

The Ideal Control Room Management Plan (Plato's Forms)

Plato, in the dialogue *Phaedo*, introduces the "Theory of Forms" along with other themes. The theory of forms means that for every object in the world, there is an ideal *form* of that object. We might not be able to see that form, but it exists somewhere in the universe. Let's say you look at a horse, and that horse may be a wonderful specimen. Yet the horse we see is not the *form* of *Horseness*, just one of many horses. This article might stretch our minds.

Let's apply the philosophical theory of forms to Control Room Management (CRM) Plans. Companies that are subject to the PHMSA CRM regulations are required to have a CRM Plan. How many CRM Plans exist? Hundreds? Thousands? There are companies in Brazil and Canada who have CRM Plans even though they are not required.

According to Plato's theory, somewhere there exists the 'form' of the perfect CRM Plan. In today's world, we might substitute 'ideal' for 'form.' That term does not carry the identical meaning Plato was intending with 'form,' but is easier for us to understand and to apply.

I do not remember anyone ever saying, "We would like the ideal, perfect CRM Plan. It is important that our plan be the best one in the world, embodying characteristics unsurpassed in the visible world." According to my understanding of the "theory of forms," mere humans cannot create such a Plan anyway. We can look for the "best" in a number of plans and seek to incorporate those into the best CRM Plan that the world has ever encountered.

The Southern Gas Association Gas Control Committee years ago developed a compliance framework document that was a template of a CRM plan. Many gas control rooms used that framework. The Canadian Energy Pipeline Association has a CRM Knowledge Network that has developed a CRM compliance guidance process for its members. Are these two ideal?

Someone called me a few years ago and wanted to know if Pipeline Performance Group had a "cookie cutter" CRM Plan we would sell him. He was not looking for the ideal CRM Plan, just a basic plan he could put on the shelf (or on a network) with his other cookie cutter documents. I was not able to satisfy his request because CRM plans need to be specific to a particular control room. But was that person the only one looking for a "cookie-cutter" CRM Plan? No, I have heard people again and again say, "We just want to pass an inspection."

We have reviewed many CRM Plans. Most are designed to minimal standards and may be implemented partially and sporadically. Alas, none seem ideal or perfect. None reach Plato's description of form-ness. What would the ideal CRM Plan be? How would it embody *CRM Plan-ness*? This is a difficult question.

We have developed a number of CRM Plans with our clients since 2008 and are currently working on three "new" plans. The approach we take is that a CRM Plan needs to satisfy the specific regulatory language, all FAQs, all inspection questions and considerations, any applicable Advisory Bulletins, industry standards, lessons learned from pipeline accidents where the control room or controllers were involved, and lessons learned from reviewing PHMSA enforcement actions from CRM inspections. We apply human factors concepts to minimize the effects of human error. We seek operational excellence. But what we seek is elusive. Most would think CRM Plan-ness is unattainable.

Simply put, Plato would say that we have the preexisting knowledge to create and implement the perfect, ideal CRM Plan. We can use our reasoning abilities to recollect the Form of the ideal CRM Plan because our mind already recognizes it does exist.

There are multiple, philosophical concepts that Plato uses to support what I have turned into a brief statement. If you have endured my ramblings this long, let me now conclude with why I think we do not choose to have the ideal, perfect CRM Plan.

We do not have the will. My interpretation of Plato's teachings about forms is that we cannot because we do not. And I am pragmatic enough to know that hardly anyone is even going to consider developing and implementing the ideal Control Room Management Plan.

My career as a consultant is winding down, yet I remain quixotic enough to believe that all of us who have responsibilities for control room management can do better in the future than we have done in the past. Will we? Will I? Will you?