Inspection Output (IOR)

Generated on 2019. April. 11 14:35

Inspection Information

Inspection Name BP Cherry Pt.	Operator(s) BP PIPELINE (NORTH AMERICA) INC. (31189)	Plan Submitted 12/04/2018
OQ Status PLANNED Start Year 2019	Lead Anthony Dorrough Supervisor Joe Subsits	Plan Approval 12/07/2018 by Joe Subsits
System Type HL	Director Sean Mayo	All Activity Start 01/24/2019
Protocol Set ID HL.2018.02		All Activity End 01/25/2019
		Inspection Submitted

Inspection Approval --

Inspection Summary

The butane line operates from Cherry Point Refinery to the Ferndale Terminal with two breakout tanks.

Scope (Assets)

# Short Label Long Label	Asset Type	Asset I Ds	Excluded Topics	Planned Re	quired Insp	Total bected	Required % Complete
1. BP Cherry Pt. OQ BP Cherry Pt. Refinery - Butane	unit		Offshore GOM Crosses Nav. Reg Rural Gather Rural Low Stress Abandoned Biofuels	49	49	49	100.0%

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

Plans

# Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent Notes
1. BP Cherry Pt. OQ n/a		TQ.OQ, TQ.QU, TQ.QUOMCONST, TQ.TRCNTRL, TQ.TRERP, TQ.TROMCONST	P, R, O, S	Detail

Plan Implementations

											Required
	Activity	SMART	Start Date	Focus	Involved		Qst			Total	%
#	Name	Act#	End Date	Directives	Groups/Subgroups	Assets	Type(s)	Planned I	Required	Inspected	Complete
1	. OQ Questions		01/24/2019		all planned questions		all types	49	49	49	100.0%
			01/25/2019			assets					

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

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

Forms

Results (all values, 49 results)

51 (instead of 49) results are listed due to re-presentation of questions in more than one sub-group.

TD.CP: External Corrosion - Cathodic Protection

- 1. Question Result, ID, Sat, TO.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h)) (also presented in: TO.QU) References
 - Question Text Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?
 - Assets Covered BP Cherry Pt. OQ

Result Notes Located in OMER section: P-195.51

2. Question Result, ID, Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b)) (also presented in: TQ.QU) References

Question Text *Is qualification of supervisors in corrosion control procedures documented?* Assets Covered BP Cherry Pt. OQ

- Result Notes
- Brian Stone Corrosion Supervisor
 - o Reviewed his qualifications and training records
- Gerald Wismer Corrosion Specialist
 - o Reviewed his qualifications and training records

TQ.OQ: Operator Qualification

3. Question Result, ID, Sat, TQ.OQ.OQPLAN.P, 195.505(a) (195.501(b), 195.3(c)(B)(9)) References

References

Question Text *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* Assets Covered BP Cherry Pt. OQ

Result Notes Verified: Located in OMER Section P-195.505

4. Question Result, ID, Sat, TQ.OQ.REEVALINTERVAL.P, 195.505(g) References

> Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?* Assets Covered BP Cherry Pt. OQ

Result Notes Located in: Section 2 - #7

- Frequencies are located in Table #3 & #4 of the OQ plan
- 5. Question Result, ID, Sat, TQ.OQ.NONQUALIFIED.P, 195.505(c) References

Question Text Does the OQ plan contain provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are appropriate restrictions and limitations placed on such activities?

Assets Covered BP Cherry Pt. OQ

Result Notes Span of control requirements are listed in Tables #3 & #4

6. Question Result, ID, Sat, TQ.OQ.EVALMETHOD.P, 195.505(b) (195.503, 195.509(d), 195.509(e)) References

Question Text Are evaluation methods established and documented appropriate to each covered task? Assets Covered BP Cherry Pt. OQ Result Notes Located in: Section #5 7. Question Result, ID, Sat, TQ.OQ.OQCONTRACTOR.R, 195.507(a) (195.507(b)) References Question Text Are adequate records containing the required elements maintained for contractor personnel? Assets Covered BP Cherry Pt. OQ Result Notes Staff reviewed [3] contractor personnel records. 8. Question Result, ID, Sat, TQ.OQ.RECORDS.R, 195.507(a) (195.507(b)) References Question Text Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified? Assets Covered BP Cherry Pt. OQ **Result Notes Verified** 9. Question Result, ID, Sat, TQ.OQ.TRAINING.P, 195.505(h) References Question Text Does the operators program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks? Assets Covered BP Cherry Pt. OQ Result Notes Section 4 - Qualification Modes 10. Question Result, ID, Sat, TQ.OQ.TRAINING.R, 195.507(a) (195.507(b), 195.505(h)) Question Text Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks? Assets Covered BP Cherry Pt. OQ **Result Notes Verified** 11. Question Result, ID, Sat, TQ.OQ.OQPLANCONTRACTOR.P, 195.505(a) (195.505(f)) References 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 BP Cherry Pt. OQ Result Notes Located in: Section 7 - Uses IS NetWorld database to communicate change to contractor. 12. Question Result, ID, Sat, TQ.OQ.OQCONTRACTOR.P, 195.505(b) (195.505(c), 195.505(d), 195.505(e), 195.505(f)) References Question Text Are contractor organizations or other entities that perform covered tasks qualified? Assets Covered BP Cherry Pt. OQ Result Notes Located in: Section #4 13. Question Result, ID, Sat, TQ.OQ.CONTRACTOREQUIV.P, 195.505(h) References Question Text Does the OQ plan assure that 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? Assets Covered BP Cherry Pt. OQ **Result Notes Verified** 14. Question Result, ID, NA, TQ.OQ.OTHERENTITY.R, 195.505(b) (195.505(c), 195.503) References Question Text If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained? Assets Covered BP Cherry Pt. OQ Result Notes BP Cherry Point has no mutual assistance agreements at this time. 15. Question Result, ID, Sat, TQ.OQ.ABNORMAL.P, 195.503 (195.505(b)) References Question Text Does the OQ plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?

Assets Covered BP Cherry Pt. OQ Result Notes Located in: Section 2 - #8 Qualified

16. Question Result, ID, Sat, TQ.OQ.ABNORMAL.R, 195.507(a) (195.507(b), 195.503) References

Question Text Do records indicate evaluation of qualified individuals for recognition and reaction to AOCs?

Assets Covered BP Cherry Pt. OQ

Result Notes Verified: Reviewed records for Kevin Washington/Technician

17. Question Result, ID, NC, TQ.OQ.ABNORMAL.O, 195.503 References

> Question Text Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions (AOCs)?

Assets Covered BP Cherry Pt. OQ

Result Notes Staff will observe during the upcoming BP Cherry Point Crude/Butane Standard Inspection.

18. Question Result, ID, Sat, TQ.OQ.PERFMONITOR.P, 195.505(d) (195.505(e))

References

Question Text Does the OQ 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 covered tasks?

Assets Covered BP Cherry Pt. OQ

Result Notes Located in: In Section #5 - Post-Incident/Accident Re-Evaluation

- 19. Question Result, ID, NA, TQ.OQ.PERFMONITOR.R, 195.505(d) (195.505(e)) References
 - Question Text Does the operator have records to demonstrate that they have evaluated individuals who may have contributed to an incident/accident while performing a covered task or where there is reason to believe that an individual may have no longer been qualified to perform a covered task?

Assets Covered BP Cherry Pt. OQ

Result Notes There have been no incidents/accidents since last inspection.

20. Question Result, ID, NC, TQ.OQ.OQPLAN.O, 195.505(h) References

Question Text Do individuals performing covered tasks demonstrate adequate skills and knowledge?

Assets Covered BP Cherry Pt. OQ

Result Notes Staff will observe during the upcoming BP Cherry Point Crude/Butane Standard Inspection.

- 21. Question Result, ID, Sat, TQ.OQ.MOC.P, 195.505(f) References
 - 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 BP Cherry Pt. OQ

Result Notes Located in: Section #7 - Plans Revisions and Communication

22. Question Result, ID, Sat, TQ.OQ.CHANGENOTIFY.P, 195.505(i)

References

Question Text Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?

Assets Covered BP Cherry Pt. OQ

Result Notes Located in OMER section: P-195.505 and Section #7 H, I, ii

23. Question Result, ID, Sat, TQ.OQ.CHANGERECORD.R, 195.505(i) (195.505(f)) References

> Question Text Are records maintained for changes that affect covered tasks and significant OQ plan changes? Assets Covered BP Cherry Pt. OQ

Result Notes Located in: Table #1 OQ Plan Revisions Table

Last editorial revision was recorded 12/11/18.

Last significant revision was Aug 27, 2015

TQ.QU: Qualification of Personnel - Specific Requirements

24. Question Result, ID, Sat, TO.QU.CORROSIONSUPERVISE.P, 195.402(c) (195.555, 195.505(h)) (also presented in: TD.CP) References

Question Text Are supervisors required to maintain a thorough knowledge of corrosion control procedures they are responsible for, and is it verified?

Assets Covered BP Cherry Pt. OQ

Result Notes Located in OMER section: P-195.51

25. Question Result, ID, Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.589(c) (195.507(a), 195.507(b)) (also presented in: TD.CP) References

Question Text *Is qualification of supervisors in corrosion control procedures documented?*

Assets Covered BP Cherry Pt. OQ

- Result Notes

 Brian Stone Corrosion Supervisor
 - o Reviewed his qualifications and training records
 - Gerald Wismer Corrosion Specialist
 - o Reviewed his qualifications and training records

26. Question Result, ID, Sat, TQ.QU.CONTROLLER.P, 195.446(h) (195.505(b)) References

Question Text Does the process establish, maintain, and review controller qualifications, abilities, and performance metrics, with particular attention to response to abnormal operating conditions?

Assets Covered BP Cherry Pt. OQ

Result Notes P-195.446 Control Room Management - Section H - Training

27. Question Result, ID, Sat, TO.QU.CONTROLLER.R, 195.446(h) (195.507(a), 195.507(b)) References

Question Text Is controller training and qualification documented?

Assets Covered BP Cherry Pt. OQ

- Result Notes Verified- Jason M. Combs; Steven W. Mason; Douglas L. Mohr; Mark E. Spraggs; Ida M. Troutman and Naomi White
- 28. Question Result, ID, NA, TO.QU.CONTROLLER.O, 195.446(b) (195.446(c), 195.505(b)) References

Question Text Do controllers demonstrate adequate skills and knowledge?

- Assets Covered BP Cherry Pt. OQ
 - Result Notes BP Controllers are located in Tulsa, OK Inspection #6766 Staff traveled to Tulsa in Oct/2016 to observe controllers-

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

29. Question Result, ID, Sat, TQ.QUOMCONST.INSPECTORQUAL.P, 195.204
 Question Text Does the process require personnel who conduct pipe or pipeline system construction inspections to be adequately trained and qualified?
 Assets Covered BP Cherry Pt. OQ

Result Notes USPL GP 43-33-1 - Welding of Pipelines to Code - Section #7

30. Question Result, ID, NA, TQ.QUOMCONST.INSPECTORQUAL.R, 195.204 References Question Text Do records indicate adequate qualification documentation for personnel who conduct pipe or pipeline system construction inspections? (TQ.QUOMCONST.INSPECTORQUAL.R) (detail)

Assets Covered BP Cherry Pt. OQ Result Notes No construction on these pipelines since last inspection.

- 31. Question Result, ID, NA, TQ.QUOMCONST.INSPECTORQUAL.O, 195.204
 - Question Text Does the inspector who ensures pipeline systems are installed per requirements demonstrate adequate skills and knowledge?
 - Assets Covered BP Cherry Pt. OQ

Result Notes No construction on these pipelines since last inspection and there is none planned at this time.

- 32. Question Result, ID, Sat, TQ.QUOMCONST.WELDER.P, 195.222(a) (195.222(b), Section 6 of API-1104, Section IX of ASME References Boiler & Pressure Vessel Code, 195.214(a))
 - Question Text Does the process require welders to be qualified in accordance with API-1104 or the ASME Boiler & Pressure Vessel Code?

Assets Covered BP Cherry Pt. OQ Result Notes P-195.214 Section 3a

- 33. Question Result, ID, NA, TQ.QUOMCONST.WELDER.R, 195.222(a) (195.214(a), 195.222(b)) References
 Question Text *Do records indicate that welders are adequately qualified?* Assets Covered BP Cherry Pt. OQ
 Result Notes There has be no welding activity over 3 years and there is none planned at this time.
- 34. Question Result, ID, NA, TQ.QUOMCONST.WELDER.O, 195.222(a) (195.505(b), 195.214(a)) References
 Question Text *Do welders demonstrate adequate skills and knowledge?* Assets Covered BP Cherry Pt. OQ

Result Notes There has be no welding activity over 3 years and there is none planned at this time.

TQ.TRCNTRL: Training of Personnel - Dispatcher

 35. Question Result, ID, Sat, TQ.TRCNTRL.CNTRLTRAINING.P, 195.444 (195.446(e)) References
 Question Text Does the process require that dispatchers are trained in the recognition of CPM alarms? Assets Covered BP Cherry Pt. OQ Result Notes P-195.444 Section F - Controller Training

36. Question Result, ID, Sat, TQ.TRCNTRL.CNTRLTRAINING1130.P, 195.444 (195.505(h)) References

Question Text *Do the process require dispatcher training be provided in compliance with API-1130?* Assets Covered BP Cherry Pt. OQ Result Notes Verified

37. Question Result, ID, Sat, TQ.TRCNTRL.CNTRLTRAINING.R, 195.444 (195.507(a), 195.507(b)) References

Question Text *Is dispatcher training and qualification documented*? Assets Covered BP Cherry Pt. OQ Result Notes Verified

38. Question Result, ID, NA, TO.TRCNTRL.CNTRLTRAINING.O, 195.444 (195.505(b)) References

> Question Text *Do dispatchers demonstrate adequate skills and knowledge?* Assets Covered BP Cherry Pt. OQ Result Notes BP Controllers are located in Tulsa, OK - Inspection #6766 - Staff traveled to Tulsa in Oct/2016 to observe controllers-

TQ.TRERP: Training of Personnel - Emergency Response

39. Question Result, ID, Sat, TQ.TRERP.ERCONDITIONS.P, 195.403(a)(3) References

Question Text Are conditions that are likely to cause emergencies, their consequences, and appropriate corrective action identified in the ER training?

Assets Covered BP Cherry Pt. OQ

Result Notes P-195.403 - Section 2

40. Question Result, ID, Sat, TQ.TRERP.ERFIREPROT.P, 195.403(a)(5)

Question Text Are the potential causes, types, sizes, and consequences of fire and appropriate use of portable fire extinguishers and other on-site fire control equipment covered in the ER training?

Assets Covered BP Cherry Pt. OQ

Result Notes P-195.403 Emergency Response Training

- 41. Question Result, ID, Sat, TQ.TRERP.ERHAZTRAINING.P, 195.403(a)(2) References
 - Question Text Are the characteristics and hazards of the hazardous liquids or carbon dioxide transported covered in the ER training?

Assets Covered BP Cherry Pt. OQ Result Notes Verified.

42. Question Result, ID, Sat, TQ.TRERP.ERRELEASECONTROL.P, 195.403(a)(4) References

Question Text Are the steps necessary to control any accidental release of hazardous liquid to minimize the potential for fire, explosion, toxicity, or environmental damage identified in the ER training?

Assets Covered BP Cherry Pt. OQ Result Notes Verified.

- 43. Question Result, ID, Sat, TQ.TRERP.ERTRAINING.P, 195.403(a)(1)
 - References

Question Text Does emergency response training cover the emergency procedures established under 195.402? Assets Covered BP Cherry Pt. OQ

Result Notes Verified.

44. Question Result, ID, Sat, TQ.TRERP.ERTRAININGRECORDS.R, 195.404(c) (195.403(a)) References

Question Text Is training for emergency response personnel documented?

Assets Covered BP Cherry Pt. OQ

Result Notes Reviewed document they call HAZWOPER training.

45. Question Result, ID, NC, TO.TRERP.ERTRAINING.O, 195.403(a) References

> Question Text Do emergency response personnel demonstrate adequate skills and knowledge? Assets Covered BP Cherry Pt. OQ

Result Notes Staff will observe during the BP Cherry Point Crude/Butane inspection later this year.

46. Question Result, ID, Sat, TQ.TRERP.ERTRAININGREVIEW.P, 195.403(b) References

> Question Text Does the process require review of emergency response personnel performance at the required frequency?

Assets Covered BP Cherry Pt. OQ Result Notes P-195.403

47. Question Result, ID, Sat, TQ.TRERP.ERTRAININGREVIEW.R, 195.404(c) (195.403(b)) References

Question Text Has review of emergency response personnel performance at the required frequency been documented? Assets Covered BP Cherry Pt. OQ

Result Notes Located in the HAZWOPER document

48. Question Result, ID, Sat, TO.TRERP.ERTRAININGSUPERVISE.P, 195.403(c)

Question Text Does the process require supervisors be trained on emergency response procedures for which they are responsible?

Assets Covered BP Cherry Pt. OQ Result Notes Section 1- P-195.403

49. Question Result, ID, _{NC}, TQ.TRERP.ERTRAININGSUPERVISE.O, 195.403(c) (195.405) References

Question Text Do emergency response supervisors demonstrate adequate skills and knowledge?

Assets Covered BP Cherry Pt. OQ

Result Notes Staff will observe this personnel during the BP Cherry Point Crude/Butane Standard Inspection.

TQ.TROMCONST: Training of Personnel - O and M Construction

50. Question Result, ID, Sat, TQ.TROMCONST.NDT.P, 195.234(b)(2) References Question Text *Does the process require nondestructive testing of welds (for maintenance and construction) be*

performed by personnel trained and qualified in procedures and in use of the testing equipment? Assets Covered BP Cherry Pt. OQ

Result Notes P-195.234 Non-destructive testing - First Page and Section 3.D

USPL GP 32-003

51. Question Result, ID, NA, TQ.TROMCONST.NDT.R, 195.234(b)(2) References

> Question Text *Is training for personnel, who perform nondestructive testing of welds, documented and demonstrated?* Assets Covered BP Cherry Pt. OQ

Result Notes No welding performed on these pipelines since last inspection.

Report Parameters: Results: all

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