

Thirteen OQ Implementation Issues

May 6, 2003

13 OQ Implementation Issues

- ✱ The issues listed below were developed and presented by OPS at the OPS Public Meeting on OQ in San Antonio.
- ✱ The numbers of the issues as presented by industry at the subsequent OPS Public Meeting on OQ in Houston on 2/25/03 are shown in parentheses.

High Impact Issues

1. **Scope of OQ Inspections (*Industry #6*):**
Should inspections go beyond evaluation of compliance with prescriptive requirements of the Rule?

High Impact Issues

- 2. Evaluation of KSAs (*Industry #10*):**
Should evaluation leading to qualification consider knowledge, skills and ability (KSA)?

Evaluation of KSAs in the qualification process is treated in Protocol 2.02.

High Impact Issues

- 3. Reevaluation Intervals (*Industry #4*):**
How should reevaluation intervals be supported and justified?

Reevaluation intervals are addressed in Protocol Questions 1.01 and 5.02.

High Impact Issues

- 4. Maintenance vs New Construction (*Industry #1*):** How should operators distinguish between maintenance and new construction in defining covered tasks?

Development of covered task lists is considered in Protocols 1.05 (through needed definitions) and 2.01.

High Impact Issues

- 5. Treatment of Emergency Response (*Industry #2*):** Does the Rule cover emergency response tasks; if so, what are its bounds?

This issue will be addressed in inspections in conjunction with Protocol Question 2.01.

Medium Impact Issues

- 6. Additional Covered Tasks (*Industry #3*):** Is pipeline excavation a covered task?

This issue will be addressed in conjunction with Protocol Question 2.01.

Medium Impact Issues

- 7. Extent of Documentation (*Industry #11*):** What OQ records must be developed and maintained by operators?

There are numerous places in the protocols where the need for documentation supporting demonstration of compliance with provisions of the Rule is evident.

Medium Impact Issues

- 8. Abnormal Operating Conditions**
(Industry #8): Abnormal Operating Conditions?

AOCs are addressed in Protocol
Question 4.02

Medium Impact Issues

- 9. Treatment of Training (*Industry #5*):**
Should training practices be evaluated during OQ inspections?

Training is addressed in the non-enforceable Protocol Question 1.04.

Low Impact Issues

- 10. Criteria for Small Operators (*Industry #13*):** Will small operator OQ programs be evaluated against the same criteria as are large operator programs?

Regulators will use the same protocols to guide inspections of all operators against OQ requirements.

Low Impact Issues

- 11. Direction and Observation of Non-qualified People (*Industry #7*):** Is guidance needed to support supervisors in determining how many non-qualified people can be directed and observed by one qualified person?

This issue is addressed in Protocol Question 3.02.

Low Impact Issues

- 12. Noteworthy Practices (*Industry #12*):**
Should regulators play a role in the identification and communication of “noteworthy practices?”

Low Impact Issues

- 13. Persons Contributing to an Incident or Accident (*Industry #9*):** Should operators have documented means to identify a covered task whose performance may have contributed to an incident/accident along with people who performed these tasks?

This issue is addressed in Protocol Question 5.01.