

Agenda

49 CFR §§ 192.631 and 195.446

✓ Others and TEAM training

- Jan 23, 2017, PHMSA modified 49 CFR §§ 192.631 and 195.446
- What is the background, what is driving it?
- Will there be additional guidance as far as FAQ or inspection guidelines
- What are enforcement expectations
- Define “others” and “supersede”
- Compliance Dates

Impacts of New Regulation on Achieving Compliant Control Room and Team Training Programs

- ✓ What is the background and what is driving it?
 - Following a pipeline accident, PHMSA discovered there were personnel in the control room or that had access to the controller and had direct influence over the actions of the controllers that were not “Qualified” or “Trained” in the roles and responsibilities of a person that was tasked with monitoring and controlling a pipeline from a SCADA system in a Control Room.
 - These “other” personnel were able to influence or “supersede” the actions of the controller even though they themselves were not controllers and they were seen as posing a significant risk to the safe operation of a pipeline.

Impacts of New Regulation on Achieving Compliant Control Room and Team Training Programs

- ✓ (b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:
 - (5) The roles, responsibilities and qualifications of others with the authority to direct or supersede the specific technical actions of a controller.

Impacts of New Regulation on Achieving Compliant Control Room and Team Training Programs

- ✓ The identification of and qualification of the “others” was required to be completed by March 23, 2017
- ✓ Did this create a new covered task for your operations or were the “others” simply qualified as controllers
- ✓ Have you defined their roles and responsibilities?
- ✓ Have they been provided with the adequate information necessary to carry out their roles and responsibilities during normal, abnormal and emergency operations?
- ✓ Are they identified in the fatigue mitigation plan, controller training plan, and hours of service plan?

Impacts of New Regulation on Achieving Compliant Control Room and Team Training Programs

- ✓ Will there be additional guidance as far as FAQ or inspection guidelines
 - PHMSA has published some FAQ's related to the Final Rule language
 - A key take away from this is that PHMSA won't be doing targeted inspections on this new regulation, it will be included in the CRM "II" inspection question set and used during and as part of a CRM II inspection on your Control Room Programs.
 - NOTE: the requirement for the "others" is in force and can be included in an inspection today.

Impacts of New Regulation on Achieving Compliant Control Room and Team Training Programs

- ✓ What are enforcement expectations?
 - Expectations are that the operator will identify anyone in the control room or that has access to the controller who has the ability and authority to influence or supersede the actions of the controller
 - Those personnel identified will be fully trained and qualified to complete their roles and responsibilities as identified by the operator.
 - It will also be expected, I believe, that anyone who has access to or can influence the controllers actions that does not have the full authority of the operator to do so will also be identified, trained and instructed to not interfere with the performance of the controller in their duties.

Impacts of New Regulation on Achieving Compliant Control Room and Team Training Programs

- ✓ Define “others” and “supersede”
 - In my opinion, these would apply
 - **Others** – anyone that has access to the controller who can influence the actions of the controller or supersede the actions of the controller in the performance of the defined roles and responsibilities.
 - **Supersede** – anyone in the control room or with access to the controller that by their position or rank would be perceived as having authority over the controllers actions; i.e. a Vice President or District Manager/Director, non-qualified supervision, etc.

Team Training in Other Modes

- ✓ NTSB stated in their recommendation to PHMSA the following: TO THE PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION: Develop requirements for team training of control center staff involved in pipeline operations similar to those used in other transportation modes.
- ✓ Related to this proposed amendment, the NTSB issued the following safety recommendations to PHMSA on July 25, 2012:
 - Develop requirements for team training of control center staff involved in pipeline operations similar to those used in other transportation modes. (P-12-7), and extend operator qualification requirements (emphasis mine) in Title 49 Code of Federal Regulations Part 195 Subpart G to all hazardous liquid and gas transmission control center staff involved in pipeline operational decisions. (P-12-8) The proposed NPRM adds team training requirements in §§ 192.631 and 195.446.

Team Training in Other Modes, NTSB Continued

- It also adds language to §§ 192.631(b)(5) and 195.446(b)(5) that would require each operator to define “the roles, responsibilities and qualifications of others with the authority to direct or supersede the specific technical actions of a controller.”
- These proposed regulatory improvements were discussed in the April 8, 2015, NTSB letter to PHMSA where the PHMSA plan to codify the training guidance previously issued as an advisory bulletin was accepted.
- In accepting this the proposed changes related to operator qualifications were also accepted.

Team Training in Other Modes, NTSB Continued

- ✓ (h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:
 - (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.

Impacts of New Regulation on Achieving Compliant Control Room and Team Training Programs

Team Training in Other Modes

- ✓ So, what is intended by the “other modes” idea and how might it apply?
- ✓ Lets look at CRM Team Training information for two other modes:
 - Air traffic control
 - Rail control

Team Training in Other Modes

✓ Air Traffic Control

- “Many air traffic control positions are staffed by two controllers who work together, with one handling radar monitoring and communications tasks and the other dealing with flight data. Thus a ground-based team manages the aircraft under its control, but a single individual usually communicates with the team's air traffic.”
 - There is a need for study of the relationships among workload, teamwork, situational awareness, and operational errors at American air traffic control facilities.
- ✓ For the FAA and Control Center team work, it is a clearly defined process of team identification, roles and responsibilities, and team training to ensure the safety of the transportation of people, goods and services by air.

Team Training in Other Modes

- ✓ Now a look at rail Control Room Team Training processes
- ✓ Two major types of teams were identified, elemental teams and interactive teams
 - Elemental Teams – Those teams that remain consistent across the operating arena; i.e. An example of an elemental team would be a train operating crew for either mainline or yard operations consisting, most often, of an engineer and conductor but occasionally with the addition of a switchman or brakeman to assist in coupling/ de-coupling of trains and manual operation of track switches.
 - Interactive Teams – The interactive team, forms when an elemental team must interact with either an outside individual or another elemental team in order to perform a task that occurs during the course of the workday.

Team Training in Other Modes

- ✓ An example of an interactive team would be the team which is formed when a train dispatcher, a Maintenance of Way (MOW) crew, and a train operating crew must coordinate their efforts to safely move a train through an area of the track where the MOW crew is repairing or maintaining the track.
- ✓ From this information we can begin to see the intent of the NTSB when they advised to follow the example of the “other modes.”

Team Training in Other Modes

- ✓ CRM Team Training will require operators to conduct a comprehensive assessment of who the team members are, what their roles and responsibilities are, and how they operationally collaborate with the Controller. From this assessment, a comprehensive operationally specific training program will need to be established to meet the intent and letter of the regulation.
- ✓ It becomes obvious then that off the shelf team training packages will not satisfy the intent or purpose of this new regulation. It must be configured with the operators processes and procedures included in the training.

Compliance Dates

- ✓ Subsection (b)(5) of both 49 §§ 192.631 and 195.446 was required to be complied with effective March 23, 2017.
- ✓ Subsection (h)(6) of both 49 §§ 192.631 and 195.446 Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018.
- ✓ The FAQ's tend to indicate that compliance with the training part can be completed by January 2019 if the operator has identified who the team members are and is developing the training materials to be able to complete the training by Jan. 2019???

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