

Inspection Output (IOR)

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Inspection Information

Inspection Name	Georgia Pacific OQ Program Inspection	Operator(s)	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC (31096)	Plan Submitted	01/03/2020
Status	PLANNED	Lead	David Cullom	Plan Approval	01/08/2020 by Joe Subsits
Start Year	2020	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Deborah Becker, Derek Norwood, Scott Anderson, Darren Tinnerstet, Rell Koizumi	All Activity Start	07/22/2020
System Type	GT	Supervisor	Joe Subsits	All Activity End	07/22/2020
Protocol Set ID	GT.2020.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

No probable violations or areas of concern were noted during this inspection. AFODs (2)

Georgia Pacific's Operator Qualification Program (OQ) and OQ procedure manual has been updated to a new format under The Compliance Group. The O&M Plans and Procedures manual has been updated to the new format as well. Roy Rogers with Cathodic Protection Engineering, Inc. (CPE) performs the OQ tasks and his company is part of a Drug and Alcohol consortium. The Drug and Alcohol inspection, along with the TIMP, Records, and Field Review will be performed in August.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	86255	Georgia-Pacific	unit	86255	--	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.	86255	n/a	TQ	P, R	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset Types	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	GP Camas OQ Program Inspection	--	07/22/2020 07/22/2020	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 **86255**
Result Notes **The OQ plan has been developed by The Compliance Group (TCG). The task list was reviewed. I reviewed the EWN list. For CT identification, the operator uses the 4 part test for each task. Once the MEA qualifications expire the operator will requalify those performing CTs through EWN.**
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 **86255**
Result Notes **Records were reviewed for Roy Rogers (CPE).**
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 **86255**
Result Notes **The only task they would have is to shut a valve in an emergency. Roy Rogers (CPE) is qualified to operate valves that would be closed.**
4. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 192.807** (also presented in: TQ.OQ)
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 **86255**
Result Notes **Records reviewed for CPE.**

TQ.OQ: Operator Qualification

5. Question Result, ID, References **Sat, TQ.OQ.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 **86255**
Result Notes **The OQ plan has been developed by The Compliance Group (TCG). The task list was reviewed. I reviewed the EWN list. For CT identification, the operator uses the 4 part test for each task. Once the MEA qualifications expire the operator will requalify those performing CTs through EWN.**
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 **86255**
Result Notes **They are using the MEA and EWN intervals.**
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 **86255**
Result Notes **Section 11.2 Span of Control. This section is very detailed.**

8. Question Result, ID, References **Sat, TQ.OQ.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 **86255**
 Result Notes **Section 10.1**
9. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **I reviewed contractor records for the consultant, CPE, and they were acceptable.**
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 **86255**
 Result Notes **Records reviewed for CPE.**
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 **86255**
 Result Notes **Section 13.1 and 13.2 were reviewed. Section 13.1 is the initial and Section 13.2 is the subsequent evaluation.**
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 **86255**
 Result Notes **Records were reviewed for Roy Rogers (CPE).**
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 **86255**
 Result Notes **Section 15.1 discusses contractor communication.**
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 **86255**
 Result Notes **CPE is the only outside party who perform tasks on behalf of the operator. If a large project requires for more individuals to be qualified, the plan accommodates that.**
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 **86255**
 Result Notes **Section 15**
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 **86255**

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 86255

Result Notes At the end of each online training module there is a list of AOCs related to each covered tasks.

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 86255

Result Notes MERT Staff are qualified from Roy Rogers Dec 13 2019 to recognize AOCs. The MERT team is MEA qualified currently.

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 86255

Result Notes Section 13.2 is subsequent and Section 14.1 is accident/incident evaluation in the OQ program manual.

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 86255

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 86255

Result Notes Section 4.2 of the OQ plan has this as part of the MOC process.

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 86255

Result Notes Section 4.2 of the OQ plan has this as part of the MOC process.

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 86255

Result Notes Changes are stored in Section 16 Form 1A.

TQ.QU: Qualification of Personnel - Specific Requirements

24. Question Result, ID, References Sat, 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 86255

Result Notes Section 7.1

25. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **I reviewed Roy Rogers (CPE) OOs**
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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review, but tapping is in 36 B.**
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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
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 **86255**
 Result Notes **CT 35 is the backfilling CT 19 is for marking. Trenching is in CT 65.**
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 **86255**
 Result Notes **Roy Rogers (CPE) is qualified to do this.**

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

30. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **Section 15**
31. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **Roy Rogers (CPE) is qualified to do this.**
32. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **Roy Rogers (CPE) is qualified to do this.**

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

33. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **Task 38B Visual and NDT 38C.**
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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Nov 2013 was the last time welding was performed.**
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 **86255**
 Result Notes **No such event occurred, or condition 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 **86255**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
37. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **O and M Section 16.**
38. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **Section 16.5 in the O&M**
39. Question Result, ID, References **Sat, 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 **86255**
 Result Notes **Section 16.11**
40. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
41. Question Result, ID, References **NA, 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 **86255**
 Result Notes **No such activity/condition was observed during the inspection.**
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 86255

Result Notes No such relevant facilities/equipment 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 86255

Result Notes Annual Pipeline training was conducted in Dec 13, 2019 and a drill October, 2019 by Roy Rogers. He is qualified to perform this training.

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 86255

Result Notes The only task they would have is to shut a valve in an emergency. Roy Rogers (CPE) is qualified to operate valves that would be closed.

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 86255

Result Notes Section 19.15.-19.18

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.