

Top OQ Issues To Date

Office of Pipeline Safety



Top OQ Issues To Date

1. Written Program

- Operators did not have a written program when inspected
- The written program was in place after 4/27/01 (or) operators were not following the requirements of their written program

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2. Abnormal Operating Conditions

- AOCs were not identified
- AOC recognition & reaction were not part of qualification process (or)
- AOC reactions were not specified for the identified AOCs

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3. Contractor Qualification

- Inadequate processes in written program for handling contractor qualifications
- Contractor qualifications not reviewed
- Contractors performed covered tasks without being qualified (or)
- Contractors qualified by WPHR

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4. Field Implementation of OQ Program Requirements (Protocol 9)
 - Individuals not qualified to perform covered tasks
 - Inadequate O&M procedures
 - Qualifications do not match procedures

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4. Field Implementation of OQ Program Requirements (Protocol 9) (Cont'd)
 - Individuals not familiar with equipment used to perform covered task
 - Poor gas practices, and
 - Use of unapproved equipment

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5. Records

- Inadequate
- Incomplete
- Incorrect (or)
- Non-existent qualification records

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6. Evaluation Methods

- Evaluation methods inadequate to measure knowledge and skills for covered tasks
- Evaluation process employed questionable practices (or)

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6. Evaluation Methods (Cont'd)

- Evaluation processes were unacceptable
 - Performed own evaluation
 - Regarded examinations upon post-test review

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7. Work Performance History Review (WPHR)
 - Inadequate/no supporting documentation for WPHR qualification decision
 - Individuals qualified solely by WPHR after 10/26/99 (or)

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7. Work Performance History Review (WPHR) (Cont'd)
 - No qualification on AOCs if WPHR used as sole method

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8. Covered Task List

- No documentation of CT list development
- Tasks required by regulations missing from CT list (or)
- Excavation activities not addressed in CTs

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9. Management of Change

- Not addressed in written program at all
- Insufficient detail/inadequate description of process
- Contractor communications not addressed (or)
- Changes that trigger requalification not identified

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10. Reevaluation Intervals

- Not addressed in written program (or)
- Intervals of 7 to 10 years used without justification

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11. Training

- Not addressed in written programs