TR 2022-47 – GM – O&M Communication of Changes

| TR Number | 2022-47 |
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| Primary | 192.605 |
| Secondary | 192.805 |
| Purpose | Newly Proposed TR to add GM in 192.605 relating to an operator having a process of ensuring its O&M and any changes to its O&M are communicated to its employees and contractors of which the O&M change impacts. This is to ensure that the O&M content is communicated appropriately. Example – establishing and following a Management of Change (MOC) process. |
| Origin/Rationale | NTSB PAB 1904 – Gasoline Transmission Pipeline Explosion Helena, Alabama Oct 31, 2016 |
| Notes | A probable cause cited in the NTSB PAB 1904 report was not adhering to company procedures. |
| Assigned to | O&M/OQ Task Group |

Section 192.605

Note: Although not required, operators should consider establishing a procedural manual for Type B gathering lines.

1 GENERAL

- (a) Each procedural manual for operations, maintenance, and emergencies should include a written statement, procedure, or other document addressing each specific requirement of §192.605 that applies to the operator's pipelines. The requirements of §192.605 are included in paragraphs that cover the following topics.
 - (1) General items related to the procedural manual (§192.605(a)).
 - (2) Maintenance and normal operation of any pipeline; (§192.605(b)).
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- •••
- (e) The required review of the manual should ensure that the operator's current facilities and any deficiencies in the manual are addressed-promptly. Applicable manual contents and updates to the manual should be communicated as soon as practicable to operator personnel and contractors-who perform activities affected by the change or supervise or inspect persons who perform activities affected by the change. This communication should-may occur at the time of employment, prior to contractor job mobilization, prior to earthwork, and after any supplemental updates to the manual are implemented. The methods of initial communication and supplemental updates should be detailed in the operator's manual and elsewhere as may be beneficial.
- (f) An operator should consider reviewing its operator qualification (OQ) processes and procedures since changes to the manual may affect the OQ program. More serious deficiencies, possibly identified following an accident, may require immediate correction.
- (f-g) Many sections ...
- (gh) An operator may include ...
- (Hi) An operator may define ...
- (j) See guide material under §§ 192.491, 192.603, 192.709, and Guide Material Appendix G-192-17 for additional information on record retention and security.

- 2 MAINTENANCE AND NORMAL OPERATIONS
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