

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	8577 Ellensburg OQ	Operator(s)	ELLENSBURG GAS DEPT, CITY OF (4400)	Plan Submitted	02/15/2023
Status	PLANNED	Lead	Derek Norwood	Plan Approval	02/27/2023 by Dennis Ritter
Start Year	2023	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson	All Activity Start	02/27/2023
System Type	GD	Observer(s)	John Trier	All Activity End	03/02/2023
Protocol Set ID	GD.2023.01	Supervisor	Dennis Ritter	Inspection Submitted	--
		Director	Scott Rukke	Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This inspection was conducted remotely via GoToMeeting on February 27th. The inspection included a review of City of Ellensburg's OQ Plan and the associated records.

Facilities visited and Total AFOD

The inspection was conducted remotely via GoToMeeting, email and phone calls.

Total AFODs: 1 day

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no probable violations or areas of concern as a result of this inspection.

Primary Operator contacts and/or participants

Darren Larsen
Assistant Utilities Director

509-962-7227
larsend@ci.ellensburg.wa.us

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88964 (89)	City of Ellensburg	unit	88964	Storage Fields Bottle/Pipe - Holders Vault Offshore GOM OCS Cast or Ductile Iron Copper Pipe	33	33	33	100.0%

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required %	Complete
					Aluminum/Amphoteric Abandoned						

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88964 (89)	--	TQ	P, R, O, S	Detail	--

Plan Implementations

Activity #	SMART Name	SMART Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required %	Complete
1.	OQ	--	02/27/2023 -- 03/02/2023	--	all planned questions	all assets	all types	33	33	33	33	100.0%	

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

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	OQ Attendance	COMPLETED	03/10/2023	OQ	88964 (89)

Results (all values, 33 results)

TQ.PROT9: OQ Protocol 9

- Question Result, ID, References: **NC, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))**

Question Text: *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered: **88964 (89)**

Result Notes: **This inspection was completed remotely. Observation activities will be completed during the Standard Inspection in July 2023.**
- Question Result, ID, References: **NC, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))**

Question Text: *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*

Assets Covered: **88964 (89)**

Result Notes: **This inspection was completed remotely. Observation activities will be completed during the Standard Inspection in July 2023.**
- Question Result, ID, References: **NC, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))**

Question Text: *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered: **88964 (89)**

Result Notes: **This inspection was completed remotely. Observation activities will be completed during the Standard Inspection in July 2023.**

4. Question Result, ID, References **NC, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**
Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*
Assets Covered **88964 (89)**
Result Notes **This inspection was completed remotely. Observation activities will be completed during the Standard Inspection in July 2023.**

5. Question Result, ID, References **NC, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**
Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*
Assets Covered **88964 (89)**
Result Notes **This inspection was completed remotely. Observation activities will be completed during the Standard Inspection in July 2023.**

TQ.OQ: Operator Qualification

6. Question Result, ID, References **Sat, TQ.OQ.CHANGENOTIFY.P, 192.805(i) (192.18)**
Question Text *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?*
Assets Covered **88964 (89)**
Result Notes **O&M Section 13.13 (C)**

7. Question Result, ID, References **Sat, TQ.OQ.CHANGERECD.R, 192.805(i) (192.805(f), 192.18)**
Question Text *Are records maintained for changes that affect covered tasks and significant OQ plan changes?*
Assets Covered **88964 (89)**
Result Notes **January 31, 2023 Ellensburg sent email to the commission regarding changes to the OQ system**
Monthly staff meeting to discuss internally, reviewed minute from Feb 21, 2023 meeting

8. 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?*
Assets Covered **88964 (89)**
Result Notes **O&M Section 13.14**
Includes all covered tasks, re-evaluation interval and evaluation methods. Methods seem appropriate for each task

9. 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 **88964 (89)**
Result Notes **O&M Section 13.2.1 and 13.13**

10. 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 **88964 (89)**
Result Notes **O&M Section 13.5**

11. Question Result, ID, References **Sat, 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 88964 (89)

Result Notes O&M Section 13.11

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

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

Assets Covered 88964 (89)

Result Notes This inspection was completed remotely. Observation activities will be completed during the Standard Inspection in July 2023.

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 88964 (89)

Result Notes O&M Section 13.2

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 88964 (89)

Result Notes O&M Section 13.11

15. Question Result, ID, References NA, 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 88964 (89)

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

16. 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 88964 (89)

Result Notes Reviewed OQ records for all individuals, 7 people performing covered tasks

Reviewed a sample of tasks performed with dates.

Marcello Martinez

Odorant Test performed 2/23/22

Qualified 2/23/22

Kody Graham

Welding Performed 8/22/22

Weld Test 3/17/22

Knowledge OQ 6/23/22

17. 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 **88964 (89)**
 Result Notes **O&M Section 13.3 (Evaluation)**

O&M Section 13.12 (Training/Re-Training)

O&M Section 13.6 and 13.7 (Reevaluation)
18. 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 **88964 (89)**
 Result Notes **O&M Section 13.11**

O&M Section 1.2.10
19. 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 **88964 (89)**
 Result Notes **O&M Section 13.2 and 13.14**
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 **88964 (89)**
21. 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 **88964 (89)**
 Result Notes **City of Ellensburg reviews OQs from the operator prior to any work being completed. The only tasks they OQ in house are fusing and welding.**

Reviewed records of fusion tests and contractors qualifications in EWN

Total of 4 jobs completed by contractors between 2018 and 2023. Reviewed all OQ records for these jobs
22. 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 **88964 (89)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
23. 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 **88964 (89)**
 Result Notes **O&M Section 13.8**
24. 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 88964 (89)

Result Notes Each OQ task has associated AOCs

City of Ellensburg also has a generic AOC task identified

All personnel were qualified

25. Question Result, ID, References NC, 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 88964 (89)

Result Notes This inspection was completed remotely. Observation activities will be completed during the Standard Inspection in July 2023.

26. 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 88964 (89)

Result Notes O&M Section 13.6 and 13.7

TQ.QU: Qualification of Personnel - Specific Requirements

27. Question Result, ID, References Sat, TQ.QU.CORROSION.P, 192.453 (192.805(b))

Question Text *Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel?*

Assets Covered 88964 (89)

Result Notes O&M Section 13.14

Various Corrosion Control tasks identified

O&M Section 12.6 (A)

Procedure CP1

28. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered 88964 (89)

Result Notes All Personnel are qualified for corrosion control methods, reviewed OQ records for field staff

29. Question Result, ID, References Sat, TQ.QU.HOTTAPQUAL.P, 192.627 (192.805(b))

Question Text *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?*

Assets Covered 88964 (89)

Result Notes O&M Section 13.14

Tasks 1081, 1091, 1101, 1131, 1141 and 1151

O&M Section 8.2 (C)

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

30. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.P, 192.227(a) (192.225(a), 192.225(b), 192.328(a), 192.328(b))**

Question Text *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?*

Assets Covered **88964 (89)**

Result Notes **O&M Section 5.0.2 and 5.0.6**

Task 0801

31. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDERLOWSTRESS.P, 192.227(b) (192.225(a), 192.225(b), 192.805(b))**

Question Text *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?*

Assets Covered **88964 (89)**

Result Notes **O&M Section 5.0.2 and 5.0.6**

Task 0801

32. Question Result, ID, References **Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**

Question Text *Do records indicate adequate qualification of welders?*

Assets Covered **88964 (89)**

Result Notes

Welder	2021 Weld Test Date	2022 Weld Test Date
Chet Weekes	2/25/21	3/14/22
Kody Graham	6/2/21	3/17/22
Logan Graham	2/25/21	3/14/22
Matt Douglas	2/25/21	3/14/22

Reviewed Weld test records, City of Ellensburg performs weld tests every calendar year NTE 15 months and completes a shop weld 6 months after in accordance with 192.229(d).

33. Question Result, ID, References **NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**

Question Text *Do records indicate the qualification of nondestructive testing personnel?*

Assets Covered **88964 (89)**

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

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