



OQ NPRM: Effects on the Industry & What You Need to Know

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Session Overview

1. OQ 101

- A quick level set of OQ and how we got to where we are today

2. OQ NPRM Status

- The latest information from PHMSA

3. Key Areas of the NRPM

- What companies can do to prepare with key areas for consideration

4. Technology

- Discuss how technology can help companies and what to look for

5. Integrity Management Advisory Bulletin ADB-2017-02 (April 10, 2017)

- Training and Qualification for Integrity Management Program

OQ 101

- PHMSA final rule 08-27-1999 effective date Oct. 2002
- The OQ Rule remains in place
- PHMSA NPRM July 2012
- Comment Period Closed 09-08-2015
- Utilities 5 , Pipeline 9, Others 25 (Comments received)
- Jan 26, 2017 - OQ NPRM issues put on hold

The OQ Final Rule... without OQ...

What happened?

- There was an election...
- There was an administration change...
- There was precedence in the delay...

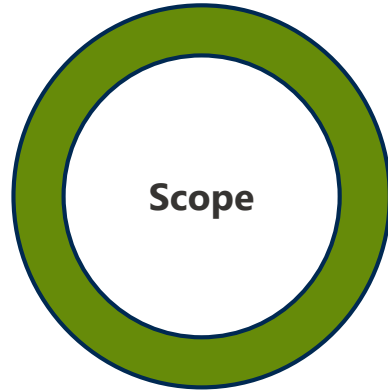
OQ NPRM Update Overview

Key proposed changes and additions

- Expanded definition of covered task
 - New Construction
 - Emergency Response
 - Integrity Management
- Focus on training as part of qualification
- Apply Management of Change to OQ
- Emphasis on program effectiveness review
- Document, document, document

Specifics

Changes that will have greatest impact



Scope

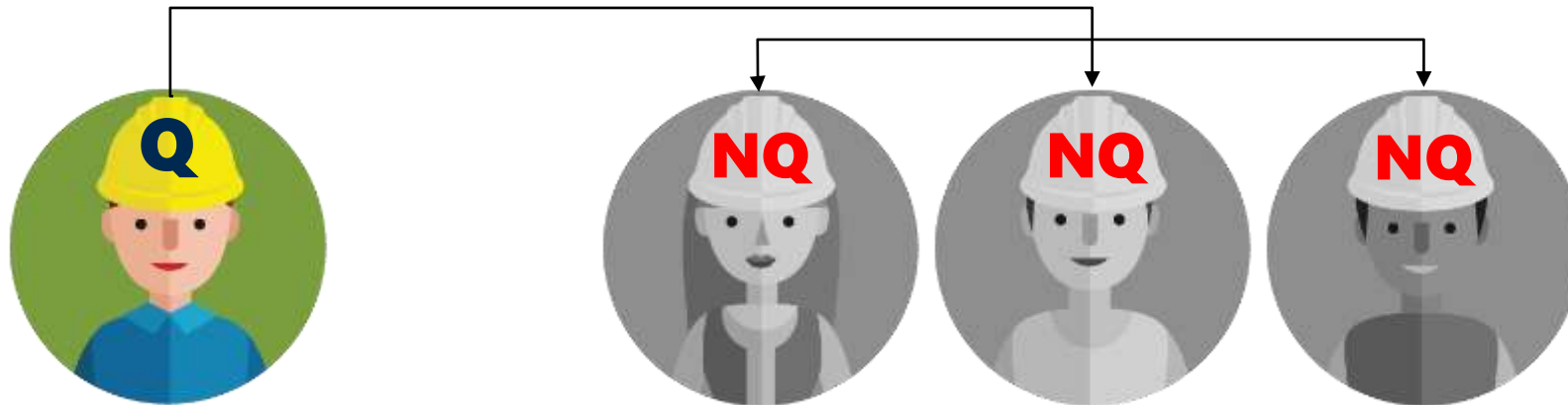
Expanded!

Qualified individual – has been evaluated and can:

1. Perform assigned covered tasks
2. Recognize and react to abnormal operating conditions
3. Demonstrate technical knowledge required to perform the covered task
4. Demonstrate the technical skills required to perform the covered task
5. Meet the physical abilities required to perform the specific covered task (e.g., color vision or hearing)

Span of Control (SOC)

A SOC ratio of **1:3** would mean that one qualified employee could direct and observe up to three unqualified employees.



Training Requirements

New!

Training for individuals performing covered tasks is required as part of qualification program

- Knowledge, skills, and abilities (KSAs) to perform covered task in manner that ensures pipeline safety and integrity
- Supplemental training on changes to procedures and specifications for covered task
- Ability to recognize and react to “generic” and “task specific” AOCs

Program Effectiveness Requirements

New!

Develop and implement a process to measure OQ program effectiveness

- Effective = minimize human error due to lack of KSAs
- Conducted once a year
- Written process to evaluate and amend based on findings
- Must include minimum measures defined by PHMSA to determine effectiveness
 - Number of occurrences
 - Qualified and non-qualified individuals involved in incident

Evaluator Requirements

New!

- Establish criteria and training necessary to be an evaluator of individuals performing covered tasks
- Measure and track evaluators' performance

Management of Change Requirements

Expanded!

Establish and maintain a Management of Change (MOC) program

- Communicate and document changes that affect a covered task to anyone performing that task and supervisor



Field employees



Contractors



Supervisors

Recordkeeping Requirements

Expanded!

Maintain Individual Qualification records

- Covered tasks qualified
- Qualification methods and dates
- AOC evaluation
- Evaluator name, date
- Training required

Retain these records for appropriate period

Recordkeeping Requirements

New!

Maintain Program records

- Program effectiveness reviews
- Program changes
- List of AOCs
- Program MOC notifications
- Covered task list
- For each covered task: SOC ratios, reevaluation intervals, and evaluation methods
- Evaluator criteria and training

Retain program records for appropriate period

Expanded Scope

- Recognize new covered tasks
- Identify, train, and qualify individuals performing those tasks
- Include additional items in evaluations, e.g., mental and physical ability
- Review covered task difficulty, complexity and importance to determine SOC limitations
 - Consider operational conditions

How Technology Can Help

- Central qualification tracking and reporting
- Evaluator training and performance
- Covered task CBT and training management
- Policy and procedure management
- Management of change communications
- Central capture/report on program effectiveness measures
- Recordkeeping

Covered Task List Manager

Instructions
Choose to create, edit or view the list based version of an internal or external Covered Task list using the pick list below. Change the status or view the change history of a task.

Create or Edit Internal Covered Task List

Internal Covered Task List

Search by Task ID or Task Description

Add New Covered Task Save Changes Cancel Changes

Task ID	Qualification Requirements				Regulatory Interval (Year)			Task Description	49 CFR 192	49 CFR 193	Span of Control (Year)	Status	Edit
	Exam	Witness	Training	Rules & Procedures	Evaluation	Training	F & P						
SPEC010CP	CCT 001	Oral Examination	CCT 001	SOP 48	1	1	1	Provide Security for Pipeline Facilities	192.711 (a) (3)	N/A	1.1	Active	
SPEC020CP	CCT 001	Final Examination	CCT 001	SOP 36, SOP 34	1	1	1	Test Breakout Task Overfill Protective Devices	192.711 (a) (3)	N/A	1.1	Active	
SPEC030CP	CCT 001, CCT 002, CCT 003, CCT 004	Observation & Oral Exam	CCT 001, CCT 002, CCT 003, CCT 004	SOP 48	1	1	1	Inspect and Calibrate Breakout Task Overfill Protective Devices	192.711 (a) (3)	N/A	1.0	Active	
SPEC040CP	CCT 001	Oral Examination	CCT 001	SOP 48	1	1	1	Repair Breakout Task Overfill Protective Devices	192.711 (a) (3)	N/A	1.1	Active	
SPEC050CP	CCT 001	Observation & Oral Exam	CCT 001	SOP 48	1	1	1	Inspection of Breakout Tanks	192.711 (a) (3)	N/A	1.0	Active	
SPEC060CP	CCT 001	Observation & Oral Exam	CCT 001	SOP 14, SOP 13, SOP 26, SOP 12	1	1	1	Operate Valve	192.711 (a) (3)	N/A	1.0	Active	
SPEC070CP	CCT 001, CCT 002, CCT 003, CCT 004	Oral Examination	CCT 001, CCT 002, CCT 003, CCT 004	SOP 48	1	1	1	Measurement of Shell Thickness with Ultrasonic Device	192.711 (a) (3)	N/A	1.1	Active	
SPEC080CP	CCT 001	Oral Examination	CCT 001	SOP 48	1	1	1	Measurement and/or Relocation of Liquid Pipelines	192.711 (a) (3)	N/A	1.1	Active	
SPEC090CP	CCT 001	Oral Examination	CCT 001	SOP 48	1	1	1	Routine Visual Inspection of Breakout Tanks	192.711 (a) (3)	N/A	1.0	Active	
SPEC100CP	CCT 001, CCT 002, CCT 003, CCT 004	Observation & Oral Exam	CCT 001, CCT 002, CCT 003, CCT 004	SOP 48	1	1	1	Provide Security for Pipeline Facilities	192.711 (a) (3)	N/A	1.1	Active	

* Must be performed by Qualified Individual



Questions?





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