

## Training and Qualification - Operator Qualification

**1. Operator Qualification Plan and Covered Tasks (detail)** *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* (TQ.OQ.OQPLAN.P) (detail)

192.805(a) (192.801(b))

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

July 1, 2013, Revision 5. Changes due to UTC inspection.

**2. Reevaluation Intervals for Covered Tasks (detail)** *Does the process establish and justify requirements for reevaluation intervals for each covered task?* (TQ.OQ.REEVALINTERVAL.P) (detail)

192.805(g)

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

Section 5.8 procedures. Everything is 3 years

**3. Contractors Adhering to OQ Plan (detail)** *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan?* (TQ.OQ.OQPLANCONTRACTOR.P) (detail)

192.805(b) (192.805(f); 192.805(c))

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

Section 5.14

Outside contractors are Townsend Controls and P91 construction in WA. P91 uses Tidewater OQ Manual. Townsend has own OQ Plan. Tidewater has OQ records. Tidewater has reviewed Townsend records they are OQed to the same requirements. Reviewed Townsend training and testing.

**4. Contractor and Other Entity Qualification (detail)** *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified?* (TQ.OQ.OQCONTRACTOR.P) (detail)

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

Yes, see above section 5.14

**6. Contractor and Other Entity Qualification (detail)** *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

Townsend has 3 employees. Reviewed Loule LaMarchsse records.

Reviewed Townsend OQ Program Supervisor's Copy of all training modules and testing material. Same or similar to Tidewater

**7. Management of Other Entities Performing Covered Tasks (detail)** Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OQ.OTHERENTITY.R) (detail)

192.805(b) (192.805(c); 192.803)

Sat	x	Sat	Concern	Unsat	NA	NC
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**Notes**  
**No mutual assistance agreements.**

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192.805(b) (192.803; 192.809(d); 192.809(e))

Sat	x	Sat	Concern	Unsat	NA	NC
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**Notes**  
**Section 5.3.**

**9. Evaluation Methods (detail)** Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))

Sat	x	Sat	Concern	Unsat	NA	NC
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**Notes**  
**Energy World notifies Tidewater when qualifications are coming due.**

**Reviewed for Damon Remus; for inspect and maintain aerial line markers; there are 2 written tests and one performance evaluation. Tidewater has a specific task for recognizing and reacting to general AOCs, it is just a written test. Several of the more complicated tasks have specific AOC training and testing in the individual task module.**

**Reviewed dates completed to ensure they were on working days.**

**10. Abnormal Operating Conditions (detail)** Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals? (TQ.OQ.ABNORMAL.P) (detail)

192.803

Sat	x	Sat	Concern	Unsat	NA	NC
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**Notes**

- 1) Yes. Tidewater has general AOC task and several specific tasks have specific AOCs**
- 2) Yes. Written test for general AOCs and written as well as oral during performance evaluation for tasks with specific AOC**
- 3) Yes. Section 6.1 definition exactly the same as 195.503**
- 4) Yes. Oral questions asked during performance evaluation for tasks with specific AOC**

**11. Abnormal Operating Conditions (detail)** Do records document evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)

Sat	x	Sat	Concern	Unsat	NA	NC
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**Notes**  
**Yes, Reviewed Damon Remus and Tim Berry records.**

**12. Qualification Records for Personnel Performing Covered Tasks (detail)** *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?* (TQ.OQ.RECORDS.R) (detail)

192.807

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

Reviewed Damon Remus and Tim Berry records. Records document the evaluation and qualification of individuals.

**13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail)** *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition?* (TQ.OQ.MERGERACQ.P) (detail)

192.805(b) (192.803)

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

Section 5.10.1 deals with Management of Change. It states before any systematic review of any proposed change all safety issues are considered. Review also identifies required communication and or training. [Reviewed MOC for merger with Nu Star acquisition Form called MOC Request and Functional Review.](#) The words "or merger" will be added after words proposed change in the plan.

**14. Training Requirements (Initial, Retraining, and Reevaluation) (detail)** *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?* (TQ.OQ.TRAINING.P) (detail)

192.805(h)

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

**Yes, Section 5.3**

**16. Covered Task Performed by Non-Qualified Individual (detail)** *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?* (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

**Yes, Section 5.9. Manual says one qualified person can watch up to 5 unqualified persons. Usually do not observe 5, have with tasks such as painting that 5 is appropriate. Number of observed individuals determined by terminal management.**

**17. Personnel Performance Monitoring (detail)** *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

**Section 5.5. Tidewater has not had situation where person no longer qualified**

**19. Program Performance and Improvement (detail)** *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))

Sat x	Sat	Concern	Unsat	NA	NC
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**Notes**

**Section 4.1.5**

**21. Management of Changes (detail)** *Does the OQ program identify how changes to procedures, 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)?* (TQ.OQ.MOC.P) (detail)

192.805(f)

<b>Sat x</b>	Sat	Concern	Unsat	NA	NC
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**Notes**  
Section 5.10.1 in OQ, referenced in O&M, and is standalone program titled Management of Change procedure found in Policy and Procedure Manager program.

**22. Notification of Significant Plan Changes (detail)** *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)

<b>Sat x</b>	<b>Sat</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes**  
Tidewater will clarify wording and provide new manual with all updated information.

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