

Inspection Output (IOR)

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Report Filters

Assets 8625 PSE HQ DA / PSE DA

Results All

Inspection Information

| | | | | | |
|-----------------|------------------------------|-------------|---|----------------------|--------------------------------|
| Inspection Name | 8625 PSE HQ DA Inspection | Operator(s) | PUGET SOUND ENERGY (22189) Lead Anthony Dorrough | Plan Submitted | 06/19/2023 |
| Status | PLANNED | Supervisor | Dennis Ritter | Plan Approval | 06/21/2023 by Dennis Ritter |
| Start Year | 2023 | Director | Scott Rukke | All Activity Start | 07/12/2023 |
| System Type | DA | | | All Activity End | 07/13/2023 |
| Protocol Set ID | DA.2023.01 | | | Inspection Submitted | -- |
| | | | | Inspection Approval | -- |

Inspection Summary

Inspection Scope and Summary

This inspection was conducted on [Jul 12-13] with Puget Sound Energy (PSE) representatives available via Microsoft TEAMS online with an exit interview on Jul 21. The inspection included a review of PSE's Anti-Drug and Alcohol Mis-use Prevention Plan and associated records. The last Anti-Drug and Alcohol Mis-use Prevention Plan inspection was Oct 21-30, 2019.

Facilities visited and Total AFOD

Plan & Records - 3 Days

Summary of Significant Findings

There were no significant findings

Primary Operator contacts and/or participants

Justin Wahlborg, Pipeline Safety Compliance Manager, PSE, (425) 766-1811

Cameron Williams, Sr. Regulatory Compliance Analyst, PSE, (425) 424-6596

Tyler Friess, Senior HR Advisor, PSE, (425) 213-2793

Operator executive contact and mailing address for any official correspondence

Dan Koch, Vice President of Operations, PSE, (425) 301-8778

355 110th Ave NE, Bellevue WA 98004

Scope (Assets)

| # | Short Name | Long Name | Asset Type | Asset IDs | Excluded Topics | Planned | Required | Total Inspected | Required % Complete |
|----|------------|----------------|------------|-----------|-----------------|---------|----------|-----------------|---------------------|
| 1. | PSE DA | 8625 PSE HQ DA | unit | -- | -- | 40 | 40 | 40 | 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. | PSE DA | -- | DA | P, R | Detail | -- |

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Plan Implementations

| Activity # Name | SMART Act# | Start Date End Date | Focus Directives | Involved Groups/Subgroups | Assets | Qst Type(s) | Planned | Required | Inspected | Total | Required % Complete |
|-----------------|------------|--------------------------|------------------|---------------------------|----------------------------------|-------------|---------|----------|-----------|-------|---------------------|
| 1. PSE DA | -- | 07/12/2023 -- 07/13/2023 | | | all planned questions all assets | all types | 40 | 40 | 40 | 40 | 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".
3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

| No. | Entity | Form Name | Status | Date Completed | Activity Name | Asset |
|-----|-----------------|-----------|-----------|----------------|---------------|--------|
| 1. | Attendance List | PSE DA | COMPLETED | 08/10/2023 | PSE DA | PSE DA |

Results (all values, 40 results)

DA.GENERAL: General Program Requirements

1. Question Result, ID, References **Sat, DA.GENERAL.DER.R, 40.3 (40.15(d), 40.355(k))**

Question Text *Has the operator appointed a company employee as the Designated Employer Representative (DER)?*

Assets Covered **PSE DA**

Result Notes **Tyler Friess - Senior HR Advisor (425) 213-2793**
2. Question Result, ID, References **Sat, DA.GENERAL.SERVICEAGENTOVERSIGHT.P, 40.11(b) (40.11(c), 40.15(c), 40.341(a), 40.355(a), 40.355(m), 40.355(n))**

Question Text *Does the process ensure the operator remains responsible for the actions of all its service agents, including a Consortium/Third Party Administrator (C/TPA)?*

Assets Covered **PSE DA**

Result Notes **Located in the Substantive Abuse Plan last revised Oct/2019**
3. Question Result, ID, References **Sat, DA.GENERAL.COVEREDEMPLOYEES.P, 199.3 (199.1, 40.347(b)(2))**

Question Text *Does the process result in the proper and complete identification of covered employees and the exclusion of non-covered employees?*

Assets Covered **PSE DA**

Result Notes **Located in the Appendix**
4. Question Result, ID, References **Sat, DA.GENERAL.PREVIOUSEMPLOYERRECORDS.P, 40.25(a) (40.25(b), 40.25(c), 40.25(d), 40.25(e), 40.25(f), 40.25(g), 40.27, 40.321(b), 40.351(d))**

Question Text *Does the process include previous employer DOT D&A record checks for employees seeking to perform covered functions for the first time (i.e., a new hire or an employee transferring into a safety-sensitive position)?*

Assets Covered **PSE DA**

Result Notes **Located on Pg. 19 - Background Check Procedures**
5. Question Result, ID, References **Sat, DA.GENERAL.NONDOTTESTS.P, 40.13(a) (40.13(b))**

Question Text *Does the process separate and prioritize DOT drug and alcohol testing over all non-DOT drug and alcohol testing?*

Assets Covered **PSE DA**

Result Notes **Located on Pg. 20 - DOT Testing Versus Non-DOT Testing Provisions**
6. Question Result, ID, References **Sat, DA.GENERAL.CONTRACTOROVERSIGHT.P, 199.115 (199.115(a), 199.115(b), 199.245(a), 199.245(b), 199.245(c))**

Question Text *If a contractor performs covered functions on the pipeline and is allowed to have its own D&A Programs, does the process ensure the contractor fully complies with Parts 199 and 40?*

Assets Covered PSE DA

Result Notes Located on PG. 99 - XV- Contractor Monitoring -

Reviewed a MIS Report

7. Question Result, ID, References Sat, DA.GENERAL.MISREPORTS.P, 199.119(a) (199.3, 199.119(f), 199.229(a), 199.229(d), 40.26)

Question Text *Does the process ensure D&A MIS reports are submitted annually to PHMSA as required?*

Assets Covered PSE DA

Result Notes Reviewed conformations for 2019-21-22

DA.DRUG: Anti-Drug Program

8. Question Result, ID, References Sat, DA.DRUG.PLAN.P, 199.101(a) (199.101(a)(1), 199.101(a)(2), 199.101(a)(3), 199.101(a)(4))

Question Text *Is a written Anti-Drug Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*

Assets Covered PSE DA

Result Notes Went over Substantive Abuse Plan

9. Question Result, ID, References Sat, DA.DRUG.SERVICEAGENTQUAL.R, 199.5 (199.107(a), 199.109(b), 40.33, 40.81(a), 40.121, 40.281)

Question Text *Do records indicate that Anti-Drug program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*

Assets Covered PSE DA

Result Notes During the inspection we went over Page 24 - General Provisions For Service Agents - Section I

Jul 21 - Reviewed records that were provided by Program Administrator

10. Question Result, ID, References Sat, DA.DRUG.PROHIBITEDDRUGS.P, 199.3 (40.3)

Question Text *Does the process require that DOT drug tests are only conducted for the "prohibited drugs" specified in Part 40?*

Assets Covered PSE DA

Result Notes Located on PG. 127 - Drugs That The Laboratories May Test Under DOT

11. Question Result, ID, References Sat, DA.DRUG.PREEMPLOYMENT.P, 199.105(a) (199.105(c)(5))

Question Text *Does the process require that no individual is allowed to perform a covered function unless that individual passes a drug test or is covered by an anti-drug program that conforms to Part 199?*

Assets Covered PSE DA

Result Notes Located on PG. 35 - Drug Tests Required

12. Question Result, ID, References Sat, DA.DRUG.POSTACCIDENT.P, 199.105(b) (199.117(a)(5), 40.355(g), 40.355(h))

Question Text *Does the process ensure that post-accident drug testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 36 - Post Accident Testing

13. Question Result, ID, References Sat, DA.DRUG.RANDOM.P, 199.105(c)(5) (199.105(c)(6), 199.105(c)(7), 199.105(c)(8), 199.105(c)(9))

Question Text *Does the process ensure that random drug testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 37 - Random Testing

14. Question Result, ID, References Sat, DA.DRUG.REASONABLECAUSE.P, 199.105(d) (199.117(a)(3), 40.355(g), 40.355(h))

Question Text *Does the process ensure that reasonable cause drug testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 40 - Reasonable-Cause Testing

15. Question Result, ID, Sat, DA.DRUG.RETURN TODUTY.P, 199.105(e) (Part 40 Subpart O, 40.67(b), 40.285(a), 40.289(b),
References 40.305(a))

Question Text *Does the process ensure that return-to-duty drug testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 41 - Return-To-Duty Testing

16. Question Result, ID, Sat, DA.DRUG.FOLLOWUPTEST.P, 199.105(f) (40.67(b), 40.307, 40.309)
References

Question Text *Does the process ensure that follow-up drug testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 42 - Follow-Up Testing

17. Question Result, ID, Sat, DA.DRUG.MRODUTIES.P, 199.109(c) (199.109(a), 40.123(a), 40.123(b), 40.123(c), 40.123(e),
References 40.123(f), 40.123(g), Part 40 Subpart G)

Question Text *Does the process ensure the MRO performs functions as required by DOT Procedures?*

Assets Covered PSE DA

Result Notes Located on PG. 54 - Medical Review Officer Responsibilities In The DOT Drug Testing Program

18. Question Result, ID, Sat, DA.DRUG.MROTESTREPORTS.P, 199.109(d) (Part 40 Subpart G, 40.345(a), 40.345(b), 40.345(c),
References 40.355(b), 40.355(c))

Question Text *Does the process ensure the MRO reports all drug test results to the DER as required?*

Assets Covered PSE DA

Result Notes Located on PG. 71 - Procedures For MRO Reporting Of Drug Results To The Company

19. Question Result, ID, Sat, DA.DRUG.STANDOWNREMOVAL.P, 199.103(a) (199.7(a), 40.21(a), 40.21(b), 40.23(a), 40.23(b),
References 40.23(d), 40.287)

Question Text *Does the process ensure an employee is immediately removed from performing covered functions after failing or refusing a drug test?*

Assets Covered PSE DA

Result Notes Located on PG. 45 - Company Stand-Down Procedures

Reviewed Failed drug tests - Results: (positive follow-up test from initial violation) lead to termination of [2] individuals - One lead to suspension.

20. Question Result, ID, Sat, DA.DRUG.EAP.P, 199.113(a) (199.113(b), 199.113(c))
References

Question Text *Does the process ensure that an EAP is established and available to employees and supervisory personnel?*

Assets Covered PSE DA

Result Notes Located on PG. 91 - XII Employee Assistance Program

DA.ALCOHOL: Alcohol Misuse Prevention Program

21. Question Result, ID, Sat, DA.ALCOHOL.PLAN.P, 199.202
References

Question Text *Is a written Alcohol Misuse Plan in-place and maintained that conforms to the requirements of Part 199 and Part 40?*

Assets Covered PSE DA

Result Notes Went over Substantive Abuse Plan

22. Question Result, ID, Sat, DA.ALCOHOL.SERVICEAGENTQUAL.R, 199.5 (40.213)
References

Question Text *Do records indicate that Alcohol Misuse Prevention Program positions and/or service agents meet the applicable qualification requirements of Part 40 and Part 199?*

Assets Covered PSE DA

Result Notes On Jul 21 Program Administrator provided records for review.

23. Question Result, ID, Sat, DA.ALCOHOL.PROHIBITEDCONDUCT.P, 199.233 (199.215, 199.217, 199.219, 199.221, 199.223,
References 40.23(c), 40.285(a), 40.285(b))

Question Text *Does the process ensure that a covered employee is not permitted to perform covered functions if the employee has engaged in prohibited conduct or an alcohol misuse rule of another DOT agency?*

Assets Covered PSE DA

Result Notes Located on PG. 40 & Pg. 215 - VI. Alcohol Prohibited - VII. Alcohol Prohibited Conduct

24. Question Result, ID, References Sat, DA.ALCOHOL.SCREENINGTESTDEVICES.P, 40.229 (40.235(e))

Question Text *Does the process for alcohol screening tests restrict the use of alcohol screening devices (ASDs) to the devices and associated requirements referenced by Part 40?*

Assets Covered PSE DA

Result Notes Located on PG. 73 - Devices To Be Used To Conduct Alcohol Screening Tests

25. Question Result, ID, References Sat, DA.ALCOHOL.CONFIRMATIONTESTDEVICES.P, 40.231(a) (40.233(c))

Question Text *Does the process for alcohol confirmation tests restrict the use of Evidential Breath Testing Devices (EBTs) to the devices and associated requirements referenced by Part 40?*

Assets Covered PSE DA

Result Notes Located on PG. 74 - Requirements For Proper Use And Care Of EBT's

26. Question Result, ID, References NA, DA.ALCOHOL.PREEMPLOY.P, 199.209(b) (199.209(b)(1), 199.209(b)(2), 199.209(b)(3))

Question Text *If pre-employment alcohol testing is conducted, does the process ensure that such testing is performed within the limits of Part 199?*

Assets Covered PSE DA

Result Notes No such activity/condition was observed during the inspection.

27. Question Result, ID, References Sat, DA.ALCOHOL.POSTACCIDENT.P, 199.225(a) (199.225(a)(1), 199.225(a)(2), 199.225(a)(3), 199.227(b)(4))

Question Text *Does the process ensure that post-accident alcohol testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG 25 - A. Post-Accident Testing

28. Question Result, ID, References Sat, DA.ALCOHOL.REASONSUSPECT.P, 199.225(b) (199.225(b)(1), 199.225(b)(2), 199.225(b)(3), 199.225(b)(4), 40.355(g), 40.355(h))

Question Text *Does the process ensure that reasonable suspicion alcohol testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 26 - Reasonable-Suspicion Testing

29. Question Result, ID, References Sat, DA.ALCOHOL.RETURNDUTY.P, 199.225(c) (199.233, 199.243(c), 40.67(b), 40.285(a), 40.305(a))

Question Text *Does the process ensure that return-to-duty alcohol testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 28 - Return To Duty Testing

30. Question Result, ID, References Sat, DA.ALCOHOL.FOLLOWUPTTEST.P, 199.225(d) (199.243(c)(2)(ii), 40.307(a), 40.307(b), 40.309(a))

Question Text *Does the process ensure that follow-up alcohol testing is conducted as required?*

Assets Covered PSE DA

Result Notes Located on PG. 29 - Follow-Up Testing

31. Question Result, ID, References Sat, DA.ALCOHOL.SCREENINGTEST.P, 40.247(a)

Question Text *Does the process ensure that alcohol screening test results are reported as required to the DER?*

Assets Covered PSE DA

Result Notes Located on PG. 80 - Procedures The BAT Or STT Is To Follow After A Screening Test Result

32. Question Result, ID, References Sat, DA.ALCOHOL.CONFIRMATIONTEST.P, 40.255(a) (40.355(d))

Question Text *Does the process ensure that alcohol confirmation test results are reported as required to the DER?*

Assets Covered PSE DA

Result Notes Located on PG. 81 - Alcohol Confirmation Tests

33. Question Result, ID, References **Sat, DA.ALCOHOL.OTHERCONDUCT.P, 199.237(a) (199.237(b), 40.23(c))**
 Question Text *Does the process ensure that a covered employee is prohibited from performing or continuing to perform covered functions when found to have an alcohol concentration of 0.02 or greater but less than 0.04?*
 Assets Covered **PSE DA**
 Result Notes **Located on PG. 49 - E. Provisions Governing Retesting of Covered Employees**
34. Question Result, ID, References **Sat, DA.ALCOHOL.EMPLOYEERESOURCES.P, 199.243(a) (40.285(b))**
 Question Text *Does the process ensure that each covered employee who has engaged in prohibited conduct is advised of the resources available to the covered employee in evaluating and resolving problems associated with the misuse of alcohol?*
 Assets Covered **PSE DA**
 Result Notes **Located on PG. 74 - B. SAP Evaluation**
35. Question Result, ID, References **Sat, DA.ALCOHOL.EDUCATION.R, 199.239(a) (199.239(a)(1), 199.239(a)(2))**
 Question Text *Do records indicate educational materials were provided that explain alcohol misuse requirements and the policies and procedures with respect to meeting those requirements?*
 Assets Covered **PSE DA**
 Result Notes **Went over PG. 22 - Collection Information The Company Must Provide To Collectors**

On Jul 21 Reviewed records - Verified receipt of employee education materials.
36. Question Result, ID, References **Sat, DA.ALCOHOL.EDUCATIONCONTENT.R, 199.239(b)**
 Question Text *Do records indicate the alcohol misuse educational materials provided by the operator included the required content?*
 Assets Covered **PSE DA**
 Result Notes **Went over PG. 22 - Collection Information The Company Must Provide To Collectors**

On Jul 21 Reviewed records - Verified receipt of employee education materials.
37. Question Result, ID, References **Sat, DA.ALCOHOL.SUPERVISORTRAINALCOHOL.P, 199.241**
 Question Text *Does the process include the required 60-minute supervisory personnel training related to recognizing reasonable suspicion for alcohol testing?*
 Assets Covered **PSE DA**
 Result Notes **Went over PG. 56 - Supervisor Training**

On Jul 21 Program Administrator provided training examples to review.

DA.PROGRAMRECORDS: Drug and Alcohol Program Records

38. Question Result, ID, References **Sat, DA.PROGRAMRECORDS.RECORDKEEPING.R, 199.117(b) (199.227(a), 199.231(b), 40.333(c), 40.333(d), 40.333(e))**
 Question Text *Are drug and alcohol program records maintained and kept in a secure and proper location?*
 Assets Covered **PSE DA**
 Result Notes **Program records are located on an encrypted internal drive with limited-access to anyone but authorized personnel.**
39. Question Result, ID, References **Sat, DA.PROGRAMRECORDS.DRUG.R, 199.117(a) (199.117(a)(1), 199.117(a)(2), 199.117(a)(3), 199.117(a)(4), 199.117(a)(5), 40.97(b), 40.111(a), 40.333(a)(1), 40.333(a)(2), 40.333(a)(4))**
 Question Text *Are drug test records retained for five years, three years, and one year as required and readily available?*
 Assets Covered **PSE DA**
 Result Notes **Yes. Reviewed SAP referrals & MIS reporting for 2018 & 2019**
40. Question Result, ID, References **Sat, DA.PROGRAMRECORDS.ALCOHOL.R, 199.227(b) (199.227(b)(1), 199.227(b)(2), 199.227(b)(3), 199.227(b)(4), 40.333(a)(1), 40.333(a)(2), 40.333(a)(3), 40.333(a)(4))**
 Question Text *Are alcohol test records retained for five years, three years, two years, and one year as required and readily available?*

Assets Covered PSE DA

Result Notes Yes. Reviewed SAP referrals & MIS reporting for 2018 & 2019

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