

## Inspection Results (IRR)

### UNIT 32965 (126)

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
1.	UNIT 32965 (and 1 other assets)	CR.CRMGEN	1.	<a href="#">CR.CRMGEN.CRMCRITERIA.P</a>	195.446(a)	Does the process adequately address criteria by which the operator determines which of its facilities are control rooms?	<b>Sat</b>	--	BP operate three control room centers located at Renton, WA; Tulsa, OK; and Long Beach, CA. Each control room is a stand alone center that are not connected. This inspection will apply to the Olympic Pipeline control center located in Renton, WA.
2.	UNIT 32965 (and 1 other assets)	CR.CRMGEN	2.	<a href="#">CR.CRMGEN.CRMGMGT.P</a>	195.446(a)	Are CRM procedures formalized and controlled?	<b>Sat</b>	--	Annual review is very October by control center training coordinator.
3.	UNIT 32965 (and 1 other assets)	CR.CRMGEN	3.	<a href="#">CR.CRMGEN.CRMIMPLEMENT.R</a>	195.446(a)	Were procedures approved, in place, and implemented on or before the regulatory deadline?	<b>Sat</b>	--	Control Room Operation, Management & Emergency Response (OMER) was developed 1-23-2009.
4.	UNIT 32965 (and 1 other assets)	CR.CRMGEN	4.	<a href="#">CR.CRMGEN.CRMPROCLOCATION.O</a>	195.446(a)	Are procedures readily available to controllers in the control room?	<b>Sat</b>	--	All controllers have access to to the Document Record Management (DRM) system for Control Room Procedures.
5.	UNIT 32965 (and 1 other assets)	CR.CRMRR	1.	<a href="#">CR.CRMRR.RESPONSIBLE.P</a>	195.446(b)(1)	Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets?	<b>Sat</b>	--	Olympic Pipeline has two controllers and a qualified supervisor. Each controller monitors the 20-inch mainline from Ferndale to Portland, OR. and the second controller monitors the 16-inch mainline from Ferndale to Seattle, WA.
6.	UNIT 32965 (and 1 other assets)	CR.CRMRR	2.	<a href="#">CR.CRMRR.QUALCONTROL.P</a>	195.446(b)(1)	Are there provisions in place to assure that only qualified individuals may assume control at any console/desk?	<b>Sat</b>	--	The two mainline controllers and their supervisor are control room qualified.
7.	UNIT 32965 (and 1 other assets)	CR.CRMRR	3.	<a href="#">CR.CRMRR.DOMAINCHANGE.P</a>	195.446(b)(1)	If the physical domain of responsibility periodically changes, has a	<b>Sat</b>	--	Procedure: FCTRL- OPS-463-004 Sections 8-13; Physical Change

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						clear process been established to describe the conditions for when such a change occurs?			to Back-up Facility.
8.	UNIT 32965 (and 1 other assets)	CR.CRMRR	4.	<a href="#">CR.CRMRR.RESPCHANGE.P</a>	195.446(b)(1)	Do processes address a controller's role during temporary impromptu (unplanned) changes in controller responsibilities?	Sat	--	Procedure: FCTRL-OPS-463-004 Sections 8-12; Shift Turn Over and Hand-Over Responsibilities.
9.	UNIT 32965 (and 1 other assets)	CR.CRMRR	5.	<a href="#">CR.CRMRR.COMMANDVERIFY.P</a>	195.446(b)(1)	Do the defined roles and responsibilities require controllers to stay at the console to verify all SCADA commands that have been initiated are fulfilled, and that commands given via verbal communications are acknowledged before leaving the console for any reason?	Sat	--	Shift Leader Responsibilities include taking over controller console during change over because all shift changes are verbal commands.
10.	UNIT 32965 (and 1 other assets)	CR.CRMRR	6.	<a href="#">CR.CRMRR.AUTHORITYABNORMAL.P</a>	195.446(b)(2)	Have processes been established to define the controllers' authority and responsibilities when an abnormal operating condition is detected?	Sat	--	Information is contained in OMER Book #1, page 3 and OMER Book #2, paragraph H for Abnormal Action.
11.	UNIT 32965 (and 1 other assets)	CR.CRMRR	7.	<a href="#">CR.CRMRR.PRESSLIMITS.O</a>	195.446(b)(2)	Are controllers aware of the current MOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MOP?	Sat	--	--
12.	UNIT 32965 (and 1 other assets)	CR.CRMRR	8.	<a href="#">CR.CRMRR.AUTHORITYEMERGENCY.P</a>	195.446(b)(3)	Do processes define the controllers' authority and responsibility to make decisions, take actions, and communicate with others upon being notified of, or upon detection of, and during, an emergency or if a leak or rupture is	Sat	--	CRM P-195.466 (b)(2) & OMER Book 2, paragraph H & I

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13.	UNIT 32965 (and 1 other assets)	CR.CRMRR	9.	<a href="#">CR.CRMRR.EVACUATION.P</a>	195.446(b)(3)	suspected? Do processes specifically address the controller's responsibilities in the event the control room must be evacuated?	Sat	--	--
14.	UNIT 32965 (and 1 other assets)	CR.CRMRR	10.	<a href="#">CR.CRMRR.COMMSYSFAIL.P</a>	195.446(b)(3)	Do processes specifically address the controller's responsibilities in the event of a SCADA system or data communications system failure impacting large sections of the controller's domain of responsibility?	Sat	--	OMER Book 2 Section 5.99.1, paragraph G and J
15.	UNIT 32965 (and 1 other assets)	CR.CRMRR	11.	<a href="#">CR.CRMRR.HANDOVER.P</a>	195.446(b)(4) (195.446(c)(5))	Have processes been established for the hand-over of responsibility that specify the type of information to be communicated to the oncoming shift?	Sat	--	FCTRL- OPS-463-004
16.	UNIT 32965 (and 1 other assets)	CR.CRMRR	12.	<a href="#">CR.CRMRR.HANDOVERDOC.P</a>	195.446(b)(4) (195.446(c)(5))	Do processes require that records document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?	Sat	--	--
17.	UNIT 32965 (and 1 other assets)	CR.CRMRR	13.	<a href="#">CR.CRMRR.HANDOVERDOC.R</a>	195.446(b)(4) (195.446(c)(5))	Are there records that document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?	Sat	--	--
18.	UNIT 32965 (and 1 other assets)	CR.CRMRR	14.	<a href="#">CR.CRMRR.HANDOVEROVERLAP.P</a>	195.446(b)(4)	Do processes require the controllers to discuss recent and impending important activities ensuring adequate overlap?	Sat	--	--

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19.	UNIT 32965 (and 1 other assets)	CR.CRMRR	15.	<a href="#">CR.CRMRR.HANDOVERALTERNATIVE.P</a>	195.446(b)(4)	When a controller is unable to continue or assume responsibility for any reason, do the shift hand-over processes include alternative shift hand-over actions that specifically address this situation?	<b>Sat</b>	--	--
20.	UNIT 32965 (and 1 other assets)	CR.CRMRR	16.	<a href="#">CR.CRMRR.UNATTENDCONSOLE.P</a>	195.446(b)(4)	Has the operator established an adequate process for occasions when the console is left temporarily unattended for any reason?	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.
21.	UNIT 32965 (and 1 other assets)	CR.CRMRR	17.	<a href="#">CR.CRMRR.CONSOLECOVERAGE.P</a>	195.446(b)(4)	Do processes maintain adequate console coverage during shift hand-over?	<b>Sat</b>	--	--
22.	UNIT 32965 (and 1 other assets)	CR.SCADA	1.	<a href="#">CR.SCADA.SYSTEMMOC.P</a>	195.446(c)(1)	Do processes clearly define the types of changes to the SCADA system(s) that constitute additions, expansions, or replacements under the meaning of the CRM rule?	<b>Sat</b>	--	--
23.	UNIT 32965 (and 1 other assets)	CR.SCADA	2.	<a href="#">CR.SCADA.DISPLAYCONFIG.P</a>	195.446(c)(1)	Are there written processes to implement the API RP 1165 display standards to the SCADA systems that have been added, expanded, or replaced since August 1, 2012?	<b>Sat</b>	--	--
24.	UNIT 32965 (and 1 other assets)	CR.SCADA	3.	<a href="#">CR.SCADA.HUMANFACTORS.R</a>	195.446(c)(1)	Has section 4 of API RP 1165 regarding human factors engineering been implemented?	<b>Sat</b>	--	--
25.	UNIT 32965 (and 1 other assets)	CR.SCADA	4.	<a href="#">CR.SCADA.DISPLAYHARDWARE.R</a>	195.446(c)(1)	Has section 5 of API RP 1165 regarding display hardware been implemented?	<b>Sat</b>	--	--
26.	UNIT 32965 (and 1 other assets)	CR.SCADA	5.	<a href="#">CR.SCADA.DISPLAYLAYOUT.R</a>	195.446(c)(1)	Has section 6 of API RP 1165 regarding display layout and organization been implemented?	<b>Sat</b>	--	--
27.	UNIT 32965 (and 1 other assets)	CR.SCADA	6.	<a href="#">CR.SCADA.DISPLAYNAVIGATION.R</a>	195.446(c)(1)	Has section 7 of API RP 1165 regarding display navigation been implemented?	<b>Sat</b>	--	--

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28.	UNIT 32965 (and 1 other assets)	CR.SCADA	7.	<a href="#">CR.SCADA.DISPLAYOBJECTS.O</a>	195.446(c)(1)	Has section 8 of API RP 1165 regarding display object characteristics been implemented?	Sat	--	--
29.	UNIT 32965 (and 1 other assets)	CR.SCADA	8.	<a href="#">CR.SCADA.DISPLAYDYNAMICS.R</a>	195.446(c)(1)	Has section 9 of API RP 1165 regarding display object dynamics been implemented?	Sat	--	--
30.	UNIT 32965 (and 1 other assets)	CR.SCADA	9.	<a href="#">CR.SCADA.CONTROLSELECTION.R</a>	195.446(c)(1)	Has section 10 of API RP 1165 control selection and techniques been implemented?	Sat	--	--
31.	UNIT 32965 (and 1 other assets)	CR.SCADA	10.	<a href="#">CR.SCADA.ADMINISTRATION.R</a>	195.446(c)(1)	Has section 11 of API RP 1165 administration been implemented?	Sat	--	--
32.	UNIT 32965 (and 1 other assets)	CR.SCADA	11.	<a href="#">CR.SCADA.1165IMPRACTICAL.R</a>	195.446(c)(1)	If any/all applicable paragraph(s) of API RP 1165 have not been implemented, has it been demonstrated and documented that the unimplemented provisions are impractical for the SCADA system used?	Sat	--	--
33.	UNIT 32965 (and 1 other assets)	CR.SCADA	12.	<a href="#">CR.SCADA.SETPOINT.P</a>	195.446(c)(2) (195.406(b))	Does the process adequately define safety-related points?	Sat	--	Procedure CTULM-SCD-OPS-460-003
34.	UNIT 32965 (and 1 other assets)	CR.SCADA	13.	<a href="#">CR.SCADA.SETPOINT.R</a>	195.446(c)(2)	Do records indicate safety-related points have been adequately implemented?	Sat	--	--
35.	UNIT 32965 (and 1 other assets)	CR.SCADA	14.	<a href="#">CR.SCADA.POINTVERIFY.P</a>	195.446(c)(2)	Are there adequate processes to define and identify the circumstances which require a point-to-point verification?	Sat	--	SOP Procedure SCADA Pt. to Pt. Testing Section 8.0
36.	UNIT 32965 (and 1 other assets)	CR.SCADA	15.	<a href="#">CR.SCADA.POINTVERIFY.R</a>	195.446(c)(2)	Have required point-to-point verifications been performed?	Sat	--	--
37.	UNIT 32965 (and 1 other assets)	CR.SCADA	16.	<a href="#">CR.SCADA.POINTVERIFYEXTENT.P</a>	195.446(c)(2)	Are there adequate processes for the thoroughness of the point-to-point verification?	Sat	--	--
38.	UNIT 32965 (and 1 other assets)	CR.SCADA	17.	<a href="#">CR.SCADA.POINTVERIFYEXTENT.R</a>	195.446(c)(2)	Do records demonstrate adequate thoroughness of the point-to-point verification?	Sat	--	--
39.	UNIT 32965 (and 1 other assets)	CR.SCADA	18.	<a href="#">CR.SCADA.POINTVERFIYINTVL.P</a>	195.446(c)(2)	Is there an adequate process for defining when the point-to-point	Sat	--	--

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40.	UNIT 32965 (and 1 other assets)	CR.SCADA	19.	<a href="#">CR.SCADA.POINTVERFIYINTVL.R</a>	195.446(c)(2)	verification must be completed? Do records indicate the point-to-point verification has been completed at the required intervals?	Sat	--	--
41.	UNIT 32965 (and 1 other assets)	CR.SCADA	20.	<a href="#">CR.SCADA.COMMPLAN.P</a>	195.446(c)(3)	Has an internal communication plan been established and implemented that is adequate to manually operate the pipeline during a SCADA failure/outage?	Sat	--	--
42.	UNIT 32965 (and 1 other assets)	CR.SCADA	21.	<a href="#">CR.SCADA.COMMPLAN.R</a>	195.446(c)(3)	Has the internal communication plan been tested and verified for manual operation of the pipeline safely at least once each calendar year but at intervals not exceeding 15 months?	Sat	--	--
43.	UNIT 32965 (and 1 other assets)	CR.SCADA	22.	<a href="#">CR.SCADA.BACKUPSCADA.O</a>	195.446(c)(4)	Is there a backup SCADA system?	Sat	--	--
44.	UNIT 32965 (and 1 other assets)	CR.SCADA	23.	<a href="#">CR.SCADA.BACKUPSCADADEV.P</a>	195.446(c)(4)	Has the use of the backup SCADA system for development work been defined?	Sat	--	Development has full capabilities and is not a part of the back-up system. Reviewed settings for 64 pressure switches from 2012 data.
45.	UNIT 32965 (and 1 other assets)	CR.SCADA	24.	<a href="#">CR.SCADA.BACKUPSCADATEST.R</a>	195.446(c)(4)	Is the backup SCADA system tested at least once each calendar year at intervals not to exceed 15 months?	Sat	--	--
46.	UNIT 32965 (and 1 other assets)	CR.SCADA	25.	<a href="#">CR.SCADA.BACKUPSCADAVERIFY.R</a>	195.446(c)(4)	Does the testing verify that there are adequate processes in place for decision-making and internal communications to successfully implement a transition from primary SCADA to backup SCADA, and back to primary SCADA?	Sat	--	--
47.	UNIT 32965 (and 1 other assets)	CR.SCADA	26.	<a href="#">CR.SCADA.BACKUPSCADADEQUACY.R</a>	195.446(c)(4)	If the back-up SCADA system is not designed to handle all the functionality of the	Sat	--	--

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						main SCADA system, does the testing determine whether there are adequate procedures in place to account for displaced and/or different available functions during back-up operations?			
48.	UNIT 32965 (and 1 other assets)	CR.SCADA	27.	<a href="#">CR.SCADA.BACKUPSCADATRANSFER.P</a>	195.446(c)(4)	Do processes adequately address and test the logistics of transferring control to a backup control room?	Sat	--	--
49.	UNIT 32965 (and 1 other assets)	CR.SCADA	28.	<a href="#">CR.SCADA.BACKUPSCADARETURN.P</a>	195.446(c)(4)	Do procedures adequately address and test the logistics of returning operations back to the primary control room?	Sat	--	--
50.	UNIT 32965 (and 1 other assets)	CR.SCADA	29.	<a href="#">CR.SCADA.BACKUPSCADAFUNCTIONS.R</a>	195.446(c)(4)	Is a representative sampling of critical functions in the back-up SCADA system being tested to ensure proper operation in the event the backup system is needed?	Sat	--	The primary computer is rotated between Renton and Tacoma Control Centers.
51.	UNIT 32965 (and 1 other assets)	CR.CRMFM	1.	<a href="#">CR.CRMFM.FATIGUEMITIGATION.P</a>	195.446(d)	Does the fatigue mitigation process or procedures (plan) identify operator-specific fatigue risks?	Sat	--	SOP FCTRL-OPS 463-009 (Rev 7-31-'12) Olympic uses Circadian Study & Recommendations to define operator specific fatigue risks.
52.	UNIT 32965 (and 1 other assets)	CR.CRMFM	2.	<a href="#">CR.CRMFM.FATIGUERISKS.P</a>	195.446(d)	Does the fatigue mitigation plan adequately address how the program reduces the risk associated with controller fatigue?	Sat	--	Olympic uses 14 hour limit per day and maximum 65 hours per 7-day period.
53.	UNIT 32965 (and 1 other assets)	CR.CRMFM	3.	<a href="#">CR.CRMFM.FATIGUEQUANTIFY.P</a>	195.446(d)	Do processes require that the potential contribution of controller fatigue to incidents and accidents be quantified during investigations?	Sat	--	SMRS page 29.
54.	UNIT 32965 (and 1 other assets)	CR.CRMFM	4.	<a href="#">CR.CRMFM.FATIGUEMANAGER.P</a>	195.446(d)	Is there a designated fatigue risk manager who is responsible and accountable for	Sat	--	--

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						managing fatigue risk and fatigue countermeasures, and someone (perhaps the same person) that is authorized to review and approve HOS emergency deviations?			
55.	UNIT 32965 (and 1 other assets)	CR.CRMFM	5.	<a href="#">CR.CRMFM.SHIFTLLENGTH.R</a>	195.446(d)(1)	Is the scheduled shift length less than or equal to 12 hours (not including shift hand-over) or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?	Sat	--	Procedure FCTRL-OPS-463-009. FRMS Document - DuPont Schedule (RP 755)
56.	UNIT 32965 (and 1 other assets)	CR.CRMFM	6.	<a href="#">CR.CRMFM.SHIFTLLENGTHTIME.R</a>	195.446(d)(1)	Does the operator factor in all time the individual is working for the company when establishing shift lengths and schedule rotations or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?	Sat	--	Circadian Evaluation for Scientific Basis for Work Schedules.
57.	UNIT 32965 (and 1 other assets)	CR.CRMFM	7.	<a href="#">CR.CRMFM.SCHEDULEDTIMEOFF.R</a>	195.446(d)(1)	Are all scheduled periods of time off at least one hour longer than 8 hours plus commute time or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?	Sat	--	--
58.	UNIT 32965 (and 1 other assets)	CR.CRMFM	8.	<a href="#">CR.CRMFM.ONCALLCONTROLLER.R</a>	195.446(d)(1)	For controllers who are on call, does the operator minimize	Sat	--	Two relief persons are available and their commute time is counted

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						interrupting the required 8 hours of continuous sleep or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?			for the same day they are requested to work. The commute time is not counted if the controller is scheduled the day before their shift.
59.	UNIT 32965 (and 1 other assets)	CR.CRMFM	9.	<a href="#">CR.CRMFM.MAXHOS.P</a>	195.446(d)(4)	Do processes limit the maximum HOS limit in any sliding 7 day period to no more than 65 hours or is there a documented technical basis to show reduction of the risk associated with controller fatigue?	<b>Sat</b>	--	
60.	UNIT 32965 (and 1 other assets)	CR.CRMFM	10.	<a href="#">CR.CRMFM.MINTIMEOFF.P</a>	195.446(d)(4)	After reaching the HOS limit in any sliding 7 day period, is the minimum time off at least 35 hours or is there a documented technical basis to show a reduction of the risk associated with controller fatigue?	<b>Sat</b>	--	Fatigue Management Risk System FCTRL-OPS-463-009
61.	UNIT 32965 (and 1 other assets)	CR.CRMFM	11.	<a href="#">CR.CRMFM.DOCSCHEDULE.P</a>	195.446(d)(4)	Is there a formal system to document all scheduled and unscheduled HOS worked, including overtime and time spent performing duties other than control room duties?	<b>Sat</b>	--	--
62.	UNIT 32965 (and 1 other assets)	CR.CRMFM	12.	<a href="#">CR.CRMFM.DAYSOFF.P</a>	195.446(d)(4)	For normal business hour type operations (i.e., five days per week), are no more than five days worked in succession before at least two days off?	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.
63.	UNIT 32965 (and 1 other assets)	CR.CRMFM	13.	<a href="#">CR.CRMFM.WORKHOURS.R</a>	195.446(d)(4)	For normal business hour type operations (i.e., five days per week), is the shift start time no earlier	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.

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64.	UNIT 32965 (and 1 other assets)	CR.CRMFM	14.	<a href="#">CR.CRMFM.FATIGUECOUNTERMEASURES.P</a>	195.446(d)(4)	than 6:00 a.m. and the shift end time no later than 7:00 p.m.? For shifts longer than 8 hours, have specific fatigue countermeasures been implemented for the ninth and beyond hours?	Sat	--	Fatigue Management Risk System FCTRL-OPS-463-009
65.	UNIT 32965 (and 1 other assets)	CR.CRMFM	15.	<a href="#">CR.CRMFM.DAILYHOSLIMIT.P</a>	195.446(d)(4)	Do processes limit the daily maximum HOS limit no more than 14 hours in any sliding 24-hour period?	Sat	--	Olympic Pipeline uses HOSED (Hours of Served Emergency Document) Form, reference Advisory Bulletin ADB-05-06, and Procedure 463-009 page 18.
66.	UNIT 32965 (and 1 other assets)	CR.CRMFM	16.	<a href="#">CR.CRMFM.CONTROLLERNUMBERS.O</a>	195.446(d)(4)	Do operations include a sufficient number of qualified controllers?	Sat	--	--
67.	UNIT 32965 (and 1 other assets)	CR.CRMFM	17.	<a href="#">CR.CRMFM.OFFDUTYHOURS.P</a>	195.446(d)(4)	Do processes ensure that controllers are provided with at least thirty-five (35) continuous off-duty hours when limits are reached following the most recent 35-hour (minimum) off-duty rest period or is there a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?	Sat	--	Procedure 463-009 page 16-19.
68.	UNIT 32965 (and 1 other assets)	CR.CRMFM	18.	<a href="#">CR.CRMFM.SHIFTHOLDOVER.P</a>	195.446(d)(4)	Does the shift holdover process conform to shift holdover guidelines or is their a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?	Sat	--	--
69.	UNIT 32965 (and 1 other assets)	CR.CRMFM	19.	<a href="#">CR.CRMFM.SPECIFICCOUNTERMEASURES.P</a>	195.446(d)(4)	Do processes require specific fatigue countermeasures during applicable time periods, or is	Sat	--	Fatigue Risk Management FCTRL-OPS-466-009

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						there a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?			
70.	UNIT 32965 (and 1 other assets)	CR.CRMFM	20.	<a href="#">CR.CRMFM.HOSDEVIATIONS.P</a>	195.446(d)(4)	Is there a formal process for approving deviations from the maximum HOS limits?	Sat	--	--
71.	UNIT 32965 (and 1 other assets)	CR.CRMFM	21.	<a href="#">CR.CRMFM.FATIGUEEDUCATE.P</a>	195.446(d)(2) (195.446(d)(3))	Does the program require that fatigue education/training is required for all controllers and control room supervisors?	Sat	--	--
72.	UNIT 32965 (and 1 other assets)	CR.CRMFM	22.	<a href="#">CR.CRMFM.FATIGUEREFRESHER.R</a>	195.446(d)(2) (195.446(d)(3))	Is refresher fatigue education provided at regular intervals?	Sat	--	--
73.	UNIT 32965 (and 1 other assets)	CR.CRMFM	23.	<a href="#">CR.CRMFM.FATIGUEREVIEW.P</a>	195.446(d)(2) (195.446(d)(3))	Do processes require that the effectiveness of the fatigue education/training program be reviewed at least once each calendar year, not to exceed 15 months?	Sat	--	--
74.	UNIT 32965 (and 1 other assets)	CR.CRMFM	24.	<a href="#">CR.CRMFM.FATIGUESTRATEGY.P</a>	195.446(d)(2)	Does fatigue education address fatigue mitigation strategies (countermeasures)?	Sat	--	--
75.	UNIT 32965 (and 1 other assets)	CR.CRMFM	25.	<a href="#">CR.CRMFM.OFFDUTY.P</a>	195.446(d)(2)	Does fatigue education address how off-duty activities contribute to fatigue?	Sat	--	--
76.	UNIT 32965 (and 1 other assets)	CR.CRMFM	26.	<a href="#">CR.CRMFM.FATIGUECONTENT.P</a>	195.446(d)(3)	Is the content of fatigue training adequate for training controllers and supervisors to recognize the effects of fatigue?	Sat	--	--
77.	UNIT 32965 (and 1 other assets)	CR.CRMAM	1.	<a href="#">CR.CRMAM.ALARM.P</a>	195.446(e)	Is the alarm management plan a formal process that specifically identifies critical topical areas included in the program?	Sat	--	Procedure FCTRL-OPS-463-007. The International Society of SCADA (ISA) is referenced for Management of Alarm Systems for the Process Industries.
78.	UNIT 32965 (and 1 other)	CR.CRMAM	2.	<a href="#">CR.CRMAM.ALARMMALFUNCTION.P</a>	195.446(e)(1)	Is there a process to identify and correct inaccurate	Sat	--	--

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	assets)					or malfunctioning alarms?			
79.	UNIT 32965 (and 1 other assets)	CR.CRMAM	3.	<a href="#">CR.CRMAM.ALARMREVIEW.P</a>	195.446(e)(1)	Does the review of safety-related alarms account for different alarm designs and all alarm types/priorities?	Sat	--	--
80.	UNIT 32965 (and 1 other assets)	CR.CRMAM	4.	<a href="#">CR.CRMAM.CONTROLLERPERFORMANCE.P</a>	195.446(e)(1)	Does the review of safety-related alarms account for individual-specific controller qualification and performance?	Sat	--	--
81.	UNIT 32965 (and 1 other assets)	CR.CRMAM	5.	<a href="#">CR.CRMAM.STALEDATA.P</a>	195.446(e)(1)	Does the review of safety-related alarms include specific procedures and practices for managing stale or unreliable data?	Sat	--	--
82.	UNIT 32965 (and 1 other assets)	CR.CRMAM	6.	<a href="#">CR.CRMAM.MONTHLYANALYSIS.P</a>	195.446(e)(2)	Do processes require the monthly identification, recording, review, and analysis of points that have been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities?	Sat	--	Procedure - OPS - 460-012
83.	UNIT 32965 (and 1 other assets)	CR.CRMAM	7.	<a href="#">CR.CRMAM.PROBLEMCORRECTION.P</a>	195.446(e)(2)	Does the alarm management plan include a process for promptly correcting identified problems and for returning these points to service?	Sat	--	--
84.	UNIT 32965 (and 1 other assets)	CR.CRMAM	8.	<a href="#">CR.CRMAM.ALARMSETPOINTS.P</a>	195.446(e)(3)	Is there a formal process to determine the correct alarm setpoint values and alarm descriptions?	Sat	--	--
85.	UNIT 32965 (and 1 other assets)	CR.CRMAM	9.	<a href="#">CR.CRMAM.SETTINGCONTROL.P</a>	195.446(e)(3)	Have procedures been established to clearly address how and to what degree controllers can change alarm limits or setpoints, or inhibit alarms, or take points off-scan?	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
86.	UNIT 32965 (and 1 other assets)	CR.CRMAM	10.	<a href="#">CR.CRMAM.VERIFICATION.P</a>	195.446(e)(3)	Do processes require that any calibration or change to field instruments require verification of alarm setpoints and alarm descriptions?	Sat	--	--
87.	UNIT 32965 (and 1 other assets)	CR.CRMAM	11.	<a href="#">CR.CRMAM.PLANREVIEW.P</a>	195.446(e)(4)	Are there processes to review the alarm management plan at least once each calendar year, but at intervals not exceeding 15 months, in order to determine the effectiveness of the plan?	Sat	--	--
88.	UNIT 32965 (and 1 other assets)	CR.CRMAM	12.	<a href="#">CR.CRMAM.PLANREVIEW.R</a>	195.446(e)(4)	Do records indicate review of the alarm management plan at least once each calendar year, but at intervals not exceeding 15 months, in order to determine the effectiveness of the plan?	Sat	--	--
89.	UNIT 32965 (and 1 other assets)	CR.CRMAM	13.	<a href="#">CR.CRMAM.WORKLOAD.P</a>	195.446(e)(5)	Does the CRM program have a means of identifying and measuring the work load (content and volume of general activity) being directed to an individual controller?	Sat	--	--
90.	UNIT 32965 (and 1 other assets)	CR.CRMAM	14.	<a href="#">CR.CRMAM.WORKLOADMONITORING.P</a>	195.446(e)(5)	Is the process of monitoring and analyzing general activity comprehensive?	Sat	--	--
91.	UNIT 32965 (and 1 other assets)	CR.CRMAM	15.	<a href="#">CR.CRMAM.CONTROLLERREACTION.P</a>	195.446(e)(5)	Does the process have a means of determining that the controller has sufficient time to analyze and react to incoming alarms?	Sat	--	--
92.	UNIT 32965 (and 1 other assets)	CR.CRMAM	16.	<a href="#">CR.CRMAM.PERFORMANCEANALYSIS.R</a>	195.446(e)(5)	Has an analysis been performed to determine if controller(s) performance is currently adequate?	Sat	--	Procedure -ADM-061-001
93.	UNIT 32965 (and 1 other assets)	CR.CRMAM	17.	<a href="#">CR.CRMAM.DEFICIENCIES.P</a>	195.446(e)(6)	Is there a process to address how deficiencies found in implementing 195.446(e)(1) through 195.446(e)(5) will	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
94.	UNIT 32965 (and 1 other assets)	CR.CRMAM	18.	<a href="#">CR.CRMAM.DEFICIENCIES.R</a>	195.446(e)(6)	be resolved? Do records indicate deficiencies found in implementing 195.446(e)(1) through 195.446(e)(5) have been resolved?	Sat	--	--
95.	UNIT 32965 (and 1 other assets)	CR.CRMCMGT	1.	<a href="#">CR.CRMCMGT.CHANGECOORDINATION.P</a>	195.446(f)(1)	Does the process assure changes in field equipment (for example, moving a valve) that could affect control room operations are coordinated with control room personnel?	Sat	--	Procedure USPL-MOO-001-001
96.	UNIT 32965 (and 1 other assets)	CR.CRMCMGT	2.	<a href="#">CR.CRMCMGT.CHANGECOORDINATION.R</a>	195.446(f)(1)	Do records indicate that changes in field equipment (for example, moving a valve) that could affect control room operations were coordinated with control room personnel?	Sat	--	--
97.	UNIT 32965 (and 1 other assets)	CR.CRMCMGT	3.	<a href="#">CR.CRMCMGT.CHANGEMEETINGS.P</a>	195.446(f)(1)	Is there a process to mandate a control room representative will participate in meetings where changes that could directly or indirectly affect control room operations (including routine maintenance and repairs) are being considered, designed and implemented?	Sat	--	--
98.	UNIT 32965 (and 1 other assets)	CR.CRMCMGT	4.	<a href="#">CR.CRMCMGT.CHANGETRAINING.R</a>	195.446(f)(1)	Before implementing changes, do records indicate controllers were provided with notification and training to assure their ability to safely incorporate the proposed change into operations?	Sat	--	--
99.	UNIT 32965 (and 1 other assets)	CR.CRMCMGT	5.	<a href="#">CR.CRMCMGT.EMERGENCYCONTACT.P</a>	195.446(f)(2)	Is there a process requiring field personnel and SCADA support personnel to contact the control room when emergency conditions exist?	Sat	--	--
100.	UNIT 32965 (and 1 other assets)	CR.CRMCMGT	6.	<a href="#">CR.CRMCMGT.FIELDCONTACT.P</a>	195.446(f)(2)	Does the process require field	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
	other assets)					personnel and SCADA support personnel to contact the control room when making field changes (for example, moving a valve) that affect control room operations?			
101.	UNIT 32965 (and 1 other assets)	CR.CRMCMGT	7.	<a href="#">CR.CRMCMGT.FIELDCHANGES.R</a>	195.446(f)(2)	Do records indicate field personnel and SCADA support personnel contacted the control room when making field changes (for example, moving a valve) that affect control room operations?	Sat	--	--
102.	UNIT 32965 (and 1 other assets)	CR.CRMEXP	1.	<a href="#">CR.CRMEXP.ABNORMALREVIEW.P</a>	195.446(g)(1)	Is there a formal, structured approach for reviewing and critiquing reportable events to identify lessons learned?	Sat	--	--
103.	UNIT 32965 (and 1 other assets)	CR.CRMEXP	2.	<a href="#">CR.CRMEXP.ABNORMALREVIEW.R</a>	195.446(g)(1)	Do records indicate reviews of reportable events specifically analyzed all contributing factors to determine if control room actions contributed to the event, and corrected any deficiencies?	Sat	--	--
104.	UNIT 32965 (and 1 other assets)	CR.CRMEXP	3.	<a href="#">CR.CRMEXP.LESSONSLEARNED.P</a>	195.446(g)(2)	Does the program require training on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance errors, etc.), even though the control room may not have been at fault?	Sat	--	--
105.	UNIT 32965 (and 1 other assets)	CR.CRMEXP	4.	<a href="#">CR.CRMEXP.LESSONSLEARNED.R</a>	195.446(g)(2)	Has operating experience review training been conducted on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
106.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	1.	<a href="#">CR.CRMTRAIN.CONTROLLERTRAIN.P</a>	195.446(h)	errors, etc.)? Has a controller training program been established to provide training for each controller to carry out their roles and responsibilities?	Sat	--	--
107.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	2.	<a href="#">CR.CRMTRAIN.CONTROLLERTRAIN.R</a>	195.446(h)	Has a controller training program been implemented to provide training for each controller to carry out their roles and responsibilities?	Sat	--	--
108.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	3.	<a href="#">CR.CRMTRAIN.TRAININGREVIEW.P</a>	195.446(h)	Have processes been established to review the controller training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months?	Sat	--	--
109.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	4.	<a href="#">CR.CRMTRAIN.TRAININGREVIEW.R</a>	195.446(h)	Have processes been implemented to review the controller training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months?	Sat	--	--
110.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	5.	<a href="#">CR.CRMTRAIN.TRAININGCONTENT.R</a>	195.446(h)	Does training content address all required material, including training each controller to carry out the roles and responsibilities that were defined by the operator?	Sat	--	--
111.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	6.	<a href="#">CR.CRMTRAIN.AOCLIST.R</a>	195.446(h)(1)	Has a list of the abnormal operating conditions that are likely to occur simultaneously or in sequence been established?	Sat	--	Simultaneous or sequence AOC's have been included in training for controller to take action to keep people safe first and property second.
112.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	7.	<a href="#">CR.CRMTRAIN.TRAININGABNORMAL.P</a>	195.446(h)(1)	Does the training program provide controller training on recognizing and responding to abnormal operating conditions that are likely to occur simultaneously or	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
113.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	8.	<a href="#">CR.CRMTRAIN.TRAINING.O</a>	195.446(h)(2)	in sequence? Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?	<b>Sat</b>	--	--
114.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	9.	<a href="#">CR.CRMTRAIN.TRAINING.R</a>	195.446(h)(2)	Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?	<b>Sat</b>	--	--
115.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	10.	<a href="#">CR.CRMTRAIN.COMMUNICATIONTRAINING.P</a>	195.446(h)(3)	Does the CRM program train controllers on their responsibilities for communication under the operator's emergency response procedures?	<b>Sat</b>	--	--
116.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	11.	<a href="#">CR.CRMTRAIN.SYSKNOWLEDGE.P</a>	195.446(h)(4)	Does the training program provide controllers a working knowledge of the pipeline system, especially during the development of abnormal operating conditions?	<b>Sat</b>	--	--
117.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	12.	<a href="#">CR.CRMTRAIN.INFREQOPLIST.R</a>	195.446(h)(5)	Has a list of pipeline operating setups that are periodically (but infrequently) used been established?	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.
118.	UNIT 32965 (and 1 other assets)	CR.CRMTRAIN	13.	<a href="#">CR.CRMTRAIN.INFREQOPSREVIEW.P</a>	195.446(h)(5)	Do processes specify that, for pipeline operating set-ups that are periodically (but infrequently) used, the controllers must be provided an opportunity to review relevant procedures in advance of their use?	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.
119.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	1.	<a href="#">CR.CRMCOMP.SUBMITPROCEDURES.P</a>	195.446(i)	Are there adequate processes to assure that the operator is responsive to requests from applicable agencies to submit their CRM procedures?	<b>Sat</b>	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
120.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	2.	<a href="#">CR.CRMCOMP.SUBMITPROCEDURES.R</a>	195.446(i)	Has the operator been responsive to requests from applicable agencies to submit their CRM procedures?	Sat	--	A copy of BP's CRM procedures were requested on February 27, 2013 that was 61 days before the scheduled inspection on April 29, 2013. BP considers their procedures as a proprietary document and not make their procedure available at anytime before the inspection. CFR 195.446 Control Room Management (i) Compliance Validation states: Upon request, operators must submit their procedures to PHMSA (or the State Agency). BP needs to be forthright in expressing their intention and make procedures access by an agreement rather than stalling and evading questions. It's not in the interest of PHMSA (or the State Agency) to sell or publish an operator's procedure.
121.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	3.	<a href="#">CR.CRMCOMP.CRMCOORDINATOR.R</a>	195.446(i)	Is there an individual that is responsible and accountable for compliance with requests from PHMSA or other applicable agencies?	Sat	--	--
122.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	4.	<a href="#">CR.CRMCOMP.RECORDS.P</a>	195.446(j)(1)	Records management processes adequate to assure records are sufficient to demonstrate compliance with the CRM rule?	Sat	--	--
123.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	5.	<a href="#">CR.CRMCOMP.RECORDS.R</a>	195.446(j)(1)	Are records sufficient to demonstrate compliance with the CRM rule?	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
124.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	6.	<a href="#">CR.CRMCOMP.ELECTRONICRECORDS.R</a>	195.446(j)(1)	Are electronic records properly stored, safeguarded, and readily retrievable?	<b>Sat</b>	--	--
125.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	7.	<a href="#">CR.CRMCOMP.DEVIATIONS.P</a>	195.446(j)(2)	Are there processes to demonstrate and provide a documented record that every deviation from any CRM rule requirement was necessary for safe operation?	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.
126.	UNIT 32965 (and 1 other assets)	CR.CRMCOMP	8.	<a href="#">CR.CRMCOMP.DEVIATIONS.R</a>	195.446(j)(2)	Were all deviations documented in a way that demonstrates they were necessary for safe operation?	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.

**UNIT 925 (126)**

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
1.	UNIT 925 (and 1 other assets)	CR.CRMGEN	1.	<a href="#">CR.CRMGEN.CRMCRITERIA.P</a>	195.446(a)	Does the process adequately address criteria by which the operator determines which of its facilities are control rooms?	<b>Sat</b>	--	BP operate three control room centers located at Renton, WA; Tulsa, OK; and Long Beach, CA. Each control room is a stand alone center that are not connected. This inspection will apply to the Olympic Pipeline control center located in Renton, WA.
2.	UNIT 925 (and 1 other assets)	CR.CRMGEN	2.	<a href="#">CR.CRMGEN.CRMGMGT.P</a>	195.446(a)	Are CRM procedures formalized and controlled?	<b>Sat</b>	--	Annual review is very October by control center training coordinator.
3.	UNIT 925 (and 1 other assets)	CR.CRMGEN	3.	<a href="#">CR.CRMGEN.CRMIMPLEMENT.R</a>	195.446(a)	Were procedures approved, in place, and implemented on or before the regulatory deadline?	<b>Sat</b>	--	Control Room Operation, Management & Emergency Response (OMER) was developed 1-23-2009.
4.	UNIT 925 (and 1 other assets)	CR.CRMGEN	4.	<a href="#">CR.CRMGEN.CRMPROCLOCATION.O</a>	195.446(a)	Are procedures readily available to controllers in the control room?	<b>Sat</b>	--	All controllers have access to the Document Record Management (DRM) system for Control Room Procedures.
5.	UNIT 925 (and 1 other assets)	CR.CRMRR	1.	<a href="#">CR.CRMRR.RESPONSIBLE.P</a>	195.446(b)(1)	Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other	<b>Sat</b>	--	Olympic Pipeline has two controllers and a qualified supervisor. Each controller monitors the 20-inch mainline from

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
						facility assets?			Ferndale to Portland, OR. and the second controller monitors the 16-inch mainline from Ferndale to Seattle, WA.
6.	UNIT 925 (and 1 other assets)	CR.CRMRR	2.	<a href="#">CR.CRMRR.QUALCONTROL.P</a>	195.446(b)(1)	Are there provisions in place to assure that only qualified individuals may assume control at any console/desk?	Sat	--	The two mainline controllers and their supervisor are control room qualified.
7.	UNIT 925 (and 1 other assets)	CR.CRMRR	3.	<a href="#">CR.CRMRR.DOMAINCHANGE.P</a>	195.446(b)(1)	If the physical domain of responsibility periodically changes, has a clear process been established to describe the conditions for when such a change occurs?	Sat	--	Procedure: FCTRL-OPS-463-004 Sections 8-13; Physical Change to Back-up Facility.
8.	UNIT 925 (and 1 other assets)	CR.CRMRR	4.	<a href="#">CR.CRMRR.RESPCHANGE.P</a>	195.446(b)(1)	Do processes address a controller's role during temporary impromptu (unplanned) changes in controller responsibilities?	Sat	--	Procedure: FCTRL-OPS-463-004 Sections 8-12; Shift Turn Over and Hand-Over Responsibilities.
9.	UNIT 925 (and 1 other assets)	CR.CRMRR	5.	<a href="#">CR.CRMRR.COMMANDVERIFY.P</a>	195.446(b)(1)	Do the defined roles and responsibilities require controllers to stay at the console to verify all SCADA commands that have been initiated are fulfilled, and that commands given via verbal communications are acknowledged before leaving the console for any reason?	Sat	--	Shift Leader Responsibilities include taking over controller console during change over because all shift changes are verbal commands.
10.	UNIT 925 (and 1 other assets)	CR.CRMRR	6.	<a href="#">CR.CRMRR.AUTHORITYABNORMAL.P</a>	195.446(b)(2)	Have processes been established to define the controllers' authority and responsibilities when an abnormal operating condition is detected?	Sat	--	Information is contained in OMER Book #1, page 3 and OMER Book #2, paragraph H for Abnormal Action.
11.	UNIT 925 (and 1 other assets)	CR.CRMRR	7.	<a href="#">CR.CRMRR.PRESSLIMITS.O</a>	195.446(b)(2)	Are controllers aware of the current MOPs of all pipeline segments for which they are responsible, and have they been assigned the	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
12.	UNIT 925 (and 1 other assets)	CR.CRMRR	8.	<a href="#">CR.CRMRR.AUTHORITYEMERGENCY.P</a>	195.446(b)(3)	responsibility to maintain those pipelines at or below the MOP? Do processes define the controllers' authority and responsibility to make decisions, take actions, and communicate with others upon being notified of, or upon detection of, and during, an emergency or if a leak or rupture is suspected?	Sat	--	CRM P-195.466 (b)(2) & OMER Book 2, paragraph H & I
13.	UNIT 925 (and 1 other assets)	CR.CRMRR	9.	<a href="#">CR.CRMRR.EVACUATION.P</a>	195.446(b)(3)	Do processes specifically address the controller's responsibilities in the event the control room must be evacuated?	Sat	--	--
14.	UNIT 925 (and 1 other assets)	CR.CRMRR	10.	<a href="#">CR.CRMRR.COMMSYSFAIL.P</a>	195.446(b)(3)	Do processes specifically address the controller's responsibilities in the event of a SCADA system or data communications system failure impacting large sections of the controller's domain of responsibility?	Sat	--	OMER Book 2 Section 5.99.1, paragraph G and J
15.	UNIT 925 (and 1 other assets)	CR.CRMRR	11.	<a href="#">CR.CRMRR.HANDOVER.P</a>	195.446(b)(4) (195.446(c)(5))	Have processes been established for the hand-over of responsibility that specify the type of information to be communicated to the oncoming shift?	Sat	--	FCTRL-OPS-463-004
16.	UNIT 925 (and 1 other assets)	CR.CRMRR	12.	<a href="#">CR.CRMRR.HANDOVERDOC.P</a>	195.446(b)(4) (195.446(c)(5))	Do processes require that records document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?	Sat	--	--
17.	UNIT 925 (and 1 other assets)	CR.CRMRR	13.	<a href="#">CR.CRMRR.HANDOVERDOC.P</a>	195.446(b)(4) (195.446(c)(5))	Are there records that document the hand-over of responsibility, document the time the actual	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
						hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?			
18.	UNIT 925 (and 1 other assets)	CR.CRMRR	14.	<a href="#">CR.CRMRR.HANDOVEROVERLAP.P</a>	195.446(b)(4)	Do processes require the controllers to discuss recent and impending important activities ensuring adequate overlap?	Sat	--	--
19.	UNIT 925 (and 1 other assets)	CR.CRMRR	15.	<a href="#">CR.CRMRR.HANDOVERALTERNATIVE.P</a>	195.446(b)(4)	When a controller is unable to continue or assume responsibility for any reason, do the shift hand-over processes include alternative shift hand-over actions that specifically address this situation?	Sat	--	--
20.	UNIT 925 (and 1 other assets)	CR.CRMRR	16.	<a href="#">CR.CRMRR.UNATTENDCONSOLE.P</a>	195.446(b)(4)	Has the operator established an adequate process for occasions when the console is left temporarily unattended for any reason?	NA	--	No such event occurred, or condition existed, in the scope of inspection review.
21.	UNIT 925 (and 1 other assets)	CR.CRMRR	17.	<a href="#">CR.CRMRR.CONSOLECOVERAGE.P</a>	195.446(b)(4)	Do processes maintain adequate console coverage during shift hand-over?	Sat	--	--
22.	UNIT 925 (and 1 other assets)	CR.SCADA	1.	<a href="#">CR.SCADA.SYSTEMMOC.P</a>	195.446(c)(1)	Do processes clearly define the types of changes to the SCADA system(s) that constitute additions, expansions, or replacements under the meaning of the CRM rule?	Sat	--	--
23.	UNIT 925 (and 1 other assets)	CR.SCADA	2.	<a href="#">CR.SCADA.DISPLAYCONFIG.P</a>	195.446(c)(1)	Are there written processes to implement the API RP 1165 display standards to the SCADA systems that have been added, expanded, or replaced since August 1, 2012?	Sat	--	--
24.	UNIT 925 (and 1 other assets)	CR.SCADA	3.	<a href="#">CR.SCADA.HUMANFACTORS.R</a>	195.446(c)(1)	Has section 4 of API RP 1165 regarding human factors engineering been implemented?	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
25.	UNIT 925 (and 1 other assets)	CR.SCADA	4.	<a href="#">CR.SCADA.DISPLAYHARDWARE.R</a>	195.446(c)(1)	Has section 5 of API RP 1165 regarding display hardware been implemented?	Sat	--	--
26.	UNIT 925 (and 1 other assets)	CR.SCADA	5.	<a href="#">CR.SCADA.DISPLAYLAYOUT.R</a>	195.446(c)(1)	Has section 6 of API RP 1165 regarding display layout and organization been implemented?	Sat	--	--
27.	UNIT 925 (and 1 other assets)	CR.SCADA	6.	<a href="#">CR.SCADA.DISPLAYNAVIGATION.R</a>	195.446(c)(1)	Has section 7 of API RP 1165 regarding display navigation been implemented?	Sat	--	--
28.	UNIT 925 (and 1 other assets)	CR.SCADA	7.	<a href="#">CR.SCADA.DISPLAYOBJECTS.O</a>	195.446(c)(1)	Has section 8 of API RP 1165 regarding display object characteristics been implemented?	Sat	--	--
29.	UNIT 925 (and 1 other assets)	CR.SCADA	8.	<a href="#">CR.SCADA.DISPLAYDYNAMICS.R</a>	195.446(c)(1)	Has section 9 of API RP 1165 regarding display object dynamics been implemented?	Sat	--	--
30.	UNIT 925 (and 1 other assets)	CR.SCADA	9.	<a href="#">CR.SCADA.CONTROLSELECTION.R</a>	195.446(c)(1)	Has section 10 of API RP 1165 control selection and techniques been implemented?	Sat	--	--
31.	UNIT 925 (and 1 other assets)	CR.SCADA	10.	<a href="#">CR.SCADA.ADMINISTRATION.R</a>	195.446(c)(1)	Has section 11 of API RP 1165 administration been implemented?	Sat	--	--
32.	UNIT 925 (and 1 other assets)	CR.SCADA	11.	<a href="#">CR.SCADA.1165IMPRACTICAL.R</a>	195.446(c)(1)	If any/all applicable paragraph(s) of API RP 1165 have not been implemented, has it been demonstrated and documented that the unimplemented provisions are impractical for the SCADA system used?	Sat	--	--
33.	UNIT 925 (and 1 other assets)	CR.SCADA	12.	<a href="#">CR.SCADA.SETPOINT.P</a>	195.446(c)(2) (195.406(b))	Does the process adequately define safety-related points?	Sat	--	Procedure CTULM-SCD-OPS-460-003
34.	UNIT 925 (and 1 other assets)	CR.SCADA	13.	<a href="#">CR.SCADA.SETPOINT.R</a>	195.446(c)(2)	Do records indicate safety-related points have been adequately implemented?	Sat	--	--
35.	UNIT 925 (and 1 other assets)	CR.SCADA	14.	<a href="#">CR.SCADA.POINTVERIFY.P</a>	195.446(c)(2)	Are there adequate processes to define and identify the circumstances which require a point-to-point verification?	Sat	--	SOP Procedure SCADA Pt. to Pt. Testing Section 8.0
36.	UNIT 925 (and 1 other assets)	CR.SCADA	15.	<a href="#">CR.SCADA.POINTVERIFY.R</a>	195.446(c)(2)	Have required point-to-point verifications been performed?	Sat	--	--
37.	UNIT 925 (and 1 other assets)	CR.SCADA	16.	<a href="#">CR.SCADA.POINTVERIFYEXTENT.P</a>	195.446(c)(2)	Are there adequate processes for the	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
	other assets)					thoroughness of the point-to-point verification?			
38.	UNIT 925 (and 1 other assets)	CR.SCADA	17.	<a href="#">CR.SCADA.POINTVERIFYEXTENT.R</a>	195.446(c)(2)	Do records demonstrate adequate thoroughness of the point-to-point verification?	Sat	--	--
39.	UNIT 925 (and 1 other assets)	CR.SCADA	18.	<a href="#">CR.SCADA.POINTVERFIYINTVL.P</a>	195.446(c)(2)	Is there an adequate process for defining when the point-to-point verification must be completed?	Sat	--	--
40.	UNIT 925 (and 1 other assets)	CR.SCADA	19.	<a href="#">CR.SCADA.POINTVERFIYINTVL.R</a>	195.446(c)(2)	Do records indicate the point-to-point verification has been completed at the required intervals?	Sat	--	--
41.	UNIT 925 (and 1 other assets)	CR.SCADA	20.	<a href="#">CR.SCADA.COMMPLAN.P</a>	195.446(c)(3)	Has an internal communication plan been established and implemented that is adequate to manually operate the pipeline during a SCADA failure/outage?	Sat	--	--
42.	UNIT 925 (and 1 other assets)	CR.SCADA	21.	<a href="#">CR.SCADA.COMMPLAN.R</a>	195.446(c)(3)	Has the internal communication plan been tested and verified for manual operation of the pipeline safely at least once each calendar year but at intervals not exceeding 15 months?	Sat	--	--
43.	UNIT 925 (and 1 other assets)	CR.SCADA	22.	<a href="#">CR.SCADA.BACKUPSCADA.O</a>	195.446(c)(4)	Is there a backup SCADA system?	Sat	--	--
44.	UNIT 925 (and 1 other assets)	CR.SCADA	23.	<a href="#">CR.SCADA.BACKUPSCADADEV.P</a>	195.446(c)(4)	Has the use of the backup SCADA system for development work been defined?	Sat	--	Development has full capabilities and is not a part of the back-up system. Reviewed settings for 64 pressure switches from 2012 data.
45.	UNIT 925 (and 1 other assets)	CR.SCADA	24.	<a href="#">CR.SCADA.BACKUPSCADATEST.R</a>	195.446(c)(4)	Is the backup SCADA system tested at least once each calendar year at intervals not to exceed 15 months?	Sat	--	--
46.	UNIT 925 (and 1 other assets)	CR.SCADA	25.	<a href="#">CR.SCADA.BACKUPSCADAVERIFY.R</a>	195.446(c)(4)	Does the testing verify that there are adequate processes in place for decision-making and internal communications to successfully	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
47.	UNIT 925 (and 1 other assets)	CR.SCADA	26.	<a href="#">CR.SCADA.BACKUPSCADA Adequacy.R</a>	195.446(c)(4)	implement a transition from primary SCADA to backup SCADA, and back to primary SCADA? If the back-up SCADA system is not designed to handle all the functionality of the main SCADA system, does the testing determine whether there are adequate procedures in place to account for displaced and/or different available functions during back-up operations?	Sat	--	--
48.	UNIT 925 (and 1 other assets)	CR.SCADA	27.	<a href="#">CR.SCADA.BACKUPSCADA Transfer.P</a>	195.446(c)(4)	Do processes adequately address and test the logistics of transferring control to a backup control room?	Sat	--	--
49.	UNIT 925 (and 1 other assets)	CR.SCADA	28.	<a href="#">CR.SCADA.BACKUPSCADA Return.P</a>	195.446(c)(4)	Do procedures adequately address and test the logistics of returning operations back to the primary control room?	Sat	--	--
50.	UNIT 925 (and 1 other assets)	CR.SCADA	29.	<a href="#">CR.SCADA.BACKUPSCADA Functions.R</a>	195.446(c)(4)	Is a representative sampling of critical functions in the back-up SCADA system being tested to ensure proper operation in the event the backup system is needed?	Sat	--	The primary computer is rotated between Renton and Tacoma Control Centers.
51.	UNIT 925 (and 1 other assets)	CR.CRMFM	1.	<a href="#">CR.CRMFM.Fatigue Mitigation.P</a>	195.446(d)	Does the fatigue mitigation process or procedures (plan) identify operator-specific fatigue risks?	Sat	--	SOP FCTRL-OPS 463-009 (Rev 7-31-'12) Olympic uses Circadian Study & Recommendations to define operator specific fatigue risks.
52.	UNIT 925 (and 1 other assets)	CR.CRMFM	2.	<a href="#">CR.CRMFM.Fatigue Risks.P</a>	195.446(d)	Does the fatigue mitigation plan adequately address how the program reduces the risk associated with controller fatigue?	Sat	--	Olympic uses 14 hour limit per day and maximum 65 hours per 7-day period.
53.	UNIT 925 (and 1 other assets)	CR.CRMFM	3.	<a href="#">CR.CRMFM.Fatigue Quantify.P</a>	195.446(d)	Do processes require that the potential contribution of controller fatigue to incidents and	Sat	--	SMRS page 29.

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
54.	UNIT 925 (and 1 other assets)	CR.CRMFM	4.	<a href="#">CR.CRMFM.FATIGUEMANAGER.P</a>	195.446(d)	accidents be quantified during investigations? Is there a designated fatigue risk manager who is responsible and accountable for managing fatigue risk and fatigue countermeasures, and someone (perhaps the same person) that is authorized to review and approve HOS emergency deviations?	Sat	--	--
55.	UNIT 925 (and 1 other assets)	CR.CRMFM	5.	<a href="#">CR.CRMFM.SHIFTLENGTH.R</a>	195.446(d)(1)	Is the scheduled shift length less than or equal to 12 hours (not including shift hand-over) or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?	Sat	--	Procedure FCTRL-OPS-463-009. FRMS Document - DuPont Schedule (RP 755)
56.	UNIT 925 (and 1 other assets)	CR.CRMFM	6.	<a href="#">CR.CRMFM.SHIFTLENGTHTIME.R</a>	195.446(d)(1)	Does the operator factor in all time the individual is working for the company when establishing shift lengths and schedule rotations or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?	Sat	--	Circadian Evaluation for Scientific Basis for Work Schedules.
57.	UNIT 925 (and 1 other assets)	CR.CRMFM	7.	<a href="#">CR.CRMFM.SCHEDULEDTIMEOFF.R</a>	195.446(d)(1)	Are all scheduled periods of time off at least one hour longer than 8 hours plus commute time or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
58.	UNIT 925 (and 1 other assets)	CR.CRMFM	8.	<a href="#">CR.CRMFM.ONCALLCONTROLLER.R</a>	195.446(d)(1)	<p>sufficient to achieve 8 hours of continuous sleep?</p> <p>For controllers who are on call, does the operator minimize interrupting the required 8 hours of continuous sleep or is there a documented technical basis to show that shift lengths and schedule rotations are adequate to provide controllers off-duty time sufficient to achieve 8 hours of continuous sleep?</p>	<b>Sat</b>	--	Two relief persons are available and their commute time is counted for the same day they are requested to work. The commute time is not counted if the controller is scheduled the day before their shift.
59.	UNIT 925 (and 1 other assets)	CR.CRMFM	9.	<a href="#">CR.CRMFM.MAXHOS.P</a>	195.446(d)(4)	<p>Do processes limit the maximum HOS limit in any sliding 7 day period to no more than 65 hours or is there a documented technical basis to show reduction of the risk associated with controller fatigue?</p>	<b>Sat</b>	--	
60.	UNIT 925 (and 1 other assets)	CR.CRMFM	10.	<a href="#">CR.CRMFM.MINTIMEOFF.P</a>	195.446(d)(4)	<p>After reaching the HOS limit in any sliding 7 day period, is the minimum time off at least 35 hours or is there a documented technical basis to show a reduction of the risk associated with controller fatigue?</p>	<b>Sat</b>	--	Fatigue Management Risk System FCTRL-OPS-463-009
61.	UNIT 925 (and 1 other assets)	CR.CRMFM	11.	<a href="#">CR.CRMFM.DOCSCHEDULE.P</a>	195.446(d)(4)	<p>Is there a formal system to document all scheduled and unscheduled HOS worked, including overtime and time spent performing duties other than control room duties?</p>	<b>Sat</b>	--	--
62.	UNIT 925 (and 1 other assets)	CR.CRMFM	12.	<a href="#">CR.CRMFM.DAYSOFF.P</a>	195.446(d)(4)	<p>For normal business hour type operations (i.e., five days per week), are no more than five days worked in succession before at least two days off?</p>	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.
63.	UNIT 925 (and 1 other assets)	CR.CRMFM	13.	<a href="#">CR.CRMFM.WORKHOURS.R</a>	195.446(d)(4)	<p>For normal business hour type operations (i.e., five</p>	<b>NA</b>	--	No such event occurred, or condition existed,

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
	assets)					days per week), is the shift start time no earlier than 6:00 a.m. and the shift end time no later than 7:00 p.m.?			in the scope of inspection review.
64.	UNIT 925 (and 1 other assets)	CR.CRMFM	14.	<a href="#">CR.CRMFM.FATIGUECOUNTERMEASURES.P</a>	195.446(d)(4)	For shifts longer than 8 hours, have specific fatigue countermeasures been implemented for the ninth and beyond hours?	Sat	--	Fatigue Management Risk System FCTRL-OPS-463-009
65.	UNIT 925 (and 1 other assets)	CR.CRMFM	15.	<a href="#">CR.CRMFM.DAILYHOSLIMIT.P</a>	195.446(d)(4)	Do processes limit the daily maximum HOS limit no more than 14 hours in any sliding 24-hour period?	Sat	--	Olympic Pipeline uses HOSED (Hours of Serviced Emergency Document) Form, reference Advisory Bulletin ADB-05-06, and Procedure 463-009 page 18.
66.	UNIT 925 (and 1 other assets)	CR.CRMFM	16.	<a href="#">CR.CRMFM.CONTROLLERNUMBERS.O</a>	195.446(d)(4)	Do operations include a sufficient number of qualified controllers?	Sat	--	--
67.	UNIT 925 (and 1 other assets)	CR.CRMFM	17.	<a href="#">CR.CRMFM.OFFDUTYHOURS.P</a>	195.446(d)(4)	Do processes ensure that controllers are provided with at least thirty-five (35) continuous off-duty hours when limits are reached following the most recent 35-hour (minimum) off-duty rest period or is there a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?	Sat	--	Procedure 463-009 page 16-19.
68.	UNIT 925 (and 1 other assets)	CR.CRMFM	18.	<a href="#">CR.CRMFM.SHIFTHOLDOVER.P</a>	195.446(d)(4)	Does the shift holdover process conform to shift holdover guidelines or is their a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?	Sat	--	--
69.	UNIT 925 (and 1 other assets)	CR.CRMFM	19.	<a href="#">CR.CRMFM.SPECIFICCOUNTERMEASURES.P</a>	195.446(d)(4)	Do processes require specific fatigue countermeasures during applicable	Sat	--	Fatigue Risk Management FCTRL-OPS-466-009

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
						time periods, or is there a documented technical basis to show that the maximum limit on controller HOS is adequate to reduce the risk associated with controller fatigue?			
70.	UNIT 925 (and 1 other assets)	CR.CRMFM	20.	<a href="#">CR.CRMFM.HOSDEVIATIONS.P</a>	195.446(d)(4)	Is there a formal process for approving deviations from the maximum HOS limits?	Sat	--	--
71.	UNIT 925 (and 1 other assets)	CR.CRMFM	21.	<a href="#">CR.CRMFM.FATIGUEEDUCATE.P</a>	195.446(d)(2) (195.446(d)(3))	Does the program require that fatigue education/training is required for all controllers and control room supervisors?	Sat	--	--
72.	UNIT 925 (and 1 other assets)	CR.CRMFM	22.	<a href="#">CR.CRMFM.FATIGUEREFRESHER.R</a>	195.446(d)(2) (195.446(d)(3))	Is refresher fatigue education provided at regular intervals?	Sat	--	--
73.	UNIT 925 (and 1 other assets)	CR.CRMFM	23.	<a href="#">CR.CRMFM.FATIGUEREVIEW.P</a>	195.446(d)(2) (195.446(d)(3))	Do processes require that the effectiveness of the fatigue education/training program be reviewed at least once each calendar year, not to exceed 15 months?	Sat	--	--
74.	UNIT 925 (and 1 other assets)	CR.CRMFM	24.	<a href="#">CR.CRMFM.FATIGUESTATEGY.P</a>	195.446(d)(2)	Does fatigue education address fatigue mitigation strategies (countermeasures)?	Sat	--	--
75.	UNIT 925 (and 1 other assets)	CR.CRMFM	25.	<a href="#">CR.CRMFM.OFFDUTY.P</a>	195.446(d)(2)	Does fatigue education address how off-duty activities contribute to fatigue?	Sat	--	--
76.	UNIT 925 (and 1 other assets)	CR.CRMFM	26.	<a href="#">CR.CRMFM.FATIGUECONTENT.P</a>	195.446(d)(3)	Is the content of fatigue training adequate for training controllers and supervisors to recognize the effects of fatigue?	Sat	--	--
77.	UNIT 925 (and 1 other assets)	CR.CRMAM	1.	<a href="#">CR.CRMAM.ALARM.P</a>	195.446(e)	Is the alarm management plan a formal process that specifically identifies critical topical areas included in the program?	Sat	--	Procedure FCTRL-OPS-463-007. The International Society of SCADA (ISA) is referenced for Management of Alarm Systems for the Process Industries.
78.	UNIT 925 (and 1 other assets)	CR.CRMAM	2.	<a href="#">CR.CRMAM.ALARMMALFUNCTION.P</a>	195.446(e)(1)	Is there a process to identify and correct inaccurate or malfunctioning	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
79.	UNIT 925 (and 1 other assets)	CR.CRMAM	3.	<a href="#">CR.CRMAM.ALARMREVIEW.P</a>	195.446(e)(1)	alarms? Does the review of safety-related alarms account for different alarm designs and all alarm types/priorities?	Sat	--	--
80.	UNIT 925 (and 1 other assets)	CR.CRMAM	4.	<a href="#">CR.CRMAM.CONTROLLERPERFORMANCE.P</a>	195.446(e)(1)	Does the review of safety-related alarms account for individual-specific controller qualification and performance?	Sat	--	--
81.	UNIT 925 (and 1 other assets)	CR.CRMAM	5.	<a href="#">CR.CRMAM.STALEDATA.P</a>	195.446(e)(1)	Does the review of safety-related alarms include specific procedures and practices for managing stale or unreliable data?	Sat	--	--
82.	UNIT 925 (and 1 other assets)	CR.CRMAM	6.	<a href="#">CR.CRMAM.MONTHLYANALYSIS.P</a>	195.446(e)(2)	Do processes require the monthly identification, recording, review, and analysis of points that have been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities?	Sat	--	Procedure - OPS - 460-012
83.	UNIT 925 (and 1 other assets)	CR.CRMAM	7.	<a href="#">CR.CRMAM.PROBLEMCORRECTION.P</a>	195.446(e)(2)	Does the alarm management plan include a process for promptly correcting identified problems and for returning these points to service?	Sat	--	--
84.	UNIT 925 (and 1 other assets)	CR.CRMAM	8.	<a href="#">CR.CRMAM.ALARMSETPOINTS.P</a>	195.446(e)(3)	Is there a formal process to determine the correct alarm setpoint values and alarm descriptions?	Sat	--	--
85.	UNIT 925 (and 1 other assets)	CR.CRMAM	9.	<a href="#">CR.CRMAM.SETTINGCONTROL.P</a>	195.446(e)(3)	Have procedures been established to clearly address how and to what degree controllers can change alarm limits or setpoints, or inhibit alarms, or take points off-scan?	Sat	--	--
86.	UNIT 925 (and 1 other assets)	CR.CRMAM	10.	<a href="#">CR.CRMAM.VERIFICATION.P</a>	195.446(e)(3)	Do processes require that any calibration or	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
	assets)					change to field instruments require verification of alarm setpoints and alarm descriptions?			
87.	UNIT 925 (and 1 other assets)	CR.CRMAM	11.	<a href="#">CR.CRMAM.PLANREVIEW.P</a>	195.446(e)(4)	Are there processes to review the alarm management plan at least once each calendar year, but at intervals not exceeding 15 months, in order to determine the effectiveness of the plan?	Sat	--	--
88.	UNIT 925 (and 1 other assets)	CR.CRMAM	12.	<a href="#">CR.CRMAM.PLANREVIEW.R</a>	195.446(e)(4)	Do records indicate review of the alarm management plan at least once each calendar year, but at intervals not exceeding 15 months, in order to determine the effectiveness of the plan?	Sat	--	--
89.	UNIT 925 (and 1 other assets)	CR.CRMAM	13.	<a href="#">CR.CRMAM.WORKLOAD.P</a>	195.446(e)(5)	Does the CRM program have a means of identifying and measuring the work load (content and volume of general activity) being directed to an individual controller?	Sat	--	--
90.	UNIT 925 (and 1 other assets)	CR.CRMAM	14.	<a href="#">CR.CRMAM.WORKLOADMONITORING.P</a>	195.446(e)(5)	Is the process of monitoring and analyzing general activity comprehensive?	Sat	--	--
91.	UNIT 925 (and 1 other assets)	CR.CRMAM	15.	<a href="#">CR.CRMAM.CONTROLLERREACTION.P</a>	195.446(e)(5)	Does the process have a means of determining that the controller has sufficient time to analyze and react to incoming alarms?	Sat	--	--
92.	UNIT 925 (and 1 other assets)	CR.CRMAM	16.	<a href="#">CR.CRMAM.PERFORMANCEANALYSIS.R</a>	195.446(e)(5)	Has an analysis been performed to determine if controller(s) performance is currently adequate?	Sat	--	Procedure -ADM-061-001
93.	UNIT 925 (and 1 other assets)	CR.CRMAM	17.	<a href="#">CR.CRMAM.DEFICIENCIES.P</a>	195.446(e)(6)	Is there a process to address how deficiencies found in implementing 195.446(e)(1) through 195.446(e)(5) will be resolved?	Sat	--	--
94.	UNIT 925 (and 1 other assets)	CR.CRMAM	18.	<a href="#">CR.CRMAM.DEFICIENCIES.R</a>	195.446(e)(6)	Do records indicate deficiencies found in implementing 195.446(e)(1)	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
95.	UNIT 925 (and 1 other assets)	CR.CRMCMGT	1.	<a href="#">CR.CRMCMGT.CHANGECOORDINATION.P</a>	195.446(f)(1)	through 195.446(e)(5) have been resolved? Does the process assure changes in field equipment (for example, moving a valve) that could affect control room operations are coordinated with control room personnel?	Sat	--	Procedure USPL-MOO-001-001
96.	UNIT 925 (and 1 other assets)	CR.CRMCMGT	2.	<a href="#">CR.CRMCMGT.CHANGECOORDINATION.R</a>	195.446(f)(1)	Do records indicate that changes in field equipment (for example, moving a valve) that could affect control room operations were coordinated with control room personnel?	Sat	--	--
97.	UNIT 925 (and 1 other assets)	CR.CRMCMGT	3.	<a href="#">CR.CRMCMGT.CHANGEMEETINGS.P</a>	195.446(f)(1)	Is there a process to mandate a control room representative will participate in meetings where changes that could directly or indirectly affect control room operations (including routine maintenance and repairs) are being considered, designed and implemented?	Sat	--	--
98.	UNIT 925 (and 1 other assets)	CR.CRMCMGT	4.	<a href="#">CR.CRMCMGT.CHANGETRaining.R</a>	195.446(f)(1)	Before implementing changes, do records indicate controllers were provided with notification and training to assure their ability to safely incorporate the proposed change into operations?	Sat	--	--
99.	UNIT 925 (and 1 other assets)	CR.CRMCMGT	5.	<a href="#">CR.CRMCMGT.EMERGENCYCONTACT.P</a>	195.446(f)(2)	Is there a process requiring field personnel and SCADA support personnel to contact the control room when emergency conditions exist?	Sat	--	--
100.	UNIT 925 (and 1 other assets)	CR.CRMCMGT	6.	<a href="#">CR.CRMCMGT.FIELDCONTACT.P</a>	195.446(f)(2)	Does the process require field personnel and SCADA support personnel to contact the control room when making	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
101.	UNIT 925 (and 1 other assets)	CR.CRMCMGT	7.	<a href="#">CR.CRMCMGT.FIELDCHANGES.R</a>	195.446(f)(2)	field changes (for example, moving a valve) that affect control room operations?  Do records indicate field personnel and SCADA support personnel contacted the control room when making field changes (for example, moving a valve) that affect control room operations?	Sat	--	--
102.	UNIT 925 (and 1 other assets)	CR.CRMEXP	1.	<a href="#">CR.CRMEXP.ABNORMALREVIEW.P</a>	195.446(g)(1)	Is there a formal, structured approach for reviewing and critiquing reportable events to identify lessons learned?	Sat	--	--
103.	UNIT 925 (and 1 other assets)	CR.CRMEXP	2.	<a href="#">CR.CRMEXP.ABNORMALREVIEW.R</a>	195.446(g)(1)	Do records indicate reviews of reportable events specifically analyzed all contributing factors to determine if control room actions contributed to the event, and corrected any deficiencies?	Sat	--	--
104.	UNIT 925 (and 1 other assets)	CR.CRMEXP	3.	<a href="#">CR.CRMEXP.LESSONSLEARNED.P</a>	195.446(g)(2)	Does the program require training on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance errors, etc.), even though the control room may not have been at fault?	Sat	--	--
105.	UNIT 925 (and 1 other assets)	CR.CRMEXP	4.	<a href="#">CR.CRMEXP.LESSONSLEARNED.R</a>	195.446(g)(2)	Has operating experience review training been conducted on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance errors, etc.)?	Sat	--	--
106.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	1.	<a href="#">CR.CRMTRAIN.CONTROLLERTRAIN.P</a>	195.446(h)	Has a controller training program been established to provide training for each controller to carry out their roles and responsibilities?	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
107.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	2.	<a href="#">CR.CRMTRAIN.CONTROLLERTRAIN.R</a>	195.446(h)	Has a controller training program been implemented to provide training for each controller to carry out their roles and responsibilities?	Sat	--	--
108.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	3.	<a href="#">CR.CRMTRAIN.TRAININGREVIEW.P</a>	195.446(h)	Have processes been established to review the controller training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months?	Sat	--	--
109.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	4.	<a href="#">CR.CRMTRAIN.TRAININGREVIEW.R</a>	195.446(h)	Have processes been implemented to review the controller training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months?	Sat	--	--
110.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	5.	<a href="#">CR.CRMTRAIN.TRAININGCONTENT.R</a>	195.446(h)	Does training content address all required material, including training each controller to carry out the roles and responsibilities that were defined by the operator?	Sat	--	--
111.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	6.	<a href="#">CR.CRMTRAIN.AOCLIST.R</a>	195.446(h)(1)	Has a list of the abnormal operating conditions that are likely to occur simultaneously or in sequence been established?	Sat	--	Simultaneous or sequence AOC's have been included in training for controller to take action to keep people safe first and property second.
112.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	7.	<a href="#">CR.CRMTRAIN.TRAININGABNORMAL.P</a>	195.446(h)(1)	Does the training program provide controller training on recognizing and responding to abnormal operating conditions that are likely to occur simultaneously or in sequence?	Sat	--	--
113.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	8.	<a href="#">CR.CRMTRAIN.TRAINING.O</a>	195.446(h)(2)	Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?	Sat	--	--

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
114.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	9.	<a href="#">CR.CRMTRAIN.TRAINING.R</a>	195.446(h)(2)	Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?	Sat	--	--
115.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	10.	<a href="#">CR.CRMTRAIN.COMMUNICATIONTRAINING.P</a>	195.446(h)(3)	Does the CRM program train controllers on their responsibilities for communication under the operator's emergency response procedures?	Sat	--	--
116.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	11.	<a href="#">CR.CRMTRAIN.SYSKNOWLEDGE.P</a>	195.446(h)(4)	Does the training program provide controllers a working knowledge of the pipeline system, especially during the development of abnormal operating conditions?	Sat	--	--
117.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	12.	<a href="#">CR.CRMTRAIN.INFREQOPSLIST.R</a>	195.446(h)(5)	Has a list of pipeline operating setups that are periodically (but infrequently) used been established?	NA	--	No such event occurred, or condition existed, in the scope of inspection review.
118.	UNIT 925 (and 1 other assets)	CR.CRMTRAIN	13.	<a href="#">CR.CRMTRAIN.INFREQOPSREVIEW.P</a>	195.446(h)(5)	Do processes specify that, for pipeline operating set-ups that are periodically (but infrequently) used, the controllers must be provided an opportunity to review relevant procedures in advance of their use?	NA	--	No such event occurred, or condition existed, in the scope of inspection review.
119.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	1.	<a href="#">CR.CRMCOMP.SUBMITPROCEDURES.P</a>	195.446(i)	Are there adequate processes to assure that the operator is responsive to requests from applicable agencies to submit their CRM procedures?	Sat	--	--
120.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	2.	<a href="#">CR.CRMCOMP.SUBMITPROCEDURES.R</a>	195.446(i)	Has the operator been responsive to requests from applicable agencies to submit their CRM procedures?	Sat	--	A copy of BP's CRM procedures were requested on February 27, 2013 that was 61 days before the scheduled inspection on April 29, 2013. BP considers their procedures as a proprietary

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
									document and not make their procedure available at anytime before the inspection. CFR 195.446 Control Room Management (i) Compliance Validation states: Upon request, operators must submit their procedures to PHMSA (or the State Agency). BP needs to be forthright in expressing their intention and make procedures access by an agreement rather than stalling and evading questions. It's not in the interest of PHMSA (or the State Agency) to sell or publish an operator's procedure.
121.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	3.	<a href="#">CR.CRMCOMP.CRMCOORDINATOR.R</a>	195.446(i)	Is there an individual that is responsible and accountable for compliance with requests from PHMSA or other applicable agencies?	Sat	--	--
122.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	4.	<a href="#">CR.CRMCOMP.RECORDS.P</a>	195.446(j)(1)	Records management processes adequate to assure records are sufficient to demonstrate compliance with the CRM rule?	Sat	--	--
123.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	5.	<a href="#">CR.CRMCOMP.RECORDS.R</a>	195.446(j)(1)	Are records sufficient to demonstrate compliance with the CRM rule?	Sat	--	--
124.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	6.	<a href="#">CR.CRMCOMP.ELECTRONICRECORDS.R</a>	195.446(j)(1)	Are electronic records properly stored, safeguarded, and readily retrievable?	Sat	--	--
125.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	7.	<a href="#">CR.CRMCOMP.DEVIATIONS.P</a>	195.446(j)(2)	Are there processes to demonstrate and provide a documented record that every deviation from any CRM rule requirement was	NA	--	No such event occurred, or condition existed, in the scope of inspection review.

No.	Assets	Sub Module	Qst #	Question ID	References	Question Text	Result	Issue Summary	Inspection Notes
126.	UNIT 925 (and 1 other assets)	CR.CRMCOMP	8.	<a href="#">CR.CRMCOMP.DEVIATIONS.R</a>	195.446(j)(2)	<p>necessary for safe operation?</p> <p>Were all deviations documented in a way that demonstrates they were necessary for safe operation?</p>	<b>NA</b>	--	No such event occurred, or condition existed, in the scope of inspection review.

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