1411 E. Mission, PO Box 3727
Spokane, WA 99220-3727

Submitted to Sean Mayo via electronic mail at pipelineprogram@utc.wa.gov

March 29, 2021

Mr. Sean Mayo
Pipeline Safety Director
Washington Utility and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re: WUTC Control Room Management Inspection (Inspection No. 8154) – Avista Response

Dear Mr. Mayo:

In your letter of March 1, 2021, you listed four areas of concern discovered during the 2021 Natural Gas Standard Inspection #8154 that was conducted February 16-17, 2021. In this letter we have provided restatements of the areas of concern and Avista's responses.

Area of Concern (AOC) #1 Reference:

49 CFR §192.631(b)(3)

Description of AOC #1:

> *(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 provided 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, eyeglasses, 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.

Avista Response to AOC #1:

Avista has updated the Gas Control Disaster Recovery Evacuation Plan (Rev 5, March 24, 2021) to address why delay in "standing up" the Gas Controller at the Coeur d'Alene office is acceptable. The new document is enclosed with this response letter.

Area of Concern #2 Reference:

49 CFR §192.631(h)(1)

Description of Area of Concern AOC #2:

> *(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.*

Findings:

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.

Avista Response to AOC #2:

Avista has updated the applicable portion of the DRAFT Rev 18 CRM Plan document (Section 9, 6.6) and the Emergency and Abnormal Operating Conditions List, Rev 2, March 24, 2021, to address staff concerns. The new documents are enclosed with this response letter.

Area of Concern (AOC) #3 Reference:

49 CFR §192.631(h)(1)

Description of AOC #3:

(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:

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

Findings:

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.

Avista Response to AOC #3:

Avista has updated the Emergency and Abnormal Operating Conditions List, Rev 2, March 24, 2021, and our training curriculum to address the aforementioned gap. The three training documents are enclosed herein and will be trained upon between now and July 31, 2021.

Area of Concern (AOC) #4 Reference:

49 CFR §192.631(j)

Description of AOC #4:

(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.

Avista Response to AOC #4:

Avista concurs our procedures do not specify when the form is to be filled out, by whom, and who approves the form. Please see Avista's DRAFT edits to our CRMP Section 10, Compliance and Deviations that will serve to correct this shortcoming.

Respectfully Submitted,

Heather Rosentrater
Senior Vice President, Energy Delivery and Shared Services
HR/rkb

Enclosures

Cc: Mike Faulkenberry, Director of Natural Gas
Tim Mair, Gas Control and Service Dispatch Manager – DO
Vern Malensky, Manager of Pipeline Integrity and Compliance - DO