



7340 W. 21st Street N. • Wichita, Kansas 67205
Telephone (316) 773-9000

February 4, 2013

Washington Utilities and Transportation Commission
1300 South Evergreen Park Dr., S.W.
P.O. Box 47250
Olympia, WA 98504-7250
ATTN: Mr. David D. Lykken, Pipeline Safety Director

RE: 2012 Control Room Management Technical Assistance Inspection - NuStar Pipeline Operating Partnership L.P.

Dear Mr. Lykken,

Thank you for the opportunity to respond to your correspondence dated December 21, 2012, which outlined the 18 areas of concern that resulted from a Control Room PHMSA inspection from July 23 to July 27, 2012, in which your agency participated. As you know, NuStar Pipeline Operating Partnership L.P. (NuStar) is dedicated to safety and being a good steward of the environment. Please find attached the response that was provided to PHMSA for those areas of concern. At this time, no formal correspondence with PHMSA has been received. However, based on the attachment, PHMSA is satisfied with our informal correspondence and we do not anticipate a formal request from PHMSA.

A notification to your agency will be provided once Tidewater takes over Control Room activities. Tidewater is anticipating taking over Control Room activities no later than mid-April 2013. Please let us know if we can provide any additional information.

Sincerely,

Gary Koegeboehn
VP/GM Operations

cc: Dan Tibbits, Regional HSE Director
Andy Stephens, Tidewater
Pat Jensen, Tidewater

RECEIVED
RECORDS MANAGEMENT
2013 FEB - 7 AM 11: 26
STATE OF WASH.
UTIL. AND TRANSPORTATION
COMMISSION

A1-2: The team suggested to NuStar that they develop a signoff sheet to be used as a record of the annual review.(3.2.1 O&M 304 Communication, all operations are coordinated through the Control Room department, may need to revise, asked for a copy of the procedure). The team requested the OQ task for pilot that would instruct him/her to contact the Control Room in the event of a leak). [NuStar developed Form 6623 to document the Annual Review.](#)

A1-3: (Requested Dates for verification of implementation) this information was provided and reviewed by Buddy Sheets. The team suggested that NuStar capture all of the activities associated with the program implementation and capture in a document and have an official of the company develop and sign a document so stating when the program was finalized. There was a 7/20/2012 revision date in the manual. It doesn't appear to be a MOC for the implementation of CRM even though it should have been according to their MOC Procedure #1.2.12.1 page 2 of 12. [Initial plan approval was completed via facilitated meeting with Senior Management in July 2011; annual review was completed July 2012 and modifications for implementation were submitted via MOC No. SACC-2012-00001. Refer to signoff letter dated October 2012 for additional details.](#)

C1-3: There is a potential issue with color blindness; the employee job description addresses, but there is no formal testing for color blindness. [We are in the process of implementing API RP 1165 recommended graphics that consider color blindness in their design, scheduled for completion by 12/31/2012. This API RP 1165 graphics implementation was completed on December 5, 2012.](#)

C2-2: There is an issue with Inhibited Alarms – where is the process defined? NuStar needs to formalize the process defined in the Shift Supervisor Best Practice Checklist. [Alarm Management procedures were drafted during element implementation \(due August 1, 2012\) and are currently being reviewed against the implemented program for revision and incorporation of the Alarm Management Tool Reporting capabilities. The Alarm Management Plan is being revised to incorporate these procedures and will be released first quarter of 2013.](#)

C3-1 & C3-2: NuStar needs to develop procedures that describe the practices that they currently use (each quarter) in regards to the testing and verifying the internal communication plan for manual operation of the pipeline safely at least once each a year. Actual testing needs to be documented. [These procedures are located in the current General Systems Manual \(July 2011\). The Emergency Evacuation drill includes a simulated test of the internal communication plan. In addition, the actual procedures for a true emergency that would result in the potential to manually operate are located in the Remote Operations Manual \(such as the AOC – loss of communications procedure\) for each system and also the field procedures located in the O&M. . AOCs and all communication and actions taken are documented in the PITS system/Impact. The drills are documented and filed on the intranet with the ACC Backup Testing files.](#)

D4-4: There aren't any countermeasures on NuStar's deviation form. NuStar needs to develop a procedure and associate form for capturing items addressed in D4-4. [For 2012, the Supervisors were trained to start including countermeasures on the deviation form. The 2013 annual review will include changes to the form that incorporate countermeasures.](#)

D4-8: NuStar needs to change language on page 18, Section 4.4.1 of CRMP to reflect actual practice. [This has been completed and will be implemented in the 2013 annual review updates.](#)

E1-2: NuStar needs procedures that address a closure mechanism for Safety Related Alarms and a form that documents closure. [We are in the process of working with Miller Consulting to incorporate these improvements in our alarm management procedures, scheduled for completion first quarter of 2013.](#)

E3-1: NuStar needs a procedure to ensure all safety related alarm setpoint values and alarm descriptions are verified and documented at least once each calendar year. [We are in the process of working with Miller Consulting to incorporate these improvements in our alarm management procedures, scheduled for completion first quarter of 2013.](#)

E4-1: NuStar needs to develop a procedure that documents their current activities associated with the review of the alarm management plan and a form to capture each time this activity is conducted. [We are in the process of working with Miller Consulting to incorporate these improvements in our alarm management procedures, scheduled for completion first quarter of 2013.](#)

E5-1, E5-2, E5-3, & E5-4: NuStar needs to develop a procedure and matrix that documents their current activities associated with the review of the alarm management plan and a form to capture each time this activity is conducted for E5-1 through E5-4. [We are in the process of working with Miller Consulting to incorporate these improvements in our alarm management procedures, scheduled for completion first quarter of 2013.](#)

E6-1: NuStar needs to develop procedures to address how deficiencies found in implementing (e)(1) through (e) (5) will be resolved. [We are in the process of working with Miller Consulting to incorporate these improvements in our alarm management procedures, scheduled for completion first quarter of 2013.](#)

H1-1 & H1-2: Nustar needs to develop a matrix for H1-1 & H1-2. [This will be implemented for the 2013 annual review.](#)

Tibbits, Dan

From: Arguelles, Mark
Sent: Tuesday, November 06, 2012 1:27 PM
To: Buddy.Sheets@dot.gov
Subject: PHMSA Notes
Attachments: PHMSA Notes.docx

Buddy, good talking with you today. Attached are the questions I had per the phone call today.

Also, I'll be following up with another email tomorrow (possibly Thursday) with draft responses to all the other items.

Thanks for the help.

Mark

A1-2: The team suggested to NuStar that they develop a sign – off sheet to be used as a record of the annual review. (3.2.1 O&M 304 Communication, all operations are coordinated through the Control Room department, may need to revise, asked for a copy of the procedure). The team requested the OQ task for pilot that would instruct him/her to contact the Control Room in the event of a leak).

A1-3: (Requested Dates for verification of implementation) this information was provided and reviewed by Buddy Sheets. The team suggested that NuStar capture all of the activities associated with the program implementation and capture in a document and have an official of the company develop and sign a document so stating when the program was finalized. There was a 7/20/2012 revision date in the manual. It doesn't appear to be a MOC for the implementation of CRM even though it should have been according to their MOC Procedure #1.2.12.1 page 2 of 12.

C1-3: There is a potential issue with color blindness; the employee job description addresses, but there is no formal testing for color blindness.

C2-2: There is an issue with Inhibited Alarms – where is the process defined? NuStar needs to formalize the process defined in the Shift Supervisor Best Practice Checklist.

C3-1 & C3-2: NuStar needs to develop procedures that describe the practices that they currently use (each quarter) in regards to the testing and verifying the internal communication plan for manual operation of the pipeline safely at least once each a year. Actual testing needs to be documented.

D4-4: There aren't any countermeasures on NuStar's deviation form. NuStar needs to develop a procedure and associate form for capturing items addressed in D4-4.

D4-8: NuStar needs to change language on page 18, Section 4.4.1 of CRMP to reflect actual practice.

E1-2: NuStar needs procedures that address a closure mechanism for Safety Related Alarms and a form that documents closure.

E3-1: Nustar needs a procedure to ensure all safety related alarm setpoint values and alarm descriptions are verified and documented at least once each calendar year.

E4-1: NuStar needs to develop a procedure that documents their current activities associated with the review of the alarm management plan and a form to capture each time this activity is conducted.

E5-1, E5-2, E5-3, & E5-4: NuStar needs to develop a procedure and matrix that documents their current activities associated with the review of the alarm management plan and a form to capture each time this activity is conducted for E5-1 through E5-4.

E6-1: NuStar needs to develop procedures to address how deficiencies found in implementing (e)(1) through (e) (5) will be resolved.

H1-1 & H1-2: Nustar needs to develop a matrix for H1-1 & H1-2.

Comment [NE1]: Question: Buddy, in talking with the control room, we couldn't recall what this request was about. The O&M Procedure 304 addresses Communication. We can't recall what the context of the request was. Our procedure 304 states that the control room will communicate with operations for various tasks including SCADA outage. That process is further flushed out by reference in greater detail to our procedure 102 which addresses abnormal operations.

Comment [NE2]: Question: Our NCCER Candidate sheet and PV for OQ task 15.2 addresses Reporting protocols. The documentation says that the individual (in our case a pilot) is to follow the Company's reporting process. NuStar provides our pilots with a notification process which includes all the relevant contacts including operations and the control center. I can provide copies of this if you would like to see.

I believe this issue came up before I arrived to San Antonio so I'm not sure if our folks touched on this or not.

I can provide copies of this information if you would like to see it in more detail.

Tibbits, Dan

From: Buddy.Sheets@dot.gov
Sent: Tuesday, January 15, 2013 9:33 AM
To: Arguelles, Mark
Subject: RE: PHMSA Notes

Mark, just catching up on emails. What is provide adequately addresses the team's concerns.

Sorry for the late response.

From: Arguelles, Mark [<mailto:Mark.Arguelles@nustarenergy.com>]
Sent: Tuesday, November 06, 2012 1:27 PM
To: Sheets, Buddy (PHMSA)
Subject: PHMSA Notes

Buddy, good talking with you today. Attached are the questions I had per the phone call today.

Also, I'll be following up with another email tomorrow (possibly Thursday) with draft responses to all the other items.

Thanks for the help.

Mark

This e-mail has been scanned by Verizon Managed Email Content Service, using Skeptic(tm) technology powered by MessageLabs. For more information on Verizon's Managed Email Content Service, visit <http://www.verizonbusiness.com>.
