

Operator Qualification

Plan and Implementation Audit Results

Operator Qualification Plan and Covered Tasks [192.801(b); 192.805(a) and 195.501(b); 192.505(a)]

- Written Plan does not clearly retain the Operator's responsibility and authority to approve any changes made to the written Plan and/or the covered task list by the OQ Service Provider. *Operator, not an outside party, is responsible for the Plan's compliance.*
- No reference is made to the O&M manual for the development of covered tasks.
- There is no reference made to the use of the Operator's O&M Plan in the evaluation of the covered tasks in the OQ Plan. The Operator's O&M procedures are needed in the evaluation of covered tasks to ensure that individuals are being qualified for tasks specific to the Operator's systems.
- There are some tasks, such as investigating leak/odor complaints, line locating and mark out, and joining plastic pipe that have been broken down into "subcategories". These "subcategories" are not included in the written Plan. It is also not clear how it is determined who gets qualified for which of these "subcategories". When reviewing the records this proved to be problematic and confusing.

Operator Qualification Plan and Covered Tasks
[192.801(b); 192.805(a) and 195.501(b); 192.505(a)]
(continued)

- The OQ Plan did not incorporate all of the covered tasks/sub-tasks which are currently being implemented and trained to the employees.
- Plans do not require the Operator to maintain graded knowledge examinations. Examinations should be maintained to validate qualification.
- The Operator's OQ Plan does not address emergency response functions, and does not specify that individuals performing activities such as manipulating valves, and repairing pipe during an emergency must be qualified.
- Plans do not have provisions to evaluate new activities to determine if a new covered task is required.

Reevaluation Intervals for Covered Tasks [192.805(g) and 195.505(g)]

- At the time of the audit, the Operator's Plan did not specify a maximum re-evaluation interval for covered task analysis. Since that time, a 3 year maximum has been added.
- The Operator's OQ Plan does not consider qualifying individuals immediately before performing complex tasks that are performed very infrequently is not covered in the Plan.
- The Operator's OQ Plan does not specify a minimum/maximum time frame for reevaluation upon failure of evaluation for a covered task, nor does it establish how many times an individual will be allowed to go through the evaluation process before the qualification is revoked (attempting to qualify that individual is abandoned or another approach is developed for that individual and the procedures for the development of that approach).

Reevaluation Intervals for Covered Tasks [192.805(g) and 195.505(g)] (continued)

- Plans do not adequately define how task reevaluation frequency was determined.
- OQ Plan does not have time frames for reevaluation upon failure of evaluation for a covered task or due to questionable performance or post-accident. Intervals after first failure, second failure are not specified. Requirements for additional training after a failure of qualification or re-qualification are not specified. Maximum number of attempts for re-qualification are not specified.
- The Operator has knowledge tests and practical tests taken on different dates and the expiration date used for the task is of the later test taken. In some instances the knowledge portion expires before the practical portion. The dates must be tracked consistently and for a fully qualified individual the start of qualification is when the individual has completed both parts of the testing and expires on the date of the earliest test taken from the two.

Covered Task Performed by Non-Qualified Individual [192.805(c) and 195.505(c)]

- The OQ Plan does not establish a span of control (number of non-qualified personnel who could be observed by a qualified person) for the covered tasks.
- The span of control is not reasonable or realistic.

Abnormal Operating Conditions [192.803 and 195.503]

- Each covered task should have its own task specific AOC's identified so that proper personnel training can occur, ensuring that such conditions can be recognized during normal operations.
- Plans have a generic task for AOCs and do not incorporate AOC evaluation into each covered task.
- Knowledge/written tests do not include task specific AOC questions for AOCs that may be encountered in the field while performing the specific task. Knowledge test questions for certain covered tasks only cover the general (generic) AOCs and not specific AOCs.

Abnormal Operating Conditions – Records
[192.803; 192.807(a-b) and 195.503; 192.507(a-b)]

- No significant non-compliances noted.
- Records document evaluation of qualified individuals for recognition and reaction to AOCs.

Evaluation Methods

[192.803; 192.805(b); 192.809(d-e) and 195.503; 192.505(b); 192.509(d-e)]

- The Operator's O&M procedures and the Operator's specific equipment is not incorporated in the evaluation of covered tasks, to ensure that individuals are being qualified for tasks specific to the Operator's system which applies to both the Operator's employees and contractor employees.
- Plans do not specify how Knowledge, Skills, and Ability will be evaluated. Many task evaluations rely solely on a written test.
- Staff found that task details within the Plan require knowledge and skill evaluations, but the Operator was qualifying with knowledge only (written test).

Evaluation Methods

[192.803; 192.805(b); 192.809(d-e) and 195.503; 192.505(b); 192.509(d-e)]
(continued)

- Plans do not specify whether performance evaluations are to be done in a group or individually.
- There is also no indication of how the Operator verify that contractors are being qualified individually.
- The Operator's OQ Plan does not contain any specific requirements for the individuals that are performing evaluations. They need to come up with details that specifically call out the qualifications that an individual must possess to evaluate others.
- Plans do not have a process to ensure the security of written tests and answers.

Evaluation Methods

[192.803; 192.805(b); 192.809(d-e) and 195.503; 192.505(b); 192.509(d-e)]
(continued)

- OQ Plans do not specify pass/fail criteria for written exams and/or performance evaluations.
- Plans have a generic task for AOCs and do not incorporate AOC evaluation into each covered task.
- OQ Plan does not have a process to ensure the security of the written tests and answers developed for evaluation of qualification.
- Plan must specify requirements for qualified proctor administering the tests for evaluations; the security measures must be documented and explained for proper and secure administration of the tests.

Evaluation Methods

[192.803; 192.805(b); 192.809(d-e) and 195.503; 192.505(b); 192.509(d-e)]
(continued)

- The evaluation methods are not adequate to measure the task-specific, knowledge, skills, and abilities based on field violations found.
 - The Operator's employee operated a main line valve when attempting to close a curb valve.
 - The Operator's employee attempted to bar hole directly over an electric service markout during a leak investigation.
 - The Operator's employee failed to use the water filter attachment on their cgi during a leakage surveillance. As a result water was pulled through the cgi and out the exhaust port. Employee continued to use the cgi after possible damage occurred to the machine.
 - The Operator's employees using homeowners' doorbells to attempt to make contact and gain access to the residence during a leakage investigation.
 - Inadequate service line pressure tests.
 - Misclassification of leaks.
 - Improper isolation for a warning tag condition.

Evaluation Methods

[192.803; 192.805(b); 192.809(d-e) and 195.503; 192.505(b); 192.509(d-e)]
(continued)

- OQ Plan does not have time frames for reevaluation upon failure of evaluation for a covered task or due to questionable performance or post-accident.
- Intervals after first failure, second failure are not specified.
- Requirements for additional training after a failure of qualification or re-qualification are not specified.
- Maximum number of attempts for re-qualification are not specified.
- There is no policy in place dictating actions to be taken if the individual fails a re-qualification post incident evaluation.

Training Requirements (Initial, Retraining, and Reevaluation) – Records [192.807(a-b) and 195.507(a-b)]

- Plans do not contain a process for documenting training.
- Plans do not require the Operator to maintain graded knowledge examinations. Examinations should be maintained to validate qualification.
- The Operator did not maintain evaluation documentation (that is, tests) for multiple individual's evaluations.
- The Operator is using an online testing system for knowledge test portion which only retains pass/fail results, not the actual copy of the test taken by an individual.

Qualification Records for Personnel Performing Covered Tasks [192.807 and 195.507]

- The Operator was unable to produce actual testing results for from the older system; only sign in sheets and the test questions were available for review.
- With regards to records, Staff found some instances where the Operator's official OQ database was not up to date and the Operator was relying on sign in sheets from classroom training.
- The Operator utilizes a form to document practical (skill) portion of the qualification which specifies multiple covered tasks which are required tasks for applicable procedures but not necessarily the covered tasks tested during the qualification. The form incorrectly lists multiple covered tasks which do not represent the practical qualification testing conducted. The form must clearly identify only the covered tasks qualified during the practical exam.

Qualification Records for Personnel Performing Covered Tasks
[192.807 and 195.507]
(continued)

- The Operator failed to maintain records to demonstrate qualification methods for specific covered tasks for an individual.

- Difficult to determine which covered tasks an individual is qualified for. Presentation makes difficult to determine if an individual is missing an evaluation required for qualification for a given covered task.

- A non-qualified individual was observed in the field performing an O&M covered task, he was not qualified for. There is no effective process in place to ensure that only a qualified individual is performing a covered task.

Personnel Performance Monitoring [192.805(d-e) and 195.505(d-e)]

- Supervisor/foreman is not qualified for work they are overseeing.
- Re-evaluation of an individual after their performance of a covered task contributed to an incident and evaluating an individual or group of individuals, if the Operator has reason to believe the individual(s) is no longer qualified to perform a covered task respectively. These sections are both very broad and do not specifically address how the Operator will respond to these situations.

Personnel Performance Monitoring - Records [192.805(d-e) and 195.505(d-e)]

- Documentation maintained by the Operator to demonstrate the individual performing covered tasks is limited and does not have enough information to trace who specifically performed the covered task and if the person was non-qualified who was the individual observing and directing the non-qualified individual.
- The records are currently limited to documenting the names of individuals on site for a specific day and/or project, not what covered tasks each individual performed or observed.

Management of Other Entities Performing Covered Tasks [192.805(b-f) and 195.505(b-f)]

- Written Plan does not adequately address Mutual Assistance issues. *The written Plan does not address the need for the Operator to ensure that other entities receive the Operator's O&M specific training and/or have the Operator qualified oversight when performed a covered task.*
- The Operators established qualification interval that were different than the generic Plan that their contractors were using. This information was not being communicated to other entities performing covered tasks for the Operators.
- There are no procedures in place for qualifying other OQ Plans of other entities. The Operator indicates that they currently compare the other qualifications to theirs before accepting, however, there is no procedure for doing so nor are the results of the verification documented.

Management of Other Entities Performing Covered Tasks [192.805(b-f) and 195.505(b-f)] (continued)

- OQ Service Provider committee members recently discussed raising the evaluation passing grade from 80% to 85%. The decision was made to keep the passing grade at 80% for passing Knowledge and pass/fail for Performance. This is not included in the Plan. Everyone evaluating to that OQ Service Provider is recorded automatically relative to the current passing score of the OQ Service Provider (80% at this time). Other evaluation Plans may, however, hold a 70% as passing and only show the result of "pass" to the Operator. It is not clear how this issue is addressed to ensure that all individuals who may work for the Operator are being evaluated to the same standard.
- There is no indication in the Plan that the Operator ensures that Knowledge tests are consistent with O&M procedures or the Operator's practices. Written evaluations are OQ Service Provider developed evaluations and do not include the Operator's specific O&M procedures. Only Performance evaluations conducted by the Operator's proctors are likely to be consistent with O&M procedures.
- The Operator failed to ensure that contractor employees are following the Operator's O&M procedure.

Management of Other Entities Performing Covered Tasks – Records [192.803; 192.805(b-c) and 195.503; 195.505(b-c)]

- Plans do not require the Operator to maintain graded knowledge examinations. Examinations should be maintained to validate qualification.
- The Operator is using an online testing system for knowledge test portion which only retains pass/fail results, not the actual copy of the test taken by an individual.
- When using mutual aid, the Operator did not maintain documentation of verifying mutual aid crews' qualifications.

Contractor Qualification Documentation Meets Operator Requirements [192.805(h) and 195.505(h)]

- The Operator is responsible for ensuring that contractor/subcontractor employees have been qualified to the standard applicable to the Operator's employees performing the same tasks. There is nothing in the Plan to show how the Operator accomplish this.
- The Operator had unqualified contractor individual performing plastic fusion peer inspection. The Operator failed to ensure that an individual performing a covered task is qualified.
- The Operator failed to review and/or document review and acceptance of the Operator-approved agencies OQ Plans and provide evaluation that was performed to ensure that other agency OQ Plan meets or exceeds the Operator's OQ Plan.

Contractor Qualification – Records [192.807(a-b) and 195.507(a-b)]

- Plans do not require the Operator to maintain graded knowledge examinations. Examinations should be maintained to validate qualification.
- The Operator using an online testing system for knowledge test portion only retains pass/fail results, not the actual copy of the test taken by an individual.
- The Operator failed to provide adequate evaluation documentation of qualifications of its contractor employees to ensure that all individuals qualified for covered tasks listed in the OQ Plan are qualified to perform covered tasks with the Operator specific equipment and according to its O&M procedures.

Contractors Adhering to OQ Plan [192.805(b-c,f) and 195.505(b-c,f)]

- The Plan explains, what is expected when a non-qualified individual is performing a covered task when directed and observed by a qualified person. But when specifically referring to contractors, it is not clear how the Operator is ensuring that this is occurring.
- No documented review of contractors OQ Plans to ensure that they are acceptable. Many Operators require contractors to qualify through a specific OQ Service Provider. Those Operators believe that doing this eliminates the need to review the contractors OQ Plan. The Operators must conduct and document a review of all contractor OQ Plans, regardless of whether or not they use same OQ vendor.
- The Operator's inspectors and field supervisors do not regularly verify contractors' qualifications. OQ verification is typically left up to an OQ Team/Group who rarely go into the field.

**Contractors Adhering to OQ Plan
[192.805(b-c,f) and 195.505(b-c,f)]
(continued)**

- Staff found instances where in-house Plans require knowledge and three independent skill evaluations, but contractor Plans only require knowledge and one or two skill evaluations for the same task. Why are they different?
- Staff found instances where in-house Plans require reevaluation once every three years, but contractor Plans require reevaluation once every five years for the same task. Why are they different?
- The Operator failed to review and/or document review and acceptance of the Operator-approved agencies OQ Plans and provide evaluation that was performed to ensure that other agency OQ Plan meets or exceeds the Operator's OQ Plan.
- The Operator performs an onboard "contractor challenge" for welding only. However the Operator does not have a formal process to evaluate contractor employees for performance of all covered tasks besides welding to verify whether their qualification is equivalent to those used by the Operator.

Management of Changes [192.805(f) and 195.505(f)]

- The Operators have not developed the Operator-specific who, when, what, where, and why for management of changes specific to their operations. It is not clear how these changes are communicated to contractors.
- Detail is lacking as to how changes are incorporated into training programs and initial/subsequent evaluations for qualification.
- It is not clear how new activities are evaluated to determine if new covered tasks should be generated.
- Plans do not have provisions to evaluate new activities to determine if a new covered task is required.
- The Operator failed to perform annual reviews of the Plan and maintain the Plan with new tasks/sub-tasks.

Management of Changes [192.805(f) and 195.505(f)] (continued)

- Timeframes are not given for communicating changes.
- There is mention that equipment changes would require notification to individuals affected by this change, however there is not any mention of training and reevaluation specific to these changes.
- The Operator's OQ Plan uses terminology for categories of change, such as limited, moderate, significant impact, and significant changes, but do not define or provide criteria for the terms, nor identify time frames for completing change communication.
- The Operator's OQ Plan does not address how the Operator manages the addition, revision, or deletion of covered tasks due to changes in regulations.

Notification of Significant Plan Changes [192.805(i) and 195.505(i)]

- It is not clear what constitutes a "significant" change (for example: Eliminating covered tasks; A change in the evaluation methods or criteria for performing covered tasks; Increases in the number of non-qualified individuals who may perform a covered task while being directed and observed by a qualified individual; Wholesale changes made to an OQ Plan or program, whether due to an overall effort to improve program performance, or due to a merger or acquisition that results in incorporating the best features of the competing Plans and programs).
- There is also no specific process for addressing when, why and how to notify the state agency of significant changes.

Records of OQ Program Changes
[192.805(f,i) and 195.505(f,i)]

- No significant non-compliances noted.
- Records maintained for changes that affect covered tasks and significant OQ changes.