



California State Fire Marshall 2011 Pipeline Safety Workshop OO Update and Control Room Management



Advisory Bulletin No. ADB-09-03 Issued Dec 7, 2009

- Standardized notification for OQ plan transmittal and information required in transmittal
 - Operator information, regions involved, copy of the plan, and changes.
 - Do NOT send personnel information



- Added definitions for:
 - Observation of on the job performance
 - No tasks where adequate, sole method of evaluation
 - Does not measure ability to respond to AOCs
 - Significant
 - eliminating covered tasks, increasing interval or span of control, evaluation changes,



- Per requirements of §192.605(a) and §195.402(a), require a review of the OQ plan once per calendar year, not to exceed 15 months.
 - Periodic review of work, including AOC's



Protocol 9

- Part of every inspection
- Review of procedures and qualification requirements
- Abnormal Operating Conditions





ASME B31Q-2010 Standard

- ASME B31Q Standard issued 2010
 - Published November 2010
 - Addresses all remaining issues except noteworthy practices
 - Includes Effectiveness Measures for the operators plan
 - Includes Construction in the Scope of the Standard



- Added definition for new construction
 - All new construction, not just Alternative MAOP construction tasks





- PHMSA is reviewing the B31Q-2010 document to determine if it will consider incorporating it by reference





OQ Review

- Review of incidents, accidents, and other failures
 - Localized problem versus systematic problem





Other OQ Issues

- Breakout Tanks
 - API-653 incorporated by reference in whole adding tasks:
 - **Inspections, repairs, and alterations** to the covered task list
 - Ensure contractors qualified



CONTROL ROOM MANAGEMENT



CRM - BACKGROUND

- ❖ Pipeline Safety Improvement Act of 2002
 - ❖ Study control room operations to enhance pipeline safety (CCERT)
 - ❖ Provide report to Congress
- ❖ NTSB
 - ❖ Conducted study of hazardous liquid pipeline SCADA systems



CRM - BACKGROUND

❖ PIPES Act of 2006

- ❖ Establish human factors management plan
- ❖ Reduce risks associated with human factors
- ❖ Program to assure safe operations of pipelines
- ❖ Adopt NTSB Recommendations
- ❖ Changes to reporting requirements to include Control Room and fatigue factors



CRM - BACKGROUND

- ❖ NPRM published September 12, 2008
 - ❖ Objectives were to introduce additional requirements with respect to control room management and human factors

- ❖ PHMSA received 144 comments on the NPRM



CRM – FINAL RULE

- ❖ CRM Final Rule issued on December 3, 2009
 - ❖ Amendment Nos. 192-112 and 195-93
 - ❖ Only Parts 192 and 195 changed
 - ❖ LNG excluded entirely from regulations
- ❖ Effective date is February 1, 2010
 - ❖ Clock Starts



CRM – FINAL RULE EXCLUSIONS

Excludes gas distribution operators with less than 250,000 services and gas transmission operators without compressor stations from certain portions of the rule

No exclusions for Liquids at all



CRM – FINAL RULE EXCLUSIONS

❖ Must Comply with:

- ❖ provisions of fatigue mitigation
- ❖ compliance validation
- ❖ compliance and deviation



CRM – FINAL RULE

- ❖ Addition of definitions
- ❖ Addition of new reference standards
- ❖ Provision for written CRM procedures as part of O&M Manual and Emergency Plan
- ❖ New section of code for Control Room Management



195.2 DEFINITIONS

ALARM

Means an audible or visible means of indicating to the controller that the equipment or processes are outside **operator-defined**, safety related parameters



DEFINITIONS

CONTROL ROOM

Means an operations center staffed by personnel charged with the responsibility for remotely monitoring and controlling a pipeline facility.



DEFINITIONS

CONTROLLER

Means a qualified individual who remotely monitors and controls the safety-related operations of an entire, multiple or single section(s) of a pipeline facility via a SCADA system from a control room, and who has operational authority and accountability for the remote operational functions of a pipeline facility



DEFINITIONS

Supervisory Control and Data Acquisition (SCADA) System

Means a computer-based system or systems used by a controller in a control room that collects and displays information about a pipeline facility and **may** have the ability to send commands back to the pipeline facility.



195.3 REFERENCES

Added to both Parts 192 and 195

- ❖ API RP 1165 “Recommended Practice for Pipeline SCADA Displays”, First Edition (January 2007)

Added only to Part 195

- ❖ API RP 1168 “Pipeline Control Room Management”, First Edition (September, 2008)



PROCEDURES

❖ O&M Manual - 195.402 (c)(15)

Implementing the applicable control room management procedures required by 195.446

❖ Emergency Plan 195.402 (e)(10)

Actions required to be taken by a controller during an emergency in accordance with 195.446



195.446 – CONTROL ROOM MANAGEMENT

New Section of code to address
control room management

- ❖ Final requirements for CRM
- ❖ Applies to all operators that use SCADA systems and have at least one controller and control room



(a) GENERAL

The 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.



(a) GENERAL

Each operator must have and follow written control room management procedures that implement the requirements of this section,



(a) General

The procedures required by this section must be integrated, as appropriate, with operating and emergency procedures required by 195.402



(a) General

An operator must develop the procedures no later than August 1, 2011, and implement the procedures no later than February 1, 2012.



Implementation Dates

Date Corrected to

February 1, 2013

Clock Started

**Federal Register Notice published
02/03/2010**



195.446(b) ROLES AND RESPONSIBILITIES

Each operator must define roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions.



(b) ROLES AND RESPONSIBILITIES

To provide for a controller's prompt and appropriate response to operating conditions, and operator must define each of the following:



(b) ROLES AND RESPONSIBILITIES

(1) Controller's
authority/responsibility to make
decisions and take action during
normal operations;



(b) ROLES AND RESPONSIBILITIES

(2) Controller's role when an abnormal operating condition is detected, including responsibility to take specific actions and communicate with others;



(b) ROLES AND RESPONSIBILITIES

(3) Controller's role during an emergency, including responsibility to take specific actions and communicate with others;



(b) ROLES AND RESPONSIBILITIES

(4) Method of recording controller shift changes and handover of responsibility between controllers



195.446(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:



(C) PROVIDE ADEQUATE INFORMATION

(1) Implement API RP 1165

(incorporated by reference, see 195.3)

whenever a SCADA system is added,
expanded or replaced, unless the
operator demonstrates that certain
provisions of API RP 1165 are not
practical for the SCADA system used;



(c) PROVIDE ADEQUATE INFORMATION

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



(C) PROVIDE ADEQUATE INFORMATION

(3) Test and verify internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year not to exceed 15 months;



(c) PROVIDE ADEQUATE INFORMATION

(4) Test any backup SCADA system at least once each calendar year not to exceed 15 months; and



(C) PROVIDE ADEQUATE INFORMATION

(5) Implement section 5 of API RP

1168 (incorporated by reference, see

195.3) to establish procedures for

when a different controller assumes

responsibility, including the content of

information to be exchanged.



195.446(d)

FATIGUE MITIGATION

Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:



(d)

FATIGUE MITIGATION

(1) Establish shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep;



(d)

FATIGUE MITIGATION

(2) Educate controllers & supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue;



(d)

FATIGUE MITIGATION

(3) Train controllers and supervisors to recognize the effects of fatigue; and



(d)

FATIGUE MITIGATION

(4) Establish maximum limit on controller hours-of-service, providing from emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility



195.446(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:



(e) ALARM MANAGEMENT

(1) Review SCADA safety-related alarm operations by a process that ensures alarms are accurate and support safe operations;



(e) ALARM MANAGEMENT

(2) At least once a month identify points affecting safety that have been taken off the SCADA scan, had alarms inhibited, generated false alarms or that have had forced or manual values for periods of time exceeding those required for O&M activities;



(e) ALARM MANAGEMENT

(3) Verify correct safety-related alarm set-point values and alarm descriptions at least once each calendar year, not to exceed 15 months;



(e) ALARM MANAGEMENT

(4) Review required alarm management plan at least once each calendar year, not to exceed 15 months;



(e) ALARM MANAGEMENT

(5) Monitor content and volume of general activity being directed to and required of each controller at least once each calendar year, not to exceed 15 months to assure controllers have sufficient time to analyze and react to incoming alarms; and



(e) ALARM MANAGEMENT

(6) Address deficiencies identified through implementation of (e)(1) through (e)(5)



195.446(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:



(f) CHANGE MANAGEMENT

(1) Implement section 7 of API RP1168 (incorporated by reference, see 195.3) for control room management change and require coordination between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration; and



(f) CHANGE MANAGEMENT

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



195.446(g) OPERATING EXPERIENCE

Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:



(g) OPERATING EXPERIENCE

(1) Review accidents that must be reported pursuant to 195.50 and 195.52 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to:



(g) OPERATING EXPERIENCE

- (i) Controller fatigue;
 - (ii) Field equipment;
 - (iii) The operation of any relief device;
 - (iv) Procedures;
 - (v) SCADA system configuration; and
 - (vi) SCADA system performance.
- (2) Include lessons learned from the operator's experience in the training program required by this section.



195.446 (h) TRAINING

Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months.



(h) TRAINING

An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:



(h) TRAINING

(1) Responding to abnormal operating conditions likely to occur simultaneously or in sequence;



(h) TRAINING

(2) Use a computerized or non-computerized (tabletop) method for training controllers to recognize abnormal operating conditions;



(h) TRAINING

(3) Training controllers on their responsibilities for communication under the operator's emergency response procedures;



(h) TRAINING

(4) Training that will provide a controller a working knowledge of the pipeline system, especially during the development of abnormal operating conditions; and



(h) TRAINING

(5) For pipeline operating setups that are periodically, but infrequently used, providing an opportunity for controllers to review relevant procedures in advance of their application.



195.446 (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.



195.446 (j) COMPLIANCE AND DEVIATIONS

An operator must maintain for
review during inspection:



(j) COMPLIANCE AND DEVIATIONS

(1) Records that demonstrate compliance with the requirements of this section; and



(j) COMPLIANCE AND DEVIATIONS

(2) Documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of a pipeline facility.



ADDITIONAL INFORMATION

PHMSA Training and Qualification

<http://www.phmsa.dot.gov/pipeline/TQ>

CRM FAQ's

<http://primis.phmsa.dot.gov/crm/faqs.htm>

PHMSA Pipeline Safety Regulations

<http://www.phmsa.dot.gov/pipeline/TQ/Regulations>



Contact Information



Wallace McGaughey

Pipeline Safety Specialist

U.S. Department of Transportation

PHMSA Office of

Inspector Training and Qualifications

Main (405) 954-7219

Office (405) 954-6806

Fax (405) 954-0206

Email wallace.mcgaughey@dot.gov