

Understanding OQ Requirements

CFR 49 - §192 Sub-Part N - §195 Sub-Part G



U.S. Department of Transportation

**Pipeline and Hazardous Materials
Safety Administration**

Leticia Santos
Pipeline Safety Specialist/Instructor
PHMSA T&Q
Leticia.Santos@dot.gov

Objectives

- Define the Scope of §192 Sub-Part N and §195 Sub-Part G
- Define OQ related terms
- Differentiate between Training and Qualification
- Discuss each one of the elements required in an Operator Qualification Program according to Parts 192 and 195
- Describe recordkeeping requirements for Operator Qualification Programs



Scope

- The rule applies to all individuals who perform covered tasks
 - The operator
 - Contractors
 - Sub-contractors
 - Any other entity performing covered tasks on behalf of the operator, this includes **emergency responders**.



Definitions

Covered Tasks

- Performed on a pipeline facility;
- An operations or maintenance task;
- Performed pursuant to a requirement in 49 CFR part 192 or 195; **and**
- Affects the operation or integrity of the pipeline.

Operation (Dictionary)

- Starting, stopping and/or monitoring and controlling devices or systems

Maintenance (Dictionary)

- The act of maintaining; the work of keeping something in proper condition

Definitions

Pipeline Facility means

- new and existing pipeline
- rights-of-way, and
- any equipment, facility, or building

Used in the transportation of gas or in the treatment of gas during the course of transportation

Covered Tasks or Not?

Welding or joining

Excavation

Pipe to Soil Readings

Meter Reading

Patrolling

Install and Maintain Pipeline Markers

Definitions

Abnormal operating condition

- 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

Definitions

Qualified means that an individual has been evaluated and can:

- Perform assigned covered tasks; and
- Recognize and react to abnormal operating conditions.

Training vs Qualification

Training: the act, process, or method of one that trains

the skill, knowledge, or experience acquired by one that trains

Qualification: a quality or skill that fits a person (as for an office) i.e. the applicant with the best qualifications

a condition or standard that must be complied with (as for the attainment of a privilege) i.e. a qualification for membership

Training vs Qualification

- In Summary
 - Training is the process where knowledge and skills are acquired
 - Qualification is the result of the evaluation process where a person demonstrates their knowledge, skill and ability to perform a covered task and recognize and react to AOCs.



Operator Qualified

- The individual must have the knowledge, skill and ability to perform the covered task, **AND**
- **Recognize and react to Abnormal Operating Conditions**
- Being a qualified welder or qualified joiner, doesn't make an individual Operator Qualified, it demonstrates the individual has the KSAs to perform the covered task.



Operator Qualified

- Abnormal Operating Conditions must be a part of the evaluation process.
- The individual must know all the AOCs associated with the covered task and it has to be demonstrated in the evaluation process



Operator Qualified

- For example, if the evaluation method is a written exam, there must be a question or questions asking what are **ALL** the AOCs for the covered task the individual is being evaluated for.
 - Select all that apply or fill the blanks
- In a performance evaluation, the evaluator must ask the individual to mention **ALL** the AOCs associated to the covered task.



The Program

- Each *operator* shall ***have and follow*** a written qualification program.
 - Procedures
 - Evaluation
 - Non-Qualified individuals performing covered tasks
 - Evaluate individuals who were possibly involved in an accident/incident
 - Evaluate individuals no longer qualified
 - Communicate changes
 - Identify evaluation intervals
 - Provide training AS APPROPRIATE
 - Notify PHMSA of any significant changes (after July 1, 2020, according to 192.18)





Evaluations

- Methods:
 - Written or Oral
 - Work performance history (Not as sole method after October 28, 2002)
 - Observation
 - On the job training
 - On the job performance (Not as sole method after and December 16, 2004)
 - Simulations
- ***Must be objective and no coaching allowed***



Evaluation Intervals

- The operator must determine the interval of ***subsequent*** evaluations
 - Considerations
 - Complexity or difficulty
 - Frequency
 - Other qualifications (i.e. welding or joining)



Evaluator - Expectation

- Does the evaluator need to be OQ qualified?
 - NO
- Should have basic knowledge of the covered task to be evaluated
- The level of knowledge and experience may vary depending on the method of evaluation.



Non-qualified Individuals Performing Covered Tasks

- Operator must ensure that a nonqualified individual may only perform a covered task under the following conditions.
 - A qualified individual is assigned to ***direct and observe*** the non-qualified individual during the performance of the covered task.
 - A qualified individual is ***able to take immediate corrective actions*** if necessary.



Span Of Control

- The operator should limit the number of individuals being observed by each qualified person.
- Based on the ability of the observer to effectively respond to errors that may occur during the performance of the task by the non-qualified individuals.



Span Of Control

- The number may vary based on factors such as the following.
 - Complexity of the task.
 - Consequence of improper performance of the task.
 - Ability of the person performing the observation.
 - Knowledge and abilities of the individuals being observed.



Span Of Control

- Not adequate under certain circumstances
 - High risk tasks such as hot tapping
 - Additional regulatory requirements such as welding or joining qualifications



Evaluate Individuals Who Were Possibly Involved In An Accident/Incident

- Determine if reevaluation of covered task qualification is needed.
 - Was it lack or poor qualification or some other personal factor such as stress or illness?
- Determining if other actions are needed.
 - If re-evaluation is needed, determine if the method or process used to evaluate this individual was adequate.
 - Do others evaluated with this method need to also be re-evaluated?
 - Does the method need to be revised?



Evaluate Individuals No Longer Qualified

This may be prompted by a number of circumstances, which include the following:

- Change in an individual's physical abilities related to performance of the covered task.
- Documented statement from the individual or other persons regarding the individual's performance of the covered task.



Evaluate Individuals No Longer Qualified

- Prolonged absence from performing the covered task.
- Documented unsatisfactory performance of the covered task.
- Results of any monitoring that the operator may conduct on covered task performance.

Evaluate Individuals No Longer Qualified

Course of Action

- Reevaluation
 - The individual may be reevaluated in accordance with the OQ program if the individual is still expected to perform the task.
- Training and reevaluation
 - Consider whether training would be appropriate prior to reevaluation.
- Stop using individual for the covered task
 - The operator should stop using this individual to perform the covered task until re-evaluated and qualified.






Communicate Changes

- The operator must communicate changes to covered tasks to individuals performing those covered tasks
- In addition, the operator should consider communicating those changes to others affected by the changes
 - i.e., Engineers, purchasing, evaluators, supervisors


Communicate Changes

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- Types of changes could include:
 - Modifications to operator policies or procedures
 - Changes in state or federal regulations
 - Use of new equipment or technology
 - New information from equipment or product manufacturers
 - Changes needed as a result of monitoring performance or program effectiveness

Communicate Changes

- The procedure should include
 - Level of communication
 - What is the actual impact on the covered task?
 - Does it affect the knowledge, skills and abilities to perform the covered task?
 - Timing of communication
 - Phasing in new equipment while still using previous equipment – not interrupting O&M activities

Communicate Changes

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- Changes in regulations – may require more immediate action
 - Type of communication
 - Written, oral, tailgate, training sessions
 - Documentation
 - Document the communications including individuals that were notified



Provide Training As Appropriate

- Determine the knowledge and skills that are needed to perform covered tasks in a competent manner and focus training, **if needed**, accordingly for the individuals who perform a covered task.
- Does it have to be operator created training?
 - **NO**
 - The operator may accept previous training, industry qualifications, third party OQ training, etc.



Provide Training As Appropriate

- Should consider including the following
 - Knowledge of elements of the O&M Manual that apply to the covered task
 - Knowledge of pertinent policies, procedures, job methods, materials, maps, and records that apply to the covered task
 - **Knowledge of appropriate abnormal operating conditions**
 - Skills to use the appropriate tools, instruments, and equipment
 - Skills to perform appropriate actions if abnormal operating conditions are encountered



Notify PHMSA Of Any Significant Changes

NOTE: After July 1, 2020, according to 192.18

- Significant changes must be defined in the OQ Program
- Examples of such modifications could include the following.
 - Increase of evaluation interval.
 - Deletion of previously identified covered tasks in the program.
 - Change in required evaluation methods.
 - Increase span-of-control ratios.
 - Changes due to mergers or acquisitions.
 - Wholesale changes, such as using a third-party plan instead of an operator plan or the adoption of different tasks (e.g., ASME B31Q instead of operator-determined tasks).

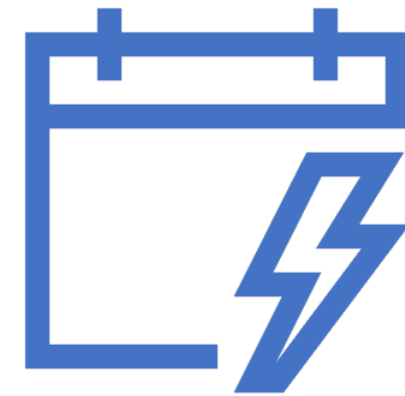
Recordkeeping

- Each operator shall maintain records that demonstrate compliance with this subpart.
- If third party data management vendors are used, the records should be readily accessible by the operator.
- The operator should be able to produce documentation of qualification for any individual that is performing a covered task on their behalf.



Recordkeeping - Retention Period

- Must have current qualification of individuals performing covered tasks
- Past qualifications must be kept for a minimum of 5 years
 - No longer performing specific covered tasks
 - Individuals no longer in the company



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Questions?

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