

Operator Qualification 49 CFR Part 192.801 – 192.809

Regulations require that you prepare and follow a written OQ plan that at a minimum includes the following *nine* provisions:

§192.805 Qualification program.

Each *operator* shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks
- (b) Ensure through *evaluation* that individuals performing covered tasks are qualified
- (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;
- (d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191.
- (e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;
- (f) Communicate changes that affect covered tasks to individuals performing those covered tasks;

§192.805 Qualification program.

- (g) Identify those covered tasks and the intervals at which evaluation of the individual's qualification is needed:
- (h) After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities; and
- (i) After December 16, 2004, notify the *Administrator* or a state agency participating under 49 U.S.C. Chapter 601 if an operator significantly modifies the program after the administrator or state agency has verified that it complies with this section. Notifications to PHMSA must be submitted in accordance with §192.18.

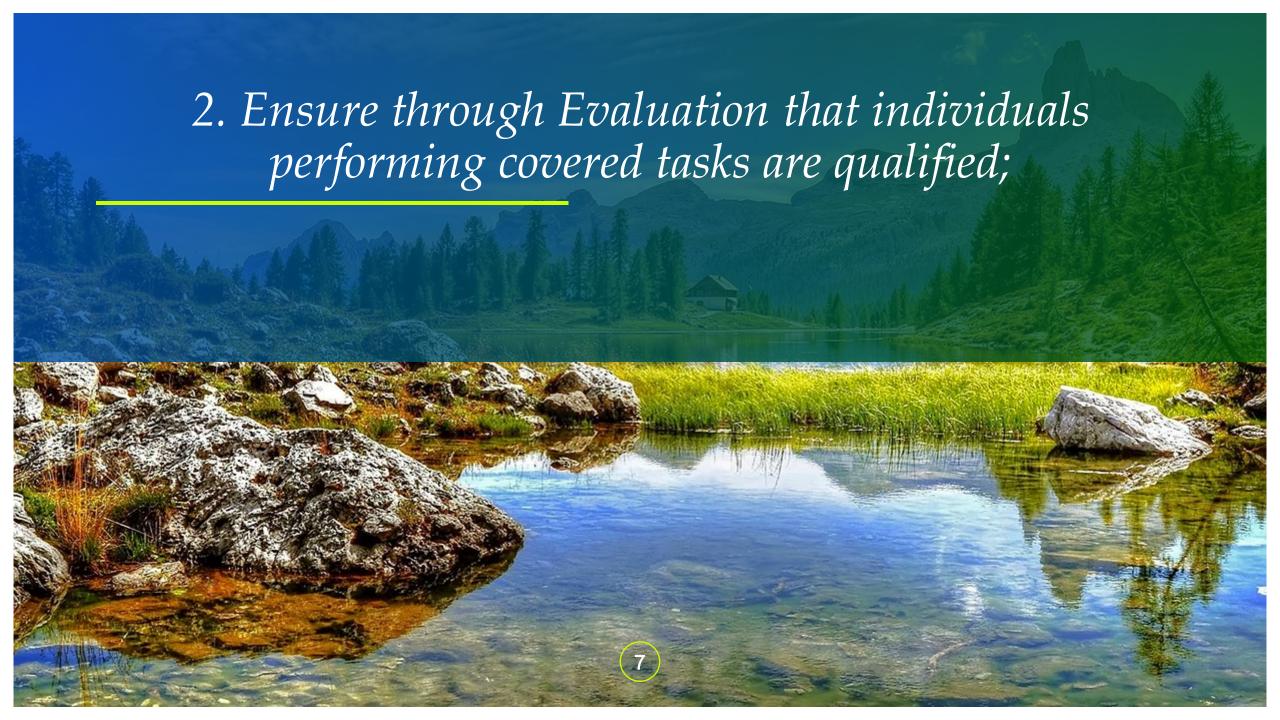
1. Identify covered tasks (operation and maintenance activities affecting the integrity of the operators' pipeline and required by the safety code);



"Covered Task"

A covered task is defined as any task that meets the four part test:

- 1. Is performed on a pipeline;
- 2. Is an operations or maintenance task;
- 3. Is performed as a requirement of this part (Part 192 or Part 195); and
- 4. Affects the operation or integrity of the pipeline.



Evaluating means: testing a person through written exam, oral exams, observation while performing the task on the job, or in a classroom or simulated setting, or any other documented method that can ensure the individual possesses the necessary "knowledge, skills and abilities" to perform the covered task and recognize and react to Abnormal Operating Conditions (AOC's).



Operator must evaluate individuals to ensure they possess the necessary "knowledge"

- 192.803 defines "Evaluation" as a process, established and documented by the operator. Evaluation can be:
- Testing through written or oral exam,
- ✓ Review history of work performance
- observation while performing the task on-the-job, or
 - on-the-job training or simulated setting, or
- ✓ any other documented method that can ensure the individuals "knowledge".

Evaluation methods:

- 1. Written exam
- 2. Oral exam
- 3. Work performance history review
- 4. Observation during performance of the task:
 - a. On-the-job
 - b. On-the-job training
 - c. In a simulated setting, or
- 5. Other methods of assessment documented by the operator.

An operator must also evaluate individuals to ensure they possess the necessary "skills and abilities"

"Skills and Abilities"

Evaluation of an individuals skill and ability requires the observation of the performance of the task by that individual or, a performance evaluation.



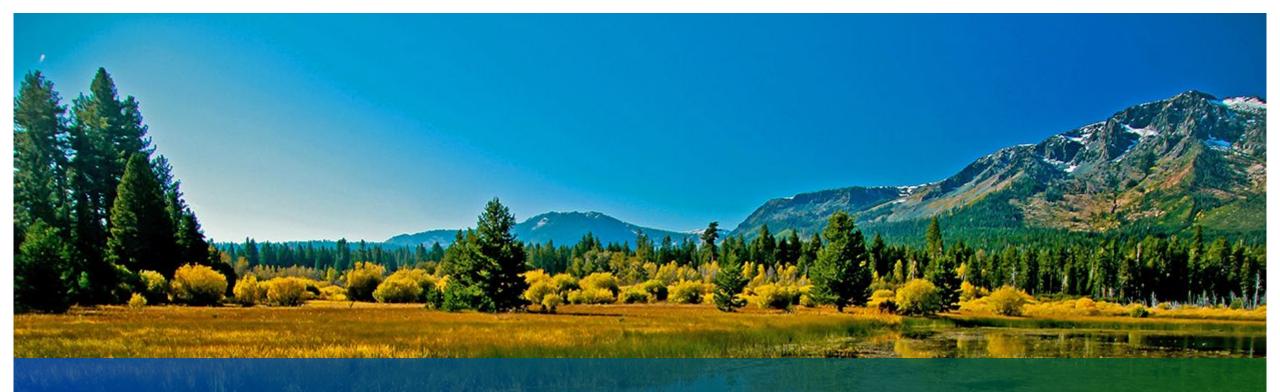
Evaluating Skills and Abilities

Performance evaluation methods:

Work performance history review,
Observation during:
 performance on the job,
 on-the-job training,
 simulations
Other methods of assessment
documented by the operator.

"Not the time to think about getting qualified"





3. Allow individuals that are not qualified to perform a covered task if "directed and observed" by an individual who is qualified;

Operators may allow individuals who have not met the evaluation criteria listed in the OQ plan to perform covered tasks under controlled conditions.

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Operators may allow individuals who have not met the evaluation criteria listed in the OQ plan to perform covered tasks under controlled conditions.

• A written OQ plan must spell out the conditions under which individuals who have not met the qualification criteria may perform tasks while under the observation and direction of a qualified individual. This is intended to allow on-the-job training and temporary labor work teams.

• The operator must ensure that non-qualified personnel are directed by a person qualified in the covered task being performed and the observer should be prepared to take immediate corrective action should he/she observe work being done that is not in accordance with the operator's procedures, or is being done in an unsafe manner.

4. Evaluate an individual if there is reason to believe that the individual's performance of a covered task contributed to an incident;

The OQ plan must specify that the operator will re-evaluate anyone whose performance of a covered task may have contributed to an accident (for hazardous liquid pipelines) or incident (for gas pipelines), either caused it, failed to respond appropriately or made it worse by responding inappropriately.

5. Evaluate an individual if there is reason to believe that the individual is no longer qualified to perform a covered task;

The OQ plan must include provisions on how to re-evaluate persons for whom there are reasons to believe that they are no longer qualified. The plan should include some guidance for supervisors to recognize and react to behavior that would trigger these provisions. Reasons could include observation of the person not following procedures, injury or illness that reduces motor skills.



The OQ plan must specify how changes to policies, procedures, equipment or regulations are to be communicated to anyone who performs covered tasks affected by the change. Re-evaluation may be required if the changes affect the knowledge, skills and abilities required for the task. The OQ plan should also spell out conditions under which re-evaluation will be required such as new tools, equipment and material or when changes to policies, procedures, etc., require it

7. Establish re-evaluation intervals; and

To continue to be qualified, individuals performing covered tasks must be periodically re-evaluated. Re-evaluation internals should be based on factors such as:

- 1. How frequently is the covered task performed?

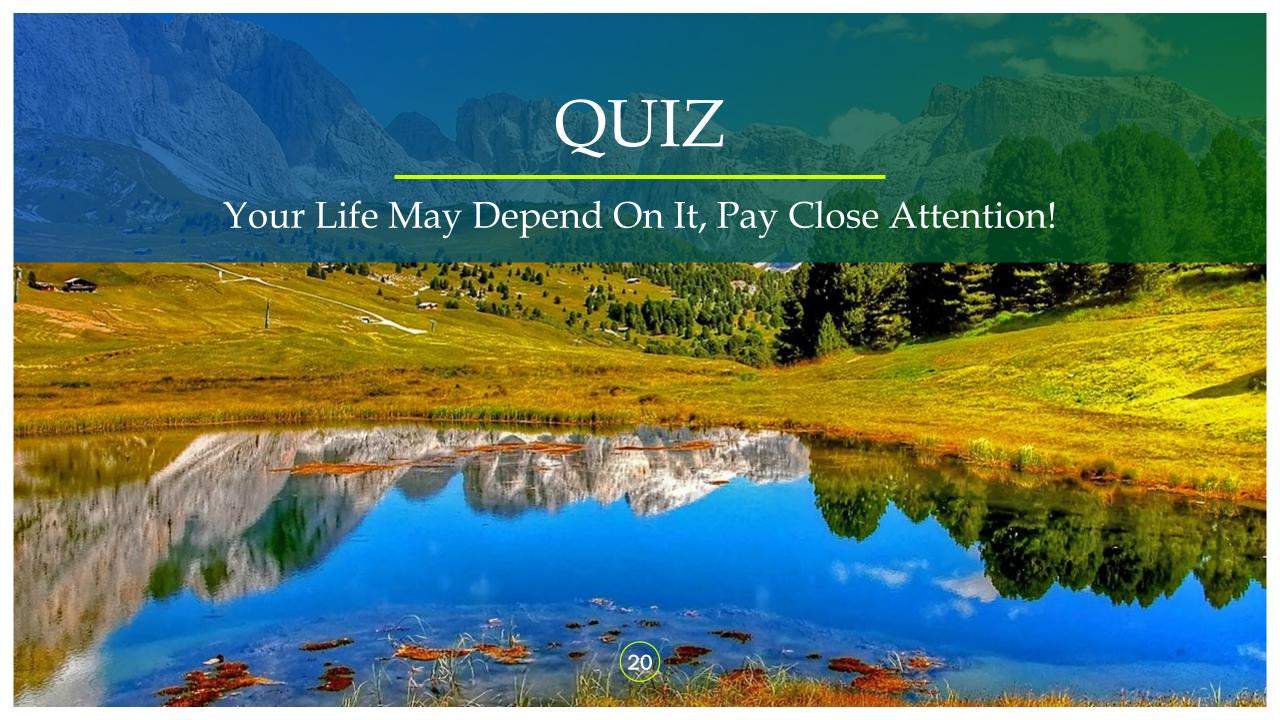
 More frequent performance may justify longer re-evaluation intervals;
- 2. How complex is the covered task?

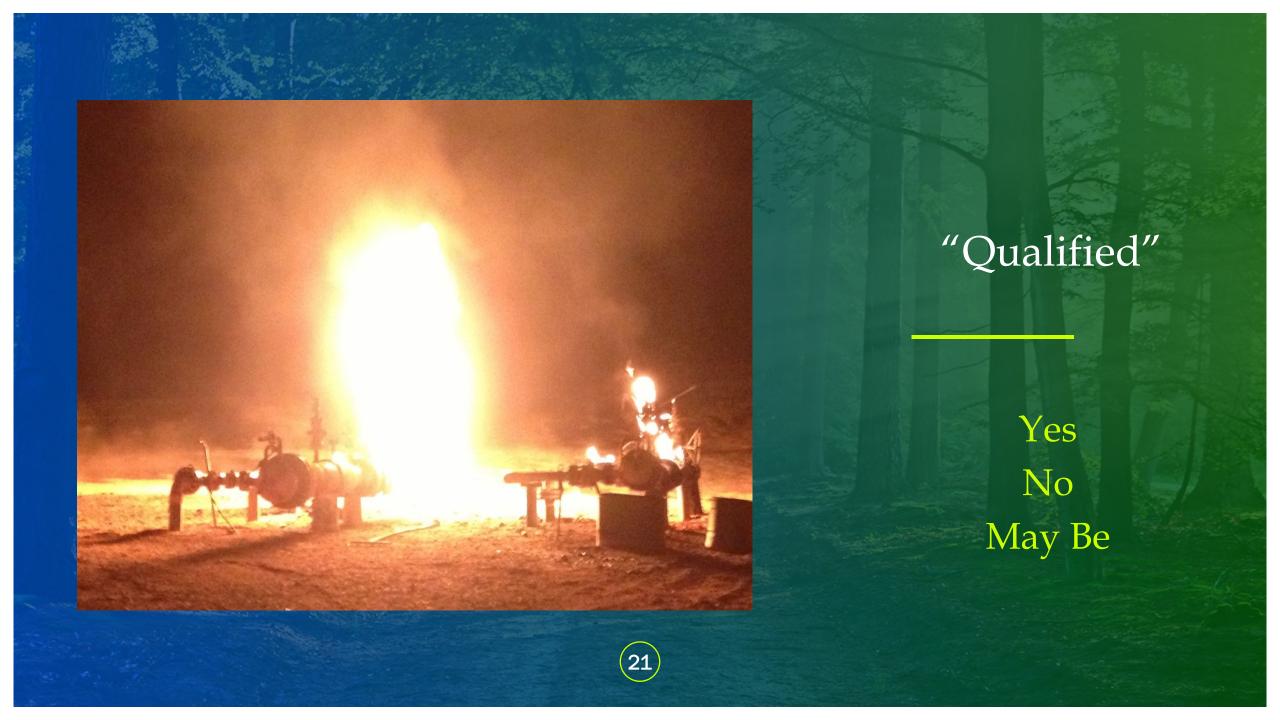
 More complex tasks my require shorter re-evaluation intervals; and
- 3. What would the consequences be if the task is performed improperly? What is the worst that could happen if the covered task is not performed correctly, with a catastrophe justifying shorter re-evaluation intervals and nothing justifying longer intervals?

8. Describe how training will be used in the OQ program where appropriate (new hires, refresher training for existing employees who transfer into new jobs or employees who fail re-evaluations etc.).

The OQ plan should describe how training is used in an operators program. While qualification is accomplished through evaluation, some individuals will require training to provide them with the knowledge, skills and abilities necessary to competently perform the covered task and pass the evaluation. Some examples that would require training of individuals are:

- 1. New hires (individuals about to begin performing tasks for the first time).
- 2. Individuals taking on new tasks (transferred into new position or promoted).
- 3. Individuals who fail on or more evaluations.
- 4. Changes the operator makes to equipment used or procedural changes.







"Qualified"?

Yes No



"Qualified"?

Yes No



"Qualified"?

Yes
No
Needs more
training

9. After December 16, 2004;

provide training, as appropriate to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the SAFE operation of the pipeline facilities.





Remember Training?

Examples that would require training of individuals are:

- 1. New hires (individuals about to begin performing tasks for the first time).
- 2. Individuals taking on new tasks (transferred into new position or promoted).
- 3. Individuals who fail on or more evaluations.
- 4. Changes the operator makes to equipment used or procedural changes.

10. After December 16, 2004, the program must include a process to notify the Administrator or a state agency if;

An operator significantly modifies the program after the Administrator or state agency has verified that it complies with 192 subpart O. Notifications to PHMSA must be submitted in accordance with 192.18.

Significant?

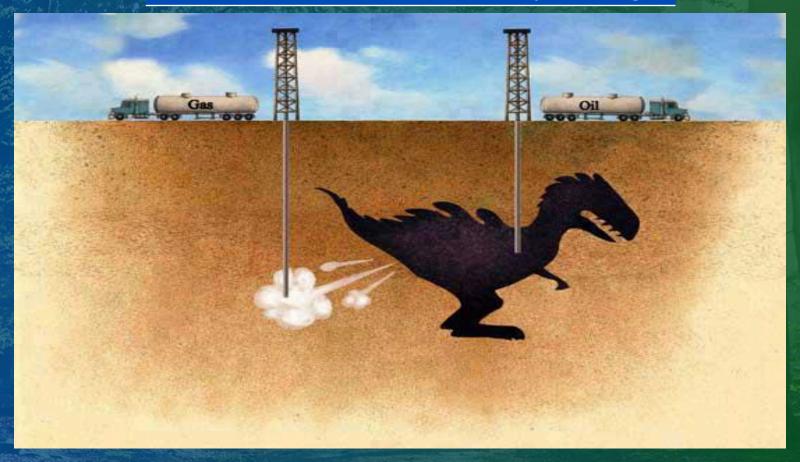
Includes but is not limited to:
Increasing evaluation internals
Increasing Span of Control ratios,
Eliminating covered tasks,
Mergers or acquisitions

10. After December 16, 2004, the program must include a process to notify the Administrator or a state agency if;

- Includes but is not limited to:
- Increasing evaluation internals
- Increasing Span of Control ratios,
- Eliminating covered tasks,
- Mergers or acquisitions, or

Change the overall program,
I'm changing from
"Explosions Are Our Specialty"
OQ Plan
to
"Think Safety" OQ Plan.

How Gas and Oil are extracted by Drilling



Questions?