

# 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)

195.505(a) (195.501(b); 195.3(c)(B)(9))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - There are two groups of Covered Task (CT) individuals 8 Operators from Refinery (4 operators and 4 backups)**

**The operator's OQ program is on Rev7**

**They use the 4 part test in their manual and have 46 covered tasks. The Maximo system has the CTs and when job is started maintenance supervisor cross checks qualifications with the CTs.**

## 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)

195.505(g)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - The 3 year reevaluation interval under Process Safety Management (PSM) is the same. Each group of operators has their own subsets of tasks.**

## 3. Contractors Adhering to OQ Plan

**(confirm)** *Does the process require the OQ plan to be communicated to contractors and provide a means to ensure that contractors are following the plan?* (TQ.OQ.OQPLANCONTRACTOR.P) (confirm)

195.505(a) (195.505(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - They have their contractors for routine tasks and they keep them qualified. Infrequent patrols such as the river/water crossings they will qualify right before the task is scheduled to be performed.**

## 4. Contractor and Other Entity Qualification

**(detail)** *Are contractor organizations or other entities that perform covered tasks qualified?* (TQ.OQ.OQCONTRACTOR.P) (detail)

195.505(b) (195.505(c); 195.505(d); 195.505(e); 195.505(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - They maintain for their contractors in Learner Web. Section 5.4 has the detail about this portion.**

## 6. Contractor and Other Entity Qualification

**(confirm)** *Are qualification records available for contractor personnel that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (confirm)

195.507(a) (195.507(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - They maintain for their contractors in Learner Web.**

### 7. Management of Other Entities Performing Covered Tasks

**(confirm)** Do records document evaluation of other entity (ies) performing the covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task? (TQ.OQ.OTHERENTITY.R) (confirm)

195.505(b) (195.505(c); 195.503)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - Emergency response only, but not a CT.**

### 8. Evaluation Methods

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

195.505(b) (195.503; 195.509(d); 195.509(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - A MS-Word document contains each covered task and the evaluation methods used to verify competency.**

### 9. Evaluation Methods

**(detail)** Are evaluation methods documented for covered tasks and consistent with personnel qualification records? (TQ.OQ.EVALMETHOD.R) (detail)

195.505(b) (195.503; 195.509(d); 195.509(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - They are performance based, or require advanced credentials.**

### 10. Abnormal Operating Conditions

**(detail)** Does the OQ plan adequately address abnormal operating conditions (AOCs)? (TQ.OQ.ABNORMAL.P) (detail)

195.503 (195.505(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - These are detailed in each covered task.**

### 11. Abnormal Operating Conditions

**(detail)** Do records indicate evaluation of qualified individuals for recognition and reaction to AOCs? (TQ.OQ.ABNORMAL.R) (detail)

195.507(a) (195.507(b); 195.503)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - Learner Web contains this info for the test. The last step of the OQ test has the AOC detail The employee's training file has the test results for the CT. The maintenance tasks are primarily checked in field.**

### 13. Qualification Records for Personnel Performing Covered Tasks

**(confirm)** Do records indicate personnel qualification records contain the required elements? (TQ.OQ.RECORDS.R) (confirm)

195.507(a) (195.507(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - I checked the person who does most of the patrolling and maintenance work on the pipeline, John Williamson's, OQ records and test results.**

#### 14. Training Requirements (Initial, Retraining, and Reevaluation)

**(detail)** Does the operators program include training as a part of the qualification and/or requalification process? (TQ.OQ.TRAINING.P) (detail)

195.505(h)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - Initial qualification is in Section 8.0. Part 7 has reasons listed for requalification. Section 8.3 has the qualification phases.**

#### 16. Covered Task Performed by Non-qualified Individual

**(confirm)** 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) (confirm)

195.505(c)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - Section 10 has provisions for this. There is a good example in their manual.**

#### 18. Personnel Performance Monitoring

**(detail)** Does the OQ program include provisions to evaluate an individual if the operator has 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)

195.505(d) (195.505(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - In the manual, Section 8.0 and 8.7 address this.**

#### 21. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals)

**(detail)** Does the process require managing qualifications of individuals performing covered tasks during program integration following a merger or acquisition? (TQ.OQ.MERGERACQ.P) (detail)

195.505(b) (195.503)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

##### Notes

**In 2006, the pipeline previously changed ownership and there is discussion of another sale or merger in progress currently.**

**However, I do not see this as being enforceable at this time after reviewing the regulations.**

#### 22. Management of Change

**(confirm)** 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) (confirm)

195.505(f)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - Section 9 has the MOC program detail. Anyone is encouraged to use Appendix F of the manual to request changes.**

**23. Notification of Significant Plan Changes**

**(confirm)** Does the process require significant OQ program changes to be identified and the Administrator or State agency notified? (TQ.OQ.CHANGENOTIFY.P) (confirm)

195.505(i)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes - Section 14 has that notice is to be made to the UTC.**

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