

STATUS OF SMS IN THE PIPELINE INDUSTRY

July 14, 2021

UCT / UtiliTech

Nashville, Tennessee



Panelists



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Overview



- ▶ **Background of Pipeline SMS**
 - ▶ API 1173
 - ▶ DCA/APCA Contractor Template
- ▶ **Implementation of SMS within the Pipeline Industry**
 - ▶ Operators
 - ▶ Contractors
- ▶ **Pipeline SMS Industry Team**
- ▶ **PIPES Act of 2020**
- ▶ **Next Steps for SMS**

Background



- ▶ **API 1173**
- ▶ **PHMSA Perspective**
- ▶ **NAPSR Perspective**
- ▶ **Evolution of PSMS Industry Team**

PSMS from 10,000 Feet

► Where Does Safety Management Begin?

- “Pipeline” or “Asset” safety ultimately begins before and during construction (relate to the bathtub curve)

► “Voluntary” nature of PSMS for stakeholders, despite that all Industry groups and most of their individual members are in support adoption

► Contractor Engagement

- Why it is important for Operators to engage their contractors with PSMS even beyond the items specified in 8.4 (ensure a positive safety culture, continuous improvement objectives (PDCA), CAP, etc.)

► Steps a contractor should follow when adopting PSMS (assignment of responsibilities, completion of a GAP analysis, completion of a safety culture assessment, discussions with operators, etc.)





API 1173 – Section 8.4 – “Use of Contractors”

Operator responsible for defining and documenting a process for:

- ▶ Communicate requirements of SMS activities and processes to be conducted by the contractor (scope, boundaries, and applicable standards and procedures;
- ▶ Training and orientation on safety policies;
- ▶ Evaluating contractor safety performance;
- ▶ Define responsibility, accountability and authority for managing outsourced activities;
- ▶ Communicating risks at the work site; and
- ▶ Communicating MOC procedures.
- ▶ Incorporating work and findings into operators operations;

DCA/APCA Contractor Template

- ▶ **DCA/APCA Template on Pipeline Construction Safety Management Systems**
- ▶ **Overview of the three primary documents that influenced the final document**
 - ▶ API RP-1173
 - ▶ API RP-1177
 - ▶ AGA Whitepaper on Contractor Construction Quality Management



Avoiding OQ “Portability” Problem

- ▶ Problems w/inconsistencies regarding compliance with operators' SMS programs
- ▶ Standardization of “Plan-Do-Check-Act” approaches
- ▶ Experiences in the field so far



Regulatory Status of Pipeline SMS

- ▶ **SMS Provisions in PIPES Act of 2020**
 - ▶ PHMSA evaluation of current level of implantation of SMS
- ▶ **Future SMS mandate?**
(Reauthorization and mandate for PHMSA to explore industry adoption and other PSMS related topics)
- ▶ **SMS approaches at the state level**



Pipeline SMS Industry Team





Questions?

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