

A Concept for Enhancing Operator Qualification (OQ)

Regulatory

The first regulatory step would be to add the following to the OQ regulations.

- New construction – The OQ regulations now address covered tasks in operations and maintenance. PHMSA is considering requiring operators to qualify employees performing covered tasks in new construction which would affect the safety and integrity of the pipeline. An operator would also be responsible for ensuring contractors qualify their employees working on a project. When present integrity verification requirements (such as pressure testing and welding) verify the performance of the task in new construction, additional qualification may not be needed. Many operators now include new construction in OQ programs on a voluntary basis. Errors in the construction of a pipeline can result in failures. In addition, errors in construction necessitate costly repairs when discovered and increase maintenance costs. An operator using accepted quality control practices to verify the future comparable safety performance of the new facilities may not need to qualify individuals performing covered tasks during the construction.

The two other regulatory changes would clarify existing parts of the regulations as follows:

- Training – The regulations now require only that an OQ program include training “as appropriate”. PHMSA is considering providing additional specificity. In addition to including training “as appropriate,” an OQ program would have to include training in particular circumstances. These circumstances are as follows:
 - 1) an individual has never performed an assigned covered task;
 - 2) there has been substantial change to a covered task, such as the use of new equipment or procedures that makes previous training no longer adequate; or
 - 3) an individual has failed to requalify on a covered task after an accident.

In addition, an operator would have to ensure training in damage prevention for individuals performing excavation for the operator. Excavation damage remains a major concern in pipeline failures.

- Reevaluation intervals – The regulations now require an operator to identify the tasks for which reevaluation is required and the intervals for reevaluation. PHMSA is considering requiring an operator to set maximum intervals for reevaluation for every task. These intervals would not exceed five years. Operators may find a shorter absolute maximum interval of three years easier to administer.

Non-regulatory

Other clarifications, possibly by advisory bulletin, would enhance an operator’s understanding of the requirements:

- Emergency response - Clarify the requirement to include emergency response tasks in OQ programs. An operator needs to have qualified personnel available to handle actions necessary to ensure pipeline safety.
- Abnormal operating conditions – Clarify the need for an operator to identify and periodically review the operator’s list of abnormal operating conditions to aid in compliance.