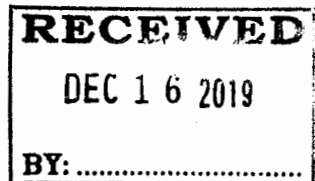




eni us operating

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Mr. Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
Department of Transportation
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228



Re: Response to Notice of Amendment CPF 5-2019-5011M

Dear Mr. Hubbard,

On November 12, 2019 eni US Operating Co., Inc. (Eni) received Notice of Amendment CPF 5-2019-5011M (NOA) from the Pipeline and Hazardous Materials Administration (PHMSA) in response to the inspection of Eni's DOT pipeline procedures performed by PHMSA representatives on March 4 through 8, 2019 and March 19, 2019. Two apparent inadequacies related to controller training procedures associated with Eni's Control Room Management (CRM) Program are identified within the NOA. Specifically, the NOA alleges that:

1. Eni's Control Room Management Program procedures (version 1.0, dated 2/10/2019) were inadequate because they lacked a listing of abnormal operating conditions likely to occur simultaneously or in sequence, and lacked training in responding to the identified abnormal operating conditions (§195.446(h)(1)).
2. Eni's Control Room Management Program procedures (version 1.0, dated 2/10/2019) were inadequate because they failed to require the use of a computerized simulator or non-computerized (tabletop) method for training controllers to recognize abnormal operating conditions (§195.446(h)(2)).

In response, Eni respectfully wishes to provide explanation summarizing the means by which it believes its CRM Program complies with the regulatory requirements cited in each count of the NOA, its understanding of the specific procedural deficiencies identified, and proposed actions to effectively address each deficiency identified.

In response to allegation 1, Eni's controller training procedures are presented in Section 9 of the CRM Program. Sections 9.2 and 9.3 identify the processes and materials for training controllers to recognize and respond to abnormal operating conditions likely to occur simultaneously or in sequence. These abnormal operating conditions and appropriate response actions are listed in the associated written pipeline operating procedures and these written operating procedures are elements of the training processes and materials identified in sections 9.2 and 9.3. As such, Eni believes that its CRM Program includes a listing of abnormal operating conditions likely to occur simultaneously or in sequence and procedures for training controllers to respond appropriately to each, as set forth in §195.446(h)(1).

It is Eni's understanding that though its CRM Program provides a listing of abnormal operating conditions likely to occur simultaneously or in sequence and mechanisms for training controllers to respond appropriately to each regardless of circumstance, it lacks a set of credible scenarios in which specific abnormal operating conditions would be likely to occur simultaneously or in sequence and procedures for training controllers to respond appropriately to each scenario. To address this deficiency Eni proposes development of a procedural addendum detailing these credible scenarios and appropriate controller responses to abnormal operating conditions to be included among the controller training materials listed in CRM Program Section 9.2.


In response to allegation 2, CRM Program Sections 9.2 and 9.3 identify required methods for training controllers to recognize abnormal operating conditions. The required methods include documented procedure reviews, supervised hands-on training, and tabletop exercises, as well as supervisory written and practical competency evaluations of each controller to validate and document completion of training. As such, Eni believes that its CRM Program requires use of a non-computerized method for training controllers to recognize abnormal operating conditions and is compliant with requirements set forth in §195.446(h)(2).

It is Eni's understanding that its practice of combining pipeline and production facility abnormal operating condition tabletop training exercises and associated exercise documentation records were determined to be insufficient to satisfy the requirements set forth in §195.446(h)(2). Eni respectfully proposes revision of CRM Program Section 9.3 text to specify that tabletop exercises for training controllers to recognize pipeline abnormal operating conditions be conducted and documented independently of production facility tabletop training.

Eni respectfully proposes submittal of the completed procedural addendum and CRM Program text revisions to PHMSA within 90 days following receipt of PHMSA approval of these proposed remedial actions.

If you have any questions regarding this response, please contact David Hart, Operations Manager at (907) 865-3300 or david.hart@eni.com.

Sincerely,



Luca Pellicciotta

12/10/2013

Vice President, Technical Services

Enclosures: 005121PSDPMO00046_SID-OPP Subsea Pipeline Leak Detect Response Procedure
005121PFDPMO000086_Oliktok Point Pad (OPP) Distributed Control System (DCS) Leak
Detection Alarm Source Procedure
005121D1DPMO01195 Diesel/Base-Oil Transfer to Spy Island
005121KPDPMO000003_Bypass SDV-12021 (KPL Sales Oil Valve)
005121KPDPMO000001 Kuparuk Pipeline (KPL) Consequences of Deviation

005121PLDPMO00030 OPP-KPP 10" Sales Oil Pipeline Abnormal Operating Conditions
(AOC)

DOT Pipeline Controller Qualification Checklist

cc(via email): David Hart, Eni, Operations Manager
Stephanie Rupert, Eni, Production Manager
Marty Slade/Rich Vicente, Eni, Compliance Coordinator
Jennifer Owens, DOT PHMSA