

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	Avista Corporation - HQ	Operator(s)	AVISTA CORP (31232)	Plan Submitted	12/01/2017
Status	STARTED	Lead	Anthony Dorrough	Plan Approval	--
Start Year	2017	Team Members	Bruce Perkins, Darrin Ulmer	All Activity Start	11/07/2017
System Type	GD	Supervisor	Joe Subsits	All Activity End	11/07/2017
Protocol Set ID	WA.GD.2017.01	Director	Sean Mayo	Inspection Submitted	--
				Inspection Approval	--

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	Avista HQ OQ	Avista Corp.	unit	--	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe	26	26		26	100.0%

a. Percent completion excludes unanswered questions planned as "always observe".

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Avista HQ OQ	n/a	TQ	P, R	Detail	

## Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Avista HQ OQ	--	11/07/2017 11/07/2017	n/a	all planned questions	all assets	all types	26	26	26	100.0%

a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

b. Percent completion excludes unanswered questions planned as "always observe".

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	New Attendance Form	STARTED	--	--	--

# Results (all values, 26 results)

## TQ.OQ: Operator Qualification

1. Question Result, ID, References	Sat, TQ.OQ.ABNORMAL.P, 192.803
Question Text	<i>Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?</i>
Assets Covered	Avista HQ OQ
Result Notes	<p>1) Spec 4.31 page 4 and each task in APPENDIX A requires individuals to be aware of AOC associated with each task.</p> <p>"Initial training and refresher training shall include curriculum that identifies AOC's for each covered task as well as general AOC's. Covered individuals shall be instructed and OQ on how to recognize and react to AOC's. Task specific AOC's are identified in Appendix A."</p> <p>2) Each evaluation (skill and knowledge) lists the AOC's for that task. Individual is tested on AOC's.</p> <p>3) AOC are listed in APPENDIX A on a per task/task specific basis</p> <p>4) It's on the Record of Evaluation (ROE) form and Computer Based Training (CBT) knowledge tests; note that CBT's cover AOCs. Template of ROE available to show if needed.</p>
2. Question Result, ID, References	Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b);192.803)
Question Text	<i>Do records document evaluation of qualified individuals for recognition and reaction to AOCs?</i>
Assets Covered	Avista HQ OQ
Result Notes	AOC's are aligned to tasks. Avista's Record of Evaluation (ROE) Skill evaluation forms require that individuals demonstrate that they can identify AOC's and react appropriately. Avista can provide documents associated with skill evaluations.
3. Question Result, ID, References	Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i)
Question Text	<i>Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?</i>
Assets Covered	Avista HQ OQ
Result Notes	Reference Spec 4.31, Page 8, Notification of OQ Program Changes: "Changes determined to be significant by the Director of Gas Operations shall be communicated to regulatory agencies, including state commissions, as soon as practical following implementation."
4. Question Result, ID, References	Sat, TQ.OQ.CHANGERECORD.R, 192.805(i) (192.805(f))
Question Text	<i>Are records maintained for changes that affect covered tasks and significant OQ plan changes?</i>
Assets Covered	Avista HQ OQ
Result Notes	<b>Avista's OQ Change Tracker (reviewed)</b>
5. Question Result, ID, References	Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803;192.809(d);192.809(e))
Question Text	<i>Are evaluation methods established and documented appropriate to each covered task?</i>
Assets Covered	Avista HQ OQ
Result Notes	<p><b>Yes, Evaluation Methods Established:</b></p> <p>Reference Spec 4.31 page 2 – Evaluation Intervals established</p>

Reference Spec 4.31 –APPENDIX B - EVALUATION GUIDELINES -

**Yes, Evaluation Methods Documented:**

Reference Spec 4.31, APPENDIX A – OPERATOR QUALIFICATION COVERED TASK LIST

- Each covered task at Avista has a Task Description
- Active covered tasks have established Criteria Guides for all evaluations (knowledge / skill)
- Record of Evaluation (ROE) forms are used for all skill based tasks.

6. Question Result, ID, References

Sat, TQ.OQ.MOC.P, 192.805(f)

Question Text

*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)?*

Assets Covered

Avista HQ OQ

Result Notes

**Reference Spec 4.31, page 7, Program Changes**

“Changes impacting the OQ Program shall be evaluated and managed by the, Administrator to determine the impact on covered tasks or on the OQ Program as a whole. The Administrator shall establish written guidelines for managing program changes. Some of the changes that may impact tasks and/or the OQ Program include:

- a) Modification or adoption of a new procedure or policy
- b) Changes in applicable codes, standards, and regulations
- c) Changes in equipment
- d) Changes in AOC’s
- e) Implementation of new processes or technology
- f) New information from equipment or product manufacturers
- g) Changes to evaluation criteria
- h) Modification to the covered task list
- i) Changes resulting from findings regarding investigation of events or actions that impact the safety or integrity of the pipeline
- j) Changes from program effectiveness results
- k) Changes from merger acquisitions/divestitures
- l) Changes resulting from employee and contractor feedback

Evaluation of impacts should consider the following ratings:

Low Impact: Changes or modifications that result in no material effect on the OQ Program or covered tasks. (e.g. grammatical changes, or color deviations for paint).

Medium Impact: Changes or modifications may include revisions to administrative procedures, evaluation methods, company procedures, or other items that affect the implementation of the OQ

Program but may not require training or evaluation of qualified individuals. This level of change requires documented notification to affected individuals.

High Impact: Changes that affect the knowledge or skill required to perform a covered task or the knowledge to implement OQ Program requirements. At a minimum, affected individuals shall be trained on high-impact changes. High Impact changes may also be significant changes and may require regulatory notification (Refer to Notification of OQ Program Changes).”

**NOTE: Avista also maintains an OQ Change Tracker document as part of the MOC Process for OQ in order to track historical changes to the program.**

7. Question Result, ID, References	Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)
Question Text	<i>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?</i>
Assets Covered	Avista HQ OQ
Result Notes	Reference Span of Control in APPENDIX A for each covered task as well as Spec 4.31 page 5  <p>“Except for those tasks identified as “non-observable,” non-qualified individuals may work on a covered task if directed and observed by a qualified individual. Qualified individuals that are overseeing the work of a non-qualified individuals shall be in the immediate area where work is being performed and shall provide direct oversight and assistance (if necessary) when covered tasks are being performed. The qualified individual must also be able to take immediate corrective action if an unsafe situation occurs. Non-observable tasks may only be performed by individuals who are qualified for that task and may not be performed under span of control.</p> <p><b>NOTE: Refer to Appendix A – Operator Qualification Covered Task List within the OQ Program for span of control for each covered task. ”</b></p>

8. Question Result, ID, References	Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))
Question Text	<i>Are adequate records containing the required elements maintained for contractor personnel?</i>
Assets Covered	Avista HQ OQ
Result Notes	<b>Yes.</b> The following information is maintained by Avista’s Training Department in the Avista Learning Network (ALN):  <p>Name, Employee/Contractor ID, Task ID, Certification/Expiration Date; Skill/Knowledge</p> <p>Field Verification Reports (FVR) are required to be readily available in the field</p> <p>Record Summary:</p> <p>Years of records - - 5 Years of Records (Veriforce Archive and ALN Database)</p> <p>Location of records – ALN and Veriforce Archive on SharePoint</p> <p>Availability of records – Available to Contractors, Avista Employees/Managers and Training Dept.</p> <p>Mom &amp; Pop Contractors– All records located in the ALN</p> <p>Veriforce Migration: 9/2016. Excel records housed on SharePoint site</p> <p><b>[NOTE: Records electronically available in the ALN]</b></p>

9. Question Result, ID, References	Sat, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)
Question Text	<i>Does the OQ plan document that the operator has assured that the procedures on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?</i>

Assets Covered	Avista HQ OQ
Result Notes	<b>Located on Page 9 of 11</b>  <b>OQ-Field Verification Report (reviewed)</b>

10. Question Result, ID, References Sat, TQ.OQ.OQPLAN.P, 192.805(a) (192.801(b))

Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*

Assets Covered	Avista HQ OQ
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Result Notes **OQ Plan Covered Tasks:**

Yes. Avista Gas Standards Manual Specification 4.31 and Appendix A (4.3 AVISTA UTILITIES' OPERATOR QUALIFICATION PROGRAM) outlines the OQ Plan (Program) and the covered task list found in Appendix A.

**Basis Used for Covered Tasks:**

The basis used for identifying covered tasks is outlined in Spec 4.31, page 2, 'Determination of Covered Tasks' which states:

"Covered tasks shall be determined using the following four-part test (Refer to §192.801 and WAC 480-93-013):

1. Is the activity performed on a pipeline facility?
2. Is the activity an operations or maintenance task (and in the State of Washington a new construction task)?
3. Is the activity performed as a requirement of §192?
4. Does the activity affect the operation or integrity of the pipeline?

The task shall meet all four parts of the test to meet the requirements as a covered task. If any one of the four parts is not met, the task is not a covered task under the OQ Program.

Refer to Appendix A for the list of covered tasks. The Appendix A list was initially compiled utilizing the Midwest Energy Association (MEA) covered task list and a list that was compiled by the Inter Utility Working Group. These lists were then modified based on Avista's operations by the Operator Qualification Development Team."

11. Question Result, ID, References Sat, TQ.OQ.OQPLANCONTRACTOR.P, 192.805(b) (192.805(f);192.805(c))

Question Text *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*

Assets Covered	Avista HQ OQ
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Result Notes **Plan Communication:**

Yes, Spec 4.31 pg 9. Contractor Qualification and Contractor Management states: "Contract Services shall consult with the Avista representative initiating the contract work to ensure terms and conditions related to OQ have been communicated to the contractor and complied with prior to the start of any covered task."

Further Information:

As a standard practice, Avista reviews updates to its Gas Standards Manual and Gas Emergency and Service Handbook with contractors annually. Avista's standards are provided to contractors in hard copy format.

<p><b>Plan Compliance:</b></p> <p>See Avista Gas Standards Specification 4.61 QUALITY ASSURANCE / QUALITY CONTROL (QA/QC) PROGRAM which outlines an objective as, "Ensuring adherence to federal, state, and Company requirements, standards, policies and procedures. [AND] Providing support to Field Supervisors, Trainers, and Operator Qualification (OQ) Specialists."</p> <p><b>Further Information:</b></p> <p>Supply Chain Contract Language: see excerpts as an example of contract language requiring plan compliance.</p>
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12. Question Result, ID, References	NA, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c);192.803)
Question Text	<i>If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?</i>
Assets Covered	Avista HQ OQ
Result Notes	<b>Not Applicable:</b> Specific to mutual assistance, during the period of this inspection, Avista has not had any instances of mutual assistance from outside entities.  Reference Page 10 of Spec 4.31 and Contractors on Page 9.

13. Question Result, ID, References	Sat, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))
Question Text	<i>If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?</i>
Assets Covered	Avista HQ OQ
Result Notes	Yes, See Spec 4.31, page 6 <b>[Reasonable Causes to Verify Qualification Investigations]</b>  "If there is sufficient reason to believe an individual is no longer qualified on a covered task (generally as a finding of an investigation process), the individual shall be considered non-qualified for the particular covered task(s) in question and it shall be documented in their OQ records."  Also, see Specification 4.31, APPENDIX

14. Question Result, ID, References	Sat, TQ.OQ.RECORDS.R, 192.807
Question Text	<i>Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?</i>
Assets Covered	Avista HQ OQ
Result Notes	Evaluation and qualification documentation can be provided via Avista's Field Verification Reports (FVR) for individuals: All records are housed in the Avista Learning Network (ALN)  <b>Verified a PDF of all FVR'S</b>

15. Question Result, ID, References	Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)
Question Text	<i>Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?</i>
Assets Covered	Avista HQ OQ
Result Notes	<ul style="list-style-type: none"> <li>• <b>Establishing Reevaluation Intervals</b></li> <li>• Yes. The process for reevaluation intervals for covered tasks are outlined in Spec 4.31, page 2 titled 'Subsequent Evaluation Intervals':</li> <li>• "After an individual's initial OQ to perform covered task(s), the evaluation interval ranges from 6 months to 3 years depending on the task, with grace periods. Reference Appendix A for the specific evaluation interval for a covered task. All 6-month tasks must be renewed no later than 7-1/2 months since the last evaluation, 1-year tasks must be renewed no later than 15 months</li> </ul>

from the last evaluation, and 3-year tasks must be renewed by the end of the calendar year in which they expire.”

- Justification for Reevaluation Intervals
- **The justification for reevaluation is outlined in 4.31, page 2-3:**
- “Since there was no previous trend or history of incidents or accidents that would indicate a more frequent interval be necessary, a baseline of 3 years was established for most covered tasks. Avista reviewed the intervals recommended by MEA, which ranged between 3 and 5 years. Avista chose the more conservative interval for covered tasks unless there was a more conservative interval in place by federal or state regulations. A covered task interval is subject to change based on trends, reviews, audits, regulatory changes, incidents, etc.”
- **NOTE:**
- MEA was the original basis and industry best practice (page 2/3) used. In 2017, Avista reduced the reevaluation interval on one task, “221.090.030 - Odorization-Periodic Odorant Testing”

16. Question Result, ID, References	Sat, TQ.OQ.TRAINING.P, 192.805(h)
Question Text	<i>Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?</i>
Assets Covered	Avista HQ OQ
Result Notes	<p><b>Initial:</b> Standard 4.31 Page 3: Initial Training and Qualification.</p> <p>“Individuals performing covered tasks as of October 28, 2002, received initial qualification through an appropriate method to ensure they were qualified to perform their assigned tasks. Appropriate evaluation methods included, but were not limited to:</p> <ol style="list-style-type: none"> <li>1. Written or oral examination.</li> <li>2. Observation during performance of a specific task or observation during simulations.</li> <li>3. Other forms of assessment.</li> </ol> <p>Work history performance review could have been used as the sole evaluation method for individuals who were performing a covered task prior to August 27, 1999; however, Avista chose not to utilize this method. Work history performance was not used as the sole evaluation method after October 28, 2002.</p> <p>Evaluation for initial qualification was made by Safety/Health and Training with support from Gas Engineering. Other experienced employees or managers were used to administer tests, evaluations or gather work or training history documentation, as necessary. For written examinations a passing score was between 80 percent and 100 percent. A field or hands-on evaluation was evaluated as either pass or fail.</p> <p>“For covered positions after October 28, 2002, initial OQ shall be accomplished utilizing training materials via classroom, computer based, and on-the-job training, written and oral testing, hands-on evaluations, simulations, or any combination of these methods. Equipment and facilities used for training and OQ must be similar to the equipment and facilities on which the employee will perform the covered task.”</p> <p><b>Retraining:</b> Page 7 – requalification</p> <p>“After disqualification for any reason, evaluation shall be performed by an approved Avista instructor, technical support staff person, qualified employee, or an outside contractor. Each evaluator should be trained in Avista’s evaluation process (refer to Appendix B, Evaluation Guidelines of this specification). Training is responsible for determining the method of requalification taking into consideration the findings of any investigation.”</p> <p><b>Reevaluation:</b> Page 4 – refresher qualification</p>

"Refresher OQ evaluations shall be performed by an approved Avista instructor, technical support staff person, qualified employee, or an outside contractor. Each evaluator should be trained in Avista's evaluation process (refer to Appendix B, Evaluation Guidelines within the OQ Program)."

**[verified Flow Charts of the qualification process]**

17. Question Result, ID, References	Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))
Question Text	Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?
Assets Covered	Avista HQ OQ
Result Notes	<b>Records are located in the ALN- Page 3 of 11 - Appendix B, Page 7 - Page 4 Refresher Qualification</b>
18. Question Result, ID, References	Sat, TQ.OQ.OQCONTRACTOR.P, 192.805(b) (192.805(c);192.805(d);192.805(e);192.805(f))
Question Text	Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?
Assets Covered	Avista HQ OQ
Result Notes	Use of Mutual assistance Agreements - Page 10 -  <b>Contractor Qualification:</b>  Yes, Page 9, Spec 4.31 "Contractor Qualification" states that, "Contract employees performing a covered task on an Avista facility shall be qualified either through this OQ Program or through a contractor's program that has been reviewed and approved by Avista."  <b>[SEE EXAMPLE CONTRACT LANGUAGE]</b>
19. Question Result, ID, References	Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))
Question Text	Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?
Assets Covered	Avista HQ OQ
Result Notes	<b>Located on Page 6 of 11 (verified)</b>

## TQ.QU: Qualification of Personnel - Specific Requirements

20. Question Result, ID, References	Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))
Question Text	Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel?
Assets Covered	Avista HQ OQ
Result Notes	<b>Have (7) multiple tasks for corrosion control - Located in Appendix A Page 2 thru 4</b>
21. Question Result, ID, References	Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a);192.807(b))
Question Text	Do records indicate qualification of personnel implementing pipeline corrosion control methods?
Assets Covered	Avista HQ OQ
Result Notes	<b>Located on Field verification Reports and training transcripts - (reviewed these documents)</b>
22. Question Result, ID, References	Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))



Question Text	Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?
Assets Covered	Avista HQ OQ
Result Notes	<b>Located on Page 17 - Appendix A &amp; Page 18 Appendix (40) Tapping Tasks</b>

## TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

23. Question Result, ID, References	Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a);192.225(b);192.328(a);192.328(b))
Question Text	Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?
Assets Covered	Avista HQ OQ
Result Notes	<b>Located in Gas Standards Manual - Section 4.18 - Section 3.22 Page 1 of 15</b>
24. Question Result, ID, References	Sat, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a);192.225(b);192.805(b))
Question Text	Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?
Assets Covered	Avista HQ OQ
Result Notes	<b>Located on Page 1 of 15 (verified)</b>
25. Question Result, ID, References	Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b);192.229(a);192.229(b);192.229(c);192.229(d);192.328(a);192.328(b);192.807(a);192.807(b))
Question Text	Do records indicate adequate qualification of welders?
Assets Covered	Avista HQ OQ
Result Notes	<b>Located on Page 12 of 16 (verified)</b>
26. Question Result, ID, References	Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a);192.807(b);192.328(a);192.328(b))
Question Text	Do records indicate the qualification of nondestructive testing personnel?
Assets Covered	Avista HQ OQ
Result Notes	<b>Yes. The following information is maintained by Avista's Training Department in the Avista Learning Network (ALN) (verified)</b>

Report Parameters: Results: all

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