

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	8031 Avista HQ OQ	Operator(s)	AVISTA CORP (31232)	Plan Submitted	02/11/2020
Status	PLANNED	Lead	Anthony Dorrrough	Plan Approval	02/20/2020 by Joe Subsits
Start Year	2020	Supervisor	Joe Subsits	All Activity Start	05/12/2020
System Type	GD	Director	Sean Mayo	All Activity End	05/12/2020
Protocol Set ID	GD.2020.01			Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### QQScope and Summary:

*This Operator Qualification (OQ) inspection covered process and records review questions and field observations of observed covered tasks that were recorded earlier this year during a Transmission and TAMP pipeline review, as well as related questions that included WAC requirements. The last OQ inspection of this unit was performed 11/17/2017 with no recommended follow up actions. The inspection was conducted online via a Microsoft Teams Meeting due to COVID-19 restrictions, and covered process and records review questions that were completed by Avista prior to the online meeting and emailed to staff, along with copies of documents for verification and review. During the meeting staff was able to ask further questions and request greater detail with Avista SME included in the discussion. A verbal exit interview was conducted on 8/29/2020.*

### Dates and Activities:

*No additional dates or activities were needed.*

### Summary of Significant Findings:

*No apparent violations of federal or state code  
No areas of concern identified*

### Primary operator contacts/participants in the inspection:

*Randy Bareither/ Pipeline Safety Engineer (509) 434-6783*

*Joe Brown/ Manager Craft Training and OQ (509) 495-8611*

*Jillian Winkler/ Learning and Development Coordinator (509) 495-2142*

*Dan Pooler/ Learning and Development Coordinator (509) 495-8470*

*Dave Smith/ Senior Gas design Engineer (509) 495-4664*

*Richard Inouye/ Gas Pressure Controlman (509) 495-4057*

### Recommended follow up actions for next inspection:

*No recommended follow up actions needed.*

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total %	Required Complete
1.	Avista OQ	8031 Avista HQ OQ	unit	--	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	33	33	33	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.	Avista OQ	n/a	TQ	P, R, O, S	Detail	

## Plan Implementations

Activity #	SMART Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total %	Required Complete
1.	Avista OQ	--	05/12/2020	05/12/2020	n/a	all planned questions	all assets	all types	33	33	33	100.0%	

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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Avista OQ	COMPLETED	10/23/2020	Avista OQ	--

## Results (all values, 33 results)

### TQ.PROT9: OQ Protocol 9

- Question Result, ID, References: Sat, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))

Question Text: *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered: Avista OQ

Result Notes: Three areas of concern (AOCs) were noted in the last OQ Audit by OPUC. Zero by WUTC or IPUC. The first and second AOC were resolved with edits to the OQ Plan document which is Gas Standards Specification 4.31. The third was resolved by beginning to document the company Weld Qualifications within the Avista Learning Network (ALN) database. These improvements were detailed in Avista's Response letter to OPUC on 3/5/18.
- Question Result, ID, References: Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))

Question Text: *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*

Assets Covered: Avista OQ
- Question Result, ID, References: Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered **Avista OQ**

4. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**

Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*

Assets Covered **Avista OQ**

5. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**

Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*

Assets Covered **Avista OQ**

## **TQ.OQ: Operator Qualification**

6. Question Result, ID, References **Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i)**

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

Assets Covered **Avista OQ**

Result Notes **The OQ Program (GSM Spec. 4.31) is submitted to the PUC on an annual basis along with the rest of Avista Standards.**

**Reference Spec 4.31, Page 8 of 11,**

### ***Notification of OQ Program Changes***

**Changes determined to be significant by the Director of Natural Gas shall be communicated to regulatory agencies, including state commissions, as soon as practical following implementation.**

7. Question Result, ID, References **Sat, TQ.OQ.CHANGERECD.R, 192.805(i) (192.805(f))**

Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*

Assets Covered **Avista OQ**

Result Notes **See Spec. 4.31 for changes year to year, [copies of Avista Standards have been provided to the UTC annually]**

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

8. Question Result, ID, References **Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))**

Question Text *Are evaluation methods established and documented appropriate to each covered task?*

Assets Covered **Avista OQ**

Result Notes **All Evaluation Methods have been Established and Documented for each covered task:**

**Reference Spec 4.31 page 2 – Evaluation Intervals Established**

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

**Reference Spec 4.31 –APPENDIX B - EVALUATION GUIDELINES -**

9. 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 OQ

Result Notes Spec 4.31 Page 8 of 11.

### **Communication of Changes**

Changes to the OQ Program shall be communicated to affected individuals. Methods for communicating such changes include:

- Revisions to the GSM, GESH, and any other documents in the Avista Operating and Maintenance (O&M) Plan.
- Group or individual meetings, training, and/or testing.
- On-the-job training and/or testing.
- Addendums to contracts.
- Or other forms of effective communication.

10. Question Result, ID, References Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)

Question Text *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?*

Assets Covered Avista OQ

Result Notes Spec 4.31 Page 5.

11. Question Result, ID, References NA, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)

Question Text *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?*

Assets Covered Avista OQ

Result Notes No such activity/condition was observed during the inspection. Avista does not utilize an OQ Vendor. All personnel (employee and contractor) must meet Avista OQ requirements.

Example:  
Spec 4.31 Page 10: **Contractor OQ Programs and Third Party Portability**

12. Question Result, ID, References Sat, TQ.OQ.OQPLAN.O, 192.805(h)

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

Assets Covered Avista OQ

13. 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 OQ

Result Notes GSM SPEC 4.31 Pg 2 Determination of Covered Tasks

14. 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 OQ

Result Notes Spec 4.31 Page 9 - **-Contractor Management**

15. Question Result, ID, References NA, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))

Question Text *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?*

Assets Covered Avista OQ

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Avista has not had a federally reportable incident/accident requiring an individual to re-evaluated after the occurrence.

Avista's OQ Program does have a provision for this: Spec 4.31 Page 6: **Post Reportable or OQ Incident Investigation**

16. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

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 Avista OQ

Result Notes All records for company and contractor personnel are housed in the Avista Learning Network. An extract of Company and Contractor qualifications for 2016 to present can be provided upon request. ("Full Status User View Report" in MS Excel format- Note Document is 49K lines and filtered alphabetically by last name.)

17. Question Result, ID, References Sat, TQ.OQ.TRAINING.P, 192.805(h)

Question Text *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered Avista OQ

Result Notes GSM SPEC 4.31 pg 3-4

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 OQ

Result Notes Contractor Qualifications – Spec 4.31 Page 9

19. Question Result, ID, References Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)

Question Text *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*

Assets Covered Avista OQ

Result Notes Spec 4.31 Page 2: Subsequent Evaluation Intervals

20. 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 OQ

21. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered Avista OQ

22. Question Result, ID, References NA, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)

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 Avista OQ

Result Notes No such activity/condition was observed during the inspection. No mutual assistance activities have occurred in WA or ID for the period of this inspection. Mutual assistance was received from Cascade and Northwest Natural for the Ashland Outage in 2018.

SPEC 4.31 Pg10

23. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.P, 192.803

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 Avista OQ

Result Notes **Spec 4.31 Pg 4**

24. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

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

Assets Covered Avista OQ

Result Notes Knowledge Tests evaluate AOC's: ALN tests ask AOC questions – Skill Evaluations ask all relevant AOC's: Record of Evaluation (ROE) hard copy forms are used to update our system of record, the Avista Learning Network.

25. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.O, 192.803

Question Text *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*

Assets Covered Avista OQ

26. 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 OQ

Result Notes Spec 4.31 Page 6

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

27. 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 OQ

Result Notes CP Design, installation, operation and maintenance is carried out under the supervision of Gary Douglas, CP Foreman, who is "qualified in pipeline corrosion control methods" by virtue of his NACE Cathodic Protection Specialist (NACE Level 4) Certification. See Gas Standards, Spec. 2.32, "General" for guidance. (Each CP Tech has individual NACE qualifications which correspond to various CP OQ Tasks in Spec. 4.31, Appendix A.)

28. 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 OQ

Result Notes Each CP Tech has individual NACE qualifications which correspond to various CP OQ Tasks in Spec. 4.31, Appendix A.

29. Question Result, ID, References **Sat, TQ.QU.HOTTAQUAL.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 OQ**  
Result Notes **All tapping work has been deemed to meet the Four Part Test and accordingly requires personnel to be OQ'd to perform the task. See Spec. 4.31, Appendix A, Sheets 17-18 for applicable tapping OQ Tasks.**

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

30. 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 OQ**  
Result Notes **From GSM Spec. 3.22, Sheet 1: "Pipeline welding shall be performed by welders or welding operators tested and qualified by Avista and qualified to API 1104. Employees qualified to complete production welds shall be qualified to this standard and applicable sections of API 1104. Welders qualified to complete in-service welds shall be qualified to API 1104 and may also be qualified to applicable sections of API 1104 – Appendix B"**
31. Question Result, ID, References **NA, 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 OQ**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
32. 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 OQ**  
Result Notes **Hard copy records are maintained by pressure controlmen and tracked in the Avista Learning Network.**
33. 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 OQ**  
Result Notes **NDT qualification pertains to welding on Transmission Lines. See GSM Spec. 3.22, Sheets 11-12. Only one transmission project this inspection cycle and it occurred in WA. This was the installation of Reg. Station #1071 in 2019 for the Chewelah Casino. NDT Documentation can be found on the network drive c01d44/GASENGINEER/Gas Compliance\_PUC Audits folder**

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Report Parameters: Results: all

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