

Name of Operator:	Georgia Pacific	Insp. ID 6203
OPID No. 31096	Unit ID No.	
HQ Address:	System/Unit Name & Address:	
133 Peach Tree St NE Atlanta, GA 30303	401 NE Adams St Camas, WA 98607	
Operator Official:	Ron D. Simmons	Address:
Title:	Manager of Energy Measurement	City:
Phone:	404.317.4035	State:
Emergency Phone/Cell:		Zip Code:
Persons Interviewed	Title	Phone No.
Robert Cosentino	President & CEO, Cosentino Consulting Inc.	360.200.4959
Ron D. Simmons	Manager of Energy Measurement	404.317.4035
Carson Blocker	Reliability Engineer	360.834.8419
State Representative(s): Anthony Dorrrough	Inspection Date(s) 08/21/2015	
Records Location:	401 NE Adams St, Camas, WA 98607	

Unit Description:
1.68 mile total [Class 3] 10-inch API 5L (X-42/X-52 with varying wall thickness – approx. 4 thicknesses) pipeline originating in a Williams Northwest Pipeline facility and extending to the Georgia Pacific (Camas) Mill and operating at 10.4% SMYS
Portion of Unit Inspected:
The entire unit as stated above

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

Yes, it is Revision [0] - dated 2/17/2013

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

[See section 5.12] – Every (3) years – Also Cosentino does a Covered Tasks review every 90 days.

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

[See section 3.3.3] – Contractor follows Georgia Pacific’s (GP) plan and when they have an outside third party contractor they make sure that they meet GP’s minimum standards as part of the process.

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

[See section 3.3.3] – Pipeline coordinator must approve and sign off on any plan from the contractor as part of the process.

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

Yes, GP has a copy of the contractors OQ records – Staff reviewed these 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
N/A, no records of these agreements exist – There are no mutual assistance agreements for covered tasks for this operator.

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
[See sections 5.3 & 5.8 and 6] - MEA is the primary method used.

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
Yes, records were available – Staff reviewed these records.

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
[See sections 6.1 & 6.2] – MEA is the primary method used - Staff viewed online training module, an example of the process.

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
[See section 6.1 & 6.2] – MEA is the primary method used - Staff reviewed these 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+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Yes - Staff reviewed these records

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
N/A, there is no process for this type of planning, the pipeline is dedicated to the mill only- GP does not anticipate any significant mergers or acquisitions and therefore does not believe that they should have planning for it in their OQ.

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
[See section 5.11, 5.12 & 6] - Staff verified that Training Requirements were provided.

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
[See section 3.3.4 & 5.16] – Provisions include a thorough, lengthy and well worded definition of what direct supervision is considered to be.

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
[See section 5.14 & 5.15] – Staff verified evaluation provisions.

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
[See section 8.1] – It was explained to staff that GP uses form “F-32” (Documenting Personnel Reviews) for evaluation of OQ Program and for implementation of improvements, as part of their process. Staff asked for a more detailed explanation of how this addresses evaluation. GP provided a more detailed description of the process via email and staff eventually concluded that this process was not ideal but acceptable under the circumstances.

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
[See section 8] – Verified by staff

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
[See section 8.2.6] – Verified by Staff

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