Inspection Output (IOR)

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Inspection Information

Inspection Name	8154 Avista HQ Control Room Management	Operator(s)	AVISTA CORP (31232)	Plan Submitted	01/28/2021
Status	PLANNED	Lead	Dennis Ritter	Plan Approval	01/28/2021 by Joe Subsits
Start Year	2021	Team Members	Scott Rukke, David Cullom, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Bruce Perkins, Darrin Ulmer, Darren Tinnerstet, Cody Cox	All Activity Start	02/15/2021
System Type	GD			All Activity End	02/18/2021
Protocol Set ID	WA.GD.2020.02	Observer(s)	Deborah Becker, Kevin Hennessy, Ray Muller, Rell Koizumi, David Hoy, John Ivey	Inspection Submitted	--
				Inspection Approval	--
		Supervisor	Joe Subsits		
		Director	Sean Mayo		

Inspection Summary

Inspection Scope and Summary

2021 CRM Audit will use the Control Room Management IA question set as the audit framework (144 questions). This inspection was originally to take place in 2020 but was delayed due to Covid-19. Representatives from Oregon PUC and Idaho PUC will also be part of the inspection team. Avista Pipeline System. operates in three states, Washington, Oregon and Idaho. They employ SCADA to monitor their pipeline assets and have a control room with controllers that meet the definition of a control room. Avista's control room is at their HQ building on Mission St in Spokane WA. As of the end of 2019, Avista has 349,849 distribution services (163,662 in WA, 105,921 OR and 80,266 Id) and 91.229 miles of transmission line (76.562 WA, 14.667 OR). Avista does not have a backup control room or a redundant back up gas SCADA system. They currently have 6 qualified controllers and a qualified lead controller and employ the Dupont schedule of 12-hr shifts. They have one console and one controller on duty 24-7. Avista's control structure does not have outputs to remote controllable assets. Controllers must call out field employees to make changes to the system. Avista can evacuate their control room and move to Couer d'Alene, ID and operate the pipeline, however, Avista does not consider this a back up control room as they do no have fully redundant SCADA at this location for gas assets.

Facilities visited and Total AFODs

This inspection was conducted virtually using MS Teams platform.

Feburary 10-11,2021--Review records provided by Avista in FTP site. These records would normally have been reviewed onsite during the inspection, but due to Covid-19, were conducted remotely. **2 AFODs**

February 16, 2021--Begin virtual inspection (MS TEAMS platform). Oregon had originally planned this inspection for 2020, and had reviewed Control Room Management Plan and answered most of the inspection questions remotely. They joined inspection initially to go over approximately 15 questions needing additional explanation, then dropped off. WA and ID continued. **1 AFOD**

February 17, 2021--WA and ID, concluded inspection questions and held exit interview at 1600 with OR, ID and operator--Randy Bareither, Carie Mourin, Steve Schacher, Tim Mair. **1 AFOD**

Summary of Significant Findings
(DO NOT Discuss Enforcement options)

There were four areas of concern as noted in the Inspection for the following IA questions:

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

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

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

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

Any potential enforcement actions will be acted on by the individual regulatory agency(s).

Primary Operator contacts and/or participants

Randy Bareither, Pipeline Safety Engineer

Tim Mair, Manager Gas Control & Service Dispatch

Carie Mourin, Manager Gas Construction Services

Operator executive contact and mailing address for any official correspondence

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Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	WA UTC	88960	unit	88960	Bottle/Pipe - Holders Vault Offshore GOM OCS Copper Pipe Aluminum/Amphoteric Plastic pipe	143	143	143	100.0%
2.	89903 (10031232)	Avista HQ	unit	89903	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Aluminum/Amphoteric Plastic pipe Copper Pipe	--	--	--	--

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	WA UTC	Control Room Management	PRO, PRR, FR, GDIM, MMLPGIM, MISCTOPICS, GENERIC	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Procedures Records Observations	--	02/15/2021 02/18/2021	Control Room Management	PRO, PRR, FR, GDIM, MMLPGIM, MISCTOPICS, GENERIC	all assets	all types	143	143	143	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	Procedures Records Observations 1	COMPLETED	02/25/2021	Procedures Records Observations	WA UTC
2.	Control Room Management	Procedures Records Observations	COMPLETED	02/25/2021	Procedures Records Observations	WA UTC 89903 (10031232)

Results (Unsat,Concern values, 4 results)

MISCTOPICS.CRM: Control Room Management

1. Question Result, ID, References: Concern, CR.CRMRR.EVACUATION.P, 192.631(b)(3)

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

Assets Covered: WA UTC, 89903 (10031232)

Result Issue Summary:

When Avista has to shut down Mission HQ during an emergency evacuation and relocate to Couer d'Alene, the time to shut down control room, pack up equipment and physically move to Couer d'Alene is currently not addressed in the procedures. The pipeline is apparently not being monitored during this time. The procedure needs to account for how Avista addresses this situation.

Result Notes: Gas Control Disaster Recovery- Evacuation Plan Rev 2 June 26, 2018 not in CRMP.

CRMP Part 9.0 Control Room Training 6.5.4

When Avista has shut down Mission HQ during an emergency evacuation and relocate to Couer d'Alene, the time to shut down control room, pack up equipment and physically move to Couer d'Alene is currently not addressed in the procedures. The pipeline is apparently not being monitored during this time. The procedure needs to account for how Avista addresses this situation.

2. Question Result, ID, References: Concern, CR.CRMTRAIN.AOCLIST.R, 192.631(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: WA UTC

Result Issue Summary: This AOC list does not specifically address sequential or simultaneous conditions. Avista should evaluate alarm conditions based on alarm history specific to those occurring simultaneously or in sequence.

Result Notes: CRMP Rev 17 Nov 10, 2020

Section 9 Control Room Training Program

6.6.2 Covered tasks

6.6.2.2 Abnormal operating conditions

Reviewed Avista Emergency and AOC General List June 9, 2015 Rev 1

This AOC list does not specifically address sequential or simultaneous conditions. Avista should evaluate alarm conditions based on alarm history specific to those occurring simultaneously or in sequence.

3. Question Result, ID, References	Concern, CR.CRMTRAIN.TRAININGABNORMAL.P, 192.631(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	WA UTC
Result Issue Summary	Reviewed Avista Gas Controller Training program-OJT Task, Task Group 100: SCADA Title: Alarm Management Number:105 The training does not appear to be specific to abnormal operating conditions which occur simultaneously or in sequence as these conditions. Avista should amend the training to define specific abnormal operating conditions which occur simultaneously or in sequence and train controllers on those conditions.
Result Notes	Reviewed Avista Gas Controller Training program-OJT Task, Task Group 100: SCADA Title: Alarm Management Number:105 The training does not appear to be specific to abnormal operating conditions which occur simultaneously or in sequence as these conditions. Avista should amend the training to define specific abnormal operating conditions which occur simultaneously or in sequence and train controllers on those conditions.
4. Question Result, ID, References	Concern, CR.CRMCOMP.DEVIATIONS.P, 192.631(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	WA UTC, 89903 (10031232)
Result Issue Summary	The deviation process does not state when the form should be filled out. The process should clarify that the form is filled out and approved at the time a deviation is deemed necessary for the safe operation of the pipeline.
Result Notes	CRMP Rev 17 Nov 10, 2020 Section 10 Compliance and Deviations 5. Plan Requirements 5.2 deviations--The deviation process does not state when the form should be filled out. The process should clarify that the form is filled out and approved at the time a deviation is deemed necessary. A deviation form was reviewed dated 4/8/2018. The following note was on the bottom of the form: Note: Deviation form was not filled out at the time of the incident. This was discovered during the 2018 HOS review. Form filled out by Carie Mourin on 2/1/19. 5.2.2 reviewed once per year 5.3 Ops support mgr to supply compliance summary annually to Director of Nat Gas

Report Parameters: Results: Unsat,Concern

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