

<b>Name of Operator:</b> Puget Sound Energy		
<b>OPID No. 22189, Insp ID# 5853</b>	<b>Unit ID No. HQ</b>	
<b>HQ Address:</b> 355 110th Ave. NE Bellevue, WA 98004	<b>System/Unit Name &amp; Address:</b> 355 110th Ave. NE Bellevue, WA 98004	
<b>Operator Official:</b> Booga K. Gilbertson <b>Title:</b> VP Operations <b>Phone:</b> 425-462-3843 <b>Emergency Phone/Cell:</b>	<b>Address:</b> 355 110th Ave. NE <b>City:</b> Bellevue <b>State:</b> WA <b>Zip Code:</b> 98004	
<b>Persons Interviewed</b>	<b>Title</b>	<b>Phone No.</b>
Darryl Hong	Sr. Regulatory Compliance Analyst	425-462-3911
Joe McDuff	Field Training-Gas Supervisor Training	425-754-8046
Michael Yang	Engineer	425-456-2086
Troy Nutter	Manager, Operational Training	360-647-6523
Mike Hardesty	Senior Engineer	425-456-2636
Brett Conrad	Sr. Project Manager	253-670-2170
Dave Wharton	Infrasource Contract Management	253-380-3451
Tony Lupo	Project Manager	425-495-0276
Angela Wingate	Project Manager	
Beth Ernsberger	S&A	
<b>State Representative(s): Dennis Ritter</b>		<b>Inspection Date(s) November 12-13, 2014</b>
<b>Records Location:</b>		Georgetown (Seattle, WA)

<b>Unit Description:</b>
This is a headquarters inspection of the operator qualification plan and procedures and associated records.
<b>Portion of Unit Inspected:</b>
Operator Qualification Plan and associated records.
<b>Inspection Summary:</b>
There were no apparent violations or areas of concern found during this inspection. <ul style="list-style-type: none"> <li>Reviewed OQ plans for PSE and contractors: Infrasource, S&amp;A, USIC. Contractor OQ plans follow and compliment PSE's plan;</li> <li>Reviewed OQ records for employees for each company as noted below;</li> <li>Reviewed PSE's OQ records management approach and that of contractors to ensure consistency and adherence to codes</li> </ul>

<p><b>Sat+ - Exceeds requirements/exemplary performance</b>  <b>Sat - Meets requirements</b>  <b>Con - "Concern" meets requirements, but is an area of recommendation and/or area that if not addressed may lead to non-compliance</b>  <b>Unsat - Does not meet requirements</b>  <b>N/A - Not Applicable</b>  <b>N/C - Not Checked</b></p>
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## 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	Concern	Unsat	NA	NC
	X				

**Notes**

Q for 1 Midwest Energy Assoc (MEA) is the basis for plan. Use their procedure numbering system. Latest revision 9.0 Operator Qualification Plan, Aug 01, 2014. Task 804 is excavation activities-tasks listed in Appendix A of the plan. Reviewed Chuck Lantau's test PEF 0303.01for Starting Remote Gas Compressor Units-written and practical.

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

PSE uses a system which uses MEA's task frequency evaluation interval, but they are all reevaluated in 3 years even though might be a 5 yr interval.

**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	Concern	Unsat	NA	NC
	X				

**Notes**

Section 12 Contractor Qualification. 12.3.3 specifically states contractors shall provide records that verify qualifications

S&A reviewed OQ plan and select random employees OQ records and test scores. Also reviewed John Baes, Regional Director, OQ evaluator qualifications. Permanent records are scored, recorded, and maintained by Industrial Training Service, ITS.

USIC Locating Contractor-OQ plan last revised 9/25/12;-PSE last updated their OQ plan in 2014. No significant changes in PSE plan to warrant a change in USIC plan.

**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	Concern	Unsat	NA	NC
	X				

**Notes**

Chapter 12 Contractor Qualification. Also specific service contract with that contractor. Section 2425.2100 of Gas Operating Standards. Contractors have to submit plan to PSE who will review and state plan does or does not comply.

**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	Concern	Unsat	NA	NC
	X				

**Notes**

Section 12 Contractor Qualification section 12.5, states contractors have to maintain and provide PSE access.

Reviewed the following contractor employee OQ records:

**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	Concern	Unsat	NA	NC
	X				

**Notes**  
Chapter 12 Contractor Qualification and Chapter 14 Use of Individuals Obtained through a Mutual Assistance Agreement.

**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	Concern	Unsat	NA	NC
	X				

**Notes**  
Looked at task 1408-Installation of Plastic Pipe, MEA operator qualification.

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Mark Paras testing "evaluator" was Mark Paras, as was testee. PSE to check. OK Dave Wooten was evaluator and signed. Ken Yates-quals MEA certification-best practices. This is not currently a formal PSE process but it is MEA best practice and PSE is looking to make this part of their formal process requirements. This should be trickled down to the contractors also as part of formal contract language.

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Section 4 Definitions-4.23 Qualified  
Section.5 Covered Task List  
Section 6-Evaluation Plan-6.1.6, 61.8.1.1  
Appendix A Covered Task list has AOCs built in to the written and performance testing of each covered task.

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Randomly checked the following PSE employees:

**Infrasource: Laborers:** Allyn Baker, Travis Erb, Justin Lockhart, Jason Shields, Jim Vasquez; **Operators:** Craig Austin, Marc Dillard, Robert Dobbs, Matt Erb, Kit McGhie, John Ringer, David Zetterberg. Fitters are checked routinely during crew inspections and on Standard Inspections when reviewing construction jobs. Did not check during OQ.

**Survey & Analysis (leak surveys, patrolling, atm corrosion)--Daniel Abendroth,** Christina Brooks, Jason Marshall, Chris Porterfield, Tyson Stevens.

**USIC (leak surveys, patrolling, atm corrosion)—Dan Comeau,** Jeffrey McGovern, Preston Fothergill, Wendy Robbins, Kamil Berensniewicz

**Puget Sound Energy: (checked fitters, customer field techs, CFS techs, PC tech, supervisors, gas storage operator, IMO tech, gas controller, PI inspector, propane air storage ooperator)--Derik Kane,** David Wooten, Terry Linville, Garrett Garris, David Decker, Ron Moini,, Brady Kinsella, Mike Armstrong, Michael, Leptich, Mark Anders, Pam Newberry, Debbie Stewart, Douglas Varner, Mark Paras, Steve Mellinger,

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Randomly checked the following PSE employees:

**Infrasource: Laborers:** Allyn Baker, Travis Erb, Justin Lockhart, Jason Shields, Jim Vasquez; **Operators:** Craig Austin, Marc Dillard, Robert Dobbs, Matt Erb, Kit McGhie, John Ringer, David Zetterberg. Fitters are checked routinely during crew inspections and on Standard Inspections when reviewing construction jobs. Did not check during OQ.

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**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+	Sat	Concern	Unsat	NA	NC
				X	

**Notes**  
PSE's plan does not have a specific section. Discussed the Buckley acquisition. PSE hired 1 employee from Buckley, Terry Roberts, however, he was evaluated and a training program established to have him retrain under PSE's program. He will be fully qualified in June, 2015.

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Section 6 Evaluation Plan Section 6.3  
Since 2005, every 3 years PSE requalifies all OQ covered employees, even though required intervals may be longer per MEA.

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Chapter 7- Use of Non-qualified Individuals

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
Section 8 Post-incident Evaluation of an Individual's Qualifications  
  
Section 9 Evaluation of an Individual's Qualifications due to Reasonable Cause Considerations.

**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+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**  
**Why does it reference 192.605?? Is OQ part of O&M?**  
**Section 3 Responsibility-3.2.9 Conducting periodic program reviews and revising the OQ Plan as needed and**  
Maintaining a file of recommended changes pending plan updates.  
Gas Operating Standards-2425.2100  
References 7600.1000 Operator Qualification Plan

**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)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

4.3 Change

4.3.1 Change as it relates to Operator Qualification generally consists of the following:

4.3.1.1 Modification to a PSE policy, Gas Operating Standard, or Gas Field Procedure that changes the way employees understand and perform a covered task. Gas Operating Standard and Gas Field Procedure changes occur annually at a minimum. Midyear addenda are possible.

4.3.1.2 Changes in state or federal regulations that modify the regulatory basis for task performance or revise the task itself.

4.3.1.3 New equipment or technology that affects the way a task is performed whether or not a formal Gas Field Procedure exists.

4.3.1.4 Changes in manufacturer or supplier written support materials that modify recommended practices or procedures for installing, operating, or maintaining pipeline components.

4.3.1.5 Any addition of PSE-defined tasks or subtasks to the covered task list.

4.3.1.6 Significant changes to the OQ Plan itself.

10. Change Management

10.5 Change determined to be of significance shall be communicated to employees, contractors, *Operational Training*, and others as appropriate.

10.6 Methods for facilitating communication of change may include:

10.6.1 Review of revisions to the Gas Operating Standards and Gas Field Procedures manuals and midyear addenda with PSE departments and OQ-covered contractors by *Standards*.

10.6.2 Technical assistance provided in the interpretation and implementation of new or revised Gas Operating Standards or Gas Field Procedures.

10.6.3 Performance review meetings with key PSE contractors at which time Gas Operating Standards and Gas Field Procedures are discussed and changes recommended.

10.6.4 Briefings of *Operational Training by Standards*, covering significant changes in Gas Operating Standards and Gas Field Procedures manuals, in order for changes to be included in annual training and qualification activities.

**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)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

**Notes**

10.8 *Compliance Programs* shall notify the WUTC of any significant modifications to the OQ Plan. This notification shall be accomplished by submitting a copy of the revised OQ Plan to the WUTC.

**Acceptable Use:** 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.