

2020 South Dakota Pipeline Safety Inspection

Summary of Deficiencies

Operator: Xcel Energy

Inspection Types: Standard Records, Field Inspection, OQ Plan and Records and Control Room Management

Inspection Dates: October 2 -November 30, 2020

Exhibit 1

Notices of Probable Violation

Code Section	Code Description	Deficiency Noted	Proposed Correction Due Date	Penalty Proposed	Maximum Allowable Penalty	Compliance Order Proposed
192.631(h)	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?	<p>Don't document the review appropriately on the form. Do show updates to controller modules. Review should include a summary of what was analyzed, what was discovered and what changes were made based on those discoveries. If nothing is changed, then a reason for no changes being made should be described.</p> <p>Need to use form referenced.</p> <p>This issue has been identified in every Control Room Management Inspection starting in 2013. (Previously identified as question H0-2 in the CRM Protocols.) In 2013 the requirement wasn't due but it was discussed. In 2017 a warning was issued for not fulfilling this requirement.</p>	1/29/2021	\$1,138	\$200,000 per day with a maximum of \$2 million.	Operator must implement appropriate measures to ensure compliance with this code requirement.
192.631(h)(6)	(6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018.	<p>This section of code has not been implemented. The requirements need to be added to the plan. All documentation regarding completion of team training must be documented.</p> <p>192.631 (h) (6) was added January 23, 2017 and required to be implemented by January 23, 2018.</p>	1/29/2021	\$938	\$200,000 per day with a maximum of \$2 million.	Operator must implement appropriate measures to ensure compliance with this code requirement.

Warnings

Code Section	Code Description	Deficiency Noted	Warning	Proposed Correction Due Date
192.801	How do you identify which tasks apply to each individual?	Information is not clear in the plan but they have another document that details this information. Tasks are identified by job title. This information needs to be added to the plan.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	Does the plan have generic AOCs that could be found anywhere near the pipeline?	Generic AOCs are not identified. All AOCs are task specific. Per discussion the New plan will have one AOC covered task. Ensure this information is included in revised plan.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	What are the methods used for evaluating an individual's ability to perform a covered task? (Written, Oral, Observation/Performance)	In section 4, Evaluation Process the methods of evaluations includes (Item 5) workshops, which could include hands-on training, classes, outside vendor demonstrations with evaluations. Per discussion this type of evaluation will not be included in the revised plan. Please ensure that change is made.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	Review the evaluation method of each of the covered task to determine if the method is appropriate.	Appendix A uses W, P, S & O as evaluation methods but they are not defined. Please ensure the revised plan includes those definitions.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	If oral evaluations are used, are they limited to situations where other methods are not appropriate?	Some tasks have the option for oral evaluations and not others do not. Per discussion new plan will provide a definition of oral and describe how it is applied.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	Are all observation/performance evaluations done one on one?	This requirement is not stated. Recommend that it is included in the next edition of the OQ plan.	Xcel may be in violation of the code section in Column A. Xcel is advised to	

Warnings

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			correct this or be subject to enforcement action.	
192.803	How are high/medium/low and significant/insignificant/critical changes defined?	Significant is used in Section 7.4. Suggest significant be defined in the next version.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	Is there documentation of the changes that have occurred to the OQ program?	Need to track reviews and changes to the OQ program. 2015 was previous revision. Nothing document for 2016-2018. How will documentation be ensured in the future?	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	What method was used to determine the requalification time frame?	DIF analysis completed originally. Now going to B31Q but not changing requalification timeframe. Plan needs to include information about how requalification time was determined.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	
192.803	Is the qualification removed from an individual who has been observed completing a task incorrectly? Who can report those situations?	Plan should identify who can report incorrect completion of tasks.	Xcel may be in violation of the code section in Column A. Xcel is advised to correct this or be subject to enforcement action.	

Notices of Concern

Code Section	Code Description	Comment
192.631 (b)(3)	Do processes specifically address the controller's responsibilities in the event the control room must be evacuated?	B.2 identifies that evacuations plans are documented within the Control Room Operations Manual and scheduled testing throughout the year. Do not reference procedure at bottom of page.
192.631 (b)(5)	Do others authorized to direct or supersede the technical actions of a controller demonstrate an understanding of the process to implement this authority?	Difficult question to ask the controller and didn't get the response expected. May want to discuss further in training.
192.631(d)	Does the fatigue mitigation process or procedures (plan) identify operator-specific fatigue risks?	Might want to include the 2-6 am time frame as a time to be aware of increased fatigue.

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192.631(d)	Do processes require that the potential contribution of controller fatigue to incidents and accidents be quantified during investigations?	Need to add incident review form to appendix G.
192.631(d)	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?	Should call out who is managing the overall fatigue mitigation and risk program.
192.631(d)(1)	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?	D1 - should make minor change to say minimum of eight hours minimum sleep time rather than off duty time.
192.631(d)(4)	For shifts longer than 8 hours, have specific fatigue countermeasures been implemented for the ninth and beyond hours	Suggest adding this information in the plan the counter measures available for when the work in the control room vs. working from home.
192.631(d)(4)	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?	Should address handling two 14 hour shifts in any sliding 5 day period.
192.631(e)(1)	Does the review of safety-related alarms include specific procedures and practices for managing stale or unreliable data?	Alarm Management Philosophy should be referenced on bottom of E.6
192.631(e)(4)	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?	Don't have documentation of the review but do have edits that have been made. Included in the CRM plan review discussed earlier in the inspection. E.4 not using Alarm Management Plan Review form.
192.631(h)(1)	Has a list of the abnormal operating conditions that are likely to occur simultaneously or in sequence been established?	Appendix H needs to reference Alarm Limits and Response Procedures.
192.631(i)	Has the operator been responsive to requests from applicable agencies to submit their CRM procedures?	I got the CRM plan when requested, but when procedures are reference in CRM plan, they need to be included in the request to allow review.
192.631(j)(1)	Are records sufficient to demonstrate compliance with the CRM rule?	Forms called out in the CRM plan need to be utilized. If a form isn't working, make revisions and adapt to something that does work.

Notices of Concern

Code Section	Code Description	Comment
192.631(j)(1)	Are electronic records properly stored, safeguarded, and readily retrievable?	Records are organized in a method specific to the job, but to find examples is difficult. Large number of documents and it is difficult to manage. Looking to change methods of storage.