

Safety-Related Conditions vs. Abnormal Operating Conditions

Question: What is the relationship between pre-OQ Rule “safety-related conditions” and “Abnormal Operating Conditions” as addressed by the OQ Rule?

Answer: Under the gas pipeline safety rules, safety-related conditions are defined in §191.25. The conditions addressed therein should be included within the list of AOCs that each operator is required to identify under §192.803. Note that the expected “reactions” may differ from those associated with other AOCs, in that there are certain actions that must be taken following determination that a safety-related condition exists. Thus, the expected reaction would include beginning the process needed to ensure that the existence of the recognized “potential” safety-related condition is relayed to the person who is charged with determining whether or not the condition is reportable (if it exists in certain locations, and/or if it is not corrected within the appropriate time frame).

Also note that the list of AOCs is not subject to application of the 4-part test, as is the list of “covered tasks”. Thus, this set of AOCs (being located outside of Part 192) does not represent a conflict with the OQ Rule. Furthermore, §192.605(d) clearly requires that personnel who perform operating and maintenance activities must receive instructions enabling them to recognize conditions that could potentially be safety-related conditions.

In the case of “abnormal operations”, the list of circumstances contained in §192.605(c) should be reviewed to determine which of them also fit the definition of AOC in the OQ Rule. Clearly, there are deviations (increases and decreases) in pressure or flow rate that are “outside of normal operating limits”, but do not exceed design limits or pose a hazard to persons, property or the environment. However, unintended closure of valves, or unintended shutdowns of systems, operation of safety devices (such as overpressure protection devices) or loss of communications clearly could represent the existence of such conditions and should also be included within the operators list of AOCs.

Parallel arguments may be made for the hazardous liquids pipeline safety rules. Similar requirements exist, with the main difference being that safety-related conditions are contained within Part 195 (at §195.55 and .56) and not within another Part, as is the case of the gas pipeline safety rules. §195.402(d) provides requirements similar to those for §192.605(c) and the same arguments for and against including certain elements within a list of AOCs apply.