

Results and Notes Review

CR.CRMGEN: General

Question ID, CR.CRMGEN.CRMCRITERIA.P, 195.446(a)

References

Question Text *Does the process adequately address criteria by which the operator determines which of its facilities are control rooms?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Gas Assessment on Control Room Management Regulation and USPL Operations -

Question ID, CR.CRMGEN.CRMMGMT.P, 195.446(a)

References

Question Text *Are CRM procedures formalized and controlled?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Manual - Procedure #P-195.402(a)

Question ID, CR.CRMGEN.CRMIMPLEMENT.R, 195.446(a)

References

Question Text *Were procedures approved, in place, and implemented on or before the regulatory deadline?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Procedures were in place prior to required dates.

Question ID, CR.CRMGEN.CRMPROCLOCATION.O, 195.446(a)

References

Question Text *Are procedures readily available to controllers in the control room?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Procedures are readily available to the controller.

CR.CRMRR: Roles and Responsibilities

Question ID, CR.CRMRR.RESPONSIBLE.P, 195.446(b)(1)

References

Question Text *Are there clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Review spreadsheet defines controller locations of control.

Question ID, CR.CRMRR.QUALCONTROL.P, 195.446(b)(1)

References

Question Text *Are there provisions in place to assure that only qualified individuals may assume control at any console/desk?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Qualified Controllers are logged in to only the console they are qualified to control prior to access to the system.

Question ID, CR.CRMRR.DOMAINCHANGE.P, 195.446(b)(1)

References

Question Text *If the physical domain of responsibility periodically changes, has a clear process been established to describe the conditions for when such a change occurs?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Procedure covering transfer of operations, Document Number: CTULM-OPS-460-009 Original 9/21/09 appears adequate.

Question ID, CR.CRMRR.RESPCHANGE.P, 195.446(b)(1)

References

Question Text

Do processes address a controller's role during temporary impromptu (unplanned) changes in controller responsibilities?

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Procedure covering transfer of operations, Document Number: CTULM-OPS-460-009 Section 8.0 Original 9/21/09 appears adequate.

Question ID, CR.CRMRR.COMMANDVERIFY.P, 195.446(b)(1)

References

Question Text *Do the defined roles and responsibilities require controllers to stay at the console to verify all SCADA commands that have been initiated are fulfilled, and that commands given via verbal communications are acknowledged before leaving the console for any reason?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Shift Turnover Document FCTRL-OPS-463-004 Section 8.0

Question ID, CR.CRMRR.AUTHORITYABNORMAL.P, 195.446(b)(2)

References

Question Text *Have processes been established to define the controllers' authority and responsibilities when an abnormal operating condition is detected?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 - P#195.446 section B Page 3 and Abnormal Operations Procedure P-195.402(b)

Question ID, CR.CRMRR.PRESSLIMITS.O, 195.446(b)(2)

References

Question Text *Are controllers aware of the current MOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MOP?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Question ID, CR.CRMRR.AUTHORITYEMERGENCY.P, 195.446(b)(3)

References

Question Text *Do processes define the controllers' authority and responsibility to make decisions, take actions, and communicate with others upon being notified of, or upon detection of, and during, an emergency or if a leak or rupture is suspected?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 - Procedure P-#195.446 section B Page 3 and Emergencies P-195.402 (e)

Question ID, CR.CRMRR.EVACUATION.P, 195.446(b)(3)

References

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

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Tulsa Control Center (TCC) Emergency Response Plan Document Number CTULM-ERP-463-002, includes, fire, tornado and bomb threats as causes for evacuation.

Question ID, CR.CRMRR.COMMSYSFAIL.P, 195.446(b)(3)

References

Question Text *Do processes specifically address the controller's responsibilities in the event of a SCADA system or data communications system failure impacting large sections of the controller's domain of responsibility?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER BOOK 2 - Section 5.69.01, Ferndale Gas System Summary, Section H, page 7, Communications and SCADA failure.

Question ID, CR.CRMRR.HANDOVER.P, 195.446(b)(4) (195.446(c)(5))

References

Question Text *Have processes been established for the hand-over of responsibility that specify the type of information to be communicated to the oncoming shift?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 195.446 (B)(1) Procedure FCTRL-OPS-463-004 Section 8

Question ID, CR.CRMRR.HANDOVERDOC.P, 195.446(b)(4) (195.446(c)(5))

References

Question Text *Do processes require that records document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 195.446 (B)(1) Procedure FCTRL-OPS-463-004 Section 8

Question ID, CR.CRMRR.HANDOVERDOC.R, 195.446(b)(4) (195.446(c)(5))

References

Question Text *Are there records that document the hand-over of responsibility, document the time the actual hand-over of responsibility occurs, and the key information and topics that were communicated during the hand-over?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes TCC Shift Change Reports - Reviewed sample of reports. Shift change report and 12 hour forecast.

Question ID, CR.CRMRR.HANDOVEROVERLAP.P, 195.446(b)(4)

References

Question Text *Do processes require the controllers to discuss recent and impending important activities ensuring adequate overlap?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes

TCC Shift Change Reports - Reviewed sample of reports. Shift change report and 12 hour forecast.

Question ID, CR.CRMRR.HANDOVERALTERNATIVE.P, 195.446(b)(4)

References

Question Text *When a controller is unable to continue or assume responsibility for any reason, do the shift hand-over processes include alternative shift hand-over actions that specifically address this situation?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Procedures are adequate.

Question ID, CR.CRMRR.UNATTENDCONSOLE.P, 195.446(b)(4)

References

Question Text *Has the operator established an adequate process for occasions when the console is left temporarily unattended for any reason?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER BOOK 1 - Procedure No fctrl-ops-463-004 Section 8.15 page 7-8

Question ID, CR.CRMRR.CONSOLECOVERAGE.P, 195.446(b)(4)

References

Question Text *Do processes maintain adequate console coverage during shift hand-over?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER BOOK 1 - Procedure No FCTRL-OPS-463-004 Section 8.12

CR.SCADA: Supervisory Control and Data Acquisition

Question ID, CR.SCADA.SYSTEMMOC.P, 195.446(c)(1)

References

Question Text *Do processes clearly define the types of changes to the SCADA system(s) that constitute additions, expansions, or replacements under the meaning of the CRM rule?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Management of Change (MoC) Procedure - USPL(Corporate)-MOC-001-001
Section 3.1 MOC types, page 4

Question ID, CR.SCADA.DISPLAYCONFIG.P, 195.446(c)(1)

References

Question Text *Are there written processes to implement the API RP 1165 display standards to the SCADA systems that have been added, expanded, or replaced since August 1, 2012?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system since August 1, 2012.

Question ID, CR.SCADA.1165HUMANFACTORS.R, 195.446(c)(1)

References

Question Text *Has section 4 of API RP 1165 regarding human factors engineering been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.DISPLAYHARDWARE.R, 195.446(c)(1)

References

Question Text *Has section 5 of API RP 1165 regarding display hardware been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.DISPLAYLAYOUT.R, 195.446(c)(1)

References

Question Text *Has section 6 of API RP 1165 regarding display layout and organization been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.DISPLAYNAVIGATION.R, 195.446(c)(1)

References

Question Text *Has section 7 of API RP 1165 regarding display navigation been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.DISPLAYOBJECTS.O, 195.446(c)(1)

References

Question Text *Has section 8 of API RP 1165 regarding display object characteristics been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.DISPLAYDYNAMICS.R, 195.446(c)(1)

References

Question Text *Has section 9 of API RP 1165 regarding display object dynamics been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.CONTROLSELECTION.R, 195.446(c)(1)

References

Question Text *Has section 10 of API RP 1165 control selection and techniques been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.ADMINISTRATION.R, 195.446(c)(1)

References

Question Text *Has section 11 of API RP 1165 administration been implemented?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.1165IMPRACTICAL.R, 195.446(c)(1)

References

Question Text *If any/all applicable paragraph(s) of API RP 1165 have not been implemented, has it been demonstrated and documented that the unimplemented provisions are impractical for the SCADA system used?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Although they have done assessments, they have not implemented new and/or revised or changed their SCADA system.

Question ID, CR.SCADA.SETPOINT.P, 195.446(c)(2) (195.406(b))

References

Question Text *Does the process adequately define safety-related points?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes SCADA Point to Point Testing, FCTRL-SCD-460-014 Section 8.4 appears adequate for defining the safety-related points.

Question ID, CR.SCADA.SETPOINT.R, 195.446(c)(2)

References

Question Text *Do records indicate safety-related points have been adequately implemented?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Safety related alarms are defined in Procedure FCTRL-SCD-460-014 Section 8.4 and appear adequate.

Question ID, CR.SCADA.POINTVERIFY.P, 195.446(c)(2)

References

Question Text *Are there adequate processes to define and identify the circumstances which require a point-to-point verification?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER BOOK 1 - Procedure FCTRL-SCD-460-014 Section 8.0 Procedure appears adequate.

Question ID, CR.SCADA.POINTVERIFY.R, 195.446(c)(2)

References

Question Text *Have required point-to-point verifications been performed?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed point to point performed 01/19/2014 to add a flow-meter.

Question ID, CR.SCADA.POINTVERIFYEXTENT.P, 195.446(c)(2)

References

Question Text

Are there adequate processes for the thoroughness of the point-to-point verification?

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER BOOK 1 - Procedure FCTRL-SCD-460-014 Section 8.0 Procedure appears adequate.

Question ID, CR.SCADA.POINTVERIFYEXTENT.R, 195.446(c)(2)

References

Question Text *Do records demonstrate adequate thoroughness of the point-to-point verification?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed point to point performed 01/19/2014 to add a flow-meter.

Question ID, CR.SCADA.POINTVERFIYINTVL.P, 195.446(c)(2)

References

Question Text *Is there an adequate process for defining when the point-to-point verification must be completed?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER BOOK 1 - Procedure FCTRL-SCD-460-014 Section 8.0 Procedure appears adequate.

Question ID, CR.SCADA.POINTVERFIYINTVL.R, 195.446(c)(2)

References

Question Text *Do records indicate the point-to-point verification has been completed at the required intervals?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed point to point performed 01/19/2014 to add a flow-meter.

Question ID, CR.SCADA.COMMPLAN.P, 195.446(c)(3)

References

Question Text *Has an internal communication plan been established and implemented that is adequate to manually operate the pipeline during a SCADA failure/outage?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMERnBOOK 2 5.69.01 Ferndale Gas System Summary, Paragraph H,

Question ID, CR.SCADA.COMMPLAN.R, 195.446(c)(3)

References

Question Text *Has the internal communication plan been tested and verified for manual operation of the pipeline safely at least once each calendar year but at intervals not exceeding 15 months?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed Controller Portal time outages for a sample of units. None within scope of this inspection.

Question ID, CR.SCADA.BACKUPSCADA.O, 195.446(c)(4)

References

Question Text *Is there a backup SCADA system?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Question ID, CR.SCADA.BACKUPSCADADEV.P, 195.446(c)(4)

References

Question Text *Has the use of the backup SCADA system for development work been defined?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Separate server for testing and development.

Question ID, CR.SCADA.BACKUPSCADATEST.R, 195.446(c)(4)

References

Question Text *Is the backup SCADA system tested at least once each calendar year at intervals not to exceed 15 months?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed tests for this inspection, Additional testing from primary to backup and then back to primary.

Question ID, CR.SCADA.BACKUPSCADAVERIFY.R, 195.446(c)(4)

References

Question Text *Does the testing verify that there are adequate processes in place for decision-making and internal communications to successfully implement a transition from primary SCADA to backup SCADA, and back to primary SCADA?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I FCTRL-SCD-463-002 section 8 procedure appears to be adequate.

Question ID, CR.SCADA.BACKUPSCADADEQUACY.R, 195.446(c)(4)

References

Question Text *If the back-up SCADA system is not designed to handle all the functionality of the main SCADA system, does the testing determine whether there are adequate procedures in place to account for displaced and/or different available functions during back-up operations?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes each backup computer is the same as the main control computer, not loss of functionality during backup computer operation.

Question ID, CR.SCADA.BACKUPSCADATRANSFER.P, 195.446(c)(4)

References

Question Text *Do processes adequately address and test the logistics of transferring control to a backup control room?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, P-195.446, CTULM-OPS-460-009 Operations Transfer from Tulsa to Backup control Center.

Question ID, CR.SCADA.BACKUPSCADARETURN.P, 195.446(c)(4)

References

Question Text *Do procedures adequately address and test the logistics of returning operations back to the primary control room?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, P-195.446, CTULM-OPS-460-009 Operations Transfer from Tulsa to Backup control Center.

Question ID, CR.SCADA.BACKUPSCADAFUNCTIONS.R, 195.446(c)(4)

References

Question Text *Is a representative sampling of critical functions in the back-up SCADA system being tested to ensure proper operation in the event the backup system is needed?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, P-195.446, CTULM-OPS-460-009 Operations Transfer from Tulsa to Backup control Center.

CR.CRMFM: Fatigue Management

Question ID, CR.CRMFM.FATIGUEMITIGATION.P, 195.446(d)

References

Question Text *Does the fatigue mitigation process or procedures (plan) identify operator-specific fatigue risks?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.3-8.8 Risk Reduction page 6-12

Question ID, CR.CRMFM.FATIGUERISKS.P, 195.446(d)

References

Question Text *Does the fatigue mitigation plan adequately address how the program reduces the risk associated with controller fatigue?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.3-8.8 Risk Reduction page 6-12

Question ID, CR.CRMFM.FATIGUEQUANTIFY.P, 195.446(d)

References

Question Text *Do processes require that the potential contribution of controller fatigue to incidents and accidents be quantified during investigations?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.9 Incident Investigation page 12

Question ID, CR.CRMFM.FATIGUEMANAGER.P, 195.446(d)

References

Question Text *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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 2.0 Roles and Responsibilities Section 2.0 page 2

Question ID, CR.CRMFM.SHIFTLENGTH.R, 195.446(d)(1)

References

Question Text *Is the scheduled shift length less than or equal to 12 hours (not including shift hand-over) 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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes 12 hour shifts using the Dupont Schedule

Question ID, CR.CRMFM.SHIFTLENGHTIME.R, 195.446(d)(1)

References

Question Text *Does the operator factor in all time the individual is working for the company when establishing shift lengths and schedule rotations 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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes 12 hour shifts using the Dupont Schedule

Question ID, CR.CRMFM.SCHEDULEDTIMEOFF.R, 195.446(d)(1)

References

Question Text *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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes 12 hour shifts using the Dupont Schedule

Question ID, CR.CRMFM.ONCALLCONTROLLER.R, 195.446(d)(1)

References

Question Text *For controllers who are on call, does the operator minimize interrupting the required 8 hours of continuous sleep 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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes BP does not use on call controllers.

Question ID, CR.CRMFM.MAXHOS.P, 195.446(d)(4)

References

Question Text *Do processes limit the maximum HOS limit in any sliding 7 day period to no more than 65 hours or is there a documented technical basis to show reduction of the risk associated with controller fatigue?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.5 Hours of Work and Rest Guidelines for normal operations page 8

Question ID, CR.CRMFM.MINTIMEOFF.P, 195.446(d)(4)

References

Question Text *After reaching the HOS limit in any sliding 7 day period, is the minimum time off at least 35 hours or is there a documented technical basis to show a reduction of the risk associated with controller fatigue?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.5 Hours of Work and Rest Guidelines for normal operations page 8

Question ID, CR.CRMFM.DOCSCHEDULE.P, 195.446(d)(4)

References

Question Text *Is there a formal system to document all scheduled and unscheduled HOS worked, including overtime and time spent performing duties other than control room duties?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes All hours of service are tracked on the schedule.

Question ID, CR.CRMFM.DAYSOFF.P, 195.446(d)(4)

References

Question Text *For normal business hour type operations (i.e., five days per week), are no more than five days worked in succession before at least two days off?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.5 Hours of Work and Rest Guidelines for normal operations page 8

Question ID, CR.CRMFM.WORKHOURS.R, 195.446(d)(4)

References

Question Text *For normal business hour type operations (i.e., five days per week), do records indicate shift start times no earlier than 6:00 a.m. and shift end times no later than 7:00 p.m.?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Control room does not use normal business hour type operations.

Question ID, CR.CRMFM.FATIGUECOUNTERMEASURES.P, 195.446(d)(4)

References

Question Text *For shifts longer than 8 hours, have specific fatigue countermeasures been implemented for the ninth and beyond hours?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.7 Workplace Environment Fatigue page 9

Question ID, CR.CRMFM.DAILYHOSLIMIT.P, 195.446(d)(4)

References

Question Text *Do processes limit the daily maximum HOS limit to no more than 14 hours in any sliding 24-hour period?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.5 HOS and Overtime Tracking page 8.

Question ID, CR.CRMFM.CONTROLLERNUMBERS.O, 195.446(d)(4)

References

Question Text *Do operations include a sufficient number of qualified controllers?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Seven total system controllers.

Question ID, CR.CRMFM.OFFDUTYHOURS.P, 195.446(d)(4)

References

Question Text *Do processes ensure that controllers are provided with at least thirty-five (35) continuous off-duty hours when limits are reached following the most recent 35-hour (minimum) off-duty rest period 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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.5 Hours of Work and Rest Guidelines for normal operations page 8

Question ID, CR.CRMFM.SHIFTHOLDOVER.P, 195.446(d)(4)

References

Question Text *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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.5 Hours of Work and Rest Guidelines for normal operations page 8

Question ID, CR.CRMFM.SPECIFICCOUNTERMEASURES.P, 195.446(d)(4)

References

Question Text *Do processes require specific fatigue countermeasures during applicable time periods, 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?

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.7 Workplace Environment Fatigue page 9

Question ID, CR.CRMFM.HOSDEVIATIONS.P, 195.446(d)(4)

References

Question Text *Is there a formal process for approving deviations from the maximum HOS limits?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.7 Fatigue Related Errors mitigation table page 10-11. Reviewed Hours of service emergency Deviation form.

Question ID, CR.CRMFM.FATIGUEEDUCATE.P, 195.446(d)(2) (195.446(d)(3))

References

Question Text *Does the program require that fatigue education/training is required for all controllers and control room supervisors?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.1 Training page 4

Question ID, CR.CRMFM.FATIGUEEDUCATE.R, 195.446(d)(2) (195.446(d)(3))

References

Question Text *Is fatigue education/training documented for all controllers and control room supervisors?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Fatigue training held on Feb 2016, reviewed sign in sheet for 2016. Reviewed outline of training.

Question ID, CR.CRMFM.FATIGUEREFRESHER.R, 195.446(d)(2) (195.446(d)(3))
References

Question Text *Is refresher fatigue education provided at regular intervals?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Refresher Fatigue is done annually.

Question ID, CR.CRMFM.FATIGUEREVIEW.P, 195.446(d)(2) (195.446(d)(3))
References

Question Text *Do processes require that the effectiveness of the fatigue education/training program be reviewed at least once each calendar year, not to exceed 15 months?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-008 Section 8 Procedure, Controller Training Procedure, Program Effectiveness and Evaluation page 6

Question ID, CR.CRMFM.FATIGUESTRATEGY.P, 195.446(d)(2)
References

Question Text *Does fatigue education address fatigue mitigation strategies (countermeasures)?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.7 Fatigue Related Errors mitigation table page 10

Question ID, CR.CRMFM.OFFDUTY.P, 195.446(d)(2)
References

Question Text *Does fatigue education address how off-duty activities contribute to fatigue?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes

Question ID, CR.CRMFM.FATIGUECONTENT.P, 195.446(d)(3)

References

Question Text *Is the content of fatigue training adequate for training controllers and supervisors to recognize the effects of fatigue?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OM+ER Book I, FCTRL-OPS-463-009 Section 8.7 Fatigue Related Errors mitigation table page 10

Question ID, CR.CRMFM.FATIGUECONTENT.R, 195.446(d)(3)

References

Question Text *Has controller and supervisor training to recognize the effects of fatigue been documented?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Fatigue training held on Feb 2016, reviewed sign in sheet for 2016. Reviewed outline of training.

CR.CRMAM: Alarm Management

Question ID, CR.CRMAM.ALARM.P, 195.446(e)

References

Question Text *Is the alarm management plan a formal process that specifically identifies critical topical areas included in the program?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Section 8.0 Alarm Management Plan page

Question ID, CR.CRMAM.ALARMMALFUNCTION.P, 195.446(e)(1)

References

Question Text *Is there a process to identify and correct inaccurate or malfunctioning alarms?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Section 8.0 Alarm Management Plan page 7 Malfunctioning Alarms.

Question ID, CR.CRMAM.ALARMREVIEW.P, 195.446(e)(1)

References

Question Text *Does the review of safety-related alarms account for different alarm designs and all alarm types/priorities?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Section 8.0 Alarm Management Plan page 6, all alarm types/priorities are checked during weekly review.

Question ID, CR.CRMAM.CONTROLLERPERFORMANCE.P, 195.446(e)(1)

References

Question Text *Does the review of safety-related alarms account for individual-specific controller qualification and performance?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Section 8.0 Alarm Management Plan page 8 (Under Content and activity of alarms)

Question ID, CR.CRMAM.STALEDATA.P, 195.446(e)(1)

References

Question Text *Does the review of safety-related alarms include specific procedures and practices for managing stale or unreliable data?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Section 8.0 Alarm Management Plan page 8 - Malfunctioning Alarms

Question ID, CR.CRMAM.MONTHLYANALYSIS.P, 195.446(e)(2)

References

Question Text *Do processes require the monthly identification, recording, review, and analysis of points that have been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Section 8.0 Alarm Management Plan page 7 Monthly Alarm Analysis

Question ID, CR.CRMAM.PROBLEMCORRECTION.P, 195.446(e)(2)

References

Question Text *Does the alarm management plan include a process for promptly correcting identified problems and for returning these points to service?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Section 8.0 Alarm Management Plan page 7 Monthly Alarm Analysis

Question ID, CR.CRMAM.ALARMSETPOINTS.P, 195.446(e)(3)

References

Question Text *Is there a formal process to determine the correct alarm setpoint values and alarm descriptions?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , FTCRL-OPS-463-011 Section 8.0 Procedure page 3

Question ID, CR.CRMAM.SETTINGCONTROL.P, 195.446(e)(3)

References

Question Text

Have procedures been established to clearly address how and to what degree controllers can change alarm limits or setpoints, or inhibit alarms, or take points off-scan?

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-460-007 Section 8.1 Making Points Unavailable page 5

Question ID, CR.CRMAM.VERIFICATION.P, 195.446(e)(3)

References

Question Text *Do processes require that any calibration or change to field instruments require verification of alarm setpoints and alarm descriptions?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , FTCRL-OPS-463-011 Section 8.0 Procedure page 3

Question ID, CR.CRMAM.PLANREVIEW.P, 195.446(e)(4)

References

Question Text *Are there processes to review 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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , FTCRL-OPS-463-013 Section 8.0 Procedure page 8 Alarm Management Plan Review

Question ID, CR.CRMAM.PLANREVIEW.R, 195.446(e)(4)

References

Question Text *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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 Alarm Management Plan page 1, Revision of procedure each year for review.

Question ID, CR.CRMAM.WORKLOAD.P, 195.446(e)(5)

References

Question Text *Does the CRM program have a means of identifying and measuring the work load (content and volume of general activity) being directed to an individual controller?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , FTCRL-ADM-061-001 Section 8.0 Procedure page 3-10,

Question ID, CR.CRMAM.WORKLOADMONITORING.P, 195.446(e)(5)

References

Question Text *Is the process of monitoring and analyzing general activity comprehensive?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , FTCRL-ADM-061-001 Section 8.0 Procedure page 3-10,

Question ID, CR.CRMAM.CONTROLLERREACTION.P, 195.446(e)(5)

References

Question Text *Does the process have a means of determining that the controller has sufficient time to analyze and react to incoming alarms?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , FTCRL-ADM-061-001 Section 8.0 Procedure page 3-10,

Question ID, CR.CRMAM.PERFORMANCEANALYSIS.R, 195.446(e)(5)

References

Question Text *Has an analysis been performed to determine if controller(s) performance is currently adequate?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes F-195.446(e)(5) Pipeline controller Content and Activity Form , reviewed sample of forms and they appear adequate.

Question ID, CR.CRMAM.DEFICIENCIES.P, 195.446(e)(6)

References

Question Text *Is there a process to address how deficiencies found in implementing 195.446(e)(1) through 195.446(e)(5) will be resolved?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, p195.446 , CTULM-OPS-463-012 page 8, Alarm Management Deficiencies

Question ID, CR.CRMAM.DEFICIENCIES.R, 195.446(e)(6)

References

Question Text *Do records indicate deficiencies found in implementing 195.446(e)(1) through 195.446(e)(5) have been resolved?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes No deficiencies found during CRM operation.

CR.CRMCMGT: Change Management

Question ID, CR.CRMCMGT.CHANGEMEETINGS.P, 195.446(f)(1)

References

Question Text *Is there a process to mandate a control room representative will participate in meetings where changes that could directly or indirectly affect control room operations (including routine maintenance and repairs) are being considered, designed and implemented?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, Procedure # P-195.446 Section F. Management of Change page 8

Question ID, CR.CRMCMGT.CHANGETRAINING.R, 195.446(f)(1)

References

Question Text *Before implementing changes, do records indicate controllers were provided with notification and training to assure their ability to safely incorporate the proposed change into operations?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes BP Management of Change Form for Ferndale Refinery Crude Delivery (FFERD) MOC number 2, reviewed.

Question ID, CR.CRMCMGT.EMERGENCYCONTACT.P, 195.446(f)(2)

References

Question Text *Is there a process requiring field personnel and SCADA support personnel to contact the control room when emergency conditions exist?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, Procedure # P-195.446 Control Room Management Section F page 9

Question ID, CR.CRMCMGT.CHANGECOORDINATION.P, 195.446(f)(1)

References

Question Text *Does the process assure changes in field equipment (for example, moving a valve) that could affect control room operations are coordinated with control room personnel?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, Procedure # P-195.446 Section F. Management of Change page 8

Question ID, CR.CRMCMGT.CHANGECOORDINATION.R, 195.446(f)(1)

References

Question Text *Do records indicate that changes in field equipment (for example, moving a valve) that could affect control room operations were coordinated with control room personnel?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes BP Management of Change Form for Ferndale Refinery Crude Delivery (FFERD) MOC number 2, reviewed.

Question ID, CR.CRMCMGT.FIELDCONTACT.P, 195.446(f)(2)

References

Question Text *Does the process require field personnel and SCADA support personnel to contact the control room when making field changes (for example, moving a valve) that affect control room operations?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes BP Management of Change Form for Ferndale Refinery Crude Delivery (FFERD) MOC number 2, reviewed.

Question ID, CR.CRMCMGT.FIELDCHANGES.R, 195.446(f)(2)

References

Question Text *Do records indicate field personnel and SCADA support personnel contacted the control room when making field changes (for example, moving a valve) that affect control room operations?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book I, Procedure # P-195.446 Section F. Management of Change page 8-9

CR.CRMEXP: Operating Experience

Question ID, CR.CRMEXP.ABNORMALREVIEW.P, 195.446(g)(1)

References

Question Text *Is there a formal, structured approach for reviewing and critiquing reportable events to identify lessons learned?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 p-195.402(d) Section 6 Procedures Effectiveness and Review .PAGE 10

Question ID, CR.CRMEXP.ABNORMALREVIEW.R, 195.446(g)(1)

References

Question Text *Do records indicate reviews of reportable events specifically analyzed all contributing factors to determine if control room actions contributed to the event, and corrected any deficiencies?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed Operator Near Miss and Lessons Learned spreadsheet that detail incidents and near misses on the pipelines, Spreadsheet lists what actions were done to mitigate and correct the condition.

Question ID, CR.CRMEXP.LESSONSLEARNED.P, 195.446(g)(2)

References

Question Text *Does the program require training on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance errors, etc.), even though the control room may not have been at fault?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 p-195.402(d) Section 6 Procedures Effectiveness and Review .PAGE 10

Question ID, CR.CRMEXP.LESSONSLEARNED.R, 195.446(g)(2)

References

Question Text *Has operating experience review training been conducted on lessons learned from a broad range of events (reportable incidents/accidents, near misses, leaks, operational and maintenance errors, etc.)?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed Operator Near Miss and Lessons Learned spreadsheet that detail incidents and near misses on the pipelines, Spreadsheet lists what actions were done to mitigate and correct the condition.

Question ID, CR.CRMTRAIN.CONTROLLERTRAIN.P, 195.446(h)

References

Question Text *Has a controller training program been established to provide training for each controller to carry out their roles and responsibilities?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 p-195.446 FCTRL-OPS-463-008 SECTION 8 PAGE 4-7

Question ID, CR.CRMTRAIN.CONTROLLERTRAIN.R, 195.446(h)

References

Question Text *Has a controller training program been implemented to provide training for each controller to carry out their roles and responsibilities?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed sign in sheets and records of training and OQ testing and re-certification every 3 years.

Question ID, CR.CRMTRAIN.TRAININGREVIEW.P, 195.446(h)

References

Question Text *Have processes been established 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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 p-195.446 FCTRL-OPS-463-008 section 8 PAGE 7 Program Effectiveness and Evaluation

Question ID, CR.CRMTRAIN.TRAININGREVIEW.R, 195.446(h)

References

Question Text *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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes They have an annual training review that is done in December of each year. Reviewed the minutes for the the annual training for 2015.

Question ID, CR.CRMTRAIN.TRAININGCONTENT.R, 195.446(h)

References

Question Text *Does training content address all required material, including training each controller to carry out the roles and responsibilities that were defined by the operator?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed training programs and it appears to be adequate and covers all requirements.

Question ID, CR.CRMTRAIN.AOCLIST.R, 195.446(h)(1)

References

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

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 p-195.402(d) PAGE 2 Program Effectiveness and Evaluation and reviewed training records of controller training with simultaneous incidents, such as valve closure and pump shutdown.

Question ID, CR.CRMTRAIN.TRAININGABNORMAL.P, 195.446(h)(1)

References

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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes

OMER Book 1 p-195.402(d) PAGE 2 Program Effectiveness and Evaluation and reviewed training records of controller training with simultaneous incidents, such as valve closure and pump shutdown.

Question ID, CR.CRMTRAIN.TRAINING.R, 195.446(h)(2)

References

Question Text *Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed results of simulator training for a sample of controllers.

Question ID, CR.CRMTRAIN.TRAINING.O, 195.446(h)(2)

References

Question Text *Does the training program use a simulator or tabletop exercises to train controllers how to recognize and respond to abnormal operating conditions?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes No simulator or tabletop exercises were observed during this inspection.

Question ID, CR.CRMTRAIN.COMMUNICATIONTRAINING.P, 195.446(h)(3)

References

Question Text *Does the CRM program train controllers on their responsibilities for communication under the operator's emergency response procedures?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 p-195.402(e) PAGE 3 Emergency response Section B. Pipeline Controller Responsibilities.

Question ID, CR.CRMTRAIN.SYSKNOWLEDGE.P, 195.446(h)(4)

References

Question Text

Does the training program provide controllers a working knowledge of the pipeline system, especially during the development of abnormal operating conditions?

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Reviewed Training program appears adequate.

Question ID, CR.CRMTRAIN.INFREQOPSLIST.R, 195.446(h)(5)

References

Question Text *Has a list of pipeline operating setups that are periodically (but infrequently) used been established?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes In the scope of this inspection no infrequent setups are used.

Question ID, CR.CRMTRAIN.INFREQOPSREVIEW.P, 195.446(h)(5)

References

Question Text *Do processes specify that, for pipeline operating set-ups that are periodically (but infrequently) used, the controllers must be provided an opportunity to review relevant procedures in advance of their use?*

Result NA

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes In the scope of this inspection no infrequent setups are used.

CR.CRMCOMP: Compliance Validation and Deviations

Question ID, CR.CRMCOMP.SUBMITPROCEDURES.P, 195.446(i)

References

Question Text *Are there adequate processes to assure that the operator is responsive to requests from applicable agencies to submit their CRM procedures?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Agency requests control room procedures were provided with access to darksite where the manual can be reviewed.

Question ID, CR.CRMCOMP.SUBMITPROCEDURES.R, 195.446(i)

References

Question Text *Has the operator been responsive to requests from applicable agencies to submit their CRM procedures?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Inspectors were provided with access to the darksite application where the company procedures can be read.

Question ID, CR.CRMCOMP.CRMCOORDINATOR.R, 195.446(i)

References

Question Text *Is there an individual that is responsible and accountable for compliance with requests from PHMSA or other applicable agencies?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Assigned person for CRM inspection is John Page.

Question ID, CR.CRMCOMP.RECORDS.P, 195.446(j)(1)

References

Question Text *Records management processes adequate to assure records are sufficient to demonstrate compliance with the CRM rule?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 P-195.446 Paragraph J on page 10

Question ID, CR.CRMCOMP.RECORDS.R, 195.446(j)(1)

References

Question Text *Are records sufficient to demonstrate compliance with the CRM rule?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Records appear to be sufficient for this CRM inspection.

Question ID, CR.CRMCOMP.ELECTRONICRECORDS.R, 195.446(j)(1)

References

Question Text *Are electronic records properly stored, safeguarded, and readily retrievable?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes Records appear to be sufficient for this CRM inspection.

Question ID, CR.CRMCOMP.DEVIATIONS.P, 195.446(j)(2)

References

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?*

Result **Sat**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes OMER Book 1 P-195.446 Paragraph J on page 10

Question ID, CR.CRMCOMP.DEVIATIONS.R, 195.446(j)(2)

References

Question Text *Were all deviations documented in a way that demonstrates they were necessary for safe operation?*

Result **NA**

Assets Covered Unit Ferndale (and 1 other asset)

Result Notes No deviations were noted during inspection.

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