

## Field Inspection of OQ Program Implementation (Protocol 9)

<b>Company:</b>		<b>Field Location:</b>			
<b>Date:</b>		<b>System Information:</b> _____ _____ _____			
<b>Number of Company Employees Under OQ Program:</b>					
<b>Number of Contractor Personnel Under OQ Program:</b>					
<b>Inspection Team:</b>		<b>Company Personnel in Interview:</b>			
1. _____		1. _____			
2. _____		2. _____			
3. _____		3. _____			
4. _____		4. _____			
5. _____		5. _____			
<b>Area Inspected (Protocol Links)</b>					<b>Results Acceptable?</b>
					Yes   No   N/A   N/I
<b>1. Field/job supervisor responsibilities</b>					
a. Is knowledgeable of OQ program responsibilities (1.05, 3.01)					<input type="checkbox"/>
b. Conducts frequent observation of covered task performance (5.01)					<input type="checkbox"/>
c. Knows required actions to take when individual's performance of covered task may have contributed to incident/accident (5.01)					<input type="checkbox"/>
d. Knows factors to consider and required actions to take when individual is identified that may no longer be qualified to perform covered task (5.01)					<input type="checkbox"/>
e. Conducts verification of qualification status of individuals per OQ program requirements for employees, contractors and other entities (1.02, 1.03, 3.01, 7.01)					<input type="checkbox"/>
f. Ensures establishment of direct observation and control of unqualified individuals (3.02)					<input type="checkbox"/>
g. Establishes span of control for unqualified individuals appropriate to task (1.02, 3.02)					<input type="checkbox"/>
<b>2. Procedures for performance of covered tasks</b>					
a. Procedures are present at field location for covered task performance (3.01, 5.01)					<input type="checkbox"/>
b. Procedures used are same (content, date issued) as approved O&M manual (2.02)					<input type="checkbox"/>
c. Contractor procedures are approved by operator for use (1.02, 3.02)					<input type="checkbox"/>
d. Individuals are observed adhering to procedures when performing CTs (5.01)					<input type="checkbox"/>
e. Proper tools, techniques, processes employed per procedures (2.02)					<input type="checkbox"/>
<b>3. Abnormal operating conditions</b>					
a. Individuals performing covered tasks know how to recognize AOCs (4.02)					<input type="checkbox"/>
b. Individuals performing covered tasks know how to react to AOCs (4.02)					<input type="checkbox"/>
<b>4. Management of change</b>					
a. Supervisors are knowledgeable of communication process for changes in procedures, tools, techniques (8.01)					<input type="checkbox"/>
b. Individuals performing covered tasks are knowledgeable of communication process for changes in procedures, tools, techniques (8.01)					<input type="checkbox"/>
<b>5. Evaluation processes</b>					
a. Use of WPHR to evaluate individuals consistent with OQ plan (4.01)					<input type="checkbox"/>
b. Supervisor is involved in evaluation process consistent with OQ plan (2.02, 4.02)					<input type="checkbox"/>
<b>6. Program improvement</b>					
a. Problems experienced in field with OQ program implementation are fed back to OQ program management (1.04, 2.01, 2.02, 6.01)					<input type="checkbox"/>
b. Process for feedback of program improvement exists from field to HQ (5.01, 5.02, 6.01)					<input type="checkbox"/>
c. Response provided by HQ to feedback from field (6.01)					<input type="checkbox"/>
d. Field/job supervisor concerns with contractor/other entities qualifications identified (1.02, 1.03)					<input type="checkbox"/>
<b>7. Consistency of implementation of OQ program requirements</b>					
a. Implementation of program requirements consistent with other districts/ subsidiaries (procedures/processes for performing covered tasks) (2.02, 3.02, 5.01)					<input type="checkbox"/>
<b>8. Third Party/Internal Audits or Inspections</b>					
a. Field audits/inspections of covered task performance occur as specified in OQ program (frequency/feedback of results) (5.01)					<input type="checkbox"/>

For "No" answers, use supplemental sheet to explain details and identify deficiencies that may require enforcement action.

Ensure numbering is consistent with Field Inspection Protocol Checklist for OQ Inspection form.

"N/A" means item is not applicable to the operator's OQ program. "N/I" indicates "not inspected."

## Guidance for Use of the Field Inspection Protocol Checklist

### **1. Field/job supervisor responsibilities**

The inspector should review the operator's OQ program to determine if there are any responsibilities that are not applicable (N/A). For each of the responsibilities listed, observe the performance of or discuss them with the field or job supervisor to determine the acceptability or deficiencies associated with each item.

- a. Many operators identify the job supervisor, facility supervisor, project lead, team leader or other front-line supervisory position as the key field position responsible for ensuring the correct implementation of the OQ program. This item is designed to ensure that this individual is knowledgeable of his/her responsibilities.
- b. Supervisors are also often tasked with observing the performance of individuals in their work group for use in the operator's performance appraisal program. This item is designed to determine how much of that performance observation is directed toward ensuring the correct performance of covered tasks without deficiencies in adherence to procedures, etc.
- c. One consideration of the OQ requirements is the determination of the need for re-evaluation of an individual if it is believed that the individual's performance of a covered task has led to an incident or accident. This item investigates the role of the individual's supervisor in that process and the determination of whether or not this role is consistent with the program requirements.
- d. Another consideration of the OQ requirements is determining whether an individual is no longer qualified to perform a covered task, and requires re-evaluation. This item investigates the role of the individual's supervisor in that process, his/her knowledge of the criteria (if any) that the operator has established to make that determination, and the determination of whether or not this role is consistent with the program requirements.
- e. A covered task must be performed by a qualified individual, or by an unqualified individual who is directed and observed by a qualified individual. If possible, observe the method used to verify the qualifications of individuals, especially contractor individuals, performing covered tasks to see if it is consistent with OQ program requirements. The supervisor may also demonstrate the method used to accomplish this item. Also, confirm that hardcopy records of an individual's qualification are retained as part of the job/task information.
- f. The OQ requirements allow a covered task to be performed by an unqualified individual who is directed and observed by a qualified individual. If possible, observe the method by which the supervisor establishes the direction and control of unqualified individuals by a qualified individual. The supervisor may also describe the method employed to establish this requirement.
- g. Depending on the complexity of the covered task, the span of control of unqualified individuals performing covered tasks by qualified individuals may be as low as one-on-one or as high as five-on-one. Most operators do not specify task-specific spans of control, but leave the determination to the field supervisor. The field supervisor should be requested to describe what criteria, formal or informal, are used to establish span of control.

### **2. Procedures for performance of covered tasks**

- a. The inspector should observe the performance of covered tasks during an operations or maintenance activity and determine if procedures prepared by the operator to conduct the task(s) are present in the field and are being used as necessary to perform the task(s).

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- b. The inspector should confirm that the procedures being used in the field are the same (content, revision number, and/or date issued) as the latest approved procedures in the operator's O&M manual.
- c. The inspector should confirm that the procedures employed by contractor individuals performing covered tasks are those approved by the operator for the tasks being performed.
- d. It is important to observe individuals actually performing covered tasks, to ensure that procedure adherence is accomplished and that "work-arounds" are not employed that would invalidate the evaluation and qualification that was performed for the individual in performance of the task.
- e. Procedures list the tools, techniques, and processes employed to accomplish covered tasks. The inspection should determine if all of the tools and special equipment are present at the job site and are properly employed in the performance of the task, and if techniques and special processes are specified, that these are used and followed as described.

### 3. **Abnormal operating conditions**

- a. The definition of a qualified individual in the OQ rule includes the ability to recognize and react to abnormal operating conditions (AOCs). Operators differ in the ways AOCs are defined; some define only a set of "generic" AOCs that are applicable to all covered tasks, while others define generic and task-specific AOCs. The evaluation process for AOCs also differs, depending on whether the operator has developed a training module for AOCs, or simply defines AOCs as part of the evaluation process. This area is especially important for contractors, since those individuals who were qualified as part of an operator-recognized consortium such as NCCER, MEA, INGAA, OQSG or others may be qualified to a different set of AOCs than those that are applied to operator employees. Other operators may require that all contractors attend operator-specific AOC training prior to work. The inspection should focus on an individual's knowledge of the AOCs applicable to the covered task being performed and the ability to recognize those AOCs. The information gained during the inspection should be compared to the requirements for qualification applied during the evaluation process for the subject covered task. If possible, at least one employee individual and at least one contractor individual should be sampled.
- b. As important as recognizing AOCs during the performance of a covered task, is the reaction of the qualified individual to the AOC once it occurs. Depending on the condition, reactions may vary from immediately turning a valve or shutting off an ignition source, to vacating an area and notifying supervisory personnel. Additionally, the required reaction may vary depending on whether the individual is an operator employee or is a contractor. The inspection should focus on the required reactions for all of the AOCs for the covered task being performed, and noting these for comparison to the required reactions in procedures or training modules, if identified. As in a. above, if possible, at least one employee individual and at least one contractor individual should be sampled.

### 4. **Management of change**

- a. One of the seven key elements of an operator's qualification program must be the communication of changes that affect covered tasks to those individuals performing covered tasks. Changes may occur in procedures used to perform covered tasks, in equipment or tools used in task performance, or in techniques or special processes that improve pipeline safety. Often these changes are initiated at the headquarters level of the operator; changes may also result from feedback from the field locations where the tasks are actually performed. This inspection topic investigates the knowledge of field supervisors on the way changes are communicated, both to the supervisor from other locations and

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from the supervisor to other locations. Timeliness of communications should also be investigated to determine if the communication process impedes the timely dissemination of changes to field personnel.

- b. Along with communication of changes to field supervisors, individuals who perform covered tasks should also understand how changes are communicated to them; from the supervisor, directly from the changing authority, etc. If there are contractors performing covered tasks during the field inspection, they should also be sampled concerning changes that affect the tasks they are hired to perform.

### **5. Evaluation processes**

- a. If an operator employed Work Performance History Review (WPHR) as a method of qualification of employees performing covered tasks prior to October 27, 1999 (transitional qualification in accordance with the rule), the inspector(s) should examine field records for several randomly selected individuals who were qualified in this manner to ensure that qualification requirements specified by the operator in its OQ program for WPHR were met satisfactorily. If there are contractor individuals performing covered tasks, they should be asked what evaluation method was used for their qualification. If WPHR was used for qualification of any contractor individuals, this should be noted for follow-up with the operator's OQ program coordinator.
- b. Depending upon the operator's OQ program, the individual's supervisor may or may not be involved in the evaluation process for qualification of an individual to perform a covered task. If the program indicates the involvement of the supervisor, the inspector(s) should determine if the supervisor is performing the evaluation requirements specified in the program.

### **6. Program improvement**

- a.-d. This area investigates the communication of OQ program implementation problems and suggested improvements between the headquarters individual or committee established by the operator for OQ program management and the field individuals who actually have to make it work. The most important of these items is associated with the suitability of contractor qualifications, especially the identification and quick resolution of qualification issues.

### **7. Consistency of implementation of OQ program requirements**

- a. This area is applicable only if the inspection is broad enough in scope to cover more than one district of the operator's company or more than one subsidiary that is covered under an overall OQ program. The inspector should select several covered tasks and review the methods or procedures for performing the tasks to determine if the requirements for task performance are the same. If there are differences, the reason for these differences should be discussed with the operator's representative.

In certain cases, the operator's plan allows for different OQ requirements between segments of its company, especially where a merger or acquisition has recently taken place. If this is the case, then the inspector should determine whether or not an individual from one district or subsidiary is qualified to perform a covered task in a different area of the company without reevaluation.

### **8. Third-party/internal audits or inspections**

- a. If the operator's OQ program specifies that third-party or internal audits will be performed of field activities, the inspector should ask the operator representative if he/she is aware of the audit process

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and audit results, and determine if these results identify any problem areas with program implementation.