

**Summary of Comments on the Control Room Management NPRM
November 26, 2008**

| Issue Categories | Common Comments | Options to Address Comments (preliminary) | Most Viable Options (preliminary) | Committee Recommendation |
|-------------------------|---|---|---|---------------------------------|
| 1. Approach | <ul style="list-style-type: none"> • Withdraw proposal and re-issue • Consider use of joint trades language • Extend time frames: 18 months to write plans + 18 months to implement • Don't mandate best/noteworthy/leading practices • Don't integrate with other plans • PIPES requirement for PHMSA/ State approval ignored | <ol style="list-style-type: none"> a. Amend proposal based on comments b. Obtain Advisory Committee agreement on revised approach c. Supplemental notice d. Withdrawal and re-notice e. Issue Advisory Bulletin(s) where more appropriate | <ul style="list-style-type: none"> • Modify proposed rule based on comments • Seek Committee approval • Consider bulletins for specifics not included in final rule | |
| 2. Scope | <ul style="list-style-type: none"> • Exceeds PIPES mandate, violates EOs • Exclude LNG • NTSB Rec's (PIPES §19) NA for gas • Limited/no benefit for small gas distribution • Exclude local control • Too prescriptive; use performance based | <ol style="list-style-type: none"> a. Establish threshold criteria for inclusion b. Relate requirements to complexity c. Reduce prescriptiveness d. Exclude LNG e. Differentiate requirements for gas/liquid f. Address some comments through changes in definitions g. Consider special provisions for LNG based on 193 differences | <ul style="list-style-type: none"> • Exclude LNG • Exclude gas distribution operators with <250,000 services (except fatigue) • Exclude non-complicated gas transmission (except fatigue) • Reduce prescriptiveness • Some differentiation between gas/liquid • Revise definitions (see below) | |
| 3. Regulatory Analysis | <ul style="list-style-type: none"> • Costs significantly underestimated • Assumptions unjustified <ul style="list-style-type: none"> ○ No. incidents by controllers ○ Pt-to-pt verification practices ○ Use of HL data for gas ○ Impact on small entities • Fails to consider unfunded mandate to States • Doesn't analyze option limited to PIPES mandate • Doesn't justify inclusion of LNG | <ol style="list-style-type: none"> a. Re-analysis (needed for final rule) b. Utilize submitted cost information c. Seek additional industry data d. Consider changes in scope e. Consider changes in requirements and definitions | <ul style="list-style-type: none"> • Re-analyze for final rule, considering changes in requirements • Utilize submitted cost information • Seek additional industry data as needed | |

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| 4. Definitions | <ul style="list-style-type: none"> • Incidental data use = controller • Focus on use of SCADA for remote control • Exclude local control panel use • “Naked eye” criterion is unreasonable • Use API RP-1168 | <ol style="list-style-type: none"> a. Clarify incidental use not unintended b. Exclude station operations c. Exclude station operations under certain conditions d. Reduce requirements for station operations e. Use some/all of the proposed comment definitions | <ul style="list-style-type: none"> • Clarify that incidental use is not controller • Exclude station operations and remote panels w/ no control outside fence line • Maintain consistent definitions between Parts | |
| 5. Training and Qualification | <ul style="list-style-type: none"> • Unnecessarily duplicates OQ • Field visits & site-specific failure training unreasonable and costly • Delete requirement to train on infrequent lineups • “Working” knowledge of hydraulics is sufficient • Verifying physical abilities problematic | <ol style="list-style-type: none"> a. Rely on OQ b. Delete/modify specifics c. Clarify that verifying physical abilities does not mean medical exams | <ul style="list-style-type: none"> • Defer to established OQ for qualifications • Require training program for AOC • Program must include simulator/ tabletop • Working knowledge of pipeline systems | |
| 6. SCADA displays | <ul style="list-style-type: none"> • Scope/applicability not clear; many displays not safety related • API RP-1165 designed as non-prescriptive recommendations | <ol style="list-style-type: none"> a. Clarify applicability to displays used by controllers b. Consider or require 1165 c. Prioritize implementation for safety displays | <ul style="list-style-type: none"> • Limit to control room SCADA • Require implementation of 1165 | |
| 7. Data Point verification | <ul style="list-style-type: none"> • 100% review is unreasonable • Assumption that now being done incorrect • Perhaps reasonable for changes important to safety | <ol style="list-style-type: none"> a. Eliminate “baseline” verification b. Refine/focus requirement to verify changes | <ul style="list-style-type: none"> • Eliminate baseline • Require verification on added/moved field equipment and changes affecting safety | |
| 8. Alarm Management | <ul style="list-style-type: none"> • Too prescriptive • Delete weekly review • Most alarms are not safety related • NTSB recommendation is for a “policy” • Delete reference to “nuisance alarms” • Delete evaluation of events that should have alarmed but didn’t | <ol style="list-style-type: none"> a. Change weekly review to monthly b. Reduce prescriptiveness c. Limit events failing to alarm to “known” occurrences d. Consider non-safety alarms impact on controller’s safety response e. Require alarm management plan | <ul style="list-style-type: none"> • Require alarm management plan • Monthly review of off scan/manual • Annually verify critical set points • Annual review of plan • Review for “flood” that could overwhelm controllers | |
| 9. Change Management | <ul style="list-style-type: none"> • Unfocused, overwhelming • Would distract controller from duties • “Hydraulic changes” considered all the time • Most changes don’t affect controllers • Consider use of API RP-1168 | <ol style="list-style-type: none"> a. Clarify to require that controller’s interests be represented (e.g., by management) b. Controller involved in advance of implementation c. Use 1168 | <ul style="list-style-type: none"> • Control room “representatives” involved • “Significant” hydraulic changes • 1168 for liquids | |

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| 10. Operating Experience | <ul style="list-style-type: none"> • Incident review already required • Requirement to evaluate near-miss events is unreasonable • Review of accuracy/timeliness/portrayal on displays already in 1165 | <ol style="list-style-type: none"> a. Eliminate requirement; refine incident/accident investigation requirement if needed b. Eliminate evaluation of near-miss events c. Eliminate duplication with 1165 | <ul style="list-style-type: none"> • Review for incidents • Non-reportable events considered in training • Lessons learned in simulator/tabletop • Eliminate 1165 duplication | |
| 11. Common corridor | <ul style="list-style-type: none"> • Unreasonable to expect controllers to know common corridor users • Safety problems should use 911 • Rely on 811 and one-call | <ol style="list-style-type: none"> a. Identify means to address public call to number on markers b. Clarify that controllers may refer problems to others in company | <ul style="list-style-type: none"> • Address by Advisory Bulletin | |
| 12. Executive Validation | <ul style="list-style-type: none"> • Unreasonable • Statute requires PHMSA approval, not company execs • Criteria too detailed | <ol style="list-style-type: none"> a. Approve plans by inspection b. Require submittal on request c. Revise criteria | <ul style="list-style-type: none"> • Approve by inspection • Require plan submittal on request | |
| 13. Fatigue Mitigation | <ul style="list-style-type: none"> • Eliminate requirement for additional measures for single controller | <ol style="list-style-type: none"> a. Clarify expectations b. Eliminate single controller language | <ul style="list-style-type: none"> • Clarify expectations • Eliminate single controller language • Address by Advisory Bulletin | |