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May 18, 2021

Mr. Sean Mayo  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: NW Natural Response to Control Room Management Inspection, Report No. 8284

Dear Mr. Mayo:

The Washington Utilities and Transportation Commission (WUTC) Staff conducted a Control Room Management inspection on March 22, 2021. This letter is the response to the findings of Inspection Report 8284, sent on April 19, 2021.

**1.Area of Concern:**

**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:*

**Findings:**

*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.*

**NW Natural Response:**

NW Natural (NWN) has updated the headquarters address to reflect the current location of the control room in the Control Room Management (CRM) manual. The current manual was submitted to staff on April 12, 2021.

**2. Area of Concern:****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*

**Findings:**

*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*

**NW Natural Response:**

NWN utilizes a variety of opportunities to discuss lessons learned including, but not limited to; monthly meetings, shift changes, and general information share. Topics are drawn from internal and external sources; included in these discussions are abnormal operating conditions, reportable incidents, accidents, near misses, or emergencies. Please find attached document [NWN 8284-2 Control Room Management Lessons Learned Form](#) that will be completed to record these interactions and lessons learned in the future.

**3. Area of Concern:****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*

**Findings:**

*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.*

**NW Natural Response:**

NWN has updated CRM procedures to provide additional guidance related to records. Please find attached document [NWN 8284-3 Control Room Management General 192.631\(a\)](#), which is excerpted from the NWN CRM Plan. Additionally, records management will be supported with the two additional staff hired to the Gas Control footprint. These positions will be responsible for supporting, documenting, training, and ensuring records are complete and accessible.

**4. Area of Concern:****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*

**Findings:**

*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.*

**NW Natural Response:**

As stated in response 8284-3, NWN has updated CRM procedures to provide additional guidance related to records. Further, during the inspection, NWN experienced intentional cybersecurity and remote access limitations which were designed to protect sensitive operational data. Some records, which would have been available during an in-person inspection, could not be made available remotely via Teams. In particular, the use of Teams did not allow access to production data in programs including the Supervisory Control and Data Acquisition (SCADA) reports application and the J5 web-based logging application.

**5. Area of Concern:**

**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*

**Findings:**

*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."*

**NW Natural Response:**

NWN disagrees with this finding, as the applicable regulation establishes no requirement to document an absence of deviations. NWN stated during the inspection that no deviations occurred during the timespan covered by this inspection. With this understanding, NWN has added a section to the CRM Annual Audit Checklist where the supervisor performing the review may specifically note “No deviations”, if applicable. Please see attached *NWN 8284-5 Control Room Management Annual Audit Checklist*.

This report finalizes NWN's response to the Control Room Management Inspection, Report No. 8284.

Sincerely,



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