



# Control Room Management Public Meeting

Daron Moore

El Paso Pipeline Group

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# A Few Thoughts

- How long can you stay awake?
- What is the world record for longest time awake?
- How long to recovery?
- Implications?
- Conclusion: the best research is the only way to conclusively determine Hours of Service, and the gas industry did just that

# Expected Safety Improvements

- Zero documented natural gas incidents caused or exacerbated by controller actions
  - New reporting form is “controller-explicit”, but detailed reviews of incident histories indicate zero documented natural gas incidents
- Improvement is therefore difficult at best
- It can be expected that some rule requirements may result in some incremental safety improvements
  - Natural gas industry embracing rule requirements as witnessed by SGA common framework document

# Fatigue Response

- Southern Gas Association, with up to 100 operating companies from distribution and transmission, developed a common framework document to address the CRM rule with a technical White Paper defending conclusions
- Framework document squarely dealt with the Hours of Service issue
- White Paper guided framework conclusions
- White Paper developed by Circadian Technologies under 31-company Joint Industry Project

# Framework Conclusions

- 63 hour maximum in week with exceptions
- 34 hour “rest period”
- Minimum 8 hour rest period between shifts
- 12 hour and 8 hour shifts are equally safe
- Shift change times, safety and staff meetings considered
- Must be extenuating circumstances to go beyond or above provisions

# Joint Industry Project Conclusions

- Much the same as the common framework
  - Use of 8 hour and 12 hour shifts are equally safe and acceptable
  - On 12 hour shifts, a maximum of 60 hours (five 12 hour shifts) of “on desk” duty is reasonable during normal operations with total duty time not to exceed 63 hours
  - Following any period of duty where 63 hours is reached, a minimum of 34 hours off will be required
  - On 8 hour shifts, there will be a maximum of 17 hours of consecutive duty
  - Limited use of the 7 on – 7 off schedule in control rooms in certain situations
  - 14 hours worked on a 12 hour shift

# Safety Community Response

- National Transportation Safety Board
  - Removed fatigue issue from “Most Wanted” list following presentation of natural gas findings
  - Twice said “ecstatic with conclusions”
  - Once said “very pleased” with conclusions
- Met twice with OPS leadership
  - Excellent dialogue, understandings accomplished with minor clarification changes to common framework
  - No known ongoing issues after year of work and finished product

# Operating Conclusions

- Almost all natural gas operators will follow SGA common framework
- Over 100 controllers expected to be added to natural gas control room staffs due to SGA common framework conclusions (interpretation of Final Rule requirements)
- Rigidity and documentation will result in better organization
- Operating practices are sound, some improvements are expected and documentation requirements will show that
- Rule requires change and work to comply, but as understood by industry is a positive