

Operator Qualification

“OQ”

Crash Course

Contact Information

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In Part 192

Certain Functions are Covered

- Operations
- Maintenance
- Emergency Response
- New Construction (80%)



What is a covered task?

- Is it performed on a pipeline facility?
- Is it an operation or maintenance task?
- Is it performed as a requirement of Part 192?
- Does it affect the operation or integrity of the pipeline?

THE 4 PART TEST

The answer must be yes to all 4 questions to be considered a covered function under the regulation

§ 192.80 | Scope

- Rule prescribes minimum requirements
- Not necessarily part of O&M Plan
- May expand minimum requirements (without penalty)
 - (Example: including tasks not identified to be covered tasks)

§ 192.801 Persons Covered

- Individuals performing covered tasks
- Operator personnel
- Contractor/subcontractor personnel
- Any other entity performing a task

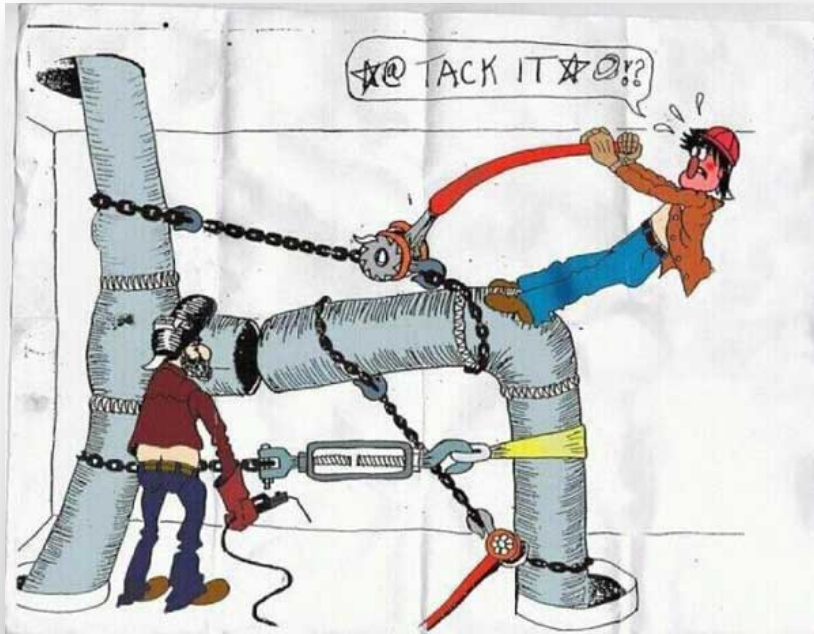
§ 192.803 Definitions

Abnormal Operating Conditions

“...a condition *identified by the operator* that may indicate a malfunction of a component or deviation from normal operations that may indicate a condition *exceeding design limits or result in a hazard(s)* to persons, property, or the environment”

Abnormal Operating Conditions

§192.803



- May be encountered while performing the covered task
- Must exceed design limits or present hazards to persons, property or environment

§192.803

Abnormal Operating Conditions

- Recognize
 - related to covered task being performed
- React
 - this may include notifying the responsible parties or taking corrective action to mitigate the condition.

Evaluation



- By any of the following:
 - Written examination
 - Oral examination
 - Work performance

§192.803

Evaluation



- Observation
 - performance on the job
 - on-the-job training
 - simulations

§192.803

Evaluation



- Not an event (ongoing)
 - Documentable
 - Must use any appropriate evaluation method
- §192.803

Qualification Modes

- ~~“**Transitional**” (Between effective date & compliance date)~~
- **“Initial”** (Any qualification for people who have not performed task prior to effective date)
- **“Subsequent”** (After transitional and/or initial)

§192.803

Definitions

Qualified

“...an individual has been evaluated and (a) can perform assigned covered task and (b) recognize and react to abnormal operating conditions”

§192.803

Qualification Program

- Provisions to:

§192.805

- Identify covered tasks
- Evaluate individuals who perform covered tasks
- Allow non-qualified individuals to perform covered tasks

Qualification Program

Provisions to evaluate:



if employee's
performance
contributed to
an accident

§192.805

Qualification Program

Provisions to evaluate:

§192.805

if the employee is
no longer qualified
due to their
actions
or task changes



Qualification Program



Provisions to communicate changes affecting covered tasks

- to whom the changes need to be communicated
- how the changes will be communicated

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Qualification Program

Provisions to identify:

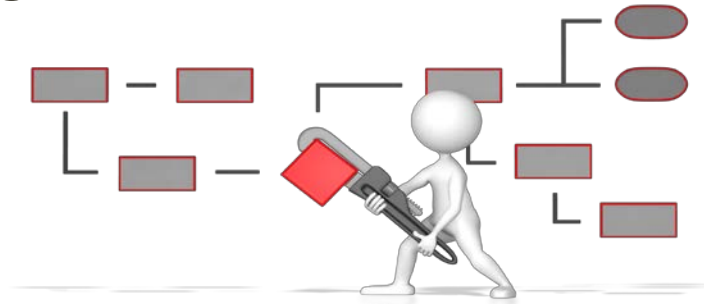
- the need for subsequent evaluation of qualification
 - which tasks may need additional evaluation
 - appropriate interval for additional evaluation

§192.805

Qualification Program

§192.805

- Provide Training as appropriate to ensure individuals performing covered tasks have
 - Skills
 - Knowledge
 - Ability
- Notify the Administrator of any **Significant** changes



Record Keeping

- Records shall include -
 - Identification of qualified employees
 - Covered task they are qualified to do
 - Date of current qualification
 - Qualification methods



Record Keeping

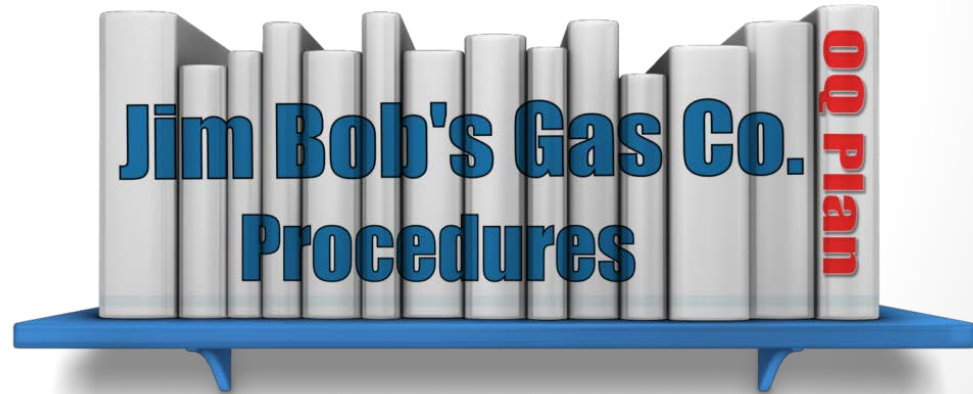
§192.807

- Records supporting current qualification - while person is performing the task.
- Records of prior qualification and records of individuals no longer performing covered task shall be retained for a period of five years.



General

- Written Qualification Program
 - Complete and in place April 27, 2001



§192.809

§192.809

General

- All Qualified by 10/28/2002
- Work Performance History Review not after 10/28/2002
- On the Job Training **NOT** sole method of Evaluation after 12/16/2004



What will the inspector
be looking for?

OPERATOR QUALIFICATION RULE



Section 192.80 | Scope

If the Operator has a process in place to determine the qualification of individuals who perform covered tasks

Section 192.801 Scope

Does the process to identify covered tasks include the 4-part test?

1. Is performed on a pipeline facility;
2. Is an operations or maintenance task;
3. Is performed as a requirement of this part; and
4. Affects the operation or integrity of the pipeline.

TASKS	Is performed on a pipeline facility	Is an operations or maintenance task	Is performed as a requirement of this part; and	Affects the operation or integrity of the pipeline
Manually Opening and Closing Valves	✓	✓	✓	✓
Adjust and Monitor Flow or Pressure - Manual Valve Operation	✓	✓	✓	✓
Compressor Preventive Maintenance	✓	✓	✓	✓
Inspection of Breakout Tanks	✓	✓	✓	✓
Joining of Plastic Pipe - Stab Fittings	✓	✓	✓	✓
Bagging and Stopping Low Pressure Pipe	✓	✓	✓	✓

Section 192.805 Qualification of Pipeline Personnel

If the Operator is following their written Qualification Program

Section 192.805 Qualification of Pipeline Personnel

Provisions to ensure through evaluation that individuals performing covered task are qualified?

Section 192.805 Qualification of Pipeline Personnel

Provisions to allow individuals that are not qualified to performed a covered task?

Section 192.805 Qualification of Pipeline Personnel

If the Operator has identified
“Abnormal Operating Conditions”

Section 192.807 Recordkeeping

If the Operator has records that demonstrate compliance with this Section

OPERATOR QUALIFICATION ISSUES

Operator Qualification Issues

Programs

- Not identifying all covered tasks
- Not defining or following “Span of Control”
- Not reevaluating individuals
- No process for communicating changes that affect covered tasks
- Inadequate written programs



Operator Qualification Issues



Training

- Improper hands-on training practices
- Ignoring training criteria
- Immediate re-testing vs. wait periods
- Unqualified instructors
- Requalification when changes in materials or components
- Lack of documentation

Operator Qualification Issues

Field Evaluations

- Coaching
- Unqualified evaluators
- Not considering AOCs
- Ignoring company procedures
- Inadequate paperwork



Questions??

