

Inspection Output (IOR)

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Inspection Information

Inspection Name	7854 Seaport CRM	Operator(s)	SEAPORT SOUND TERMINAL, LLC (39906)	Plan Submitted	08/27/2019
Status	PLANNED	Lead	Anthony Dorrough	Plan Approval	08/28/2019 by Joe Subsit
Start Year	2019	Team Members	Lex Vinsel	All Activity Start	08/27/2019
System Type	HL	Supervisor	Joe Subsit	All Activity End	08/28/2019
Protocol Set ID	HL.2019.01	Director	Sean Mayo	Inspection Submitted	09/03/2019
				Inspection Approval	--

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	Seaport CRM	Seaport Sound Terminal LLC	unit	88920	Offshore GOM Reg Rural Gather Rural Low Stress	170	170	170	170	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Seaport CRM	n/a	CR	P, R, O, S	Detail	

Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Qst Assets	Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Seaport CRM	--	08/27/2019	08/28/2019	n/a	all planned questions	all assets	all types	170	170	170	170	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Seaport CRM	STARTED	--	Seaport CRM	--

Results (all values, 170 results)

174 (instead of 170) results are listed due to re-presentation of questions in more than one sub-group.

CR.CRMGEN: General

1. Question Result, ID, References Sat, CR.CRMGEN.CRMCRITERIA.P, 195.446(a)
Question Text *Do procedures adequately address the process and criteria that determine which facilities are determined to be control rooms?*
Assets Covered Seaport CRM
Result Notes Control room management procedures appear to be adequate (Pg.19 of the plan)
2. Question Result, ID, References Sat, CR.CRMGEN.CRMMGMT.P, 195.446(a)
Question Text *Are CRM procedures formalized and controlled?*
Assets Covered Seaport CRM
Result Notes CRM inspections are formalized and controlled and revisions are expected by Sept 25, 2019. (Pg.13 & 19 of the plan)
3. Question Result, ID, References Sat, CR.CRMGEN.CRMIMPLEMENT.R, 195.446(a)
Question Text *Were procedures approved, in place, and implemented on or before the regulatory deadline?*
Assets Covered Seaport CRM
Result Notes Targa procedures were in place for the operation of the control room before the hand over to TransMontaigne procedures. TransMontaigne procedures were on line by the implementation date. Revision log for CRM - In place on 12/01/2010
4. Question Result, ID, References Sat, CR.CRMGEN.CRMPROCLOCATION.O, 195.446(a)
Question Text *Are procedures readily available to controllers in the control room?*
Assets Covered Seaport CRM
Result Notes As a hardcopy & in Sharepoint

CR.CRMRR: Roles and Responsibilities

5. Question Result, ID, References Sat, CR.CRMRR.RESPONSIBLE.P, 195.446(b)(1)
Question Text *Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets?*
Assets Covered Seaport CRM
Result Notes Transmontaigne procedure 195.446 (B) Controller Roles and Responsibilities appears adequate. (Pg.20)
6. Question Result, ID, References Sat, CR.CRMRR.QUALCONTROL.P, 195.446(b)(1)
Question Text *Are there provisions in place to assure that only qualified individuals may assume control at any console/desk?*
Assets Covered Seaport CRM
Result Notes Only qualified individuals have log in ability for the control station. The area is not currently secured as an for control room controller. (Pg. 20)
7. Question Result, ID, References Sat, CR.CRMRR.DOMAINCHANGE.P, 195.446(b)(1)
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?*
Assets Covered Seaport CRM
Result Notes Physical domains do not change for this control room. (Pg. 22 & Pg. 35)
8. Question Result, ID, References Sat, CR.CRMRR.RESPCHANGE.P, 195.446(b)(1)
Question Text *Do processes address a controller's role during temporary impromptu (unplanned) changes in controller responsibilities?*
Assets Covered Seaport CRM
Result Notes Unplanned / impromptu changes are not permitted. (Pg. 35 & 36)

9. Question Result, ID, References [Sat, CR.CRMRR.COMMANDVERIFY.P, 195.446\(b\)\(1\)](#)
 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?*
 Assets Covered [Seaport CRM](#)
 Result Notes [195.446\(B\) Shift Change procedure. Policy is that current controller will remain on duty until all duties have been completed. \(Pg. 22, 35 & 36\)](#)
10. Question Result, ID, References [Sat, CR.CRMRR.AUTHORITYABNORMAL.P, 195.446\(b\)\(2\)](#)
 Question Text *Have processes been established to define the controllers' authority and responsibilities when an abnormal operating condition is detected?*
 Assets Covered [Seaport CRM](#)
 Result Notes [195.402\(D\) Abnormal Operating Conditions appear to be adequate. \(Pg. 23\)](#)
11. Question Result, ID, References [Sat, CR.CRMRR.PRESSLIMITS.O, 195.446\(b\)\(2\)](#)
 Question Text *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?*
 Assets Covered [Seaport CRM](#)
12. Question Result, ID, References [Sat, CR.CRMRR.AUTHORITYEMERGENCY.P, 195.446\(b\)\(3\)](#)
 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?*
 Assets Covered [Seaport CRM](#)
 Result Notes [Procedures cover the controllers authority to make decision during emergency. \(Pages 29-32\)](#)
13. Question Result, ID, References [Sat, CR.CRMRR.EVACUATION.P, 195.446\(b\)\(3\)](#)
 Question Text *Do processes specifically address the controller's responsibilities in the event the control room must be evacuated?*
 Assets Covered [Seaport CRM](#)
 Result Notes [If the Tacoma Control Center must be evacuated, the pipeline will be shut down. \(Pg. 31\)](#)
14. Question Result, ID, References [Sat, CR.CRMRR.COMMSYSFAIL.P, 195.446\(b\)\(3\)](#)
 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?*
 Assets Covered [Seaport CRM](#)
 Result Notes [TransMountaigne operating system covers this in a AOC. \(Pg.31\)](#)
15. Question Result, ID, References [Sat, CR.CRMRR.HANDOVER.P, 195.446\(b\)\(4\) \(195.446\(c\)\(5\)\)](#)
 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?*
 Assets Covered [Seaport CRM](#)
 Result Notes [195.446 \(B\)\(4\) shift change procedure is appears adequate. \(Pg. 35\)](#)
16. Question Result, ID, References [Sat, CR.CRMRR.HANDOVER.O, 195.446\(b\)\(4\) \(195.446\(c\)\(5\)\)](#)
 Question Text *Do observations indicate adequate hand-over of responsibility to the oncoming shift?*
 Assets Covered [Seaport CRM](#)
 Result Notes [Shift Change Report](#)
17. Question Result, ID, References [Sat, CR.CRMRR.HANDOVERDOC.P, 195.446\(b\)\(4\) \(195.446\(c\)\(5\)\)](#)
 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?*
 Assets Covered [Seaport CRM](#)

Result Notes 95.446 (B)(4) shift change procedure is appears adequate. Shift Change Report (Pg. 35)

18. Question Result, ID, References Sat, CR.CRMRR.HANDOVERDOC.R, 195.446(b)(4) (195.446(c)(5))
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?*
Assets Covered Seaport CRM
Result Notes Reviewed a sample of the shift change reports. Turn over reports appear adequate.
19. Question Result, ID, References Sat, CR.CRMRR.HANDOVEROVERLAP.P, 195.446(b)(4)
Question Text *Do processes require the controllers to discuss recent and impending important activities ensuring adequate overlap?*
Assets Covered Seaport CRM
Result Notes 95.446 (B)(4) shift change procedure is appears adequate. (Pg. 35 & 36)
20. Question Result, ID, References Sat, CR.CRMRR.HANDOVERALTERNATIVE.P, 195.446(b)(4)
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?*
Assets Covered Seaport CRM
Result Notes 95.446 (B)(4) shift change procedure is appears adequate. (Pg. 35 & 36)
21. Question Result, ID, References Sat, CR.CRMRR.UNATTENDCONSOLE.P, 195.446(b)(4)
Question Text *Has the operator established an adequate process for occasions when the console is left temporarily unattended for any reason?*
Assets Covered Seaport CRM
Result Notes 95.446 (B)(4) shift change procedure is appears adequate. The operator is always at counsel or they have an Ipad that goes with the operator at all times. (Pg. 36)
22. Question Result, ID, References Sat, CR.CRMRR.CONSOLECOVERAGE.P, 195.446(b)(4)
Question Text *Do processes maintain adequate console coverage during shift hand-over?*
Assets Covered Seaport CRM
Result Notes 95.446 (B)(4) shift change procedure appears adequate. Shift change coverage is adequate. (Pg. 35 & 36)
23. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYDISALLOW.P, 195.446(b)(5)
Question Text *Do processes disallow others to have authority to direct or supersede the specific technical actions of a controller?*
Assets Covered Seaport CRM
Result Notes 95.446 (B) Controller Roles and Responsibilities procedure is appears adequate and only allows qualified controllers to control the SCADA system. (Pg. 20)
24. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYDISALLOW.R, 195.446(b)(5)
Question Text *Do records indicate that the policy disallowing others to have authority to direct or supersede the specific technical actions of a controller has been communicated to controllers and others?*
Assets Covered Seaport CRM
Result Notes Training records cover training on procedures and controller roles and responsibilities. (Pg. 20)
25. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYDISALLOW.O, 195.446(b)(5)
Question Text *Are controllers aware of, and can reference, processes that disallow others to have authority to direct or supersede the specific technical actions of a controller?*
Assets Covered Seaport CRM
Result Notes (Pg. 20)
26. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYQUAL.P, 195.446(b)(5)

Question Text *Does the process result in identification of required qualification elements for those authorized to direct or supersede the technical actions of a controller that are sufficient for those individuals to understand the implications of the scope of potential actions?*

Assets Covered Seaport CRM

Result Notes Process appears adequate and CRM supervisor is the only person that can make changes over the controllers. (Pg. 20)

27. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYQUAL.R, 195.446(b)(5)

Question Text *Do records indicate that others given authority to direct or supersede the specific technical actions of a controller were qualified?*

Assets Covered Seaport CRM

Result Notes Control room supervisor, Ted Lilyblade, is the only person that is qualified to direct the operations of the controllers. Reviewed training record.

28. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYIMPLEMENT.P, 195.446(b)(5)

Question Text *Is the process defined with respect to the details of how those authorized to direct or supersede the technical actions of a controller are to implement their authority?*

Assets Covered Seaport CRM

Result Notes 195.446 (B) Controller Roles and Responsibilities defines the roles of the Control Room Manager. (Pg. 20)

29. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYLIST.R, 195.446(b)(5)

Question Text *Is a list of individuals with authority to direct or supersede the technical actions of a controller readily available to controllers?*

Assets Covered Seaport CRM

Result Notes 195.446(B) Controller Roles and Responsibilities procedure, only the Control Room supervisor is qualified to direct controllers actions.

30. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYIMPLEMENT.R, 195.446(b)(5)

Question Text *Do records adequately document occurrences of when others authorized to direct or supersede the technical actions of a controller have done so?*

Assets Covered Seaport CRM

Result Notes No conditions occurred that required the Control Room supervisor to direct controllers actions.

31. Question Result, ID, References Sat, CR.CRMRR.OTHERAUTHORITYIMPLEMENT.O, 195.446(b)(5)

Question Text *Do others authorized to direct or supersede the technical actions of a controller demonstrate an understanding of the process to implement this authority?*

Assets Covered Seaport CRM

Result Notes (Pg. 20)

CR.SCADA: Supervisory Control and Data Acquisition

32. Question Result, ID, References Sat, CR.SCADA.SYSTEMMOC.P, 195.446(c)(1)

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?*

Assets Covered Seaport CRM

Result Notes 195.446 (C)(2)Conduct Point to Point Verifications covers when changes to the SCADA system are required. (Pg. 37 & 41)

33. Question Result, ID, References Sat, CR.SCADA.DISPLAYCONFIG.P, 195.446(c)(1)

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?*

Assets Covered Seaport CRM

Result Notes 195.446 (c)(1) implement API 1165 (Procedure) covers the incorporation of API 1165

34. Question Result, ID, References **Sat, CR.SCADA.1165HUMANFACTORS.O, 195.446(c)(1)**
 Question Text *Has section 4 of API RP 1165 regarding human factors engineering been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Transmontaigne operating company, pipeline SCADA system and screen design - Section 4**
35. Question Result, ID, References **Sat, CR.SCADA.DISPLAYHARDWARE.R, 195.446(c)(1)**
 Question Text *Has section 5 of API RP 1165 regarding display hardware been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 5**
36. Question Result, ID, References **Sat, CR.SCADA.DISPLAYLAYOUT.R, 195.446(c)(1)**
 Question Text *Has section 6 of API RP 1165 regarding display layout and organization been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 6**
37. Question Result, ID, References **Sat, CR.SCADA.DISPLAYNAVIGATION.R, 195.446(c)(1)**
 Question Text *Has section 7 of API RP 1165 regarding display navigation been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 7**
38. Question Result, ID, References **Sat, CR.SCADA.DISPLAYOBJECTS.O, 195.446(c)(1)**
 Question Text *Has section 8 of API RP 1165 regarding display object characteristics been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 8**
39. Question Result, ID, References **Sat, CR.SCADA.DISPLAYDYNAMICS.R, 195.446(c)(1)**
 Question Text *Has section 9 of API RP 1165 regarding display object dynamics been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 9**
40. Question Result, ID, References **Sat, CR.SCADA.CONTROLSELECTION.R, 195.446(c)(1)**
 Question Text *Has section 10 of API RP 1165 control selection and techniques been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 10**
41. Question Result, ID, References **Sat, CR.SCADA.ADMINISTRATION.R, 195.446(c)(1)**
 Question Text *Has section 11 of API RP 1165 administration been implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 11**
42. Question Result, ID, References **NA, CR.SCADA.1165IMPRACTICAL.R, 195.446(c)(1)**
 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?*
 Assets Covered **Seaport CRM**
 Result Notes **Only Atlanta has a color change that is different. (red green/ green red)**
43. Question Result, ID, References **Sat, CR.SCADA.SETPOINT.P, 195.446(c)(2) (195.406(b))**
 Question Text *Does the process adequately define safety-related points?*
 Assets Covered **Seaport CRM**
 Result Notes **.446 (c)(2) Conduct point to point verification includes setting of control points.**

44. Question Result, ID, References **Sat, CR.SCADA.SETPOINT.R, 195.446(c)(2)**
 Question Text *Do records indicate safety-related points have been adequately implemented?*
 Assets Covered **Seaport CRM**
 Result Notes **Reviewed Targa Sound Terminal Master Alarm list appears adequate.**
45. Question Result, ID, References **Sat, CR.SCADA.POINTVERIFY.P, 195.446(c)(2)**
 Question Text *Are there adequate processes to define and identify the circumstances which require a point-to-point verification?*
 Assets Covered **Seaport CRM**
 Result Notes **Point to point twice per. year. 195.446(c)(2) conduct point to point verifications**
46. Question Result, ID, References **Sat, CR.SCADA.POINTVERIFY.R, 195.446(c)(2)**
 Question Text *Have required point-to-point verifications been performed?*
 Assets Covered **Seaport CRM**
 Result Notes **Reviewed point to point verification**
47. Question Result, ID, References **Sat, CR.SCADA.POINTVERIFYEXTENT.P, 195.446(c)(2)**
 Question Text *Are there adequate processes for the thoroughness of the point-to-point verification?*
 Assets Covered **Seaport CRM**
 Result Notes **Point to point verification extent - appears adequate**
48. Question Result, ID, References **Sat, CR.SCADA.POINTVERIFYEXTENT.R, 195.446(c)(2)**
 Question Text *Do records demonstrate adequate thoroughness of the point-to-point verification?*
 Assets Covered **Seaport CRM**
49. Question Result, ID, References **Sat, CR.SCADA.POINTVERFIYINTVL.P, 195.446(c)(2)**
 Question Text *Is there an adequate process for defining when the point-to-point verification must be completed?*
 Assets Covered **Seaport CRM**
 Result Notes **195.446(c)(2) When field equipment is added or moved & when changes that affect pipeline safety.**
50. Question Result, ID, References **Sat, CR.SCADA.POINTVERFIYINTVL.R, 195.446(c)(2)**
 Question Text *Do records indicate the point-to-point verification has been completed at the required intervals?*
 Assets Covered **Seaport CRM**
 Result Notes **Previous point to points were done annually, TOC will now be bi-annual.**
51. Question Result, ID, References **Sat, CR.SCADA.POINTVERIFY.O, 195.446(c)(2)**
 Question Text *Are point-to-point verifications performed adequately when required?*
 Assets Covered **Seaport CRM**
52. Question Result, ID, References **Sat, CR.SCADA.COMMPLAN.P, 195.446(c)(3)**
 Question Text *Has an internal communication plan been established and implemented that is adequate to manually operate the pipeline during a SCADA failure/outage?*
 Assets Covered **Seaport CRM**
 Result Notes **Internal. Plan is done annually. Pipeline would shut-down without SCADA communication.**
53. Question Result, ID, References **Sat, CR.SCADA.COMMPLAN.R, 195.446(c)(3)**
 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?*
 Assets Covered **Seaport CRM**
 Result Notes **Targa was done annually. TOC does this bi-annually (every 6 mo.)**

54. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADA.O, 195.446(c)(4)**
 Question Text *Is there a backup SCADA system?*
 Assets Covered **Seaport CRM**
 Result Notes **Laptop used for back-up**
55. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADADEV.P, 195.446(c)(4)**
 Question Text *Has the use of the backup SCADA system for development work been defined?*
 Assets Covered **Seaport CRM**
 Result Notes **No development work on back-up SCADA**
56. Question Result, ID, References **NA, CR.SCADA.BACKUPSCADATEST.P, 195.446(c)(4)**
 Question Text *Is the backup SCADA system required to be tested at least once each calendar year at intervals not to exceed 15 months?*
 Assets Covered **Seaport CRM**
 Result Notes **Back-up system**
57. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADATEST.R, 195.446(c)(4)**
 Question Text *Is the backup SCADA system tested at least once each calendar year at intervals not to exceed 15 months?*
 Assets Covered **Seaport CRM**
 Result Notes **No records from previous operation**
58. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADAVERIFY.P, 195.446(c)(4)**
 Question Text *Are there 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?*
 Assets Covered **Seaport CRM**
59. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADAVERIFY.R, 195.446(c)(4)**
 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?*
 Assets Covered **Seaport CRM**
60. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADAADQUACY.R, 195.446(c)(4)**
 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?*
 Assets Covered **Seaport CRM**
61. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADATRANSFER.P, 195.446(c)(4)**
 Question Text *Do processes adequately address and test the logistics of transferring control to a backup control room?*
 Assets Covered **Seaport CRM**
62. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADARETURN.P, 195.446(c)(4)**
 Question Text *Do procedures adequately address and test the logistics of returning operations back to the primary control room?*
 Assets Covered **Seaport CRM**
63. Question Result, ID, References **Sat, CR.SCADA.BACKUPSCADAFUNCTIONS.R, 195.446(c)(4)**
 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?*
 Assets Covered **Seaport CRM**

64. Question Result, ID, References **Sat, CR.SCADA.SCADAOVERPRESSTESTBO.P, 195.428(b)** (also presented in: FS.TS)
 Question Text *Does the process adequately test applicable SCADA controlled overpressure protection devices on pressurized breakout tanks?*
 Assets Covered **Seaport CRM**
 Result Notes **Pressure tested twice per. year**
65. Question Result, ID, References **Sat, CR.SCADA.SCADAOVERPRESSTESTBO.R, 195.404(a)(vii) (195.404(c)(3), 195.428(b))** (also presented in: FS.TS)
 Question Text *Do records indicate adequate inspection and testing of SCADA overpressure protection devices on pressurized breakout tanks?*
 Assets Covered **Seaport CRM**
66. Question Result, ID, References **Sat, CR.SCADA.SCADAOVERFILL.P, 195.428(d) (195.446(b), 195.446(c))** (also presented in: FS.TS)
 Question Text *Is an adequate process/procedure in place for testing applicable SCADA controlled overfill protection devices?*
 Assets Covered **Seaport CRM**
67. Question Result, ID, References **Sat, CR.SCADA.SCADAOVERFILL.R, 195.404(a)(vii) (195.404(c)(3), 195.428(d))** (also presented in: FS.TS)
 Question Text *Do records indicate adequate inspection and testing of SCADA overfill protection systems?*
 Assets Covered **Seaport CRM**
 Result Notes **Reviewed testing of over-fill protection**

CR.CRMFM: Fatigue Management

68. Question Result, ID, References **Sat, CR.CRMFM.FATIGUEMITIGATION.P, 195.446(d)**
 Question Text *Does the fatigue mitigation process or procedures (plan) identify operator-specific fatigue risks?*
 Assets Covered **Seaport CRM**
69. Question Result, ID, References **Sat, CR.CRMFM.FATIGUERISKS.P, 195.446(d)**
 Question Text *Does the fatigue mitigation plan adequately address how the program reduces the risk associated with controller fatigue?*
 Assets Covered **Seaport CRM**
70. Question Result, ID, References **Sat, CR.CRMFM.FATIGUEQUANTIFY.P, 195.446(d)**
 Question Text *Do processes require that the potential contribution of controller fatigue to incidents and accidents be quantified during investigations?*
 Assets Covered **Seaport CRM**
71. Question Result, ID, References **Sat, CR.CRMFM.FATIGUEMANAGER.P, 195.446(d)**
 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?*
 Assets Covered **Seaport CRM**
72. Question Result, ID, References **Sat, CR.CRMFM.SHIFTLENGTH.R, 195.446(d)(1)**
 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?*
 Assets Covered **Seaport CRM**
73. Question Result, ID, References **Sat, CR.CRMFM.SHIFTLENGTHTIME.R, 195.446(d)(1)**
 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?

Assets Covered **Seaport CRM**

74. Question Result, ID, References **Sat, CR.CRMFM.SCHEDULEDTIMEOFF.R, 195.446(d)(1)**

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?*

Assets Covered **Seaport CRM**

75. Question Result, ID, References **Sat, CR.CRMFM.ONCALLCONTROLLER.P, 195.446(d)**

Question Text *For controllers who are on call, do processes minimize interrupting the required 8 hours of continuous sleep or require 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?*

Assets Covered **Seaport CRM**

76. Question Result, ID, References **Sat, CR.CRMFM.ONCALLCONTROLLER.R, 195.446(d)(1)**

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?*

Assets Covered **Seaport CRM**

77. Question Result, ID, References **Sat, CR.CRMFM.MAXHOS.P, 195.446(d)(4)**

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 reduction of the risk associated with controller fatigue?*

Assets Covered **Seaport CRM**

78. Question Result, ID, References **Sat, CR.CRMFM.MINTIMEOFF.P, 195.446(d)(4)**

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?*

Assets Covered **Seaport CRM**

Result Notes **Time off between night & day shifts is 35 hours**

79. Question Result, ID, References **Sat, CR.CRMFM.DOCSCHEDULE.P, 195.446(d)(4)**

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?*

Assets Covered **Seaport CRM**

Result Notes **Control Center supervisor keeps track of the hours worked.**

80. Question Result, ID, References **NA, CR.CRMFM.DAYSOFF.P, 195.446(d)(4)**

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?*

Assets Covered **Seaport CRM**

Result Notes **Controllers do not work 9 to 5 shifts, normal business hours**

81. Question Result, ID, References **NA, CR.CRMFM.WORKHOURS.R, 195.446(d)(4)**

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.?*

Assets Covered **Seaport CRM**

Result Notes **Controllers do not work 9 to 5 shifts, normal business hours**

82. Question Result, ID, References **Sat, CR.CRMFM.FATIGUECOUNTERMEASURES.P, 195.446(d)(4)**

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

Assets Covered Seaport CRM

83. Question Result, ID, References Sat, CR.CRMFM.DAILYHOSLIMIT.P, 195.446(d)(4)
Question Text *Do processes limit the daily maximum HOS limit to no more than 14 hours in any sliding 24-hour period?*
Assets Covered Seaport CRM
Result Notes Operators may not work double shifts
84. Question Result, ID, References Sat, CR.CRMFM.CONTROLLERNUMBERS.O, 195.446(d)(4)
Question Text *Do operations include a sufficient number of qualified controllers?*
Assets Covered Seaport CRM
Result Notes Seaport has 4 controllers & 1 shift supervisor
85. Question Result, ID, References Sat, CR.CRMFM.OFFDUTYHOURS.P, 195.446(d)(4)
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?*
Assets Covered Seaport CRM
86. Question Result, ID, References NA, CR.CRMFM.SHIFTHOLDOVER.P, 195.446(d)(4)
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?*
Assets Covered Seaport CRM
Result Notes No shift hold over
87. Question Result, ID, References Sat, CR.CRMFM.SPECIFICCOUNTERMEASURES.P, 195.446(d)(4)
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?*
Assets Covered Seaport CRM
88. Question Result, ID, References Sat, CR.CRMFM.HOSDEVIATIONS.P, 195.446(d)(4)
Question Text *Is there a formal process for approving deviations from the maximum HOS limits?*
Assets Covered Seaport CRM
89. Question Result, ID, References Sat, CR.CRMFM.FATIGUEEDUCATE.P, 195.446(d)(2) (195.446(d)(3))
Question Text *Does the program require that fatigue education/training is required for all controllers and control room supervisors?*
Assets Covered Seaport CRM
90. Question Result, ID, References Sat, CR.CRMFM.FATIGUEEDUCATE.R, 195.446(d)(2) (195.446(d)(3))
Question Text *Is periodic fatigue education/training documented for all controllers and control room supervisors?*
Assets Covered Seaport CRM
91. Question Result, ID, References Sat, CR.CRMFM.FATIGUEREVIEW.P, 195.446(d)(2) (195.446(d)(3), 195.402(a))
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?*
Assets Covered Seaport CRM
Result Notes Training by Circadian
92. Question Result, ID, References Sat, CR.CRMFM.FATIGUESTATEGY.P, 195.446(d)(2)
Question Text *Does fatigue education address fatigue mitigation strategies (countermeasures)?*

Assets Covered [Seaport CRM](#)

93. Question Result, ID, References [Sat, CR.CRMFM.OFFDUTY.P, 195.446\(d\)\(2\)](#)

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

Assets Covered [Seaport CRM](#)

94. Question Result, ID, References [Sat, CR.CRMFM.FATIGUECONTENT.P, 195.446\(d\)\(3\)](#)

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

Assets Covered [Seaport CRM](#)

95. Question Result, ID, References [Sat, CR.CRMFM.FATIGUECONTENT.R, 195.446\(d\)\(3\)](#)

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

Assets Covered [Seaport CRM](#)

CR.CRMAM: Alarm Management

96. Question Result, ID, References [Sat, CR.CRMAM.ALARM.P, 195.446\(e\)](#)

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

Assets Covered [Seaport CRM](#)

97. Question Result, ID, References [Sat, CR.CRMAM.ALARMMALFUNCTION.P, 195.446\(e\)\(1\)](#)

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

Assets Covered [Seaport CRM](#)

98. Question Result, ID, References [Sat, CR.CRMAM.ALARMREVIEW.P, 195.446\(e\)\(1\)](#)

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

Assets Covered [Seaport CRM](#)

99. Question Result, ID, References [Sat, CR.CRMAM.CONTROLLERPERFORMANCE.P, 195.446\(h\) \(195.446\(e\)\(1\)\)](#)

Question Text *Does the review of safety-related alarms account for console differences that could affect individual-specific controller qualification and performance?*

Assets Covered [Seaport CRM](#)

100. Question Result, ID, References [Sat, CR.CRMAM.STALEDATA.P, 195.446\(e\)\(1\)](#)

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

Assets Covered [Seaport CRM](#)

101. Question Result, ID, References [Sat, CR.CRMAM.MONTHLYANALYSIS.P, 195.446\(e\)\(2\)](#)

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?*

Assets Covered [Seaport CRM](#)

102. Question Result, ID, References [Sat, CR.CRMAM.PROBLEMCORRECTION.P, 195.446\(e\)\(2\)](#)

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

Assets Covered [Seaport CRM](#)

103. Question Result, ID, References **Sat, CR.CRMAM.ALARMVERIFY.R, 195.446(e)(2)**
 Question Text *Do records verify that monthly reviews and analysis of alarm points have been performed?*
 Assets Covered **Seaport CRM**
104. Question Result, ID, References **Sat, CR.CRMAM.ALARMSETPOINTS.P, 195.446(e)(3)**
 Question Text *Is there a formal process to determine the correct alarm setpoint values and alarm descriptions?*
 Assets Covered **Seaport CRM**
105. Question Result, ID, References **Sat, CR.CRMAM.SETTINGCONTROL.P, 195.446(e)(3)**
 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?*
 Assets Covered **Seaport CRM**
 Result Notes **Section 7**
106. Question Result, ID, References **Sat, CR.CRMAM.VERIFICATION.P, 195.446(e)(3)**
 Question Text *Do processes require that any calibration or change to field instruments require verification of alarm setpoints and alarm descriptions?*
 Assets Covered **Seaport CRM**
107. Question Result, ID, References **Sat, CR.CRMAM.ALARMVALUEVERIFY.R, 195.446(e)(3)**
 Question Text *Do records demonstrate verification of correct safety-related alarm set-point values and alarm descriptors when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months?*
 Assets Covered **Seaport CRM**
108. Question Result, ID, References **Sat, CR.CRMAM.PLANREVIEW.P, 195.446(e)(4)**
 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?*
 Assets Covered **Seaport CRM**
 Result Notes **Feb 3, 2019 - (Pg. 55)**
109. Question Result, ID, References **Sat, CR.CRMAM.PLANREVIEW.R, 195.446(e)(4)**
 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?*
 Assets Covered **Seaport CRM**
110. Question Result, ID, References **Sat, CR.CRMAM.WORKLOAD.P, 195.446(e)(5)**
 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?*
 Assets Covered **Seaport CRM**
111. Question Result, ID, References **Sat, CR.CRMAM.WORKLOADMONITORING.P, 195.446(e)(5)**
 Question Text *Is the process of monitoring and analyzing general activity comprehensive?*
 Assets Covered **Seaport CRM**
112. Question Result, ID, References **Sat, CR.CRMAM.CONTROLLERREACTION.P, 195.446(e)(5)**
 Question Text *Does the process have a means of determining that the controller has sufficient time to analyze and react to incoming alarms?*
 Assets Covered **Seaport CRM**
113. Question Result, ID, References **Sat, CR.CRMAM.PERFORMANCEANALYSIS.R, 195.446(e)(5)**
 Question Text *Has an analysis been performed to determine if controller(s) performance is currently adequate?*

Assets Covered **Seaport CRM**

114. Question Result, ID, References **Sat, CR.CRMAM.DEFICIENCIES.P, 195.446(e)(6)**

Question Text *Is there a process to address how deficiencies found in implementing 195.446(e)(1) through 195.446(e)(5) will be resolved?*

Assets Covered **Seaport CRM**

115. Question Result, ID, References **Sat, CR.CRMAM.DEFICIENCIES.R, 195.446(e)(6)**

Question Text *Do records indicate deficiencies found in implementing 195.446(e)(1) through 195.446(e)(5) have been resolved?*

Assets Covered **Seaport CRM**

CR.CRMCMGT: Change Management

116. Question Result, ID, References **Sat, CR.CRMCMGT.CHANGEMEETINGS.P, 195.446(f)(1)**

Question Text *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?*

Assets Covered **Seaport CRM**

117. Question Result, ID, References **Sat, CR.CRMCMGT.CHANGETRAINING.R, 195.446(f)(1)**

Question Text *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?*

Assets Covered **Seaport CRM**

118. Question Result, ID, References **Sat, CR.CRMCMGT.EMERGENCYCONTACT.P, 195.446(f)(2)**

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

Assets Covered **Seaport CRM**

119. Question Result, ID, References **Sat, CR.CRMCMGT.CHANGECOORDINATION.P, 195.446(f)(1)**

Question Text *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?*

Assets Covered **Seaport CRM**

120. Question Result, ID, References **Sat, CR.CRMCMGT.CHANGECOORDINATION.R, 195.446(f)(1)**

Question Text *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?*

Assets Covered **Seaport CRM**

121. Question Result, ID, References **Sat, CR.CRMCMGT.FIELDCONTACT.P, 195.446(f)(2)**

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?*

Assets Covered **Seaport CRM**

122. Question Result, ID, References **Sat, CR.CRMCMGT.FIELDCHANGES.R, 195.446(f)(2)**

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?*

Assets Covered **Seaport CRM**

CR.CRMEXP: Operating Experience

123. Question Result, ID, References **Sat, CR.CRMEXP.REPORTABLEACCIDENTREVIEW.P, 195.446(g)(1)**

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

Assets Covered Seaport CRM

124. Question Result, ID, References Sat, CR.CRMEXP.REPORTABLEACCIDENTREVIEW.R, 195.446(g)(1)

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?*

Assets Covered Seaport CRM

125. Question Result, ID, References Sat, CR.CRMEXP.LESSONSLEARNED.P, 195.446(g)(2) (195.446(b)(5))

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?*

Assets Covered Seaport CRM

126. Question Result, ID, References Sat, CR.CRMEXP.LESSONSLEARNED.R, 195.446(g)(2) (195.446(b)(5))

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.)?*

Assets Covered Seaport CRM

CR.CRMTRAIN: Training

127. Question Result, ID, References Sat, CR.CRMTRAIN.CONTROLLERTRAIN.P, 195.446(h)

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

Assets Covered Seaport CRM

128. Question Result, ID, References Sat, CR.CRMTRAIN.CONTROLLERTRAIN.R, 195.446(h)

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

Assets Covered Seaport CRM

129. Question Result, ID, References Sat, CR.CRMTRAIN.TRAININGREVIEW.P, 195.446(h)

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?*

Assets Covered Seaport CRM

130. Question Result, ID, References Sat, CR.CRMTRAIN.TRAININGREVIEW.R, 195.446(h)

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?*

Assets Covered Seaport CRM

Result Notes During annual review

131. Question Result, ID, References Sat, CR.CRMTRAIN.TRAININGCONTENT.R, 195.446(h)

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?*

Assets Covered Seaport CRM

132. Question Result, ID, References Sat, CR.CRMTRAIN.AOCLIST.R, 195.446(h)(1)

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

Assets Covered Seaport CRM

133. Question Result, ID, References **Sat, CR.CRMTRAIN.TRAININGABNORMAL.P, 195.446(h)(1)**
 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?*
 Assets Covered **Seaport CRM**
134. Question Result, ID, References **Sat, CR.CRMTRAIN.TRAINING.R, 195.446(h)(2)**
 Question Text *Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?*
 Assets Covered **Seaport CRM**
135. Question Result, ID, References **NA, CR.CRMTRAIN.TRAINING.O, 195.446(h)(2)**
 Question Text *Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?*
 Assets Covered **Seaport CRM**
 Result Notes **No such activity/condition was observed during the inspection.**
136. Question Result, ID, References **Sat, CR.CRMTRAIN.COMMUNICATIONTRAINING.P, 195.446(h)(3)**
 Question Text *Does the CRM program train controllers on their responsibilities for communication under the operator's emergency response procedures?*
 Assets Covered **Seaport CRM**
137. Question Result, ID, References **Sat+, CR.CRMTRAIN.SYSKNOWLEDGE.P, 195.446(h)(4)**
 Question Text *Does the training program provide controllers a working knowledge of the pipeline system, especially during the development of abnormal operating conditions?*
 Assets Covered **Seaport CRM**
 Result Notes **Requirements OK**
138. Question Result, ID, References **Sat, CR.CRMTRAIN.INFREQOPSLIST.R, 195.446(h)(5)**
 Question Text *Has a list of pipeline operating setups that are periodically (but infrequently) used been established?*
 Assets Covered **Seaport CRM**
139. Question Result, ID, References **Sat, CR.CRMTRAIN.INFREQOPSREVIEW.P, 195.446(h)(5)**
 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?*
 Assets Covered **Seaport CRM**
140. Question Result, ID, References **Sat, CR.CRMTRAIN.TEAMTRAINPERSONNEL.P, 195.446(h)(6)**
 Question Text *Do processes establish who, regardless of location, operationally collaborates with control room personnel?*
 Assets Covered **Seaport CRM**
141. Question Result, ID, References **Sat, CR.CRMTRAIN.TEAMTRAINFREQ.P, 195.446(h)(6)**
 Question Text *Do processes define the frequency of new and recurring team training?*
 Assets Covered **Seaport CRM**
142. Question Result, ID, References **Sat, CR.CRMTRAIN.TEAMTRAINCOMPLETE.P, 195.446(h)(6)**
 Question Text *Do processes address all operational modes and operational collaboration/control?*
 Assets Covered **Seaport CRM**
143. Question Result, ID, References **Sat, CR.CRMTRAIN.TEAMTRAINEXPERIENCE.P, 195.446(h)(6)**
 Question Text *Do processes include incorporation of lessons learned from actual historical events and other oil-gas industry events?*

Assets Covered [Seaport CRM](#)

144. Question Result, ID, References [Sat, CR.CRMTRAIN.TEAMTRAINEXERCISE.R, 195.446\(h\)\(6\)](#)
Question Text *Do records indicate that training exercises were adequate and involved at least one qualified controller?*
Assets Covered [Seaport CRM](#)
145. Question Result, ID, References [Sat, CR.CRMTRAIN.TEAMTRAINEXERCISE.O, 195.446\(h\)\(6\)](#)
Question Text *Does implementation of a control room team exercise demonstrate performance in accordance with regulatory and process requirements?*
Assets Covered [Seaport CRM](#)
146. Question Result, ID, References [Sat, CR.CRMTRAIN.TEAMTRAINIDENTINDIVIDUAL.R, 195.446\(h\)\(6\)](#)
Question Text *Do records demonstrate that individuals identified as of January 23, 2018 received team training by January 23, 2019?*
Assets Covered [Seaport CRM](#)

CR.CRMCOMP: Compliance Validation and Deviations

147. Question Result, ID, References [Sat, CR.CRMCOMP.SUBMITPROCEDURES.P, 195.446\(i\)](#)
Question Text *Are there adequate processes to assure that the operator is responsive to requests from applicable agencies to submit their CRM procedures?*
Assets Covered [Seaport CRM](#)
148. Question Result, ID, References [Sat, CR.CRMCOMP.SUBMITPROCEDURES.R, 195.446\(i\)](#)
Question Text *Has the operator been responsive to requests from applicable agencies to submit their CRM procedures?*
Assets Covered [Seaport CRM](#)
149. Question Result, ID, References [Sat, CR.CRMCOMP.CRMCOORDINATOR.R, 195.446\(i\)](#)
Question Text *Is there an individual that is responsible and accountable for compliance with requests from PHMSA or other applicable agencies?*
Assets Covered [Seaport CRM](#)
Result Notes [Pamela Cannon](#)
150. Question Result, ID, References [Sat, CR.CRMCOMP.RECORDS.P, 195.446\(j\)\(1\)](#)
Question Text *Are records management processes adequate to assure records are sufficient to demonstrate compliance with the CRM rule?*
Assets Covered [Seaport CRM](#)
151. Question Result, ID, References [Sat, CR.CRMCOMP.RECORDS.R, 195.446\(j\)\(1\)](#)
Question Text *Are records sufficient to demonstrate compliance with the CRM rule?*
Assets Covered [Seaport CRM](#)
152. Question Result, ID, References [Sat, CR.CRMCOMP.ELECTRONICRECORDS.R, 195.446\(j\)\(1\)](#)
Question Text *Are electronic records properly stored, safeguarded, and readily retrievable?*
Assets Covered [Seaport CRM](#)
153. Question Result, ID, References [Sat, CR.CRMCOMP.DEVIATIONS.P, 195.446\(j\)\(2\)](#)
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?*
Assets Covered [Seaport CRM](#)
154. Question Result, ID, References [NA, CR.CRMCOMP.DEVIATIONS.R, 195.446\(j\)\(2\)](#)

Question Text *Were all deviations documented in a way that demonstrates they were necessary for safe operation?*
Assets Covered **Seaport CRM**
Result Notes **No deviations**

CR.LD: Leak Detection

155. Question Result, ID, References **Sat, CR.LD.LDSYS.R, 195.446(g) (195.452(i)(3))**
Question Text *Do records demonstrate the operator has identified, considered, or implemented leak detection measures to mitigate the consequences of a pipeline failure?*
Assets Covered **Seaport CRM**
156. Question Result, ID, References **Sat, CR.LD.CPMOUTPUT.P, 195.402(a) (195.446(b))**
Question Text *What is the output of the CPM System?*
Assets Covered **Seaport CRM**
157. Question Result, ID, References **Sat, CR.LD.ALARMLOOP.P, 195.402(a) (195.446(c), 195.446(e))**
Question Text *Is automatic closed-loop control response to alarm conditions used?*
Assets Covered **Seaport CRM**
158. Question Result, ID, References **NA, CR.LD.CPM.P, 195.402(a) (195.444, 195.446(b), 195.446(c))**
Question Text *If Computational Pipeline Monitoring (CPM) is used, does it comply with guidance in API 1130 requirements in operating, maintaining, testing, record-keeping, and dispatcher training?*
Assets Covered **Seaport CRM**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
159. Question Result, ID, References **NA, CR.LD.CPMTRAINING.P, 195.444 (API-1130, 195.505(h))**
Question Text *Are the Pipeline Controllers trained in the recognition of CPM alarms?*
Assets Covered **Seaport CRM**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
160. Question Result, ID, References **NA, CR.LD.CPMTRAINING.O, 195.444 (API-1130, 195.505(h))**
Question Text *Are the Pipeline Controllers trained in the recognition of CPM alarms?*
Assets Covered **Seaport CRM**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
161. Question Result, ID, References **NA, CR.LD.ALARMDISPLAY.P, 195.444 (API-1130)**
Question Text *Are alarms in compliance with Section 5.4.3 of API 1130?*
Assets Covered **Seaport CRM**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
162. Question Result, ID, References **NA, CR.LD.ALARMCRED.P, 195.444 (API-1130, 195.134, 195.446(e))**
Question Text *Do alarms conform to API-1130?*
Assets Covered **Seaport CRM**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
163. Question Result, ID, References **NA, CR.LD.LDSTEST.P, 195.444 (API-1130, 195.134)**
Question Text *Does testing of the LDS conform to API-1130?*
Assets Covered **Seaport CRM**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
164. Question Result, ID, References **NA, CR.LD.LDSTESTINITIAL.P, 195.134 (API-1130)**

Question Text *Does initial testing of the LDS conform to API-1130?*

Assets Covered Seaport CRM

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

165. Question Result, ID, References NA, CR.LD.LDSTESTINITIAL.R, 195.134 (API-1130)

Question Text *Have initial system testing records and results been retained/available and indicate adequate results?*

Assets Covered Seaport CRM

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

166. Question Result, ID, References NA, CR.LD.LDSMOC.P, 195.444 (API-1130, 195.134)

Question Text *Are parameter and/or system changes reflected in the leak detection system?*

Assets Covered Seaport CRM

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

167. Question Result, ID, References NA, CR.LD.LDSCADA.P, 195.134 (API-1130, 195.444, 195.446(c))

Question Text *Are the LDS data, communication, and controller interface appropriately integrated with the SCADA displays?*

Assets Covered Seaport CRM

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

168. Question Result, ID, References NA, CR.LD.LDSINSTRUMENT.P, 195.444 (API-1130, 195.134)

Question Text *Is the accuracy and calibration of field instrumentation used in the leak detection system appropriately assured?*

Assets Covered Seaport CRM

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

169. Question Result, ID, References NA, CR.LD.LDSINSTRUMENT.R, 195.444 (API-1130, 195.446(j))

Question Text *Do records indicate the calibration of field instrumentation used in the leak detection system was performed?*

Assets Covered Seaport CRM

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

170. Question Result, ID, References NA, CR.LD.CPMPROTECT.P, 195.402(a)

Question Text *Is the CPM system adequately protected from security threats?*

Assets Covered Seaport CRM

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

FS.TS: Tanks and Storage

171. Question Result, ID, References Sat, CR.SCADA.SCADAOVERFILL.P, 195.428(d) (195.446(b), 195.446(c)) (also presented in: CR.SCADA)

Question Text *Is an adequate process/procedure in place for testing applicable SCADA controlled overfill protection devices?*

Assets Covered Seaport CRM

172. Question Result, ID, References Sat, CR.SCADA.SCADAOVERFILL.R, 195.404(a)(vii) (195.404(c)(3), 195.428(d)) (also presented in: CR.SCADA)

Question Text *Do records indicate adequate inspection and testing of SCADA overfill protection systems?*

Assets Covered Seaport CRM

Result Notes Reviewed testing of over-fill protection

173. Question Result, ID, References Sat, CR.SCADA.SCADAOVERPRESSTESTBO.P, 195.428(b) (also presented in: CR.SCADA)

Question Text *Does the process adequately test applicable SCADA controlled overpressure protection devices on pressurized breakout tanks?*

Assets Covered **Seaport CRM**

Result Notes **Pressure tested twice per. year**

174. Question Result, ID, **Sat, CR.SCADA.SCADAOVERPRESSTESTBO.R, 195.404(a)(vii) (195.404(c)(3), 195.428(b))** (also References presented in: CR.SCADA)

Question Text *Do records indicate adequate inspection and testing of SCADA overpressure protection devices on pressurized breakout tanks?*

Assets Covered **Seaport CRM**

Report Parameters: Results: all

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