OQ – Moving Beyond the Basics
Operator Qualification Regulatory Requirements AND Expectations
Geoff Isbell, President - ENERGY worldnet, Inc.
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HAVE A QUESTION or COMMENT?

Just ask at any time
or
Send a text* message to:

940-399-9653

(*your text questions will be anonymous)
OQ – Moving Beyond the Basics
Are you aware of the change that is taking place?

Recognizing the Change Around You

Ask, or Text Questions to 940-399-9653
DOT/PHMSA – Changing Expectations

- Operators should not be struggling with **basics**
- OQ Programs should be **mature**
- Encouraging inspectors to challenge the norm
- Training inspectors to look at OQ differently

**OQ – Moving Beyond the Basics**

*Operator Qualification Regulatory Requirements AND Expectations*

Ask, or Text Questions to **940-399-9653**
“Gentleman, this is a football.”

“You don’t do things right once in a while, you do them right ALL them time.”

– Vince Lombardi
Intent of the Final OQ Rule

To ensure a *qualified workforce* on jurisdictional pipelines, and thereby, *reduce* the probability and consequence of *pipeline incidents or accidents* caused by *human error*.
7 Elements of the Final OQ Rule + 2 Add-Ons

1. Identify Covered Tasks
2. Evaluate individuals
3. Direct & Observe non-qualified individuals
4. Re-evaluate individuals if contributed to an incident
5. Re-evaluate individuals if competency is in question
6. Communicate changes
7. Re-qualification intervals
8. Train individuals, as appropriate
9. Notification of significant program changes

“Each operator shall have and follow a written qualification program.”

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What are you FOCUSED on?

Competence or Compliance?

Program Factors to Consider:

- Alignment with Operations (risk vs. expense)
- Process vs. Task (big picture)
- Integration of Training (true competency)
- Measurement (results from the field)

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The Path to Excellence

7 Issues Regulators Want You to Know

1. Self-Inspection
2. Contractor Accountability
3. OQ Plan Consistency
4. Evaluation Content & Methods
5. Abnormal Operations Conditions
6. Span-of Control
7. Suspensions/Disqualifications

Ask, or Text Questions to 940-399-9653
1. QA/QC = Self Inspection

- Operators should be their own inspectors
- There should be no audit surprises for an Operator
- Internal audit processes (leverage PHMSA Forms)
- Field inspections (JSA’s?, Projects?, OQ?)
- Program Effectiveness (safety & competency)

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Operator’s Should be the Ultimate Inspector

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2. Contractor Oversight

- Red flag for hands-off Contractor OQ
- Validate qualifications and process
- Look for gaps between Operator & Contractor
- Contractor alignment to O&M and SOPs
3. OQ Plans for Contractors ???

- Contractor OQ Plans are **not** an OQ requirement
- OQ Rule is an **Operator issue** (operator workforce)
- If you accept, you must **keep** a copy and **audit**
- Operator and Contractor **alignment** is required
- Audit exception for **inconsistencies** & gaps

*Ask, or Text Questions to 940-399-9653*
4. Evaluation Content and Methods

• Core competency vs. **Operator Specific** *(role of OQIP & B31Q)*

• Address Operator specific **O&M** and **SOPs**?

• Track **failed** test attempts *(review exam history)*
  • Set limit on test **attempts** *(OQIP)*
  • Use **waiting period** between failures *(OQIP)*

• Do performance **simulations** represent reality?

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5. Abnormal Operating Conditions

- AOC gaps are still a top inspection issue
- How do you know they can Recognize & React?
- Has it been demonstrated and observed?
- Ability to discuss does not prove ability to perform

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6. Span-of-Control / Direct & Observe

- Not a substitute for Qualification
- Who actually performed the work under SOC?
- Length of time working under SOC?
- Is true Direct and Observe being utilized?
- Does the SOC overseer always have full control?

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7. Disqualifications/Suspensions

- 2/3 of OQ Rule is checking & re-checking competency
- Suspend and track for suspensions
- Track disqualified workers (including contractors)
- Monitor employees between qualification intervals

Always Verify Qualifications (Competency) before Task Performance

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“Perfection is not attainable, but if we chase perfection we can catch excellence.”

– Vince Lombardi
OQ – Moving Beyond the Basics

What are your current thoughts and questions?

Ask, or Text Questions to 940-399-9653
Thank you.

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