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David Lykken- Director of Pipeline Safety Program
State of Washington Utilities and Transportation Commission
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Subject: Response to 2014 Control Room Management Inspection

Dear Mr. Lykken,

This letter responds to your letter dated July 28, 2014 addressing the Washington Utilities and Transportation Commission Staff ("Staff") inspection conducted June 3-5, 2014 in Kennewick, Washington. In your letter you report that Staff identified probable violations of 49 CFR §192.631(d)(2)&(d)(3) (Control Room Management) and 49 CFR §192.631(h) (Control Room Management) and three "Areas of Concern". For ease of reference, we have copied Staff's probable violations below, followed by Cascade Natural Gas Corporation's (CNGC) response to the alleged probable violations and areas of concern.

Staff Identified Probable Violations

1. 49 CFR §192.631(d)(2) & (d)(3) Control Room Management

{IA Records Question #22 for CRM, SCADA, and Leak Detection-Fatigue Management}

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

(2) *Educate Controllers and Supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue;*

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

Finding(s):

CNGC Control Room Supervisor training had not been completed prior to Control Room operation. The Control Room Supervisor failed to complete required training prior to Control Room operation on March 1, 2014. The Control Room Supervisor completed "Training for Managing Operator Fatigue on June 4, 2014.

CNGC Response:

CNGC CP 930 section 4.3 establishes the controller fatigue management training program:

4.3 *CONTROLLER FATIGUE EDUCATION AND TRAINING*

4.3.1 *CNGC GC will receive training on understanding fatigue, mitigation strategies and how their personnel actions both at and off work can effect fatigue. This training includes two online courses from Circadian Technologies, "Review*

Understanding Fatigue and Fatigue Risk Management Systems” and “Review My Life and Fatigue”. Additional written materials and ongoing education in the form of monthly newsletters geared specifically to shift workers from Circadian Technologies. All fatigue training and educational materials will be kept and made available to the controllers in the Fatigue Management Training Binder.

The CNGC Control Room Supervisor has completed the two specified online classes “Review Understanding Fatigue and Fatigue Risk Management Systems” and “Review My Life and Fatigue”. The Control Room Supervisor has also completed the supervisor specific class “Training for Managing Operator Fatigue”. This class is an additional training beyond the minimum requirements specified in Section 4.3 of CP 930. The Circadian Technologies program does not issue a course completion certificate to supervisors for each specific class but rather one certificate for completion of the supervisor course (i.e. all three online classes together).

CNGC has initiated the Management of Change process (CNGMOC #112) to clarify that all three courses are required training for the control room supervisor.

2. **49 CFR §192.631(h) Control Room Management**

{IA Records Question #2 for CRM, SCADA, and Leak Detection – Training}

(h) *Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator’s program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:*

Finding(s):

Controller Supervisor had not completed required training per training program prior to startup of Control Room on March 31, 2014. Supervisor training was completed during the inspection on June 4, 2014.

CNGC Response:

The CNGC Control Room Supervisor has completed the two specified online classes “Review Understanding Fatigue and Fatigue Risk Management Systems” and “Review My Life and Fatigue”. The Control Room Supervisor has also completed the supervisor specific class “Training for Managing Operator Fatigue”. This class is an additional training beyond the minimum requirements specified in section 4.3 of CP 930. The Circadian Technologies program does not issue a course completion certificate to supervisors for each specific class but rather one certificate for completion of the supervisor course (i.e. all three online classes together).

CNGC has initiated the Management of Change process (CNGMOC #112) to clarify that all three classes are required training for the control room supervisor.

Areas of Concern

1. **49 CFR Part 192.631(b)(2) Control Room Management**

CP 930 revision March 31, 2014 – Section 3.6.1, Attachment #9 needs to be referenced in procedure.

CNGC Response:

CNGC has initiated the Management of Change (CNGMOC #112) process to incorporate a reference to Attachment #9 in Section 3.6.1.

2. **49 CFR Part 192.631(c)(2) Control Room Management**

CP 930 Revision March 31, 2014 – Section 3.5.1 Revise section point to point verification and Attachments 14, 15 & 16 to reflect current practices.

CNGC Response:

CNGC has initiated the Management of Change (CNGMOC #112) process to revise Attachment 16 Deviations to include more detailed information regarding the who, when, where, duration and signature for deviations to the hours of service restrictions in Section 4.2

3. **49 CFR 192.631(g)(1) Control Room Management**

CP 930 Revision March 31, 2014 – Attachment 13 does not show (controller fatigue) as a human factor to consider in investigation of an incident.

CNGC Response:

CNGC has initiated the Management of Change (CNGMOC #112) process to incorporate controller fatigue as a human factor to consider in Attachment 13 Lessons Learned.

Please contact Steven Kessie at (509)734-4575 with questions or comments.

Respectfully Submitted,



Eric Martuscelli,
Vice President, Operations
Cascade Natural Gas Corporation