STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION
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P.O. Box 47250 ● Olympia, Washington 98504-7250
(360) 664-1160 ● TTY 1-800-833-6384 or 711

Sent Via Email

March 1, 2021

Heather Rosentrater
Senior Vice President, Energy Delivery
Avista Corporation
1411 East Mission Ave
PO Box 3727
Spokane, WA 99220-3727

RE: 2021 Control Room Management Inspection – Avista Corporation Headquarters – (Insp. No. 8154)

Dear Ms Rosentrater:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Control Room Management inspection of Avista Corporation's Control Rom from February 16, 2021 to February 17, 2021. This inspection was conducted virtually using a MS Teams platform. This inspection also included representatives from the Oregon Public Utilities Commission (OPUC) as well as Idaho Public Utilities Commission (IPUC). Please note, any inspection findings by those regulatory agencies will be sent in a separate correspondence.

Our inspection indicates four area(s) of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed
Please review the attached report and respond in writing by April 2, 2021. The response should include how and when you plan to bring the area of concern into full compliance.

What happens after you respond to this letter?
The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time if the issue is resolved within 90 days of discovery.

If this issue is not resolved within 90 days, this matter may result in the issuance of a notice of probable violation.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 402-0066. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Mayo, Sean (UTC)
Digitally signed by Mayo, Sean (UTC)
Date: 2021.03.01 14:06:15 -08'00'

Sean C. Mayo
Pipeline Safety Director

Enclosure

cc: Elizabeth Frederiksen, Manager, Integrity Management and Compliance, Avista
Michael Faulkenberry, Director of Natural Gas, Avista
Randy Bareither, Pipeline Safety Engineer, Avista

UTILITIES AND TRANSPORTATION COMMISSION
2021 Control Room Management Inspection
Avista Corporation-Headquarters

The following areas of concern of Title 49 CFR Part 192 and were noted as a result of the 2021 inspection of the Avista Control Room Management Plan. The inspection included a specific selection of records pertaining to control room management per 49 CFR 192 631.

AREA OF CONCERN

1. **49 CFR §192.631 Control Room Management**
Area of Concern Involved: 192.631(b)(3)

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others;

Finding(s):
Avista provide the following document to support adherence to this part of the regulation: "Gas Control Disaster Recover—Evacuation Plan, Rev 2, June 26, 2018". The document gives direction to the control room in the event the Corporate building in Spokane (which houses the control room) must be evacuated as follows:

Corporate Building Evacuation
The Gas Controller will evacuate under the direction of Avista's System Operator or if determined by Control Room Management. Once the order to evacuate has been given perform the following tasks prior to building evacuation.
1. Shutdown the Service Suite Dispatch Application.
2. Gather the following items:
a. Personal items such as phone, wallet/purse, eye glasses, etc.
b. Control Room GoBook found in the designated place.
c. RSA token(s).
3. Evacuate the building using the established emergency evacuation routes.
4. Evacuate to the System Operations back up control center found in the basement of the Coeur d' Alene Service Center located at 1735 N 15th St Coeur d' Alene, Idaho.

During the time necessary to shut down the control room, pack up equipment and physically move to Coeur d'Alene, the pipeline is apparently not being monitored. The procedure should be amended to address this situation and ensure continuity of the pipeline.

2. **49 CFR §192.631 Control Room Management**

Area of Concern Involved: 192.631(h)(1)

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

(1) Responding to abnormal operating conditions likely to occur simultaneously or in sequence.

Finding(s):
Avista provided the following document to support adherence to this part of the regulation: "Avista Emergency and AOC General List June 9, 2015 Rev 1"

This abnormal operating condition (AOC) list while providing conditions for particular alarms, does not specifically address those alarms which could occur simultaneously or in sequence. Avista should evaluate alarm conditions based on alarm history specific to those occurring simultaneously or in sequence and update the list accordingly.

3. **49 CFR §192.631 Control Room Management**
Area of Concern Involved: 192.631(h)(1)

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

(1) Responding to abnormal operating conditions likely to occur simultaneously or in sequence.

Finding(s):
Avista provided the following document to support adherence to this part of the regulation: "Avista Emergency and AOC General List June 9, 2015 Rev 1"

This abnormal operating condition (AOC) list while providing conditions for particular alarms, does not specifically address those alarms which could occur simultaneously or in sequence. Avista should evaluate alarm conditions based on alarm history specific to those occurring simultaneously or in sequence and update the list accordingly. Upon updates to this list, provide specific training to controllers on managing alarms occurring simultaneously or in sequence

4. **49 CFR §192.631 Control Room Management**
Area of Concern Involved: 192.631(j)

(j)Compliance and deviations. An operator must maintain for review during inspection:

(1) Records that demonstrate compliance with the requirements of this section; and

(2) Documentation to demonstrate that any deviation from the procedures required by this section was necessary for the safe operation of a pipeline facility.

Findings:

During the inspection, Avista provided a record of a deviation from 4/8/2018. This record noted "Deviation form was not filled out at the time of the incident. This was discovered during the 2018 HOS review." Avista's Control Room Management Plan (CRMP) Section 10, Compliance and Deviations has the following under Part 5 Plan Requirements as the following:

5.2 Deviations from the Control Room Management Plan shall be documented on the forms and/or records for each section.
5.2.1 Records of deviations shall include:
5.2.1.1 Reason the deviation was necessary for safe operation.
5.2.1.2 Criteria for allowing the deviation.

The procedure does not specify when the form is to be filled out and by who. It also does it specify who approves the form. This procedure needs to be amended to ensure proper documentation of deviations from the control room management plan.