

## 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+	Sat X	Concern	Unsat	NA	NC
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**Notes** - NWN gave a presentation about their in-house OQ program. This type of program allows them to make enhancements to customize and tune the program rather than using a commercial off the shelf (COTS) product. They interface with many departments to develop and maintain the OQ program. The operations/technical services department trains, qualifies, inspects, and improves the program. The program includes 116 covered tasks (CTs) and 10 abnormal operating conditions (AOCs). All procedures have been linked to their respective AOCs.

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

192.805(g)

Sat+	Sat X	Concern	Unsat	NA	NC
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**Notes** - They work with SMEs to establish their intervals. 3 procedures have requalification at 6 month intervals. 8 procedures are on a 1 year requalification interval, and 105 procedures are on 3 year requalification intervals. Expert qualifications are used for less than 1% of the qualifications. Intervals are based on safety, impact, complexity, and frequency.

**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+	Sat X	Concern	Unsat	NA	NC
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**Notes** - They directly qualify 99% percent. They also allow for expert qualifications as mentioned in question 2.

**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+	Sat X	Concern	Unsat	NA	NC
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**Notes** - This is in their OQ plan. (section 6.6)

**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+	Sat X	Concern	Unsat	NA	NC
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**Notes** - I have conducted numerous design, testing, and construction checks of NWN and contract gas crews with no qualification issues for the past several years.

**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+	Sat X	Concern	Unsat	NA	NC
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**Notes** - Mutual assistance agreements are in section 7.4.

**8. Evaluation Methods (detail)** *Are evaluation methods established and documented appropriate to each covered task? (TQ.OQ.EVALMETHOD.P) (detail)*

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

Sat+	Sat X	Concern	Unsat	NA	NC
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**Notes** - The evaluation methods are documented and the testing method is also outlined in the OQ plan under section 5.

**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))	<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - I checked the evaluation methods for several covered tasks.

**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	<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - There is listing of the AOCs in the procedure and they are evaluated using written and/or performance methods.

**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)	<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - Their qualification includes any and all AOCs that are linked to a specific covered task. If they fail an AOC test, all covered tasks that are linked to that AOC are inactivated until they are retested. The retesting procedure is the same for AOCs as CTs. The interval is one year for retesting.

**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	<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - I verify this in the field when conducting design, testing, and construction (DTC) inspections.

**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)	<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - The OQ program document has this language. This was added, although this may never happen to NWN.

**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)	<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - This is detailed in section 6.2

**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)	<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - This is in section 6.5. It also explains that the qualified worker must be able to intervene if needed during operation of the task.

**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))

<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** – This is in section 6.4 in the last paragraph.

**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))

<b>Sat+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - If there are changes to the Standard Practices or Field Operations manual there is an OQ team presence at the meeting. NWN implemented a structured committee called "Cornerstone" that is also used to continually improve the OQ program.

**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+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** - This is in section 3.4.

**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+</b>	<b>Sat X</b>	<b>Concern</b>	<b>Unsat</b>	<b>NA</b>	<b>NC</b>
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**Notes** – This is in section 3. The OQ program changes are reviewed each year.

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