

2013 Pipeline Safety Seminar



May 14–16, 2013
French Lick, IN

Operator Qualification Overview



- **(CFR) Part 192 – Subpart N – Requirements**
- **(CFR) Part 195 – Subpart G – Requirements**
- **Deficiencies identified from inspections**
- **Expectations**

QUALIFICATION PROGRAM REQUIREMENTS



Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks

DEFICIENCIES IDENTIFIED



- ▶ All covered task are not identified
- ▶ Covered task performed by contractors are not identified
- ▶ Operator has not reviewed the content of their “off the shelf” OQ program

EXPECTATIONS



- ▶ Operators must review their operations to assure all covered tasks performed by their individuals and by contractors are identified and documented.
- ▶ When using an “off the shelf” OQ program the operator is responsible to review the content to assure all individuals/contractors are evaluated and qualified for all covered tasks performed on the operator’s system.

QUALIFICATION PROGRAM REQUIREMENTS



Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (g) ... the intervals at which evaluation of the individual's qualifications is needed

DEFICIENCIES IDENTIFIED



- ▶ Operator's have not identified task-specific reevaluation intervals.
- ▶ Operators cannot explain the basis for reevaluation intervals. Especially true when using an "off the shelf" program.
- ▶ Performance monitoring is not in place to identify if an individual needs to be reevaluated.

EXPECTATIONS



- ▶ An operator must identify task-specific reevaluation intervals and understand the basis on which reevaluation intervals have been established.
- ▶ Performance monitoring activities must be implemented to make sure qualified individuals are performing covered tasks per the evaluation criteria established or accepted by the operator.

“OFF THE SHELF” PROGRAMS



- ▶ Were never intended to drive your OQ Program home
- ▶ They were to get you in the neighborhood
- ▶ You must look inside the box and see what's missing. Review your operations and add the missing parts.

QUALIFICATION PROGRAM REQUIREMENTS



Each operator shall have and follow a written qualification program. The program shall include provisions to:

(h) After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary **knowledge** and **skills** to perform the tasks in a manner that ensures the safe operation of pipeline facilities; and

DEFICIENCIES IDENTIFIED



Operator's program does not include:

- any training requirements.
- provisions for task-specific training.
- the role of training in the qualification of covered tasks, such as new hires, re-evaluations, corrective performance re-evaluations, or management of change revisions.
- how contractor employee training will be accomplished.
- provisions to include training on covered task not fully covered by their web-based training.
- training to take appropriate action after AOC.

EXPECTATIONS



- Document in the OQ program how training is incorporated into the evaluation and qualification process.
- Establish or verify training requirements for contractors.
- If you are using an “off the shelf” program with training provided, review and identify the tasks that may require additional training, including the reaction to AOC’s. These are usually operator specific.

EVALUATION PROCESS



Evaluation means a process, established and documented by the operator, to determine an individual's ability to perform a covered task by any of the following:

- (a) Written examination;
- (b) Oral examination;
- (c) Work performance history review; *
- (d) Observation during:
 - (1) Performance on the job, *
 - (2) On the job training, or
 - (3) Simulations; or
- (e) Other forms of assessment.

WORK PERFORMANCE HISTORY



(d) After October 28, 2002, work performance history may not be used as a sole evaluation method.

OBSERVATION OF ON-THE-JOB



(e) After December 16, 2004, observation of on-the-job performance may not be used as the sole method of evaluation.

ADB-09-03

1. Observation without interaction during on-the-job performance does not provide an adequate measurement of the knowledge and skills of the individual;
2. PHMSA has determined that there are no covered tasks to date where observation of on-the-job performance is an adequate, sole method for examining or testing qualification; and
3. Observation of on-the-job performance does not measure the individual's ability to recognize and react to abnormal operation conditions (AOCs).

QUALIFICATION



Qualified means that an individual has been evaluated and can:

- (a) Perform assigned covered tasks; and
- (b) Recognize and react to abnormal operating conditions.

DEFICIENCIES IDENTIFIED



- Evaluation/qualification **process** are not **documented** for covered tasks.
- Evaluation/qualification process for contractors are not documented for covered tasks.
- Absence of performance evaluations to demonstrate an individual's **ability** to perform covered tasks. Simulations require demonstration.
- Performance Evaluations indicate multiple individuals were evaluated on multiple tasks on the same day. No group hugs!
- Multiple tasks bundled into one task – Lack of performance evaluations to cover all tasks included.
- Operators do not verify evaluation methods are consistent with their procedures.

DEFICIENCIES IDENTIFIED



- Lack of task-specific AOC's identified.
- The written operator qualification program and evaluation materials identify AOCs, but do not address the required reactions to the AOCs.
- Operators include AOC evaluations for employees, but do not ensure AOC evaluation for contractor individuals.
- Operator has not ensured that contractor's evaluation, procedures, evaluations, and qualifications are acceptable under the operator's OQ program.
- Evaluation method does not contain criteria for pass or fail.
- Actions and timeframe for an individual deemed no longer qualified. (failed evaluation, incident, reasonable cause...)

EXPECTATIONS



- Evaluation/qualification **process** must be **documented** for all covered tasks and include a criteria for pass or fail.
- The OQ program must specify how the operator will ensure that contractors procedures, training, evaluations, recognition and reaction to AOC'S, and qualifications are accepted under the operator's OQ Program. Verification of this must be documented.
- Qualification process must include performance evaluations for tasks that require the demonstration of an individual's ability to perform a covered task.
- Operator must verify evaluation methods are consistent with their O&M procedures.

EXPECTATIONS



- The operator qualification program must identify task-specific AOCs and the required reactions to those AOCs. Both AOC's and reactions must be documented in program.
- The operator qualification program shall have provisions:
 1. If the operator has reason to believe an individual's performance of a covered task contributed to an incident.
 2. If the operator has reason to believe that the individual is no longer qualified to perform a covered task.

ADDITIONAL REQUIREMENTS



The operators program shall include provisions to:

- (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;
- (f) Communicate changes that affect covered tasks to individuals performing those covered tasks; and
- (i) After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the Administrator or state agency has verified that it complies with this section.

EXPECTATIONS



- The operator's program must contain restrictions and limitations for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual.
- The operator's program must specify how changes to the program or changes that affect covered tasks will be communicated to qualified individuals.
- The Operator's program must address identifying significant changes in the OQ Program and the requirement to notify the IURC/PSD when these changes occur.

SIGNIFICANT



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As applicable to OQ program modifications, significant includes but is not limited to: increasing evaluation intervals, increasing span of control ratios, eliminating covered tasks, mergers and/or acquisition changes, evaluation method changes such as written vs. observation, and wholesale changes made to OQ plan.

RECORDKEEPING



Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

- (1) Identification of qualified individual(s);
- (2) Identification of the covered tasks the individual is qualified to perform;
- (3) Date(s) of current qualification; and
- (4) Qualification method(s).

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

DEFICIENCIES IDENTIFIED



- Operators not saving prior qualification records.
- Contractor qualifications were not available.
- Improvement needed for records retention.

EXPECTATIONS



- Qualification records for all individuals performing covered tasks must include the information required under Recordkeeping.
- The operator's program ensures the availability of qualification records of contractors currently performing covered tasks, or who have previously performed covered tasks.

CLARIFICATIONS



- Operators' review of their OQ Plan in accordance with §§ 192.605(a) and 195.402(a) should be conducted in connection with their reviews of their O&M Plans every 15 months, but at least once each calendar year.
- Operators' “periodic review of work” being done in accordance with §§. 192.605(b)(8) and 195.402(c)(13), should include evaluation of OQ procedure effectiveness to identify where corrective actions are needed to address deficiencies.

CLARIFICATIONS



Examples of issues that need to be reviewed to determine the effectiveness of an OQ Program:

- Adequacy of training for specific covered task(s),
- Adequacy of evaluation(s) to determine if individual has required knowledge, skills, and abilities,
- Adequacy of individual to recognize AOC(s), and
- Adequacy of individual to take appropriate action after AOC.