



Control Room Management Rule for Pipelines

If you monitor pipeline conditions and control them electronically or manually, you are considered a "Pipeline Operator" and this rule applies to you. CFR49 Section 192 for gas pipelines and CFR49 Section 195 for liquid pipelines require you to have written procedures on control room management, fatigue management and alarm management by August, 2011.

CFR49 Sections 192 and 195 on gas and liquid pipelines was issued December 3, 2009. There are compliance deadlines of **August 2011** and **February 2013**.

Current discussion from PHMSA moves up the final implementation deadline 18 months to August 2011. The only exception to the new implementation deadline is alarm management requirements. The alarm management deadline will be August 2012. All other procedures are expected to be implemented by August 2011.

ProSys can assist pipeline operating companies to meet the deadlines by beginning with a GAP analysis to define the improvements that will be required for compliance. Once specific needs are identified, ProSys engineers will organize and plan a critical path for the project detailing the timing and impact for our clients. This process helps an organization move from just seeking compliance to active risk management.

Upon review of the existing processes and present work culture, ProSys will recommend necessary updates and/or new processes for the purpose of compliance and the associated record keeping for upcoming audits. For many companies, the most challenging part of CRM projects will be updating the work culture. Our industrial engineers and staff are experts at getting even those most resistant to change participating and onboard with the process.

The CRM Standard that has been developed by ProSys as the source document for most future CRM documentation projects allows the project effort and cost to be targeted to the areas needing work as identified by the Gap analysis. The base document has been designed to allow the necessary customization for different operators while minimizing the time spent on incidental parts of the document.

ProSys can help pipeline operating companies in the following areas:

- Process workflow documentation
- Procedure writing, training and implementation
- Compliance Control Management
- SCADA screen validation and compliance with API 1165
- GAP analysis
- Compliance planning and critical path development
- Work Culture Review and Recommendations
- CRM Standard documentation
- Alarm Management, alarm verification and rationalization
- Compliance with Alarm Performance Metrics in ISA 18.2

