National Energy Board



Office national de l'énergie

File OF-Fac-Oil-E101-2014-11 04 22 November 2017

Mr. Guy Jarvis President Enbridge Pipelines Inc. Suite 200, 425 – 1 Street SW Calgary, AB T2P 3L8

Email:

Dear Mr. Jarvis:

National Energy Board review of Enbridge Pipeline Inc. (Enbridge) Corrective Action Plan (CAP) developed in response to the 2017 **Enbridge Pipeline Inc. - Pre-construction Readiness Audit**

The National Energy Board (NEB or Board) has concluded its review of Enbridge's CAP as submitted by letter 2 November 2017. The Board evaluated the corrective actions in order to verify that the proposed actions would address the deficiencies noted and prevent recurrence.

The Board notes that of the 37 audit protocol items only one finding of non-compliance was identified during the audit which resulted in 3 corrective actions proposed by Enbridge.

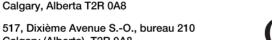
Summary of Corrective Action Review

The Board has evaluated the CAPs separately and assigns each CAP one of the three following results:

- 1. Approved
- 2. Approved with additional direction.
 - a. In these cases, the Board accepts the company's proposed CAP as part of the corrective action and, in addition, directs that the company take further action.
- Rejected due to lack of clear deliverables. Additional detail is required from the 3. company in order to ensure that the identified deficiencies are addressed.

The following table provides a summary of the results for the Enbridge CAP.

.../2





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Result	# of results	Enbridge Corrective Action #		
Approved	3	Enbridge CA #: 1, 2 and 3		

For a detailed summary of the analysis and results, please see table below.

Item	Reference	NEB Finding of Non-	Enbridge	Corrective Actions	Target	Actual
		compliance	CA#		Completion	Completion
					Date	Date
1	AP-Enbridge 23 -	General Finding:	1	Updated the	July 28,	July 28,
	Has the company	Enbridge has		Projects Safety	2017	2017
	established a	established		Management Plan		
	process to	communication process		to reflect how and		
	communicate	to communicate		when both safety		
	corrective actions	corrective actions and		and environment		
	and learnings to	learnings for safety		corrective actions		
	ensure employees	related items; however		and leanings are		
	or persons	this process was not		communicated.		
	working on behalf	clearly defined for	2	Sent a	Aug 9, 2017	Aug 9, 2017
	of the company	environmental		communication to		
	are informed?	corrective action and		all project		
		learnings.		Environmental		
				personnel		
		NEB's Conclusion:		involved to		
		Based on the scope of		reinforce the		
		the audit, the Board		Process.		
		found Enbridge to be	3	Identifying further	Aug 9, 2017	Aug 9, 2017
		non-compliant with the		documented edits		
		requirement of the		to the		
		OPR s. 6.1(r) and (u) at		Environmental		
		the time of the audit.		Protection Plan to		
				be included in		
				next revision cycle		

The CAP Review Process

The Board notes that Enbridge has already submitted the deliverables as outlined by Enbridge's CAP. The NEB will review the documents and deliverables as outlined by Enbridge's CAP. Each finding will be considered resolved when all of the deficiencies as described in the report have been addressed in accordance with the legal requirements and the commitments and the actions described in the CAP. An Implementation Assessment meetings may be organized to discuss actions taken.

In addition, the Implementation Assessments will address the following:

- Enbridge has listed its corrective actions as "complete". The Board requires a review of the related documentation and actions taken to determine whether these actions sufficiently address the deficiencies. Further actions may be required to ensure that Board expectations are met.
- The Board will verify that the CAPs are systemically applied and include measures to prevent recurrence.

The Board will make the CAP public and will continue to monitor and assess all of Enbridge's corrective actions with respect to this audit until they are fully implemented. The Board will also continue to monitor the implementation and effectiveness of its oversight measures for the Line 3 replacement project through targeted compliance verification activities as a part of its on-going regulatory mandate.

In the coming days, the Lead Auditor will contact Enbridge's representative whom we have copied on this letter to arrange the document review for the CAP. If you require any further information or clarification, please contact Barbara Wegernoski, Lead Auditor, at 403-299-3151.

Yours truly,

Original signed by L. George for

Sheri Young Secretary of the Board

c.c. Manager, Pipeline Compliance Email