

Results and Notes Review

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Topical Content (OQ, PA, CRM) : Control Room Management (MISCTOPICS.CRM)

Question Title, ID Control Room Management Criteria , CR.CRMGEN.CRMCRITERIA.P

Question Text Do procedures adequately address the process and criteria that determine which facilities are determined to be control rooms?

References 192.631(a)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 7.3 - 7.4

Question Title, ID Control Room Management , CR.CRMGEN.CRMIMPLEMENT.R

Question Text Were procedures approved, in place, and implemented on or before the regulatory deadline?

References 192.631(a)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Gas control manual for previous controller was approved manual as of 08/01/2011. WBI Energy Transmission was the controller till 2014 when CNGC took over on April 1, 2014.

Question Title, ID Control Room Management , CR.CRMGEN.CRMMGMT.P

Question Text Are CRM procedures formalized and controlled?

References 192.631(a)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 7.10 CP 930 - 7.15 requires both hard copy and electronic.

Question Title, ID Control Room Management , CR.CRMGEN.CRMPROCLOCATION.O

Question Text Are procedures readily available to controllers in the control room?

References 192.631(a)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 7.15 requires both hard copy and electronic copy of manuals. Hard copy of manuals are available in control room.

Question Title, ID Roles and Responsibilities , CR.CRMRR.RESPONSIBLE.P

Question Text Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets?

References 192.631(b)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.3.1 & 8.3.8 & 7.18

Question Title, ID Roles and Responsibilities , CR.CRMRR.QUALCONTROL.P

Question Text Are there provisions in place to assure that only qualified individuals may assume control at any console/desk?

References 192.631(b)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.3.1

Question Title, ID Roles and Responsibilities , CR.CRMRR.DOMAINCHANGE.P

Question Text If the physical domain of responsibility periodically changes, has a clear process been established to describe the conditions for when such a change occurs?

References 192.631(b)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.3.13

Question Title, ID Roles and Responsibilities , CR.CRMRR.RESPCHANGE.P

Question Text Do processes address a controller's role during temporary impromptu (unplanned) changes in controller responsibilities?

References 192.631(b)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.3.1 & 8.3.13

Question Title, ID Roles and Responsibilities , CR.CRMRR.COMMANDVERIFY.P

Question Text 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?

References 192.631(b)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.3.13.3

Question Title, ID Controller Authority (Abnormal Operations) , CR.CRMRR.AUTHORITYABNORMAL.P

Question Text Have processes been established to define the controllers' authority and responsibilities when an abnormal operating condition is detected?

References 192.631(b)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.3.6 & 8.3.8

Question Title, ID Overpressure Limits , CR.CRMRR.PRESSLIMITS.O

Question Text Are controllers aware of the current MAOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MAOP?

References 192.631(b)(2) (192.619(a);192.631(e)(1))

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes controllers are able to view and monitor pipelines.

Question Title, ID Controller Authority (Emergency Operations) , CR.CRMRR.AUTHORITYEMERGENCY.P

Question Text 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?

References 192.631(b)(3)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.3.6 & 8.3.10

Question Title, ID Control Center Evacuation , CR.CRMRR.EVACUATION.P

Question Text Do processes specifically address the controller's responsibilities in the event the control room must be evacuated?

References 192.631(b)(3)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.4.6.2

Question Title, ID Communication Failure , CR.CRMRR.COMMSYSFAIL.P

Question Text 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?

References 192.631(b)(3)
Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section 8.4.6.1

Question Title, ID Shift Change Process , CR.CRMRR.HANDOVER.P

Question Text Have processes been established for the hand-over of responsibility that specify the type of information to be communicated to the oncoming shift?

References 192.631(b)(4) (192.631(c)(5))

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - 8.3.13.1

Question Title, ID Shift Change Process - Documentation , CR.CRMRR.HANDOVERDOC.P

Question Text 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?

References 192.631(b)(4) (192.631(c)(5))

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section 8.3.13.1 & 8.3.13.2 & 8.3.13.3

Question Title, ID Shift Change Process - Documentation , CR.CRMRR.HANDOVERDOC.R

Question Text 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?

References 192.631(b)(4) (192.631(c)(5))

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes Reviewed sample of shift change log.

Question Title, ID Shift Change Process - Overlap , CR.CRMRR.HANDOVEROVERLAP.P

Question Text Do processes require the controllers to discuss recent and impending important activities ensuring adequate overlap?

References 192.631(b)(4)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section 8.3.13.1 & 8.3.13.2

Question Title, ID Shift Change Process - Handover Alternative , CR.CRMRR.HANDOVERALTERNATIVE.P

Question Text 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?

References 192.631(b)(4)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section 8.5.4.3.2 and 8.3.13.3 and 8.5.2.4

Question Title, ID Shift Change Process - Unattended Consoles , CR.CRMRR.UNATTENDCONSOLE.P

Question Text Has the operator established an adequate process for occasions when the console is left temporarily unattended for any reason?

References 192.631(b)(4)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - 8.3.1 & 8.3.14

Question Title, ID Shift Change Process - Console Coverage , CR.CRMRR.CONSOLECOVERAGE.P

Question Text Do processes maintain adequate console coverage during shift hand-over?

References 192.631(b)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section 8.3.13.1 & 8.3.13.2

Question Title, ID Change Management Adequate Information (API 1165 Compliance) , CR.SCADA.SYSTEMMOC.P

Question Text 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?

References 192.631(c)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.6.12.1 & 8.7.2.1

Question Title, ID SCADA Displays , CR.SCADA.DISPLAYCONFIG.P

Question Text 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?

References 192.631(c)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section 8.4.3

Question Title, ID SCADA API RP 1165 Human Factors , CR.SCADA.1165HUMANFACTORS.R

Question Text Has section 4 of API RP 1165 regarding human factors engineering been implemented?

References 192.631(c)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section(Step) 8.4.3

Question Title, ID SCADA Display Objects , CR.SCADA.DISPLAYOBJECTS.O

Question Text Has section 8 of API RP 1165 regarding display object characteristics been implemented?

References 192.631(c)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section(Step) 8.4.3

Question Title, ID SCADA Display Dynamics , CR.SCADA.DISPLAYDYNAMICS.R

Question Text Has section 9 of API RP 1165 regarding display object dynamics been implemented?

References 192.631(c)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section(Step) 8.4.3

Question Title, ID SCADA Administration , CR.SCADA.ADMINISTRATION.R

Question Text Have applicable paragraphs of section 11 of API RP 1165 administration been implemented?

References 192.631(c)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Section(Step) 8.4.3

Question Title, ID SCADA Impracticality , CR.SCADA.1165IMPRACTICAL.R

Question Text 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?

References 192.631(c)(1)

Result NA

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes All applicable paragraphs of 1165 have been implemented.

Question Title, ID Set Points , CR.SCADA.SETPOINT.P

Question Text Does the process adequately define safety-related points?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.6.2.2 & 8.6.2.3 & 8.6.2.4

Question Title, ID Set Points , CR.SCADA.SETPOINT.R

Question Text Do records indicate safety-related points have been adequately implemented?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.5.5.2 - Reviewed sample spreadsheet.

Question Title, ID Point-to-Point Verification , CR.SCADA.POINTVERIFY.P

Question Text Are there adequate processes to define and identify the circumstances which require a point-to-point verification?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.5.1

Question Title, ID Point-to-Point Verification , CR.SCADA.POINTVERIFY.R

Question Text Have required point-to-point verifications been performed?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.5.5.2 - Reviewed sample spreadsheet.

Question Title, ID Point-to-Point Verification Extent , CR.SCADA.POINTVERIFYEXTENT.P

Question Text Are there adequate processes for the thoroughness of the point-to-point verification?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.5.5. Performing Point-to-Point Verification

Question Title, ID Point-to-Point Verification Extent , CR.SCADA.POINTVERIFYEXTENT.R

Question Text Do records demonstrate adequate thoroughness of the point-to-point verification?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.5.5.2 - Reviewed sample spreadsheet.

Question Title, ID Point-to-Point Verification Interval , CR.SCADA.POINTVERFIYINTVL.P

Question Text Is there an adequate process for defining when the point-to-point verification must be completed?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.5.1 & 8.4.5.2

Question Title, ID Point-to-Point Verification Interval , CR.SCADA.POINTVERFIYINTVL.R

Question Text Do records indicate the point-to-point verification has been completed at the required intervals?

References 192.631(c)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.5.1 & 8.4.5.2

Question Title, ID Internal Communication Plan , CR.SCADA.COMMPLAN.P

Question Text Has an internal communication plan been established and implemented that is adequate to manually operate the pipeline during a SCADA failure/outage?

References 192.631(c)(3)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.6.1 & 8.4.6.2.

Question Title, ID Internal Communication Plan , CR.SCADA.COMMPLAN.R

Question Text 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?

References 192.631(c)(3)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Section(Step) 8.4.6.1 & 8.4.6.2. - Reviewed annual loss of communications spread sheet.

Question Title, ID Backup SCADA System , CR.SCADA.BACKUPSCADA.O

Question Text Is there a backup SCADA system?

References 192.631(c)

Result NA
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Backup SCADA Development , CR.SCADA.BACKUPSCADADEV.P

Question Text Has the use of the backup SCADA system for development work been defined?

References 192.631(c)(4)

Result NA
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Backup SCADA Testing , CR.SCADA.BACKUPSCADATEST.R

Question Text Is the backup SCADA system tested at least once each calendar year at intervals not to exceed 15 months?

References 192.631(c)(4)

Result NA
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Backup SCADA Verification , CR.SCADA.BACKUPSCADAVERIFY.R

Question Text 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?

References 192.631(c)(4)

Result NA
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Backup SCADA Adequacy , CR.SCADA.BACKUPSCADADEQUACY.R

Question Text 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?

References 192.631(c)(4)

Result NA
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Backup SCADA Transfer , CR.SCADA.BACKUPSCADATRANSFER.P

Question Text Do processes adequately address and test the logistics of transferring control to a backup control room?

References 192.631(c)(4)

Result NA
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Backup SCADA Return to Primary , CR.SCADA.BACKUPSCADARETURN.P

Question Text Do procedures adequately address and test the logistics of returning operations back to the primary control room?

References 192.631(c)(4)

Result NA

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Backup SCADA Testing , CR.SCADA.BACKUPSCADAFUNCTIONS.R

Question Text 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?

References 192.631(c)(4)

Result NA

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Question Title, ID Fatigue Mitigation , CR.CRMFM.FATIGUEMITIGATION.P

Question Text Does the fatigue mitigation process or procedures (plan) identify operator-specific fatigue risks?

References 192.631(d)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5 Fatigue Mitigation, Step 8.5.4 & 8.5.4.2

Question Title, ID Fatigue Risk Reduction , CR.CRMFM.FATIGUERISKS.P

Question Text Does the fatigue mitigation plan adequately address how the program reduces the risk associated with controller fatigue?

References 192.631(d)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.3.1 & 8.5.4

Question Title, ID Fatigue Quantification , CR.CRMFM.FATIGUEQUANTIFY.P

Question Text Do processes require that the potential contribution of controller fatigue to incidents and accidents be quantified during investigations?

References 192.631(d)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.8.1

Question Title, ID Fatigue Mitigation Manager , CR.CRMFM.FATIGUEMANAGER.P

Question Text 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?

References 192.631(d)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.2.3

Question Title, ID Scheduled Shift Length , CR.CRMFM.SHIFTLENGTH.R

Question Text 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?

References 192.631(d)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.1.1

Question Title, ID Establishing Shift Length , CR.CRMFM.SHIFTLENGTHTIME.R

Question Text 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?

References 192.631(d)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.1.4

Question Title, ID Scheduled Time Off Between Shifts , CR.CRMFM.SCHEDULEDTIMEOFF.R

Question Text 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?

References 192.631(d)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.1.4

Question Title, ID On Call Controllers , CR.CRMFM.ONCALLCONTROLLER.R

Question Text 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?

References 192.631(d)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.2.4

Question Title, ID Maximum Hours of Service , CR.CRMFM.MAXHOS.P

Question Text 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 a reduction of the risk associated with controller fatigue?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.2.2.1 - Restricts hours of service to 63 in any work week.

Question Title, ID Minimum Time Off After HOS Limit Reached , CR.CRMFM.MINTIMEOFF.P

Question Text 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?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP930 - 8.5.2.2.1

Question Title, ID Documented Time Schedule , CR.CRMFM.DOCSCHEDULE.P

Question Text 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?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes all controllers are required to input their time. Bi-Weekly time approval by supervisor Gas control

Question Title, ID Time Off Following Successive Days Worked , CR.CRMFM.DAYSOFF.P

Question Text 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?

References 192.631(d)(4)

Result NA

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Controllers are on 12 hours shifts.

Question Title, ID Day Only Work Hours , CR.CRMFM.WORKHOURS.R

Question Text For normal business hour type operations (i.e., five days per week), do records indicate shift start times no earlier than 6:00 a.m. and shift end times no later than 7:00 p.m.?

References 192.631(d)(4)

Result NA

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Controllers are on 12 hours shifts.

Question Title, ID Fatigue Countermeasures , CR.CRMFM.FATIGUECOUNTERMEASURES.P

Question Text For shifts longer than 8 hours, have specific fatigue countermeasures been implemented for the ninth and beyond hours?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.4 Fatigue mitigation strategies.

Question Title, ID Daily HOS Limit , CR.CRMFM.DAILYHOSLIMIT.P

Question Text Do processes limit the daily maximum HOS limit no more than 14 hours in any sliding 24-hour period?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.2.2.2

Question Title, ID Number of Qualified Controllers , CR.CRMFM.CONTROLLERNUMBERS.O

Question Text Do operations include a sufficient number of qualified controllers?

References 192.631(d)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes 6 Gas Controllers are appear to be sufficient.

Question Title, ID Off Duty Hours When Limits Reached , CR.CRMFM.OFFDUTYHOURS.P

Question Text 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?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP930 - 8.5.2.2.1

Question Title, ID Shift Holdover , CR.CRMFM.SHIFTHOLDOVER.P

Question Text Does the shift holdover process conform to shift holdover guidelines 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?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP930 - Step 8.3.13.1 & 8.5.2.2.2

Question Title, ID Specific Fatigue Countermeasures During Times of Heightened Risk , CR.CRMFM.SPECIFICCOUNTERMEASURES.P

Question Text Do processes require specific fatigue countermeasures during applicable 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?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP930 8.5.4 Fatigue Mitigation Strategies.

Question Title, ID Deviations from HOS Limits , CR.CRMFM.HOSDEVIATIONS.P

Question Text Is there a formal process for approving deviations from the maximum HOS limits?

References 192.631(d)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.5.2.3

Question Title, ID Fatigue Education , CR.CRMFM.FATIGUEEDUCATE.P

Question Text Does the program require that fatigue education/training is required for all controllers and control room supervisors?

References 192.631(d)(2) (192.631(d)(3))

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.5.3.1

Question Title, ID Fatigue Education , CR.CRMFM.FATIGUEEDUCATE.R

Question Text Is fatigue education/training documented for all controllers and control room supervisors?

References 192.631(d)(2) (192.631(d)(3))

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.5.3.1 - Reviewed current certifications in Fatigue Mitigation training

Question Title, ID Fatigue Education Refresher , CR.CRMFM.FATIGUEREFRESHER.R

Question Text Is refresher fatigue education provided at regular intervals?

References 192.631(d)(2) (192.631(d)(3))

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.5.3.1 - Controllers are required to review Circadian newsletter every month

Question Title, ID Review of Fatigue Education/Training Program Effectiveness , CR.CRMFM.FATIGUEREVIEW.P

Question Text 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?

References 192.631(d)(2) (192.631(d)(3))

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP930 - 8.9.1 - Annual review of training program.completion of Circadian tests prove understanding of material covered.

Question Title, ID Fatigue Mitigation Strategies , CR.CRMFM.FATIGUESTRATEGY.P

Question Text Does fatigue education address fatigue mitigation strategies (countermeasures)?

References 192.631(d)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.5.3.1 & 8.5.4

Question Title, ID Off-Duty Activity Impact on Fatigue , CR.CRMFM.OFFDUTY.P

Question Text Does fatigue education address how off-duty activities contribute to fatigue?

References 192.631(d)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.5.3.1

Question Title, ID Fatigue Training Content , CR.CRMFM.FATIGUECONTENT.P

Question Text Is the content of fatigue training adequate for training controllers and supervisors to recognize the effects of fatigue?

References 192.631(d)(3)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.5.3.1 - Training content appears to be adequate.

Question Title, ID Fatigue Training Content , CR.CRMFM.FATIGUECONTENT.R

Question Text Has controller and supervisor training to recognize the effects of fatigue been documented?

References 192.631(d)(3)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.5.3.1 - Reviewed Circadian annual certifications.

Question Title, ID Alarm Procedures , CR.CRMAM.ALARM.P

Question Text Is the alarm management plan a formal process that specifically identifies critical topical areas included in the program?

References 192.631(e)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.5.3.1 & 8.6.2.1

Question Title, ID Alarm Malfunction , CR.CRMAM.ALARMMALFUNCTION.P

Question Text Is there a process to identify and correct inaccurate or malfunctioning alarms?

References 192.631(e)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.6.3.3 & 8.6.8.1 & 8.6.9.1

Question Title, ID Alarm Review , CR.CRMAM.ALARMREVIEW.P

Question Text Does the review of safety-related alarms account for different alarm designs and all alarm types/priorities?

References 192.631(e)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - Step 8.6.2 Alarm and Alert Definitions and Determinations

Question Title, ID Controller SCADA Performance , CR.CRMAM.CONTROLLERPERFORMANCE.P

Question Text Does the review of safety-related alarms account for individual-specific controller qualification and performance?

References 192.631(e)(1)

Result NA

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes No such requirement existed in the scope of inspection review.

Question Title, ID Managing Stale or Unreliable Data , CR.CRMAM.STALEDATA.P

Question Text Does the review of safety-related alarms include specific procedures and practices for managing stale or unreliable data?

References 192.631(e)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.6.8.1 & 8.6.8.2

Question Title, ID Monthly Analysis of SCADA Data , CR.CRMAM.MONTHLYANALYSIS.P

Question Text 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?

References 192.631(e)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.6.10.1

Question Title, ID Correction of SCADA Problems , CR.CRMAM.PROBLEMCORRECTION.P

Question Text Does the alarm management plan include a process for promptly correcting identified problems and for returning these points to service?

References 192.631(e)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - 8.6.9.1

Question Title, ID Alarm Setpoint Process , CR.CRMAM.ALARMSETPOINTS.P

Question Text Is there a formal process to determine the correct alarm setpoint values and alarm descriptions?

References 192.631(e)(3)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Step 8.6.3.1 & 8.6.4 - Engineering determines the set points for alarms

Question Title, ID Controls on SCADA Settings , CR.CRMAM.SETTINGCONTROL.P

Question Text 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?

References 192.631(e)(3)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - Step 8.6.2 & 8.6.2.1.1 & 8.6.4.1 & 8.6.4.2

Question Title, ID Alarm Management Plan Review , CR.CRMAM.PLANREVIEW.P

Question Text 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?

References 192.631(e)(4)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - 8.6.10

Question Title, ID Alarm Management Plan Review , CR.CRMAM.PLANREVIEW.R

Question Text 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?

References 192.631(e)(4)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes Reviewed Alarm Management Review documents for 2014-2017

Question Title, ID Measuring Work Load , CR.CRMAM.WORKLOAD.P

Question Text 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?

References 192.631(e)(5)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - 8.6.11 Activity Review

Question Title, ID Monitoring Work Load , CR.CRMAM.WORKLOADMONITORING.P

Question Text Is the process of monitoring and analyzing general activity comprehensive?

References 192.631(e)(5)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - 8.6.11.1 Control Room Workload Study appears comprehensive.

Question Title, ID Controller Reaction to Incoming Alarms , CR.CRMAM.CONTROLLERREACTION.P

Question Text Does the process have a means of determining that the controller has sufficient time to analyze and react to incoming alarms?

References 192.631(e)(5)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 - 8.6.10 & 8.6.11.1

Question Title, ID Analysis of Controller Performance , CR.CRMAM.PERFORMANCEANALYSIS.R

Question Text Has an analysis been performed to determine if controller(s) performance is currently adequate?

References 192.631(e)(5)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.6.11 Activity Review

Question Title, ID Alarm Deficiency Resolution , CR.CRMAM.DEFICIENCIES.P

Question Text Is there a process to address how deficiencies found in implementing 192.631(e)(1) through 192.631(e)(5) will be resolved?

References 192.631(e)(6)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 - 8.6.7, 8.6.9, 8.6.10, 8.6.11

Question Title, ID Alarm Management Deficiencies , CR.CRMAM.DEFICIENCIES.R

Question Text Do records indicate deficiencies found in implementing 192.631(e)(1) through 192.631(e)(5) have been resolved?

References 192.631(e)(6)

Result NA

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes No deficiencies found

Question Title, ID Field Equipment Changes , CR.CRMCMGT.EQUIPMENTCHANGES.P

Question Text Is there a process to assure changes in field equipment that could affect control room operations are coordinated with the control room personnel?

References 192.631(f)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.7.3.1 & 8.4.5.2

Question Title, ID Controller Participation in System Changes , CR.CRMCMGT.CONTROLLERPARTICIPATE.P

Question Text Are control room representative(s) required to participate in meetings where changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented?

References 192.631(f)(1) (192.631(f)(3))

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.7.1.1 & 8.7.1.2 & 8.7.1.3

Question Title, ID Controller Participation in System Changes , CR.CRMCMGT.CONTROLLERPARTICIPATE.R

Question Text Do records indicate that control room representative(s) participate in meetings where changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline (including routine maintenance and repairs) are being considered, designed and implemented?

References 192.631(f)(1) (192.631(f)(3))

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Reviewed sample of Meeting minutes, All Control Room personnel attend monthly meeting.

Question Title, ID Emergency Contact with Control Room , CR.CRMCMGT.EMERGENCYCONTACT.P

Question Text Is there a process requiring field personnel and SCADA support personnel to contact the control room when emergency conditions exist?

References 192.631(f)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.7.3.1

Question Title, ID Coordination of Field Changes , CR.CRMCMGT.FIELDCONTACT.P

Question Text Does the process require field personnel and SCADA support personnel to contact the control room when making field changes (for example, moving a valve) that affect control room operations?

References 192.631(f)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 Step 8.7.3.1

Question Title, ID Coordination of Field Changes , CR.CRMCMGT.FIELDCHANGES.R

Question Text 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?

References 192.631(f)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes Reviewed gas control log for examples of when personnel would alert the Control Room of work being done at one of the stations.

Question Title, ID Abnormal Operations (Review) , CR.CRMEXP.ABNORMALREVIEW.P

Question Text Is there a formal, structured approach for reviewing and critiquing reportable events to identify lessons learned?

References 192.631(g)(1)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 Steps 8.8.1, 8.8.2, 8.8.3, 8.8.4

Question Title, ID Abnormal Operations (Review) , CR.CRMEXP.ABNORMALREVIEW.R

Question Text 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?

References 192.631(g)(1)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes Reviewed records for 2015(1) and 2017(2) showing that recorded incidents were not related to controller performance.

Question Title, ID Lessons Learned , CR.CRMEXP.LESSONSLEARNED.P

Question Text 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?

References 192.631(g)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 Step 8.8.3, 8.8.4.

Question Title, ID Lessons Learned , CR.CRMEXP.LESSONSLEARNED.R

Question Text 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.)?

References 192.631(g)(2)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes Reviewed Lessons Learned form Attachment 14 for recording the lessons learned from 2015.

Question Title, ID Controller Training Program , CR.CRMTRAIN.CONTROLLERTRAIN.P

Question Text Has a controller training program been established to provide training for each controller to carry out their roles and responsibilities?

References 192.631(h)

Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 Step 8.9 Training

Question Title, ID Controller Training Program , CR.CRMTRAIN.CONTROLLERTRAIN.R

Question Text Has a controller training program been implemented to provide training for each controller to carry out their roles and responsibilities?

References 192.631(h)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Reviewed training record for all controllers, all controllers are up to date on their training.

Question Title, ID Training Program Review , CR.CRMTRAIN.TRAININGREVIEW.P

Question Text 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?

References 192.631(h)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.9.1

Question Title, ID Training Program Review , CR.CRMTRAIN.TRAININGREVIEW.R

Question Text 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?

References 192.631(h)

Result Unsat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Issue Summary Review dates were not available for the previous years training manual review. 2017 was available on review sheet but the years 2015 & 2016 were not recorded.

Result Notes Review dates were not available for the previous years training manual review. 2017 was available on review sheet but the years 2015 & 2016 were not recorded.

Question Title, ID Content of Training Program , CR.CRMTRAIN.TRAININGCONTENT.R

Question Text Does training content address all required material, including training each controller to carry out the roles and responsibilities that were defined by the operator?

References 192.631(h)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Training manual appears to be complete and cover required material.

Question Title, ID List of AOCs for Training , CR.CRMTRAIN.AOCLIST.R

Question Text Has a list of the abnormal operating conditions that are likely to occur simultaneously or in sequence been established?

References 192.631(h)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Section 8 of training manual lists abnormal operation conditions.

Question Title, ID Controller Training and Qualification , CR.CRMTRAIN.TRAININGABNORMAL.P

Question Text Does the training program provide controller training on recognizing and responding to abnormal operating conditions that are likely to occur simultaneously or in sequence?

References 192.631(h)(1)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.9.2, 8.9.3

Question Title, ID Controller Training and Qualification , CR.CRMTRAIN.TRAINING.O

Question Text Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?

References 192.631(h)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CNGC uses Table top exercises and On the Job training. Did not observe during inspection.

Question Title, ID Controller Training and Qualification , CR.CRMTRAIN.TRAINING.R

Question Text Do records indicate the training program used a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?

References 192.631(h)(2)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Records show tabletop exercises are used to train for abnormal operations conditions.

Question Title, ID Communication Training , CR.CRMTRAIN.COMMUNICATIONTRAINING.P

Question Text Does the CRM program train controllers on their responsibilities for communication under the operator's emergency response procedures?

References 192.631(h)(3)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.9.3 & CP 925 appendix I

Question Title, ID Working Knowledge of Pipeline System , CR.CRMTRAIN.SYSKNOWLEDGE.P

Question Text Does the training program provide controllers a working knowledge of the pipeline system, especially during the development of abnormal operating conditions?

References 192.631(h)(4)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.9.3, 8.9.4, 8.9.5 , controllers are trained during table top and on the job training.

Question Title, ID List of Infrequently Used Pipeline Setups , CR.CRMTRAIN.INFREQOPSLIST.R

Question Text Has a list of pipeline operating setups that are periodically (but infrequently) used been established?

References 192.631(h)(5)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CR-1 attachment 3,4 & 5 show the infrequently used set ups.

Question Title, ID Review of Procedures Prior to Use , CR.CRMTRAIN.INFREQOPSREVIEW.P

Question Text 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?

References 192.631(h)(5)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.9.9

Question Title, ID Submittal of Procedures , CR.CRMCOMP.SUBMITPROCEDURES.P

Question Text Are there adequate processes to assure that the operator is responsive to requests from applicable agencies to submit their CRM procedures?

References 192.631(i)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.10.1.1.1 -

Question Title, ID Record of Procedure Submittals , CR.CRMCOMP.SUBMITPROCEDURES.R

Question Text Has the operator been responsive to requests from applicable agencies to submit their CRM procedures?

References 192.631(i)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes Reviewed email for submittal of recent CP 930.

Question Title, ID CRM Coordinator , CR.CRMCOMP.CRMCOORDINATOR.R

Question Text Is there an individual that is responsible and accountable for compliance with requests from PHMSA or other applicable agencies?

References 192.631(i)

Result Sat

Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)

Result Notes CP 930 Step 8.10.1.1.1 - Chris Grissom is the responsible person.

Question Title, ID CRM Records Management , CR.CRMCOMP.RECORDS.P

Question Text Are records management processes adequate to assure records are sufficient to demonstrate compliance with the CRM rule?

References 192.631(j)(1)
Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 Step 8.10.1.2 & 8.11.2.1

Question Title, ID CRM Records , CR.CRMCOMP.RECORDS.R

Question Text Are records sufficient to demonstrate compliance with the CRM rule?

References 192.631(j)(1)
Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes Records appear adequate to demonstrate compliance with CRM rule.

Question Title, ID Electronic Records , CR.CRMCOMP.ELECTRONICRECORDS.R

Question Text Are electronic records properly stored, safeguarded, and readily retrievable?

References 192.631(j)(1)
Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 Step 8.10.1.3 & 8.11.2.1 Hard copy is found in the control room and electronic version on Sharepoint Site.

Question Title, ID CRM Deviations , CR.CRMCOMP.DEVIATIONS.P

Question Text Are there processes to demonstrate and provide a documented record that every deviation from any CRM rule requirement was necessary for safe operation?

References 192.631(j)(2)
Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes CP 930 Step 8.11.2 Deviations, 8.11.2.2, 8.11.2.3

Question Title, ID Deviation Records , CR.CRMCOMP.DEVIATIONS.R

Question Text Were all deviations documented in a way that demonstrates they were necessary for safe operation?

References 192.631(j)(2)
Result Sat
Assets Covered 7244 CNGC CRM inspection (7244 CNGC CRM)
Result Notes Reviewed two deviation forms that appear complete and Correct.

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