

PHMSA'S Web Conference Series 2014



RP 1173: Pipeline SMS Requirements

July 02, 2014

Linda Daugherty and Mark Hereth



U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

Risk Management

Operational Controls

- Linda Daugherty, US DOT, PHMSA Kansas City
- Mark Hereth, The Blacksmith Group



Element 3: Risk Management

- The pipeline operator shall maintain (a) procedure(s) for the performance of risk management. The operator shall maintain a description of the assets comprising the pipeline, including the surrounding environment, to identify threats to pipeline safety.
- The operator shall analyze risk considering the threat occurrence likelihood and consequence throughout the pipeline lifecycle. The operator shall evaluate pipeline safety risk and make decisions on how to manage it through preventive controls, monitoring, and mitigation measures. Safety assurance sub-elements, including audits, data analysis, and performance evaluation are used to monitor the effectiveness of risk management.



Risk Management

- Builds upon the fundamentals of risk management in integrity management – "Know your system and recognize potential threats"
- As well as international consensus standards such as ISO 31010 – Risk Management
- Starts with emphasis on data and data quality
- Risk Identification "What Can Go Wrong?"
- Risk Mitigation
- Periodic Analyses at least once annually
- Reporting to Top Management including risk analysis, mitigation methods and intended effectiveness



U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

Element 4: Operational Controls

 The pipeline operator shall maintain controls for the safe operation of each facility consistent with the pipeline operator's safety policies and objectives.



Operational Controls

- "Operational controls" used in other SMSs
- Operating Procedures reviewed annually for lessons learned
- Safe Work Practices addressing situations where stop work and procedural deviations are encouraged.
- System Integrity Life cycle view
- Management of Change includes organizational changes
- Use of Contractors



Use of Contractors

- Communicating requirements of the PSMS
- Defining Responsibility, Authority & Accountability for managing the outsourced activities
- Incorporating work and findings
- Training and orientation on safety policies
- Evaluating contractor safety performance
- Communicating risks at the work sites, and
- Communicating the MOC procedure.