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ATTACHMENT B

US Department of Transportation Pipeline Safety Forum

April 18, 2011 Comments of UWUA

US DEPARTMENT OF TRANSPORTATION
Pipeline and Hazardous Materials Safety Administration
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PIPELINE SAFETY FORUM
April 18, 2011
Washington DC

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COMMENTS OF THE WORKERS UNION OF AMERICA
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The Importance of Human Pipeline Safety
and the Full Involvement of the Workers
Development and Implementation of Workplaces that
Places Safety in a Prime Safety Programs

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COMMENTS OF THE UTILITY WORKERS UNION OF
Korea

The Importance of Human Rights and the Full Involvement of the Workers in the Development and Implementation of Workplaces that Places Safety as a Priority Safety Programs

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On behalf of our members working to deliver safely to America's homes, businesses and powerplants throughout the country Utility Workers Union (hereafter UAW) is pleased to offer these Comments that emphasize the work culture that embodies an approach to eliminating hazardous conditions in the gas delivery system in order to prevent fires and events that injure, damage and kill people. We properly reject the old "sawdust in a mix" as an invitation to industry.

Our approach to safety depends on a great deal of active engagement of employees, both management and independent fully separate workplaces to address culture that places safety first. This approach requires learning lessons from the high safety events cause an analysis that identifies systemic risks and eliminates entails and adequate staffing, patrol and assessment and and adequate staffing, operating and maintenance activities (1) factors that affect judgment such as fatigue or the task; (2) factors that place with the process such poor procedure description or other cutting.

This approach must be institutionalized systems of communication among managers, employees and regulators, official reporting regulatory officials, operators be supplemented by inspection

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both announced and underegulated meetings between regulatory employee representatives who have no incentive to minimize conditions and hazards. The regulation's purpose is to place blame or trigger penalties rather than to foster an open and identifying and fixing the identified problem; or kill. UWUA's approach suggests strongly that PHMSA's that are human factor considerations of the integrity management program (DIMP) Final Rule must be taken into account. To the extent that PHMSA is convening the gas pipeline working party, it is facilitating dialogue and improving the safety and integrity of gas delivery prepared by the industry's approach to human factor issues such as utility workforce, need to kill, reverse flow, and adequacy of staffing at the operation and maintenance functions aftermath of the San Bruno pipeline failure. The detailed Comments on each of the three engaging operation and maintenance employee communication among workers, managers and regulators exist in part because of the nuclear industry and reflects in part its experience in California.³

¹ 74 FR 63906 at 63908 (December 4, 2009), and
² The TIMP Rule is curious in its treatment of identifies "human error" as a required category of threat identification program; the rule then proceeds to drop the
³ It is not easy to generalize from California's experience due to California's gas distribution Pacific Gas and Electric Company and California Gas Company each have over 50 years of jurisdictional parameters stemming from the Hinshaw Amendment, Natural Gas Act, 15 USC section 717(c), which places most their operations under the jurisdiction of the California Public Utility Commission (CPUC). However, the active response of the CPUC to the San laboratory for finding improvements in both safety philosophy

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SAFETY CULTURE PHILOSOPHY AND PRACTICE

For UWUA establishing the elements of an effective recognition that the gas are essential facilities providing a essential good to the public. The gas business rec delivery of a dangerous, combustible substance. Safety workers is of parameter in our perspective the gas business first safety philosophy workplace and public saf

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- It is recognized explicitly the essential facilities critical and essential to the gas public business require transportation and delivery of a dangerous, combustible the public and the workers is a means of subordinating the pursuit of profit maximization safety operation and maintenance practices.

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- Unsafe conditions and practices are identified proactively minimized through implementation of an approach to safety? engages employees of the utility in a dialogue. Protecting workers and the public involves every aspect operations, not just the threat identification program Title 49, section 192 Subpart O is not sufficient? excuses identification of human factor considerations.

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- Systems of safety is an abstract concept; identifying a safety is a first step in making real safety empowerment and relationship in problem solving, addressing safety issues and proposing solutions. Integrating co for training, skill development and transmission, and solving is an essential feature of the systems appr

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- Clearly written procedure with periodic review and revision worker experience and feedback, and an expectation of compliance are essential elements of an approach to saf

California has undertaken a comprehensive gas safety quality February 24, 2019 should provide important conceptual guidance <http://docs.cpuc.ca.gov/published/proceedings/R1102019.htm>

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- Safety events are addressed through root cause and disciplinary action; the emphasis is on strengthening of blaming the individual.

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- The safety culture should recognize the values of responsibility and power, and collective collaborative work employees of the gas business, both management and

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- In our industry safety and service levels are intentionally consistently utilizing our experience and knowledge, create a safe and healthy work environment for workers and public. This establishing performance levels and metrics historically prevailed in the industry.

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This approach to developing a safety culture is in the nuclear industry and practice at other gas utility provided leadership in safety culture development and offer national level for worker/management cooperation and worker; the safety culture. A successful safety system requires a high commitment and involvement by utility and full management engagement of both union and management at all levels respect in order to empower employees to operate and for the public. Articulating the expectation and describing accompanied by concrete measures of implementation.

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 4 켄 with its union colleagues in the utility industry Teamsters, works with the following companies among others I approach to safety approach to worker/management safety culture Entergy (New York, Michigan, Vermont); First Energy (Ohio); (New York); DTE (Michigan), Peoples Gas (Illinois); Bay State Dominion Resources (Massachusetts, Ohio, Pennsylvania); Allegheny West Virginia) and California Edison has recently instituted a training program implementing Systems of Safety in cooperation 켄 246. 켄

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Institutionalizing a safety-based approach to accomplish the following:

- developing a working plan that is the holding the pipeline operator accountable and measuring eliminating identified hazards.
- The fundamental plan is that it moves the responsibility from the past forward looking anticipation and prevention of the next lessons learned, but puts them to work as part of moves the line down safety going back away before the things can.
- In order to have an effective planning process, and put into effect that the employee is involved in the plan development, implementation, review and fully enforcement engaged employee in the field is the most important that plan will be effective in practice in preventing injury well as to the workers.

The elements of the plan should include at a

- identifying and eliminating hazards and systemic risks accidents, explosions, fires, and dangerous conditions and its employees;
- identifying the safety systems that will be deployed mitigate hazards, including adequate documentation of a capability;
- providing adequate storage and transportation capacity to all customers consistent with rules authorized by governing core and ability to curtailment, including for expansion, replacement, preventive maintenance and maintenance including repair of gas plant;
- providing for effective patrol and inspection of and other control facility conditions and to effect
- providing for appropriate and effective system controls, personnel procedures, to limit the damage from accidents and dangerous conditions;
- providing timely response and employee reports on other hazardous conditions and emergency events, including disconnect/reconnect and high pressure procedures.

- establishing appropriate protocols for determining maximum operating pressures of pipelines, including all documentation affecting calculation of maximum allowable pressures; [REDACTED]
- preparing for, preventing or minimizing damage from, earthquakes, fires, and other natural events; [REDACTED]
- ensuring adequate numbers of properly trained gas corporate carry out these activities; [REDACTED]
- exceeding the minimum standards for safe design, construction and maintenance of gas transmission and prescribed by regulations issued by the US Department of Energy, 49 CFR part 192. [REDACTED]

[REDACTED]

The safety plan would begin with the hazard map proactive approach to answering the existential question of “systemic risk assessment: what else is out there?” and “what can we do to prevent another tragedy from unexpected sources?” [REDACTED]

The current national discourse appears to focus on aging infrastructure and to prioritize hazards of great magnitude and magnitude. In other words, are there other San Allentowns? Beginning to answer this question involves Transportation safety Board (NTSB) and other agencies, PG&E in response to the San Bruno gas pipeline and capacities of existing physical infrastructure to establish foundation for operating procedures that permit a degree of articulating improved patrol, inspection, and remote devices documentation practices in more thorough and more completely implemented them effectively ensuring continuity. (3) Once the physical mapped, a program developed identifying the physical deficiencies, hazards, and managing the risks associated with cannot be eliminated [REDACTED]

Equally important to the development of a safety factors that impact safety. These risks are particularly significant infrastructure is universally acknowledged. The continued potentially fatigued physical and material often depends on judgment and performance of the employees who operate public benefits from a trained, skilled, and motivated workforce, who are fully engaged in maintaining the plant and equipment with which they interact among labor, management and regulators about system and the most efficient and effective ways to that consumers will get the service they need at a rate.

In this respect safety practice can build on progress addressing workplace safety, particularly the development of performing work safely and efficiently and the development procedure compliance. Hazard mapping and hazard elimination factors that undermine procedure compliance, including for work orders, as sign-off, completion and compliance with in the field including documentation, and the contractor whose training may be inadequate, observation of compliance be attenuated and irregular work may be necessary. From the public safety standpoint, in hazard identification, the customer level, identifying and eliminating conditions a cause explosions, fires, illness or other conditions, equipment, facilities, procedures or other conditions including error. This weight includes detection and response to the point, lighting and other assistance in applying connection and reconnection services (especially during the

effective and responsive customer service call handling. High pressure system such as the one that exploded ongoing problems at the distribution and customer service events causing injury and damage and near misses, while in identifying and evaluating hazards and avoiding damage. The important point is that the elimination is an continuous and interactive approach of proactively identifying one-time snapshot, but an integral part of the safety “how can this hazard be eliminated before damage” with participation and input from multiple types. The TIMP and should be modified to provide explicitly for employees. The plan would be submitted to regulatory authority for initial approval and would be regularly reviewed and. This is not inconsistent with federal pipeline integrity apply to both transmission and distribution including customer reach of federal authority. This requirement would apply in the California (Hinkley) safety expansion would be submitted approved by the Commission whose continuous oversight and review significant form of safety. In other cases, PHMSA should Memorandum of Understanding (MOU) with state regulatory delegate to the state authorities inspection, review and with funding (if necessary) proportionately sized and skilled regulatory personnel.

TRANSPARENCY OF SAFETY COMMITMENT GOVERNMENT AGENCIES

A systems approach to safety requires removing obstacles safety issues, both compliance and enforcement agencies. The goal is a cooperative proactive approach

before it happens, replacing existing pipelines, damage that have been prevented. The UUA proposes several regular and communication among utility managers, employees and government accordance with the following principles:

- Gas pipelines are essential facilities providing a critical the California public. Safety is the top priority for employees of the utility and for the consuming gas transport and delivery facilities.

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- There should be regular institutionalized channels of the three sets of safety responsibilities: (1) utility managers with operational responsibilities including monitoring and remediation including repair and replacement employees performing transmission, distribution and maintenance; (3) government agency investigative and enforcement capabilities to carry out their respective roles in assurance are operated and maintained in a safe and effective the public and consumers of gas service.

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- Utility employees through their bargaining representatives fully and equally in development, implementation, interpretation of programs for protecting the safety of employees, recognizing that safety is the top priority and maintenance programs have implications for safety. They in presentations to agencies having approval authority when enforcement authorities come on the property of utility operation, maintenance or other activities.

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- Utility employees through their bargaining representatives established channels of communication at regular interval management with public agencies having enforcement responsibility.

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Applying these transparency principles, safety be reported, including those corrected by any other that constitute “near misses.” You will accomplish the It would the understanding that safe operation of the gas system constant vigilance and proactive intervention and thus increase

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its safety; (2) it would improve the regulatory knowledge condition of particular (3) segments; enhance the ability to account for the safety utility expenses.

For example, PHMSA should quantify the safety incident pressures exceed MAOP. The transparency principles that these incidents misses where risk increased it should be reported, subjected to root cause analysis actions to eliminate the hazard qualified (or perhaps frequent) reporting of near misses involving excessive pressure hazard mapping and mitigation process. learn from the not happen from identified risks, how damage and

Thank you for the opportunity to present these