

MPSC Operator Qualification Program Inspections



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OQ Program Inspections

- Inspections consist of evaluating four main parts:
 - OQ plan,
 - OQ training modules,
 - OQ evaluation methods,
 - OQ records.

The OQ Plan

- PHMSA Form 14
- Covered tasks
 - Four part test – 192.801(b),
 - Task list covers activities performed on the operators system,
 - Evaluation methods and re-evaluation intervals.

OQ Training Modules

- Review training content.
 - Evaluate the training to determine if consistent with the operator's system
 - Based on equipment in system,
 - Based on tasks as performed.
- Re-training.
- Documentation.

OQ Evaluation Methods

- Review test material
 - Knowledge, skills, and ability,
 - Evaluate whether the testing is suitable,
 - Evaluate whether the testing methods are relevant.
- Definitions of evaluation methods: example Oral Examination. What does that mean?

OQ Records

- OQ Plan revision logs,
- Individual OQ qualification records,
- Contractor records,
- Audits of contractor and operator employees performance of covered tasks.

Contractor Records

- Contractor OQ Plan initial evaluation and periodic re-evaluation,
 - Reaction to AOCs, initial qualification, requalification, span of control.
- Individual OQ records – how the operator verifies prior to work performance.
- Field audits of contractor performance.

Inspections to date

- 28 Inspections performed to date,
- All inspections performed on Operators,
- Contractor / Consultant inspections to be performed in the future.

Plan Expectations

- Plans need to be adapted to meet the operator's system.
- Task list covers activities performed on the operators system,
 - Evaluate activities to the four part test,
 - Excavation, backfilling.

Plan Expectations

- Plans need to be adapted to meet the operator's system.
 - Links to forms in training modules should link to an appropriate operator form, not a generic example,
 - Reevaluation periods should be evaluated.

Plan Expectations

- Each covered task should include:
 - Abnormal Operating Conditions(AOC),
 - Span of control,
 - Requalification period,
 - Testing,
 - Training Methods,
 - Knowledge, Skills, and Ability.

Plan Expectations

- Span of control of non-qualified individuals
 - No span of control allowed on welding (§192.227), plastic fusion (§192.285(a)), or hot tapping (§192.627),
 - **§192.627 Tapping pipelines under pressure.** Each tap made on a pipeline under pressure must be performed by a crew qualified to make hot taps.

Plan Expectations

- Span of control of non-qualified individuals,
 - Contractor's span of control cannot exceed Operator's,
 - Take conditions / ability to communicate into consideration,
 - Ability to take immediate corrective action.

Plan Expectations

- Reevaluation intervals,
 - Plan should include a methodology,
 - Based on analysis – Difficulty, Importance and Frequency or equivalent evaluation method.

Evaluations

- Pass fail criteria.
- Wait period after an evaluation failure, and potential retraining.
- Evaluation forms should list task specific AOCs.
- Performance / skill based testing using equipment.
- Performance evaluated one-on-one.

Evaluations

- Limit initial qualifications on a single day.
- Work performance history may not be used as a sole evaluation method.
- Observation of on-the-job performance may not be used as a sole evaluation method.
- The individual OQ record contains date and method of evaluation.

Reevaluation

- Reevaluation for cause
 - Consider whether or not an incident is reportable,
 - Process to report non-competent work by fellow employees,
 - Immediate suspension pending determination.
- Time period when non-performance of a task requires requalification.

Plan Expectations

- Mutual assistance agreements.
- Mergers and acquisitions.

Significant Modifications

- Removal of covered tasks,
- Changing off the shelf plans,
- Send to: MPSC-Operations@michigan.gov.

Questions or Comments?





Thank You!



§192.801 Scope.

- (a) This subpart prescribes the minimum requirements for operator qualification of individuals performing covered tasks on a pipeline facility.
- (b) For the purpose of this subpart, a covered task is an activity, identified by the operator, that:
 - (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.

§192.803 Definitions.

- ***Abnormal Operating Condition*** means a condition identified by the operator that may indicate a malfunction of a component or deviation from normal operations that may:
 - (a) Indicate a condition exceeding design limits; or
 - (b) Result in a hazard(s) to persons, property, or the environment.

§192.803 Definitions.

- ***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;
 - (e) Other forms of assessment.

§192.803 Definitions.

- **Qualified** means that an individual has been evaluated and can:
 - (a) Perform assigned covered tasks; and
 - (b) Recognize and react to abnormal operating conditions.

§192.805 Qualification program.

- Each operator shall have and follow a written qualification program. The program shall include provisions to:
 - (a) Identify covered tasks;
 - (b) Ensure through evaluation that individuals performing covered tasks are qualified;
 - (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;

§192.805 Qualification program.

- (d) 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;
- (e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;
- (f) Communicate changes that affect covered tasks to individuals performing those covered tasks;
- (g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed;

§192.805 Qualification program.

- (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
- (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.

§192.807 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).

§192.807 Recordkeeping.

- (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.

§192.809 General.

- (a) Operators must have a written qualification program by April 27, 2001. The 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.
- (b) Operators must complete the qualification of individuals performing covered tasks by October 28, 2002.

§192.809 General.

- (c) Work performance history review may be used as a sole evaluation method for individuals who were performing a covered task prior to October 26, 1999.
- (d) After October 28, 2002, work performance history may not be used as a sole evaluation method.
- (e) After December 16, 2004, observation of on-the-job performance may not be used as the sole method of evaluation.