



File OF-Surv-OpAud-T241-2017-2018 01  
27 April 2018

Dr. Norrie Ramsay  
Senior Vice President, Technical Centre,  
Accountable Officer  
TransCanada Keystone Pipeline GP Ltd  
P.O. Box 1000 Station M  
Calgary, AB T2P 4K5  
[REDACTED]

Dear Dr. Ramsay:

**National Energy Board Approval of TransCanada Keystone Pipeline GP Ltd.  
(TransCanada) Corrective and Preventive Action (CAPA) Plan  
Hazard and Risk Assessment as Related to Emergency Management**

The National Energy Board (Board) hereby approves TransCanada Keystone Pipeline GP Ltd. (TransCanada) Corrective and Preventive Action Plan (CAPA) submitted by letter 6 April 2018 developed in response to the 2018 Audit of TransCanada's Hazard Identification as related to Emergency Management activities.

The Board finds TransCanada's proposed approach to addressing the deficiencies is acceptable. Accordingly, the Board directs that all corrective actions be completed on or before the dates set out in Table 1. The Board will verify that the CAPA Plan is systemically applied and includes measures to prevent recurrence.

The Board will make the CAPA Plan public and will continue to monitor and assess all of TransCanada Keystone Pipeline GP Ltd's corrective actions with respect to this audit until they are fully implemented.

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During the CAPA review, the NEB will review the deliverables as outlined by TransCanada's CAPA Plan. 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, the commitments and the actions described in the CAPA Plan. Meetings to discuss the CAPA Plan will be organized if required.

Table 1 – CAPA Due Dates

Due Date	TransCanada Keystone's CAPA	Findings addressed
March 6, 2019	Deficiency #1: Documented Overarching Process/Activity and Procedure Overview. Deficiency #2: Output Management for Development and Maintenance of the EM Program	AP07 2.1 Hazard ID
March 6, 2019	Deficiency #1: Direction of Appropriate Expertise to Emergency Operations Centre. Deficiency# 2:Contingency Planning Process	AP11 3.2 Operational Control Upset or Abnormal Operating Conditions

The Board will also continue to monitor the implementation and effectiveness of emergency management activities through targeted compliance verification activities as a part of its on-going regulatory mandate.

If you require any further information or clarification, please contact Niall Berry, Lead Auditor, at 403-471-1921.

Yours truly,

*Original signed by*

Sheri Young  
Secretary of the Board

c.c. 