

O&M and Emergency Plans Records

2018 Oklahoma Seminar

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PHMSA TQ

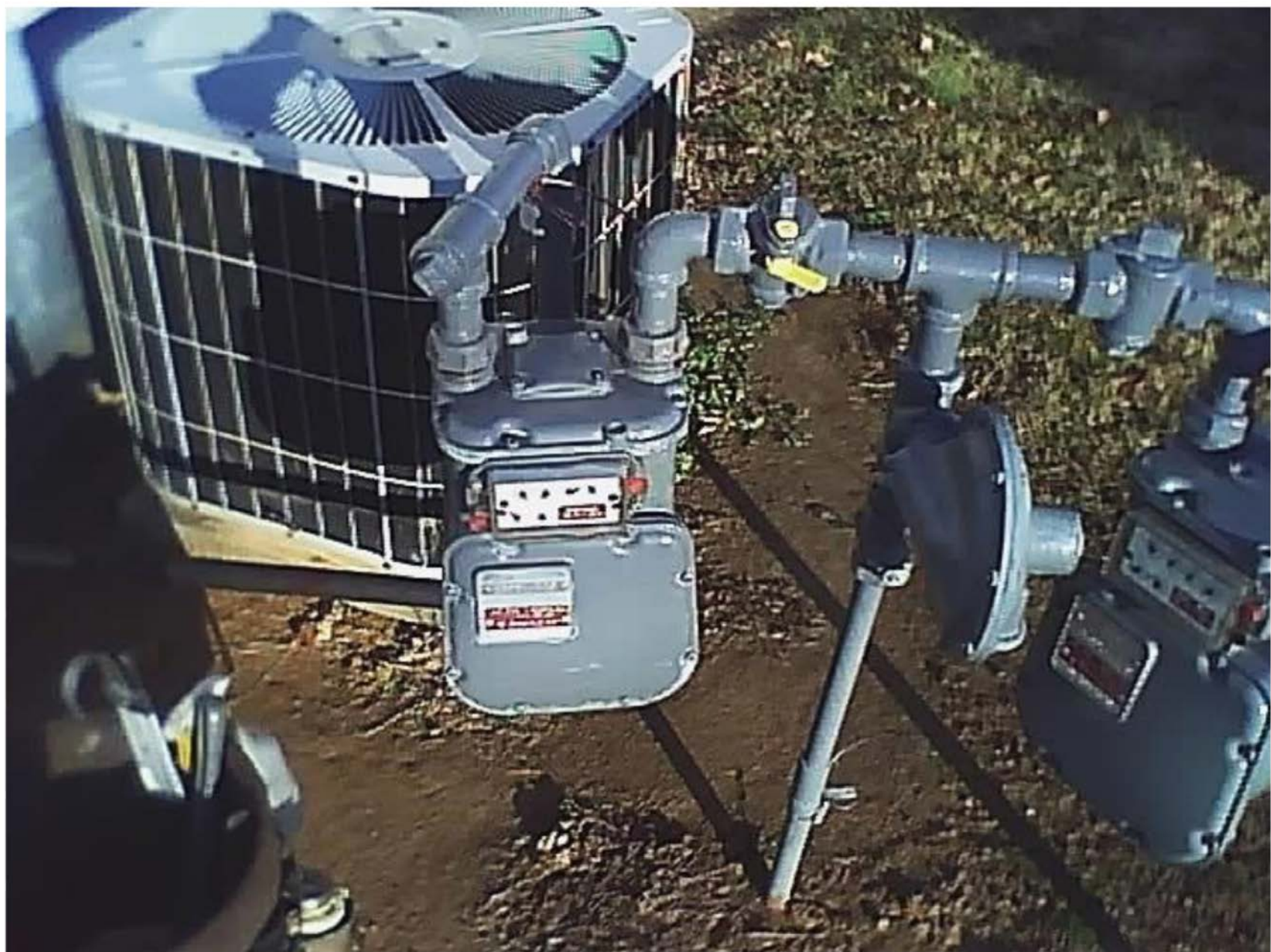
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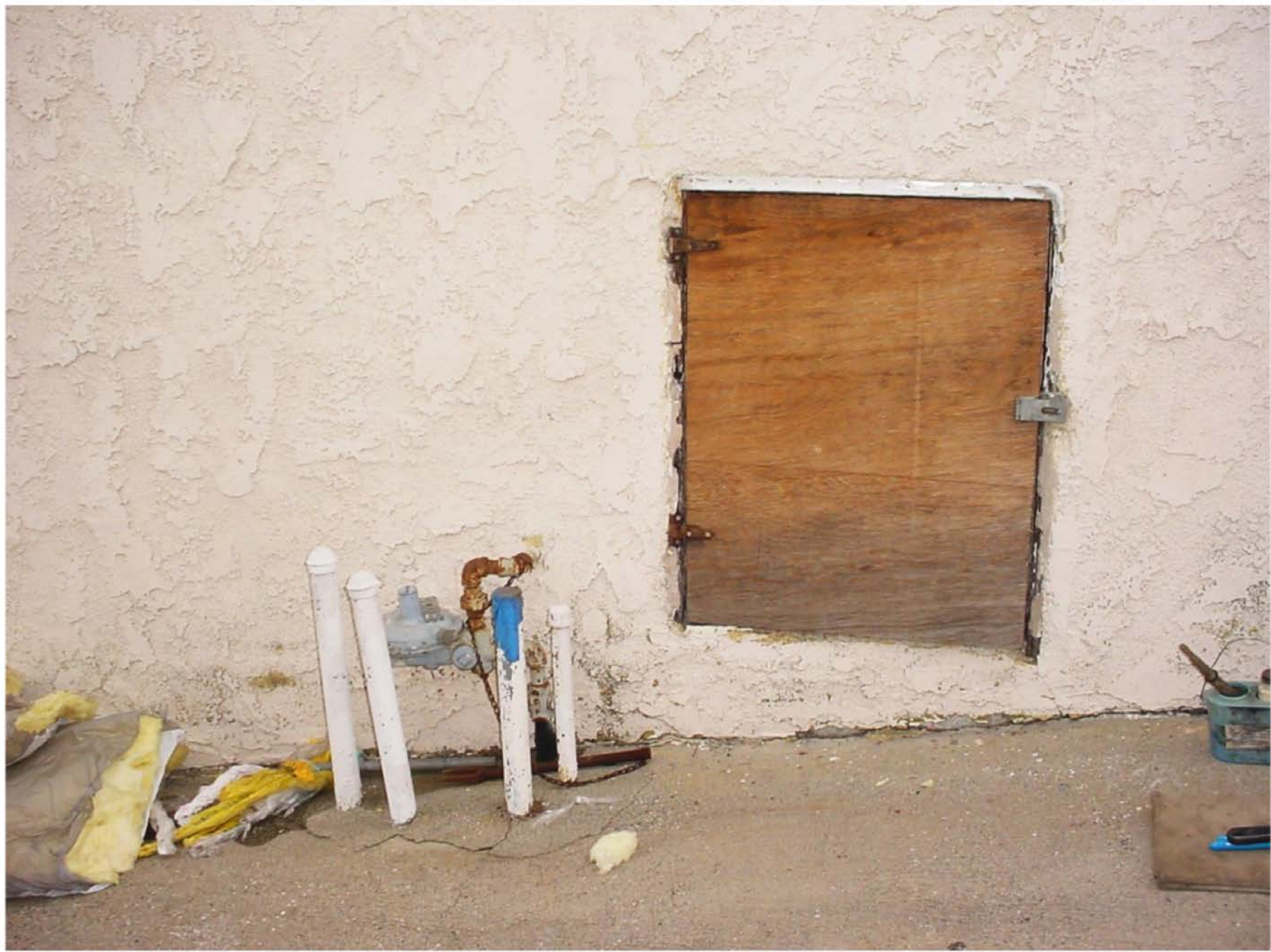
What's Wrong With This Picture











A Wide Shot for Perspective (note the severely sloped driveway)





PNC
1-23-07
5000



KIL-A-MOP

Subpart L - Operations
O&M and Emergency Plans

§192.603 General Provisions

- a) **No person may operate a segment of pipeline unless it is operated in accordance with this subpart.**
- b) Operators must keep records to administer procedures established under §192.605
- c) State or federal agency under U.S.C. 60101 can require an operator to amend plans and/or procedures to provide a reasonable level of safety

Procedures

Procedures are required
anytime a pipeline is:

- Changed
- Extended
- Removed
- Inspected
- Located
- Replaced
- Operated
- Evaluated
- etc ...

... or the product:

- Is Started
- Is Stopped
- Is Changed
- Is Released
- Is Purged
- Is Added to
- Is Compressed
- etc ...

Procedures

Specificity!

- Who
- What
- When
- Where
- Why
- How
- Other Information to Provide Clarity

Clarity!

References to:

- Corrosion References
- Corporate Safety Docs
- Emergency Plans
- Measurement Docs
- Design Documents
- Component Manuals

O&M Manuals

The plans should be an outline for compliance.

- They should either say what you do

or,

- You should do what they say

Either way you will be in compliance with your own procedures

O&M Manuals

Only the right combination of specificity and detail will provide what we essentials to achieve these goals and give us the compliance we want and need.

O&M Manuals

Example:

There are two types of full encirclement sleeves.

- **Type A** is nonpressure-containing
- **Type B** is pressure-containing

Note: Dresser-style reinforcement sleeves, weldovers, pumpkins, and possum bellies are also pressure-containing sleeves used in special-case repairs. Consult with the appropriate supervisor for their application

Passive vs. Active Voice

- **The town was destroyed by fire.**
- **Fire destroyed the town** (Fire is the subject, destroyed is the action)

Passive vs. Active Voice

- **Funny is what clowns are.**
- **Clowns are funny** (Clowns is the subject, funny is the action)

Procedures

- **Example:**

“The incident needs to reported to the gas controller.”

- **Rewritten:**

“The supervisor or the first employee on the scene will report the incident within 15 min. of arriving at the site to the gas control center by telephone or company radio.”

Operations and Maintenance



§192.605(a) General

An operator must have a manual for Operations, Maintenance and Emergency Response

- Must be reviewed each calendar year, not to exceed 15 months
- Must be prepared before pipeline operation
- Must be available to operations and maintenance personnel
- **Transmission** operators must have procedures for Abnormal Operations

Support Documentation §192.605(a)

- O&M Revision History
- MOC Documents
- Procedure and
Emergency Manual
Availability
- List of identified
Abnormal Operations



§192.605(b) Maintenance and Normal Operations

The O&M manual must include **procedures for the following**, if applicable, to provide safety during maintenance and operations.



§192.605(b) Maintenance and Normal Operations



Procedures for:

- 1) Operating, maintaining and repairing the pipeline
- 2) Controlling corrosion
- 3) Making construction records, maps, and operating history available to personnel

§192.605(b) Maintenance and Normal Operations

Procedures for:

- 4) Gathering data for reporting incidents under part 191
- 5) Safely starting up and shutting down a pipeline
- 6) Purging, isolating and maintaining compressor stations



Support Documentation §192.605(b)

- Pressure Charts
- SCADA Data
- Maintenance Documents
- Work Orders
- Corrosion Readings
- Corrosion Inspections (Atmospheric)
- Vault Inspections
- Construction As-Builts
- Service Drawings
- Leak Surveys
- Maps
- Incident Reports
- Safety-Related and AOC Reports

§192.605(b) Maintenance and Normal Operations

Procedures for:

- 7) Starting, operating, and shutting down compressors
- 8) Periodic review of existing procedures
- 9) Precautions and equipment needed to ensure safety in a gaseous atmosphere



Support Documentation §192.605(b)

MOC documents

- Control Room
- Transmission
- OQ

Training

- Programs
- Rosters
- Schedules

Compressor Maintenance Logs

Maintenance

Documentation for:

- CGIs and Flame Packs
(Calibration)
- Fire Extinguishers
- Air Bottles
- Air Filtration
(Compressors)
- And Other Personal
Protective Equipment

§192.605(b) Maintenance and Normal Operations

Procedures for:

10) Testing and inspection of bottle type holders

- i. Detecting corrosion and remaining strength of containers
- ii. Sampling and testing of gas dew points for corrosion control and/or interference in operations
- iii. Inspection of pressure limiting devices

Support Documentation §192.605(b)

Bottle Type Holders

- Inspection Documents
- Inspection Criteria
- Training Documents
- Strength Calculations
- Lab Results
- Operational History
- Refill Sheets

Pressure Limiting Devices:

- Inspection Documents
- Testing Criteria
- Manufacturers Manuals
- Spring Color or Length
- Orifice Sizes
- Set Points

§192.605(b) Maintenance and Normal Operations

Procedures for:

- 11) Responding promptly to a report of a gas odor inside or near a building, unless the operator's emergency procedures under §192.615(a)(3) specifically apply to these reports.
- 12) Implementing the applicable control room management procedures required by § 192.631.

Support Documentation §192.605(b)

- Leak Reports
- Field Survey Reports
- Emergency Repair Documents
- Incident/Accident Logs
- **Control Room**
 - Hand Over Documents
 - Failure/Repair Logs
 - Communication Logs



§192.605(c) Abnormal Operation



- c) For **transmission lines**, procedures for the following to provide safety when operating design limits have been exceeded:

§192.605(c) Abnormal Operation

Transmission Procedures for:

- 1) Responding to, investigating, and correcting the cause of:
 - i. Unintended closure of valves or shutdowns;
 - ii. Increase or decrease in pressure or flow rate outside normal operating limits;
 - iii. Loss of communications;
 - iv. Operation of any safety device; and,
 - v. Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property.

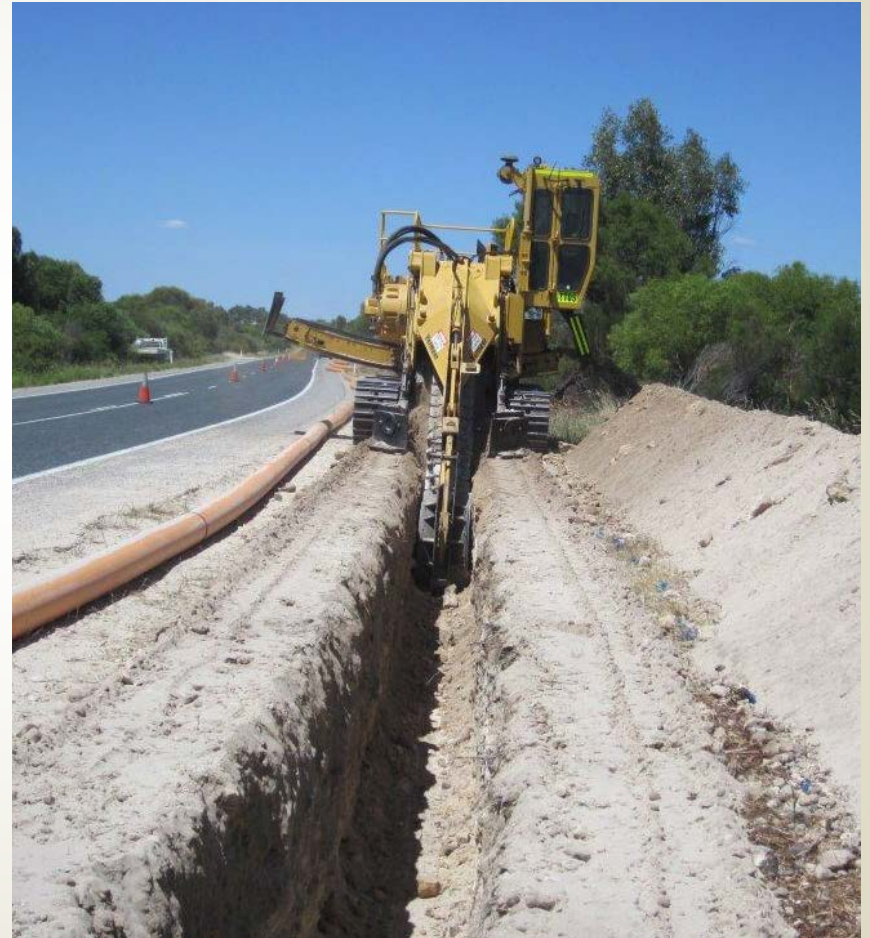
§192.605(c) Abnormal Operation

Transmission Procedures for:

- 2) Checking critical locations to ensure system integrity after an emergency
- 3) Notifying responsible operator personnel when notice of an abnormal operation is received.
- 4) Review response to ensure effectiveness of procedures

§192.605(c) Abnormal Operation

- 5) Paragraph (c) does not apply to natural gas distribution operators that are operating transmission lines in connections with their distribution system.



§192.605(d) Safety-Related Condition Reports



Procedures for:

- d) Instructions enabling personnel who perform O&M activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting under §191.23

§192.605(e) Surveillance, emergency response, and accident investigation.

- e) The procedures required by §§192.613(a), 192.615, and 192.617 must be included in the O&M manual



Record Retention

Life of Facility

- Includes construction, materials, repairs, MAOP information and most corrosion records
- Retained for active life of facility

Other Records

- Includes tests, inspections, patrols, surveys and procedure reviews which prove compliance with 49 CFR 192
- Retained for at least 5 years

Thanks!

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