

EXPRESS-PLATTE PIPELINE SYSTEM  
A Unit of Spectra Energy Partners  
Suite 1500, Bow Valley Square 4  
250-6<sup>th</sup> Ave SW  
Calgary, Alberta T2P 3H7

Duane D. Rae  
President – Express Pipeline Ltd.



January 3, 2017

**Filed By Fax**  
**Original via Courier**

Ms. Sheri Young  
Secretary of the Board  
National Energy Board  
Suite 200, 517 – 10<sup>th</sup> Avenue S.W.  
Calgary, Alberta T2R 0A8  
Fax: 403-292-5503

Dear Ms. Young:

**Re: Express Pipeline Ltd. ("Express")**  
**National Energy Board ("NEB") Focused Audit of sub-element 4.2 *Investigation***  
***and Reporting Incidents and Near Misses***  
**File OF-Surv-OpAud-E092-2016-2017 01**  
**Submission of Corrective Action Plan**

Express hereby submits its Corrective Action Plan ("CAP"), as directed by the NEB in its Final Audit Report ("Audit Report") dated 9 December, 2016. In the Audit Report, Express was directed by the NEB to file, within 30 days of the issuance of the Audit Report, a CAP which describes the methods and timing for addressing the non-compliance findings identified during the audit.

Please address any questions to [REDACTED] via telephone at [REDACTED] or email at [REDACTED] or [REDACTED] via email at [REDACTED].

[REDACTED]

Duane D. Rae  
President  
Express Pipeline Ltd.

## **Express Pipeline Ltd.**

## **Corrective Action Plan**

---

Submitted by Express Pipeline Ltd. to address findings in the National Energy Board's Final Audit Report

---

**File OF-Surv-OpAud-E092-2016-2017 01**

**January 3, 2017**

## **Introduction**

On July 14, 2016, the National Energy Board (“NEB” or “Board”) initiated a focused audit of Express’ NEB regulated facilities. The audit focused on sub-element 4.2 *Investigation and Reporting Incidents and Near Misses* of the NEB Management System and Protection Program Audit Protocol. The audit also evaluated some of the other management system elements which were relevant to the scope of the audit. The scope of the audit was inclusive of all protection programs within Express’ Operating Management System (“OMS”) (safety, environment, integrity, emergency, security, damage prevention, control centre, and design & construction).

On December 09, 2016, the NEB issued its Final Audit Report (“Audit Report”). The NEB directed Express to file with the Board for approval, a Corrective Action Plan (“CAP”) that describes the methods and timing for address the non-compliances identified through this audit.

## **Audit Findings**

The Board’s audit of Express’ regulated facilities found that Express has established processes for reporting incidents and near misses, conducting investigations, developing corrective and preventive actions and learning from incidents. The NEB noted that most processes and procedures were appropriately documented, and records reviewed and interviews conducted demonstrated that they were implemented. Three findings of non-compliance are:

**Finding 1:** Express did not have an investigation procedure reflecting current investigation practices.

**Finding 2:** Express process for taking corrective and preventive actions was not fully documented.

**Finding 3:** Express has not established the competency requirements for the investigation team members.

The NEB further noted that, although Express has been found non-compliant in these three instances, the Board is satisfied that Express has adequate processes in place for learning from its incidents and near-misses, for identifying developing trends and for acting accordingly to prevent incidents.

## **Corrective Action Methodology**

Express has developed this CAP using the basic principles of creating SMART (Specific, Measurable, Attainable, Realistic, Time-related) goals. Particular attention has been paid to ensure that corrective actions are systemic fixes, and not just a resolution of the immediate issue symptoms.

Express will manage all actions to closure using an audit tracking tool within an internal SharePoint site. Weekly progress updates will be provided to the Accountable Officer.

## Corrective Actions

Express provides in table 1, proposed corrective actions to address each finding and timing for each action.

**Table 1: Express Corrective Actions and anticipated completion dates.**

NEB Audit Finding	Express Corrective Action	Completion Date
<i>Express did not have an investigation procedure reflecting current investigation practises as required by OPR s. 6.5(3).</i>	<p>The Audit Report noted that Express has in practice an investigation process that allows the company to investigate its incidents and near-misses, and to identify the necessary corrective and preventive actions, however the process is not fully documented. Express had already identified the gap and undertaken work to address it, as demonstrated by provision of a new draft investigation procedure (Procedure 5.3.100) during the audit.</p> <p>In conjunction with its response to finding 3, Express will finalize and issue OMS Procedure – Incident Investigation 5.3.100.</p>	March 31, 2017
<i>Express process for taking corrective and preventive actions was not fully documented as required by OPR s. 6.5(3).</i>	<p>The Audit Report noted that Express has a process for developing and implementing corrective and preventive actions necessary to address the causes and contributing factors to an incident. However, the part of the process where recommended corrective and preventive actions from incidents are entered into the work order system is not documented.</p> <p>Express will develop a new document, OMS Process – Corrective Actions 5.4.100, that details the process for entering EHS and Operational Incident Report information into its work order system.</p>	March 31, 2017
<i>Express has not established the competency requirements for the investigation team members as required by OPR s. 6.5(1)(j).</i>	<p>The audit report noted that that Express has developed and implemented training programs for the company employees related to the reporting of incident and near misses, and has training requirements for staff conducting investigations and developing corrective and preventive actions. However, Express has not implemented a process for developing or documenting competency requirements for the investigation team members.</p>	March 31, 2017

	In conjunction with its response to finding 1, Express will update OMS Procedure – Incident Investigation 5.3.100 to include competency requirements for incident investigation team members and leaders.	
--	---	--

In addition to the actions described in table 1, Express will also complete and issue a Management of Change (“MOC”) notification to Express personnel, regarding the proposed changes to its OMS documents by March 31, 2017. The provision of training to Express personnel regarding the new and updated procedures will be included as part of the MOC process.