



Operator Qualifications

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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



OQ PROPOSED CHANGES



OQ Proposed Changes

Existing Definitions

- Abnormal operating condition
- Evaluation
- Qualified

Proposed

- Qualified (Revised)
- Adversely affects
- Covered task
- Direct and observe
- Emergency response tasks
- Knowledge, skills and abilities
- Safety or integrity
- Significant changes
- Span of control

OQ Proposed Changes

§ 192.803 Definitions.

Original Language:

Qualified means that an individual has been evaluated and can:

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

OQ Proposed Changes

§ 192.803 Definitions.

Proposed Language:

Qualified means that an individual has been evaluated and can:

- 1) Perform assigned covered tasks;
- 2) Recognize and react to abnormal operating conditions that may be encountered while performing a particular covered task;
- 3) Demonstrate technical knowledge required to perform the covered task, such as: equipment selection, maintenance of equipment, calibration and proper operation of equipment, including variations that may be encountered in the covered task performance due to equipment and environmental differences;

OOQ Proposed Changes

§ 192.803 Definitions.

Proposed Language:

Qualified cont.

- 4) *Demonstrate the technical skills required to perform the covered task, for example:*
 - i. *Variations required in the covered task performance due to equipment and/or new operations differences or changes;*
 - ii. *Variations required in covered task performance due to conditions or context differences (e.g., hot work versus work on evacuated pipeline); and*
- 5) *Meet the physical abilities required to perform the specific covered task (e.g., color vision or hearing).*

OQ Proposed Changes

§ 192.803 Definitions.

Proposed Language:

Adversely affects means a negative impact on the safety or integrity of the pipeline facilities.

Covered task means an activity identified by the operator that affects the safety or integrity of the pipeline facility. A covered task includes, but is not limited to, the performance of any operations, maintenance, construction or emergency response task.

OQ Proposed Changes

§ 192.803 Definitions.

Proposed Language:

Direct and observe means the process where a qualified individual personally observes the work activities of an individual not qualified to perform a single covered task, and is able to take immediate corrective action when necessary.

OOQ Proposed Changes

§ 192.803 Definitions.

Proposed Language:

Significant changes means the following as it relates to operator qualification:

- (1) Wholesale changes to the program;
- (2) Change in evaluation methods (*i.e.* performance and written to written only);
- (3) Increases in evaluation intervals (*i.e.* from 1 to 5 years); or
- (4) (4) Removal of covered tasks (not including combining covered tasks).

OQ Proposed Changes

§ 192.803 Definitions.

Proposed Language:

Span of control means the ratio of nonqualified to qualified individuals where the nonqualified individual may be directed and observed by a qualified individual when performing a covered task, with consideration to complexity of the covered task and the operational conditions when performing the covered task.

OOQ Proposed Changes

§ 192.803 Definitions.



Proposed Language:

Emergency response tasks are those identified operations and maintenance covered tasks that could reasonably be expected to be performed during an emergency to return the pipeline facilities to a safe operating condition.

OQ Proposed Changes

§ 192.803 Definitions.

Proposed Language:

Safety or integrity means the reliable condition of a pipeline facility (operationally sound or having the ability to withstand stresses imposed) affected by any operation, maintenance or construction task, and/or an emergency response.



OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(a) General.

An operator must have and follow a written operator qualification program that meets the requirements of paragraph (b) of this section for **all pipelines regulated under part 192**. The written program must be available for review by the Administrator or by a state agency participating under 49 U.S.C. chapter 601 if the program is under the authority of that state agency.

OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(b) *Program Requirements.*

The operator qualification program must, at a minimum, include provisions to:

- (1) Identify** covered tasks;
- (2) Complete** the qualification of each individual performing a covered task prior to the individual performing the covered task;

OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(b) *cont.*

(3) Ensure through evaluation that each individual performing a covered task is qualified to perform the covered task provided that:

- (i) Review of work performance history is not used as a sole evaluation method.
- (ii) Observation of on-the-job performance is not used as a sole method of evaluation. However, when on-the-job performance is used to complete an individual's competency for a covered task, the operator qualification procedure must define the measures used to determine successful completion of the on-the-job performance evaluation.

OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(b) *cont.*

(4) Allow any individual who is not qualified to perform a covered task to perform the covered task if directed and observed by a qualified individual within the limitations of the established span of control for the particular covered task.

(5) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in part 191 of this chapter;

OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(b) *cont.*

(6) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;

(7) Establish and maintain a Management of Change program that will communicate changes that affect covered tasks to individuals performing those covered tasks;

OQ Proposed Changes

§ 192.805 Qualification Program.



§ 192.805(b) *cont.*

(8) Identify all covered tasks and the intervals at which evaluation of an individual's qualifications is needed;

OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(b) *cont.*

(9) Provide training to ensure that any individual performing a covered task has the necessary knowledge, skills, and abilities to perform the task in a manner that ensures the safety and integrity of the operator's pipeline facilities;



OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(b) *cont.*

- (10)** Provide supplemental training for the individual when procedures and specifications are changed for the covered task;

- (11)** Establish the requirements to be an Evaluator, including the necessary training; and

OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(b) *cont.*

- (10)** Provide supplemental training for the individual when procedures and specifications are changed for the covered task;
- (11)** Establish the requirements to be an Evaluator, including the necessary training; and
- (12)** Develop and implement a process to measure the program's effectiveness in accordance with § 192.805

OQ Proposed Changes

§ 192.805 Qualification Program.

§ 192.805(c) Changes.

An operator must 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.



OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.807 Program effectiveness.

(a) General.

The qualification program must include a written process to measure the program's effectiveness. An effective program minimizes human error caused by an individual's lack of knowledge, skills and abilities (KSAs) to perform covered tasks. An operator must conduct the program effectiveness review once each calendar year not to exceed 15 months.

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.807(b) *Process.*

The process to measure program effectiveness must:

- (1) Evaluate if the qualification program is being implemented and executed as written; and
- (2) Establish provisions to amend the program to include any changes necessary to address the findings of the program effectiveness review.

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.807(c) *Measures.*

The operator must develop program measures to determine the effectiveness of the qualification program. The operator must, at a minimum, include and use the following measures to evaluate the effectiveness of the program.

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.807(c) *cont.*

(1) Number of occurrences caused by any individual whose performance of a covered task(s) adversely affected the safety or integrity of the pipeline due to any of the following deficiencies:

- (i) Evaluation was not conducted properly;
- (ii) KSAs for the specific covered task(s) were not adequately determined;
- (iii) Training was not adequate for the specific covered task(s);

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.807(c)(1) *cont.*

- (iv) Change made to a covered task or the KSAs was not adequately evaluated for necessary changes to training or evaluation;
- (v) Change to a covered task(s) or the KSAs was not adequately communicated;
- (vi) Individual failed to recognize an abnormal operating condition, whether it is task specific or non-task specific, which occurs anywhere on the system;

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.807(c)(1) *cont.*

- (vii) Individual failed to take the appropriate action following the recognition of an abnormal operating condition (task specific or non-task specific) that occurs anywhere on the system;
- (viii) Individual was not qualified;
- (ix) Nonqualified individual was not being directed and observed by a qualified individual;
- (x) Individual did not follow approved procedures and/or use approved equipment;

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.807(c)(1) *cont.*

- (xi) Span of control was not followed;
- (xii) Evaluator or training did not follow program or meet requirements; or
- (xiii) The qualified individual supervised more than one covered task at the time.





**THE
END IS
NEAR**

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.809 Recordkeeping.

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



OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.809(a) *Individual qualification records.* Individual qualification records must 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;
- (4) Qualification method(s);
- (5) Evaluation to recognize and react to an abnormal operating condition, whether it is task-specific non-task specific, which occurs anywhere on the system;
- (6) Name of evaluator and date of evaluation; and
- (7) Training required to support an individual's qualification or requalification.

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.809(b) *Program records.* Program records must include, at a minimum, the following:

- (1) Program effectiveness reviews;
- (2) Program changes;
- (3) List of program abnormal operating conditions;
- (4) Program management of change notifications;
- (5) Covered task list to include all task specific and non-task specific covered tasks;
- (6) Span of control ratios for each covered task;
- (7) Reevaluation intervals for each covered task;
- (8) Evaluations method(s) for each covered task; and
- (9) Criteria and training for evaluators.

OQ Proposed Changes

§ 192.807 Qualification Program.

§ 192.809(c) *Retention period*

- (1) *Individual qualification records.*** An operator must maintain records of qualified individuals who performed covered tasks. Records supporting an individual's current qualification must be retained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks must be retained for a period of five years.
- (2) *Program records.*** An operator must maintain records required by paragraph (b) of this section for a period of five years.

Questions??

