

April 28, 2010

The Honorable Cynthia L. Quarterman
Administrator
Pipeline and Hazardous Materials
Safety Administration
Washington, DC 20590

Dear Ms. Quarterman:

Thank you for your February 1, 2010, letter updating the status of Safety Recommendations P-05-1 through -3, stated below. The National Transportation Safety Board (NTSB) issued these recommendations to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on December 23, 2005, as a result of the NTSB's study on supervisory control and data acquisition (SCADA) systems in liquid pipelines.

P-05-1

Require operators of hazardous liquid pipelines to follow the American Petroleum Institute's Recommended Practice 1165 [API RP 1165] for the use of graphics on the SCADA screens.

The NTSB has reviewed the final rule "Pipeline Safety: Control Room Management/Human Factors," published on December 3, 2009. The NTSB is pleased that Title 49 *Code of Federal Regulations* (CFR) 192 and 195 now require that an operator implement API RP 1165 in its entirety whenever a SCADA system is used unless the operator can adequately demonstrate that a provision of API RP 1165 is not applicable or is impracticable in that particular SCADA system. Because the final rule satisfies the recommendation, P-05-1 is classified "Closed—Acceptable Action."

P-05-2

Require pipeline companies to have a policy for the review/audit of alarms.

The NTSB is pleased that the December 3, 2009, final rule addresses *Alarm Management* at 49 CFR Parts 192 and 195, requiring each operator using a SCADA system to ensure appropriate controller response to alarms and notifications and to review operations at designated intervals. Because the final rule satisfies the recommendation, P-05-2 is classified "Closed—Acceptable Action."

P-05-3

Require controller training to include simulator or non-computerized simulations for controller recognition of abnormal operating conditions, in particular, leak events.

The NTSB is pleased that the December 3, 2009, final rule requires simulator or non-computerized (tabletop) controller training at 49 CFR Parts 192 and 195. Because the new requirements satisfy the recommendation, P-05-3 is classified “Closed—Acceptable Action.”

We commend PHMSA for completing action to address these important safety issues within a relatively short timeframe. Thank you for your commitment to pipeline safety.

Sincerely,

Original Signed By:

Deborah A.P. Hersman
Chairman

cc: Ms. Linda Lawson, Director
Office of Safety, Energy, and Environment
Office of Transportation Policy