Inspection Output (IOR)

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Inspection Information

Inspection Name NWN OQ Program Inspection	Operator(s) NORTHWEST NATURAL GAS CO (13840)	Plan Submitted 03/12/2019
Status PLANNED	Lead David Cullom	Plan Approval 03/14/2019 by Joe Subsits
Start Year 2019	Team Members Darren Tinnerstet	
System Type GD	Supervisor Joe Subsits	All Activity Start 03/12/2019
Protocol Set ID WA.GD.2017.01	Director Sean Mayo	All Activity End 03/13/2019
		Inspection Submitted --
		Inspection Approval --

Inspection Summary

There were no probable violations or concerns noted during this inspection.

At the start of the audit, NWN gave a presentation about their in-house Operator Qualification (OQ) program. The OQ program is custom created, maintained by NWN, and it is not an off-the-shelf product.   The program requires involvement and support from HR, RMC, Contract Admin, Engineering, and welding inspectors. The operator uses an iterative approach to OQ.   117 Covered Tasks are currently in the program and there are 10 Abnormal Operating Conditions that are reviewed depending on the task.   Construction, Corrosion, Leakage, System Operations, .etc all have associated covered tasks.

The operator requires initial training for all covered tasks. Employees are trained and retrained if they fail an assessment.   If someone is disqualified for cause, the operator will retrain before a retest. NWN has ~500 employees and ~120 contractors that are covered in the program.   The primary method of evaluation is written with performance testing in a hands-on environment. Employees are allowed 3 attempts to pass the required knowledge, skills, and abilities. The re-qualification intervals are based on 4 factors. Safety, Operational Impact, Complexity, Frequency are the factors.   There is a 6 month re-qualification cycle for welding, and mechanical connections. Direct qualification is at 99%. The other 1% is expert qualification for SMEs.   NWN tests all of its contractors so the maintains the associated records in-house. The operator is mapping the program to ASME B31Q.   NWN is also starting to use a computer based "Etest" program in 2019. The operator is also implementing the SAP Success Factors program.   It has a dashboard view interface so the employees can keep qualifications current.

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	HQ	HQ	other	--	--	21	21	21	100.0%

> 1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	HQ	n/a	MISCTOPICS.OPTRQUAL	P, R, O, S	Detail	
2.	HQ	n/a	--	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	Inspection	--	03/12/2019 03/13/2019	n/a	all planned questions	all assets	all types	21	21	21	100.0%

Report Filters: Results: all

1. *Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.*
2. *Percent completion excludes unanswered questions planned as "always observe".*

Forms

This inspection has no Form data entry.

Results (all values, 21 results)

MISCTOPICS.OPTRQUAL: Operator Qualification

1. Question Result, ID, References	Sat, TQ.OQ.OQCONTRACTOR.P, 192.805(b) (192.805(c), 192.805(d), 192.805(e), 192.805(f))
Question Text	*Does the OQ plan require other entities that perform covered tasks on behalf of the operator to be qualified?*
Assets Covered	HQ
Result Notes	All contractors must use NWNs OQ program. Section 7.4 still has mutual assistance agreements and 6.6 is used to qualify contractors.

2. Question Result, ID, References	Sat, TQ.OQ.PERFMONITOR.P, 192.805(d) (192.805(e))
Question Text	*Does the program include provisions to evaluate an individual if there is reason to believe that performance of a covered task contributed to an incident or accident as defined in Parts 192 and 195 or there is reason to believe an individual is no longer qualified to perform a covered task?*
Assets Covered	HQ
Result Notes	Section 6.4 2) Contains disqualification for cause.

3. Question Result, ID, References	Sat, TQ.OQ.ABNORMAL.P, 192.803
Question Text	*Does the OQ Plan contain requirements to assure that individuals performing covered tasks are able to recognize and react to abnormal operating conditions (AOCs)?*
Assets Covered	HQ
Result Notes	Section 4.3 of the OQ plan and section 4.4 has the steps for identifying AOCs.

4. Question Result, ID, References	Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)
Question Text	*Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*
Assets Covered	HQ
Result Notes	The records are maintained in SAP. They keep records for 5 years. When we perform DTC inspections we verify OQ records for AOC recognition. We checked several OQ records for NWN and contractors. Michels OQ records were reviewed for Josh Collins and Brian Ek.

5. Question Result, ID, References	Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i)
Question Text	*Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*
Assets Covered	HQ
Result Notes	This is in 3.6. The revision log has records of change.

6. Question Result, ID, References	Sat, TQ.OQ.CHANGERECORD.R, 192.805(i) (192.805(f))
Question Text	*Are records maintained for changes that affect covered tasks and significant OQ plan changes?*
Assets Covered	HQ
Result Notes	This is in Section 3.5. A PDF version of the OQ plan is also copied to their hard drives. An email is sent and there is a "Whats New" portion of the intranet site to let individuals know about changes.

7. Question Result, ID, References	Sat, TQ.OQ.EVALMETHOD.P, 192.805(b) (192.803, 192.809(d), 192.809(e))
Question Text	*Are evaluation methods established and documented appropriate to each covered task?*

Report Filters: Results: all

Assets Covered HQ

Result Notes Section 5 has this. SMEs, front line employees, and supervisors.   There are 3 instructional system designers that help design questions and use training concepts from the Kirkpatrick Model.

8. Question Result, ID, References Sat, TQ.OQ.MOC.P, 192.805(f)

Question Text *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?*

Assets Covered HQ

Result Notes This is in Section 3.4, 3.5.   A PDF version is also copied to qualified individuals hard drives.

OQ Program Manual   Revision 14.3

Proprietary and Confidential

Page 4 of 20 02.28.19

3.4 Identifying Procedural Change The Supervisor of Quality and Qualifications will monitor proposed changes in regulations, procedures and equipment that may affect the performance of a covered task. When a change or potential change is identified, the Supervisor of Quality and Qualifications, will notify the OQ Program Administrator, who will review the proposed change with SME's to determine if a revision is necessary. The OQ Program Administrator may identify necessary changes to procedures through test administration and may consult the appropriate SME's and/or the Supervisor of Quality and Qualifications. Supervisors and SME's can also initiate the procedure change process by notifying the OQ Program Administrator.

3.5 Communicating Procedural Change to Covered Workers Once changes are made to a procedure, it will be assigned a new revision number and date. Updated procedures will be issued to all covered workers, supervisors, and contractors affected by the change. The OQ Program Administrator will work with SMEs to determine if training and/or requalification is necessary. If so, training and/or requalification will be scheduled.

9. Question Result, ID, References Sat, TQ.OQ.NONQUALIFIED.P, 192.805(c)

Question Text *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?*

Assets Covered HQ

Result Notes Section 6.5 has the provisions for this.

10. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered HQ

Result Notes We reviewed Michels and Loy Clark records during the inspection.

11. Question Result, ID, References NA, TQ.OQ.OQCONTRACTOREQUIV.P, 192.805(h)

Question Text *Does the OQ plan document that the operator has assured that the procedures on which an OQ vendor has evaluated qualified personnel are the same or consistent with those used by the operator for employees and contractors in the field?*

Assets Covered HQ

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.   Section 6.3 has this information.

12. Question Result, ID, References Sat, TQ.OQ.OQPLAN.O, 192.805(h)

Question Text *Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability?*

Assets Covered HQ

Result Notes DTC inspections are performed to verify this on a regular basis and there have been no issues with individuals OQ KSAs.

Report Filters: Results: all

13. Question Result, ID, References   Sat, TQ.OQ.OQPLAN.P, 192.805(a) (192.801(b))

Question Text   *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?*

Assets Covered   HQ

Result Notes   In Section 4.1, the 4 part test for a covered task is defined.   Section 4.2 contains Identifying Covered tasks

14. Question Result, ID, References   Sat, TQ.OQ.OQPLANCONTRACTOR.P, 192.805(b) (192.805(f), 192.805(c))

Question Text   *Does the OQ plan have a process to communicate the OQ plan requirements to contractors and ensure that contractors are following it?*

Assets Covered   HQ

Result Notes   NWN audits contractors with a quality assurance team.   Leakage, locating, system operations, and construction. Section 6.6 (Qualification of Contract Workers)

15. Question Result, ID, References   NA, TQ.OQ.OTHERENTITY.R, 192.805(b) (192.805(c), 192.803)

Question Text   *If the operator employs other entities to perform covered tasks, such as mutual assistance, are adequate records containing the required elements maintained?*

Assets Covered   HQ

Result Notes   No such event occurred, or condition existed, in the scope of inspection review.

16. Question Result, ID, References   Sat, TQ.OQ.PERFMONITOR.R, 192.805(d) (192.805(e))

Question Text   *If the operator had an incident/accident where there is reason to believe that an individual contributed to the cause, do records indicate evaluation of the individual following the occurrence?*

Assets Covered   HQ

Result Notes   May 23, 2018 there was a disqualification for cause. The inspection team checked for re-qualification and the individual was able to re-qualify at a later date.

17. Question Result, ID, References   Sat, TQ.OQ.RECORDS.R, 192.807

Question Text   *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered   HQ

18. Question Result, ID, References   Sat, TQ.OQ.REEVALINTERVAL.P, 192.805(g)

Question Text   *Does the OQ plan establish and justify requirements for reevaluation intervals for each covered task?*

Assets Covered   HQ

Result Notes   Frequency and complexity are in Appendix A   3 years is the max re-qualification interval. 5 year intervals are not allowed.   This is also in Section 6.4 (Re-qualification)

19. Question Result, ID, References   Sat, TQ.OQ.TRAINING.P, 192.805(h)

Question Text   *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered   HQ

Result Notes   Section 6.2 contains these requirements. It is on page 9 of 20 in the current plan.

20. Question Result, ID, References   Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text   *Does the operator have records for initial qualification, retraining and reevaluation of individuals performing covered tasks?*

Assets Covered   HQ

Result Notes   NWN currently is keeping test records for a year.   The Etesting program is a SAS testing product that is web-based and eliminates the need for storing paper test records.

21. Question Result, ID, References   Sat, TQ.OQ.ABNORMAL.O, 192.803

Question Text   *Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?*

Assets Covered   HQ

Report Filters: Results: all

Result Notes KSAs for OQ are checked during our frequently conducted DTC inspections. There have been no issues noted in field visits in regards to training or lack thereof.

Report Parameters: Results: all

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Report Filters: Results: all