm," its procedures fail to define the term "point" – a related term that is required to operate the SCADA system. Additionally, Mountain West's CRM Plan Section 3.2 does not define the time period by which point-to-point verification must be completed.

Mountain West must amend its procedures to define the term "point" as it pertains to Mountain West pipeline operations, and define a time period by which point-to-point verifications must be completed when field equipment is added or moved, or when other changes that affect pipeline safety are made to field equipment or SCADA displays.

3. § 192.631 Control room management.

(a)...

(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;

Mountain West's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, Mountain West's CRM Plan Section 5.3 fails to provide for review of all SCADA safety-related alarms that the SCADA system generates. During the inspection, PHMSA learned

¹ See 49 C.F.R. § 192.631(j)(1) (requiring operators to maintain for review during inspection records that demonstrate compliance with the requirements of this section).

that the Mountain West SCADA system allows alarms to annunciate and then clear themselves from the alarm screen without controller action. The Mountain West CRM Plan provides for review of only those alarms that remain unresolved at the end of each month. This method of alarm management and alarm review, however, fails to provide the company with a full understanding of how the SCADA system is operating and fails to provide the controller with full situational awareness of pipeline operations.

Additionally, the existing Mountain West SCADA style guide fails to include a naming convention for points and alarms. Mountain West must amend its procedures to provide a process that ensures alarms are accurate and support safe pipeline operations, including requiring that all alarms be acknowledged by a controller, and not auto-deleted. Further, Mountain West must amend its procedures by updating its style guide to include naming conventions for points and alarms.

4. § 192.631 Control room management.

(a)...

(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) ...

(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;

Mountain West's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, Mountain West's CRM plan does not contain a written procedure for the determination of SCADA safety-related alarm set-point values or a written procedure describing how safety-related alarm descriptions are designated. Consequently, it is unclear how Mountain West verifies correct set-point values and alarm descriptions pursuant to the requirements set forth in § 192.631(e)(3). Mountain West must amend its procedures to identify the method and procedure by which safety-related alarm set-point values and safety-related alarm descriptions are established.

5. § 192.631 Control room management.

(a)...

(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) ...

(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.

Mountain West's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, Mountain West's CRM plan Section 5.7 lacks specificity on how identified deficiencies will be documented and tracked through to full remediation. Mountain West must

amend its procedures to provide for the identification and documentation of CRM Plan deficiencies from identification through to full remediation.

6. § 192.631 Control room management.

(a)...

(f) *Change management.* Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:

(1) ...

(2) Require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations;

Mountain West's procedures are inadequate to assure safe operation of a pipeline facility. Specifically, Mountain West's CRM Plan Section 6.1 fails to include maintenance activities in the list of activities field staff should notify gas control room personnel about. Mountain West must amend its procedures to include all activities conducted by field personnel that affect control room operations in the list contained in CRM Plan Section 6.1.

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 Mountain West Pipeline 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 5-2022-049-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 (#22-232643)