



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

April 19, 2021

Jon G. Huddleston
Vice President of Engineering and Utility Operations
Northwest Natural
250 Southwest Taylor Street
Portland, Oregon 97204

RE: 2021 Natural Gas Control Room Management– Northwest Natural – HQ (Insp. No. 8284)

Dear Mr Huddleston:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection of Northwest Natural (NWN), HQ-CRM from March 22, 2021 to March 23, 2021. This inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates five areas of concern, 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 May 21, 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 60 days of discovery.

If this issue is not resolved within 60 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 Dave Cullom at (360) 489-8684. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

UTILITIES AND TRANSPORTATION COMMISSION
2021 Natural Gas Pipeline Safety Inspection
Northwest Natural – HQ – Control Room Management

The following areas of concern of Title 49 CFR Part 192 were noted as a result of the 2021 inspection of the Northwest Natural Control Room Management Program. The inspection included a random selection of records, operation and maintenance (O&M) procedures, emergency response, and a remote inspection of the control room.

AREAS OF CONCERN

1. 49 CFR §192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of:

Finding(s):

The location of the main control room is listed as 220 NW 2nd Portland, Oregon 97209 in the manual that the UTC currently has a copy of. The title of this document is: Control Room Management Plan, Revision Number 6.0 (12/20/2017) (reviewed by NWN 12/07/2018) The manual needs to be updated with the current control room location.

2. 49 CFR §192.631 Control room management.

(g) Operating experience. Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:

(2) Include lessons learned from the operator's experience in the training program required by this section.

Finding(s):

Records were not provided or available to demonstrate that lessons learned from the operator's experience such as reportable incidents/accidents, near misses, abnormal operations, leaks, operational and maintenance errors, etc. were incorporated into the training program. Lessons learned from these experiences are required to be incorporated into the CRM program.

3. **49 CFR §192.631 Control room management.**

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

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

Finding(s):

The procedure is lacking sufficient detail. The Compliance and Deviations section in NWN's CRM manual discusses creating records and storing them for 5 years, but that is the entirety of the procedure. It states: "Documentation and records are retained for a minimum of five (5) years."

Northwest Natural has an entry in the manual to reference CRM records creation and storage but needs to be more clearly defined. The operator was not able to provide, during the inspection, a storage location, or any further information on where the records are stored or how they can be retrieved.

4. **49 CFR §192.631 Control room management.**

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

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

Finding(s):

Records are saved for 5 years per the operator. Although the operator was able to provide a control room log from 5/3/2019 as requested, the information was stored on a system that was not readily available during the inspection. Secondary "mirrored" copies were not available without logging in at a production console. This can present issues if the main control room is disabled and the records are not available at the backup control room.

It is understood that security issues can arise from connecting remotely to a console while sharing information over shared teleconferencing. The operator should have redundancy and the capability either at a backup control room location or in another database that is not connected to the live SCADA system available. Records could then be reviewed as they are requested during an inspection rather than having the operator poll the system and return with information at a later time. This would also provide for greater transparency during the inspection process.

5. **49 CFR §192.631 Control room management.**

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

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

Finding(s):

There was no documentation available of any deviations or the lack thereof. The absence of any statement containing "no deviations" makes it difficult to determine whether there were no deviations for the inspection time period, if they were not being documented, or if the operator cannot locate where they are stored.

For example, the National Pipeline Mapping System (NPMS) requires operators to submit updated pipeline mapping information on an annual basis. If there are no changes, they are documented with a submission and a statement for the record of "No Changes."