Connecticut Department of Energy and Environmental Protection
Pipeline Safety

October 17, 2019
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2019 NGA Fall Operations Conference
Hartford, CT

Connecticut Department of Energy and Environmental Protection
Just in case you forgot...
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...and that leads to this...
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NO MORE POISON PIPELINE
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But have no fear...
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PEs and PSMS will save the day!

(just like Part 192, OQ, PAP, CRM, LIMP, TIMP and DIMP were going to save the day)
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How about a little irony...
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• 11/15/2018 - NTSB issued 2nd investigative update on FIU Bridge Collapse (6 people died) – errors made in the design (by PEs)
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• Also on 11/15/2018 - NTSB issues PE license recommendation to MA

Recommendations

As a result of this report, the National Transportation Safety Board makes the following safety recommendations:

To the Commonwealth of Massachusetts:

Eliminate the professional engineer licensure exemption for public utility work and require a professional engineer’s seal on public utility engineering drawings. (P-18-005)

To NSource, Inc.:

Revise the engineering plan and constructability review process across all of your subsidiaries to ensure that all applicable departments review construction documents for accuracy, completeness, and correctness, and that the documents or plans be sealed by a professional engineer prior to commencing work. (P-18-006) (Urgent)

Review and ensure that all records and documentation of your natural gas systems are traceable, reliable, and complete. (P-18-007) (Urgent)

Apply management of change process to all changes to adequately identify system threats that could result in a common mode failure. (P-18-008) (Urgent)

Develop and implement control procedures during modifications to gas mains to mitigate the risks identified during management of change operations. Gas main pressures should be continually monitored during these modifications and assets should be placed at critical locations to immediately shut down the system if abnormal operations are detected. (P-18-009) (Urgent)

BY THE NATIONAL TRANSPORTATION SAFETY BOARD

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Adopted: November 14, 2018
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• 9/24/2019 – NTSB Board Meeting on Merrimack Valley incident – multiple PEs were involved in the process!
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No one thing is going to fix everything.
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Lines of Defense
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• Lines of Defense
  – Regulations
  – Procedures
  – **Training**
  – Operator Qualification
  – Managers and Supervisors
  – Company Employees/Contractors
  – Company/Contractor Inspectors
  – State/Federal Pipeline Safety Inspectors
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TRAINING!

TRAINING!

TRAINING!
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• Prior to the Operator Qualification Rule
  – Training departments
  – Training staff
  – Hands-on training
  – Many days or weeks of training per year
  – Both company employees and contractors
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• After the Operator Qualification Rule
  – Training departments
  – Training staff
  – Hands-on training
  – Many days or weeks of training per year
  – Both company employees and contractors
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- CT Proposed Legislation (NY and NH also engaged)
  - Two-part covered task – on a pipeline and affects safety
  - Evaluation requires exam and hands-on skill and ability testing for every task
  - Evaluation process must be performed by operator or independent third party
  - Must reevaluate if task not performed correctly, not just after an incident
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• CT Proposed Legislation
  – Training required, including minimum training time per task
  – Training and evaluation must match company’s plans, procedures and standards
  – Inspectors must be OQ’ed for the task(s) they are observing
  – Engineering tasks added to OQ program
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MAKE OQ GREAT AGAIN
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