NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

Integrity Management Report (IMP) Attachment V REFERENCE #4

IR 403: Overall responsibilities of risk management and pipeline integrity management groups.

07-26-10 Marshall, MI DCA10-MP-007

MP 608 – Marshall, Michigan Incident NTSB/PHMSA Information Request No. 367

IR 367 Reference: NTSB email request of February 25, 2012 by Ravindra Chhatre

Preamble:

Request: The response [to IRs 365 & 366] is useful, but I do not believe it answers some of my key questions:

- 1. Organization wise, what the overall responsibilities of Risk management (David Weir's group) and Pipeline Integrity Management groups were in 2005, 2009, and at the time of the accident (or whatever the titles were at the time); and the responsibilities were specifically for liquid pipelines. If they changed over the period, when this happened.
- 2. How they officially interacted with each other in addressing pipeline integrity; and under what management structure these two groups were (like simplified org-chart) during these three timeframes mentioned above.

I would like to describe functions of integrity management and risk management during baseline assessment and various ILI runs, specifically 2005 crack tool run and 2007 wall thickness/corrosion run.

Response:

In July 2004, Enbridge completed an organizational restructuring that included the consolidation of a number of Supervisor areas and the addition of a new manager area all contained under a position titled Director, System Integrity that reported to the Vice President, Engineering and System Integrity. The structure underneath this Director position included the Manager, Pipeline Integrity; Manager, Compliance; and Manager, Facility Integrity roles. The Supervisor, Operational Risk Management position reported to the Manager, Facility Integrity.

The responsibility of the Pipeline Integrity department has always been to determine the integrity activity plans for the mainline pipelines. This responsibility includes condition monitoring such as in line inspections, mitigation programs including pipeline repairs, internal corrosion inhibition, etc., and a variety of technical support roles that complement the skills within the department. I believe we provided an org. chart in an IR response that describes the structure at the time of the failure. This structure was in place from its inception in 2005 until late 2010 with no change in the responsibilities of the areas.

The Operational Risk Management group started in 1999 and up until 2004 reported up through to the Vice President, Operations. The role of the department has always been to analyze likelihood (of a specific failure type) and consequence (of that failure) information in order to provide whole risk information to support various programs including valve spacing planning, operational activities, as well as pipeline integrity work. The various departments utilize the risk information to support the decisions they make and use both the overall risk as well as specific details such as consequence information in their processes.