

Inspection Output (IOR)

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Inspection Information

Inspection Name	J.R. Simplot OQ Program Review	Operator(s)	J.R. SIMPLOT COMPANY (32395)	Plan Submitted	01/03/2020
Status	PLANNED	Lead	David Cullom	Plan Approval	01/08/2020 by Joe Subsits
Start Year	2020	Team Members	Deborah Becker, Darren Tinnerstet, Rell Koizumi	All Activity Start	04/14/2020
System Type	GT	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson	All Activity End	04/17/2020
Protocol Set ID	GT.2020.01	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

****No areas of concern or probable violations noted****

Simplot's OQ program was reviewed. There have been some changes in the OQ program. The operator has started the process of switching from MEA to EWN and has requalified its pipeline operations personnel under the new OQ program.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86257	JR Simplot	unit	86257	Compressor Stations Storage Fields Bottle/Pipe - Holders Service Line Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned	41	41	41	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	86257	n/a	--	P, R, O, S	Detail	
2.	86257	n/a	TQ	P, R	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	JR Simplot OQ Program Inspection	--	04/14/2020 04/17/2020	n/a	all planned questions	all assets	all types	41	41	41	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

Forms

This inspection has no Form data entry.

Results (all values, 41 results)

45 (instead of 41) results are listed due to re-presentation of questions in more than one sub-group.

DC.COMM: Pipeline Commissioning

1. Question Result, ID, References Sat, TQ.OQ.OOPLAN.P, 192.805(a) (192.801(b)) (also presented in: TQ.OQ)

Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*

Assets Covered 86257

Result Notes The last update the UTC has on file is April 10, 2013. Revisions include: "Revised sections, 2.3.1, 2.3.2, 4.4, 4.5, 5.5, 5.7, & 5.10 for clarity. Revised section 6 to reflect MEA testing. Revised section 3.3.3 to include mergers and acquisitions. Revised section 8.2.6 to add requirement that manuals be sent to OQ clearinghouse. Revised incorrect index to reflect appendix G"

4.3 Identification of All Tasks

.1 A team consisting of the Simplot Moses Lake Manager, Consultants, and Contractors will identify all tasks performed by Personnel on the Pipeline System.

.2 The team responsible for the identification of tasks performed by Personnel on the Jurisdictional Natural Gas Facility will include at a minimum:

a) A person knowledgeable in the Operation and Maintenance of equipment present on Simplot Jurisdictional Natural Gas Facilities.

b) Technical Personnel that are currently assigned to the performance of Operation and Maintenance tasks on Simplot Jurisdictional Natural Gas Facilities.

c) Others determined appropriate by management.

.3 Appendix B contains listing of all identified tasks and their sources.

2. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b)) (also presented in: TQ.OQ)

Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*

Assets Covered 86257

Result Notes The New OQs and former employees are stored. Hector Garcia has been qualified under MEA and is now EWN qualified out to 3/2023. Matthew Schmidt was qualified under under MEA and now EWN out to 3/2023.

3. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b)) (also presented in: TQ.TR)

Question Text *Is training for emergency response personnel documented?*

Assets Covered 86257

Result Notes ERT 2019 training was Nov 14, 2019. Lance, Andy, Hector, Matthew all attended the training. 2018 was reviewed as well and 5 attendees.

4. Question Result, ID, References Sat, TQ.OO.RECORDS.R, 192.807 (also presented in: TQ.OO)

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 86257

Result Notes **I could not locate the procedure question in IA so this procedure from the operator OQ manual is in the notes below.**

7.2 Retention Term [§192.807(b)]

.1 Qualification records (e.g. graded examination or Job Performance Checklist) will be maintained for a period of five (5) years [§192.807(b)].

.2 Qualification records will be kept for five years after an Individual stops performing Covered Tasks [§192.807(b)].

7.3 Documentation [§197.807(a)]

.1 A Qualified Individual's record must include the following:

- a) The Qualified Individual's name and Employee/Contractor number if available;
- b) The Covered Tasks that the Individual is Qualified to perform;
- c) The date(s) of current Qualification;
- d) The Qualification method(s); and

.2 Documents used to record Qualification shall include:

- a) Abnormal Operating Conditions documents
- b) Training and testing documents

TQ.OO: Operator Qualification

5. Question Result, ID, References Sat, TQ.OO.OOPLAN.P, 192.805(a) (192.801(b)) (also presented in: DC.COMM)

Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*

Assets Covered 86257

Result Notes The last update the UTC has on file is April 10, 2013. Revisions include: "Revised sections, 2.3.1, 2.3.2, 4.4, 4.5, 5.5, 5.7, & 5.10 for clarity. Revised section 6 to reflect MEA testing. Revised section 3.3.3 to include mergers and acquisitions. Revised section 8.2.6 to add requirement that manuals be sent to OQ clearinghouse. Revised incorrect index to reflect appendix G"

4.3 Identification of All Tasks

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.2 The team responsible for the identification of tasks performed by Personnel on the Jurisdictional Natural Gas Facility will include at a minimum:

a) A person knowledgeable in the Operation and Maintenance of equipment present on Simplot Jurisdictional Natural Gas Facilities.

b) Technical Personnel that are currently assigned to the performance of Operation and Maintenance tasks on Simplot Jurisdictional Natural Gas Facilities.

c) Others determined appropriate by management.

.3 Appendix B contains listing of all identified tasks and their sources.

6. Question Result, ID, References Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)

Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*

Assets Covered 86257

Result Notes

Notes

2.3.7 Evaluation Intervals

Maximum Evaluation Interval for all Covered Tasks shall be three (3) years as specified in

Subsection 5.12. Task Specific Evaluation Intervals are specified in the individual Task

Standards.

5.12 Re-Evaluation Intervals

.1 Simplot has determined that the maximum time interval for Re-evaluation under this

program will be three (3) years. Time intervals for Re-evaluations are based on:

a) The frequency of performance of the Covered Task.

b) The complexity of the task.

c) The risk and consequences involved if the task is incorrectly performed.

d) Licensing and code requirements, such as welding certification as defined in Part 192 and API 1104.

.2 Should performance monitoring indicate that more frequent re-evaluation is beneficial

for a specific task, the Simplot Moses Lake Manager may, at his discretion, reduce the interval for that task.

.3 Tasks that are performed frequently and have low risk may have longer Reevaluation

Periods than tasks performed infrequently and have high risk. For example, a Covered Task that is:

a) Performed infrequently, is highly complex, and has severe consequences (high risk) may require more frequent Re-evaluation.

b) Performed monthly or more often and has a low degree of complexity with moderate to low consequences may require infrequent Re-evaluation.

7. Question Result, ID, References Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)

Question Text *Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?*

Assets Covered 86257

Result Notes **Direct Supervision:** A Qualified Individual overseeing and directing no more than the maximum number of non-qualified individuals allowed for each covered task as defined in Appendix A, but under no circumstances more than five Non-qualified Individuals

performing a Covered Task.

2.3.3 Non-Qualified Individuals

Non-Qualified Personnel may only perform Covered Tasks under the Direction of a Qualified Individual per Subsection 5.16.

5.16 Non-Qualified Individuals [§192.805(c)]

.1 There may be instances when Non-qualified Individuals can be utilized to perform Covered Tasks (new Employees in training, temporary Employees assisting Qualified Individuals, Contractor Personnel, etc.). In such situations, a Non-qualified Individual may perform the Covered Task provided a Qualified person is directing and observing the Non-qualified Individual.

.2 Below are the required guidelines to be utilized when Qualified persons are directing

and observing Non-qualified Individuals.

- a) The Qualified Individual must be near enough to each Non-qualified Individual to direct and observe his/her work and take immediate corrective action in the event that an abnormal condition occurs.
- b) There should be no obstructions or distance between the Non-qualified Individuals and the Qualified Individual, which would impede the Qualified Individual's ability to directly observe and take immediate corrective action, if an Abnormal Operating Condition should occur.
- c) If the qualified individual leaves the site for any reason, the performance of the task must be suspended until the qualified individual returns and can directly observe the actions performed

8. Question Result, ID, References Sat, TQ.OO.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))
Question Text *Are evaluation methods established and documented appropriate to each covered task?*
Assets Covered 86257
Result Notes **5.3 Evaluation Methods [§192.803]**

.1 SIMPLOT will use any one or a combination of Evaluation methods indicated below:

- a) Written exam
- b) Oral exam
- c) Work performance history (only in conjunction with another method)
- d) Observation during performance on-the-job
- e) Observation during on-the-job training (only in conjunction with another method)
- f) Observations during simulations
- g) Other forms of assessment at the discretion of the Simplot Moses Lake Manager.

6.3 Task Standards

.1 For Evaluation, Simplot uses MEA testing and training modules as Task Standards to summarize the most important aspects of a Covered Task.

.2 Task Standards are not sufficiently comprehensive to replace detailed Operating and Maintenance procedures, and manufacturer's instructions. Task Standards are intended for Evaluation only.

6.5 Evaluation Steps

6.5.1 Step 1, Determination of Training and Testing Modules

- a) Determine the required training and testing modules for each employee to receive online MEA training and testing.

b) See Appendix A for selection of testing and training modules.

6.5.2 Step 2, MEA Testing Website Access

Provide the individual being tested with a unique identifier and password which will allow them access to the MEA training and testing website.

6.5.3 Step 3, Task Evaluation

a) Provide online access and time to complete the MEA training and testing.

b) The employee being tested is to notify the Simplot Moses Lake Manager when the MEA training and testing has been successfully completed.

9. Question Result, ID, References NA, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

10. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807 (also presented in: DC.COMM)

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 86257

Result Notes **I could not locate the procedure question in IA so this procedure from the operator OQ manual is in the notes below.**

7.2 Retention Term [§192.807(b)]

.1 Qualification records (e.g. graded examination or Job Performance Checklist) will be maintained for a period of five (5) years [§192.807(b)].

.2 Qualification records will be kept for five years after an Individual stops performing Covered Tasks [§192.807(b)].

7.3 Documentation [§197.807(a)]

.1 A Qualified Individual's record must include the following:

a) The Qualified Individual's name and Employee/Contractor number if available;

b) The Covered Tasks that the Individual is Qualified to perform;

c) The date(s) of current Qualification;

d) The Qualification method(s); and

.2 Documents used to record Qualification shall include:

a) Abnormal Operating Conditions documents

b) Training and testing documents

11. Question Result, ID, References Sat, TQ.OQ.TRAINING.P, 192.805(h)

Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered 86257

Result Notes **Section 5 Evaluation and Qualification**

12. Question Result, ID, References **Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))** (also presented in: DC.COMM)
- Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*
- Assets Covered **86257**
- Result Notes **The New OQs and former employees are stored. Hector Garcia has been qualified under MEA and is now EWN qualified out to 3/2023. Matthew Schmidt was qualified under under MEA and now EWN out to 3/2023.**
13. Question Result, ID, References **Sat, TQ.OQ.OQPLANCONTRACTOR.P, 192.805(b) (192.805(f), 192.805(c))**
- Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*
- Assets Covered **86257**
- Result Notes **8.2 Communication Of Change [§192.805(f)]**
- .1 The Simplot Moses Lake Manager will effectively communicate any revisions of these procedures to affected Employees, and Contracted Operators and Contractors working under this OQM.**
- .2 Changes to OQM will be communicated to contractors via formal letter with receipt confirmation.**
- .3 Changes to OQM will be communicated to Simplot personnel by intra-company memo, operations meetings, safety meetings, and scheduled training sessions as appropriate.**
- .4 When significant changes occur, Simplot will consider whether additional Qualification requirements are necessary and whether Individuals performing the Covered Task should receive additional training and Re-evaluation and Qualification.**
14. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.P, 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))**
- Question Text *Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*
- Assets Covered **86257**
- Result Notes **3.3.3 Third-Party Personnel**
- a) Qualification of Personnel working for Contracted Operators, Contractors and Consultants is mandatory prior to the performance of a Covered Task.**
- b) Contractor or Consultant Personnel, where approved by the Simplot Moses Lake Manager, may be Qualified to perform Covered Tasks under the Simplot Qualification program.**
- c) In addition, Contractor Personnel can be Qualified under their own Qualification Program or third-party Qualification program provided that the applicable program has been approved by the Simplot Pipeline Manager.**
- d) Contractors shall not be allowed to perform any Covered Task until written authorization is received from the Simplot Moses Lake Manager indicating acceptance of the Contractors Qualification Program.**
- e) Non-qualified Contractor Personnel may perform Covered Tasks if directed and observed by a Qualified Individual consistent with the requirements established in Subsection 5.16 of this program.**
- g) Simplot Pipeline Manager will recognize Qualification of third-party Personnel that have been Qualified under that parties OQM to the extent that the Qualification is consistent with Simplot 's OQM and sufficient documentation is provided.**
- h) The Simplot Moses Lake Manager shall be notified if any changes occur in a previously recognized Contractor or third-party qualification program.**
15. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)**
- Question Text *Does the OQ plan document that the operator has assured that the processes on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*

Assets Covered 86257

Result Notes **6.3 Task Standards**

.1 For Evaluation, Simplot uses MEA testing and training modules as Task Standards to summarize the most important aspects of a Covered Task.

.2 Task Standards are not sufficiently comprehensive to replace detailed Operating and Maintenance procedures, and manufacturer's instructions. Task Standards are intended for Evaluation only.

.3 Task Standards applicable to a specific Covered Task are included in Appendix D.

6.5 Evaluation Steps

6.5.1 Step 1, Determination of Training and Testing Modules

a) Determine the required training and testing modules for each employee to receive online MEA training and testing.

b) See Appendix A for selection of testing and training modules.

6.5.2 Step 2, MEA Testing Website Access Provide the individual being tested with a unique identifier and password which will allow them access to the MEA training and testing website.

6.5.3 Step 3, Task Evaluation

a) Provide online access and time to complete the MEA training and testing.

b) The employee being tested is to notify the Simplot Moses Lake Manager when the MEA training and testing has been successfully completed.

16. Question Result, ID, References NA, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)

Question Text *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*

Assets Covered 86257

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

17. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.P, 192.803

Question Text *Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*

Assets Covered 86257

Result Notes **6.2 Abnormal Operating Conditions Questionnaire**

.1 The written Abnormal Operating Conditions (AOC) Questionnaire or that included as part of the MEA online program is designed to evaluate an Individual's ability to recognize Abnormal Operating Conditions and react to those conditions while completing a Covered Task.

.3 Contracted Operators, Contractors and Consultants shall provide similar evidence that their Qualified Personnel are familiar with Abnormal Operating Conditions for the Covered Task.

18. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 86257

Result Notes This is in EWN at the end of every single course and CT listing.

19. Question Result, ID, References **Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))**

Question Text *Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?*

Assets Covered **86257**

Result Notes **Section 2.3.4 Post Incident**

Section 5.11 Re-Evaluation Criteria

Appendix D has the incident/accident appraisal form.

5.15 Disqualification [§192.805(e)]

.1 The Simplot Pipeline Manager shall review an Individual's Qualification to perform Covered Task's if there is reason to suspect that the Individual may no longer be able to safely perform any/or all Covered Tasks.

.2 Some examples that may require a Qualification review may include but are not limited to the following:

a) The Individual has spent excessive time away from the job due to a disability, special assignment, or change in job duties. The time period established by Simplot is not to exceed eighteen (18) months.

b) The Individual has been Disqualified due to unsatisfactory performance of a Covered Task due to safety concerns.

c) There are significant changes to equipment or procedures. This will be communicated to all affected Individuals through technical letters or other appropriate means.

.3 When an individual's qualification to perform a task has been suspended, additional training may be required at the discretion of the Simplot Moses Lake Manager

20. Question Result, ID, References **NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))**

Question Text *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*

Assets Covered **86257**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

21. Question Result, ID, References **Sat, TQ.OQ.MOC.P, 192.805(f)**

Question Text *Does the OQ program identify how changes to processes, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*

Assets Covered **86257**

Result Notes **8.2 Communication Of Change [§192.805(f)]**

.1 The Simplot Moses Lake Manager will effectively communicate any revisions of these procedures to affected Employees, and Contracted Operators and Contractors working under this OQM.

.2 Changes to OQM will be communicated to contractors via formal letter with receipt confirmation.

.3 Changes to OQM will be communicated to Simplot personnel by intra-company memo, operations meetings, safety meetings, and scheduled training sessions as appropriate.

.4 When significant changes occur, Simplot will consider whether additional Qualification requirements are necessary and whether Individuals performing the Covered Task should receive additional training and Re-evaluation and Qualification.

.5 This process will be utilized to keep Individuals informed of changes on the procedures for Covered Tasks. The process may be used in the cases listed below:

- a) Modifications to Simplot policies, procedures, or work instructions;
- b) Changes in State or Federal regulations;
- c) Utilization of new equipment and/or technology;
- d) Modifications to existing facilities or equipment; and
- e) New information from equipment or product manufacturers.

.6 When significant changes the Simplot OQM occur, a revised manual will be forwarded to the PHMSA

.7 Contractors will be notified of any significant changes to the Simplot qualification manual.

.8 As part of the change management process, the Simplot Moses Lake Manager shall update all applicable training documentation, Qualification documentation and evaluation materials as appropriate.

22. Question Result, ID, References Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i)

Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*

Assets Covered 86257

Result Notes **8.2 Communication Of Change [§192.805(f)]**

.6 When significant changes the Simplot OQM occur, a revised manual will be forwarded to the PHMSA by either of the following methods; Email: manager@phmsa.dot.gov US Mail: U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration Office of Pipeline Safety 1200 New Jersey Avenue, SE., East Building, 2nd Floor (PHP-0), Room E22-321 Washington, DC 20590

23. Question Result, ID, References Sat, TQ.OQ.CHANGERECD.R, 192.805(i) (192.805(f))

Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*

Assets Covered 86257

Result Notes This is in the revision history (Page 3)

TQ.QU: Qualification of Personnel - Specific Requirements

24. Question Result, ID, References NA, TQ.QU.CORROSION.P, 192.453 (192.805(b))

Question Text *Does the process require corrosion control processes to be carried out by, or under the direction of, qualified personnel?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

25. Question Result, ID, References NA, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 86257

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

26. Question Result, ID, References **NA, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))**
 Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
27. Question Result, ID, References **NA, TQ.QU.HOTTAPQUAL.R, 192.627 (192.807(a), 192.807(b))**
 Question Text *Do records indicate the qualification of personnel performing hot taps?*
 Assets Covered **86257**
 Result Notes **No such activity/condition was observed during the inspection.**
28. Question Result, ID, References **Sat, TQ.QU.EXCAVATE.P, 192.805(b) (ADB-06-01, 192.801, 192.328)**
 Question Text *Does the process require individuals who oversee and perform marking, trenching, and backfilling operations be qualified?*
 Assets Covered **86257**
 Result Notes **Marking and marker placement are covered tasks as identified in item 61 and 62 in Appendix B. Excavation and backfilling would be covered under contractor OQs.**
29. Question Result, ID, References **Sat, TQ.QU.EXCAVATE.R, 192.807(a) (192.807(b), ADB-06-01, 192.801, 192.328)**
 Question Text *Do records indicate qualification of individuals who oversee marking, trenching, and backfilling operations?*
 Assets Covered **86257**
 Result Notes **Matthew's records for DP during excavation were reviewed in 2017 for MEA and he is now qualified under EWN.**

TQ.QUIM: Qualification of Personnel - Specific Requirements (IM)

30. Question Result, ID, References **NA, TQ.QUIM.IMREVIEWQUAL.P, 192.915(a) (192.915(b), 192.915(c), 192.935(b))**
 Question Text *Does the process require that operator/vendor personnel (including supervisors and persons responsible for preventive and mitigative measures), who review and evaluate results meet acceptable qualification standards?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
31. Question Result, ID, References **NA, TQ.QUIM.IMREVIEWQUAL.R, 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))**
 Question Text *Do records indicate adequate qualification of integrity management personnel?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
32. Question Result, ID, References **NA, TQ.QUIM.IMQC.P, 192.805(b) (ASME B31.8S-2004, Section 12.2(b)(4), 192.935(b)(1)(i), 192.907(b), 192.911(l))**
 Question Text *Does the process require personnel who execute IM program activities to be competent and qualified in accordance with the quality control plan in accordance with ASME B31.8S-2004, Section 12.2(b)(4)?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

33. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTOR.P, 192.241(a) (192.241(c), 192.805(b), 192.328(a), 192.328(b))**
 Question Text *Does the process require welding inspection personnel to be adequately trained and qualified?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

34. Question Result, ID, References **NA, TQ.QUOMCONST.INSPECTOR.R, 192.241(a) (192.241(c), 192.807(a), 192.807(b))**
 Question Text *Do records indicate adequate qualification documentation for personnel who conduct welding inspections?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
35. Question Result, ID, References **NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**
 Question Text *Do records indicate the qualification of nondestructive testing personnel?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
36. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**
 Question Text *Do records indicate that welders are adequately qualified?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
37. Question Result, ID, References **NA, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b), 192.805(b))**
 Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
38. Question Result, ID, References **NA, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))**
 Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
39. Question Result, ID, References **NA, TQ.QUOMCONST.NDT.P, 192.243(b)(2) (192.803, 192.805(b), 192.805(h), 192.328(a), 192.328(b))**
 Question Text *Does the process require nondestructive testing of welds performed by personnel trained and qualified in processes and in use of the testing equipment?*
 Assets Covered **86257**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
40. Question Result, ID, References **Sat, TQ.QUOMCONST.PLASTIC.P, 192.285(a) (192.285(d), 192.805(b))**
 Question Text *Does the process require personnel making joints in plastic pipelines be qualified?*
 Assets Covered **86257**
 Result Notes **If joins are made in the future, the joiner will be qualified per Simplot's OQ program.**
41. Question Result, ID, References **Sat, TQ.QUOMCONST.PLASTICINSPECT.P, 192.287 (192.805(b))**
 Question Text *Does the process require that persons who inspect joints in plastic pipes be qualified?*
 Assets Covered **86257**
 Result Notes **If joins are made in the future, the inspector will be qualified per Simplot's OQ program.**
42. Question Result, ID, References **NA, TQ.QUOMCONST.PLASTIC.R, 192.285(a) (192.285(d), 192.287, 192.807(a), 192.807(b))**
 Question Text *Do records indicate adequate qualification of personnel making/inspecting joints in plastic pipelines?*
 Assets Covered **86257**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

TQ.TR: Training of Personnel

43. Question Result, ID, References **Sat, TQ.TR.TRAINING.P, 192.615(b)(2) (192.805(b))**
 Question Text *Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?*
 Assets Covered **86257**
 Result Notes **Task 105-128 in the manual (Appendix B) list them as not being covered tasks, but they are performed on the pipeline facility.**
44. Question Result, ID, References **Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))** (also presented in: DC.COMM)
 Question Text *Is training for emergency response personnel documented?*
 Assets Covered **86257**
 Result Notes **ERT 2019 training was Nov 14, 2019. Lance, Andy, Hector, Matthew all attended the training. 2018 was reviewed as well and 5 attendees.**
45. Question Result, ID, References **Sat, TQ.TR.TRAININGREVIEW.P, 192.615(b)(3)**
 Question Text *Does the process require review of emergency response personnel performance?*
 Assets Covered **86257**
 Result Notes **This is contained in the EPM.**

1.9 Post Emergency Event Review [§192.615(b)]

Following a verified Emergency, the Simplot Pipeline Manager shall conduct a review of Emergency response activities and prepare an operational report that includes:

- a. Description of the Emergency situation.
- b. Log of events.
- c. Actions taken by all personnel involved.
- d. Evaluation of effectiveness of the Emergency response.
- e. Conclusions.
- f. Recommendations for improvements or changes to the EPM.

Report Parameters: Results: all

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.