

Inspection Output (IOR)

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Inspection Information

Inspection Name	Cascade OQ 8051	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	11/21/2019
Status	PLANNED	Lead	Scott Rukke	Plan Approval	11/22/2019 by Joe Subsites
Start Year	2020	Team Members	David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity Start	02/10/2020
System Type	GD	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	02/14/2020
Protocol Set ID	GD.2019.01	Supervisor	Joe Subsites	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

Inspection Summary

This is a Cascade Natural Gas Operator qualification headquarters inspection. This inspection includes an office records and procedure review and a select field review of operations personnel performing covered tasks.

Records were reviewed in the office on 8/11/2020. Field inspections were conducted on 8/12/2020.

Drive days were 8/10/2020 and 8/13/2020.

CNG switched from MEA to EWN and is currently in the process of reviewing task specific AOC's under a Management of Change process.

Tasks reviewed in the office were adequate and field personnel that were inspected as part of this inspection were knowledgeable of the AOC's for the tasks observed.

Additional documentation regarding AOC's for covered tasks was requested from CNG and that documentation was provided on 8/21/2020.

The additional documents were reviewed on 2/25/2020 and an exit interview was conducted on 2/25/2020. No issues were noted.

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Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	CNG OQ 8051	Cascade Natural Gas - Headquarters	unit	88961	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Abandoned	26	26	26	26	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.	CNG OQ 8051	n/a	MISCTOPICS.OPTRQUAL, MISCTOPICS.PROT9	P, R, O, S	Detail	

Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Qst Assets	Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	CNG OQ 8051	--	02/10/2020	02/14/2020	n/a	all planned questions	all assets	all types	26	26	26	26	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	Office Records CNG OQ 8051	COMPLETED	02/25/2020	CNG OQ 8051	CNG OQ 8051

Results (all values, 26 results)

MISCTOPICS.PROT9: OQ Field Inspection

1. Question Result, ID, References **NA, 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 **CNG OQ 8051**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
2. 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 **CNG OQ 8051**

Result Notes **A field inspection was conducted after the records portion of the inspection. Individuals were observed performing covered tasks and qualifications were verified.**
3. 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 **CNG OQ 8051**

Result Notes **A field inspection was conducted after the records portion of the inspection. Individuals were observed performing covered tasks and qualifications were verified. The parameters of the covered tasks were reviewed according to the operators procedures manual. An example is fusion. The temperatures observed were in accordance with procedures.**
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 **CNG OQ 8051**

Result Notes **A field inspection was conducted after the records portion of the inspection. Individuals were observed performing covered tasks and qualifications were verified. In addition AOC questions were asked during some covered tasks. An example was fusion. The OQ'd employee was able to identify AOC's that may be encountered during fusion.**
5. Question Result, ID, References **NA, 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 **CNG OQ 8051**

Result Notes **No such activity/condition was observed during the inspection.**

MISCTOPICS.OPTRQUAL: Operator Qualification

6. 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 **CNG OQ 8051**

Result Notes OPS 800. Step 12.

CNG uses EWN Energy World Net to qualify employees.

CNG requires all of their contractors to use EWN also. This assists in their tracking and assurance of contractor qualification.

7. Question Result, ID, References Sat, TQ.OO.OOPLAN.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 CNG OQ 8051

Result Notes OPS 800

Step 1 and 4.3

Reviewed the list of covered tasks.

8. Question Result, ID, References Sat, TQ.OO.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 CNG OQ 8051

Result Notes OPS 800 3.3.8 requires notification. One notification was made and reviewed during the Annual Review.

9. Question Result, ID, References Sat, TQ.OO.CHANGERECORD.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 CNG OQ 8051

Result Notes There has been only one change since the last OQ inspection. I reviewed the letter dated 11/8/2017 stating that CNG was switching from MEA to EWN.

10. Question Result, ID, References Sat, TQ.OO.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 CNG OQ 8051

Result Notes OPS 800

4.5.1

Reviewed some covered tasks on a sampling basis. Gas detectors in compression stations. Procedures state 3% methane calibration gas. Should be 2.5%. A new procedure has been written. It was suggested that they record the as found and as left LEL on the gas detectors also. They have modified their form.

11. Question Result, ID, References Sat, TQ.OO.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 CNG OQ 8051

Result Notes OPS 800 section 8. Info is communicated either company wide or to specific districts that handle unique system tasks.

CP 742 is being modified based on this inspection and CNG will send us the communication to the Mt Vernon District that handles the compressor.

12. 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 **CNG OQ 8051**
 Result Notes **Step 4.7 of OPS 800.**
- Reviewed DIF analysis on a sampling basis. DIF - Difficulty, Importance and Frequency.**
13. Question Result, ID, References **Sat, 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 **CNG OQ 8051**
 Result Notes **Both CNG and all contractors use the EWN OG program to qualify individuals and specify covered tasks.**
- Reviewed a comparison of qualified CNG and contractor employees to ensure the evaluation frequencies were the same. No issues.**
14. 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 **CNG OQ 8051**
 Result Notes **A field inspection was conducted after the records portion of the inspection. Individuals were observed performing covered tasks and qualifications were verified.**
15. 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 **CNG OQ 8051**
 Result Notes **Contractors use the same plan EWN, as CNG.**
16. 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 **CNG OQ 8051**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No incidents or accidents since the last OQ inspection.**
17. 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 **CNG OQ 8051**
 Result Notes **Reviewed several employees performing covered tasks. CNG personnel carry bar coded ID which allows iPhones to read their OQ status through energy world Net. Crew inspections have been performed throughout CNG's service territory and all employees were qualified.**
18. 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 **CNG OQ 8051**
 Result Notes **A sampling of the DIF analysis reports were reviewed. DIF stands for Difficulty, Importance and Frequency. It is a tool CNG uses to determine the re-evaluation frequency.**
19. 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 CNG OQ 8051

Result Notes Initial OQ is step 2.1 of OP 800

Reevaluation is a repeat of the initial training at a designated frequency determined by the DIF analysis.

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 CNG OQ 8051

Result Notes CNG switched from MEA to EWN in 2018.

We reviewed a sampling of initial evaluations and reevaluations of employees both MEA and EWN.

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 CNG OQ 8051

Result Notes Both CNG and all contractors use EWN. This helps CNG track contractor personnel.

22. Question Result, ID, References Sat, 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 CNG OQ 8051

Result Notes Section 14.5 details Mutual Assistance agreements.

Mutual assistance has not been required though so no records are available.

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 CNG OQ 8051

Result Notes Section 2.3, mentions AOC's. AOC's are in CNG's O&M under task specific procedures.

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 CNG OQ 8051

Result Notes Cascade Nat Gas is in the process of working through a Management of Change (MOC) process to review all covered tasks including AOC's. Cascade switched from MEA to EWN. Tasks reviewed in the office included AOC's. Field inspections were conducted after the records portion and personnel were able to identify AOC's.

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 CNG OQ 8051

Result Notes Field crews were inspected as part of this inspection and they were knowledgeable of the AOC's associated with the covered tasks being performed.

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 CNG OQ 8051

Result Notes The procedure is found in OP 800 under section 5. CNG has no OQ issues related to accidents or incidents.

Report Parameters: Results: all

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