

# 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	8597 - Enumclaw - Operator Qualification	Operator(s)	ENUMCLAW GAS DEPT, CITY OF (4500)	Plan Submitted	03/17/2023
		Lead	David Cullom	Plan Approval	03/28/2023
		Supervisor	Dennis Ritter		by Dennis Ritter
		Director	Scott Rukke	All Activity Start	05/16/2023
Status	PLANNED			All Activity End	05/19/2023
Start Year	2023			Inspection Submitted	--
System Type	GD			Inspection Approval	--
Protocol Set ID	WA.GD.2022.02				

## Inspection Summary

This was an Operator Qualification Plan review for the City of Enumclaw that had 1 AFODs, no AOCs. or probable violations. The operator uses MEA for their OQ program content and qualification records.

Participants included Nick Pello and AJ Haas.

This inspection was performed at the Public Works Operations (Shops) located at 2041 Railroad St. Enumclaw, WA 98022

Question set appears to be 33 now instead of 51. Reference 8592 (DR) and 8613 (DC) OQ plan vs this (8597) and 8577 (DN). All the same planning presentation, which should not matter and appear to use the same group TQ per the Excel Inspection Crosswalk. - DCC 03172023

## Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. 88992 (115)	City of Enumclaw - Natural Gas Department	unit	88992	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric Abandoned	33	33	33	33	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.	88992 (115)	--	TQ	P, R, O, S	Detail	--

## Plan Implementations

8597 - Enumclaw - Operator Qualification

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Report Filters: Results: all

#	Activity Name	SMAR T Act#	Start Date End Date	Focus Directive s	Involved Groups/Subgroup s	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	OQ Program Review	--	05/16/2023 05/19/2023	--	all planned questions	all assets	all types	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

This inspection has no Form data entry.

## Results (all values, 33 results)

### TQ.PROT9: OQ Protocol 9

1. Question Result, ID, References **NA, 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 **88992 (115)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. There have been no issues with OQ that needed to be resolved.**
2. Question Result, ID, References **Sat, 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 **88992 (115)**  
 Result Notes **Covered tasks were looked at in the field during the field portion of the standard inspection. Please reference that inspection for 2023 Enumclaw OQ records.**
3. Question Result, ID, References **Sat, 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 **88992 (115)**  
 Result Notes **Before covered tasks are performed OQ qualifications were checked and are in my field notes for the gas distribution inspection for City of Enumclaw 2023 The inspection number is 8599.**
4. Question Result, ID, References **Sat, 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 **88992 (115)**  
 Result Notes **AOCs were discussed with the operator for corrosion control and during the pressure regulation portion. Enumclaw's gas personnel are highly cross trained and multi qualified.**
5. Question Result, ID, References **Sat, 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 88992 (115)

Result Notes The supervisor had everyone show the relevant cards, pulled them up in MEA, and was with me the entire time I reviewed each qualification and expiration date.

## 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 88992 (115)  
Result Notes Section 13. of the O&M manual contains this.
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 88992 (115)  
Result Notes Records of changes are kept in section (1-R) (Manual changes) of the O&M
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 88992 (115)  
Result Notes 5A of the O&M manual contains the OQ program portion. Performance based tests are administered when needed. The operator has a list of covered tasks for other operators that are acceptable for them to perform once qualification is confirmed.
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 88992 (115)  
Result Notes Section 13.1 of the O&M manual contains this.
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 88992 (115)  
Result Notes 5A Section 4B of the O&M manual contains this and the Span of Control table is in Appendix 5A1.
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 88992 (115)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review. No contractors were used during this inspection time period.
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 88992 (115)  
Result Notes Yes this was covered in TQ Protocol 9 and during the standard inspection for the gas distribution system in 2023. There were no issues.
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 88992 (115)  
Result Notes Section 5A2B of the O&M manual contains this.

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 88992 (115)  
Result Notes Section 5A 11 of the O&M manual contains this.
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 88992 (115)  
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 88992 (115)  
Result Notes Appendix 5 A 4 of the O&M manual contains this.
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 88992 (115)  
Result Notes Section 12 of the O&M manual contains this.
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 88992 (115)  
Result Notes Section 5A 11 of the O&M manual contains this.
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 88992 (115)  
Result Notes Appendix 5A1 Column H of the O&M manual contains this.
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 88992 (115)  
Result Notes Records observed during the field portion, which are contained in the MEA database, have the necessary dates for qualification and expiration dates.
21. Question Result, ID, References NA, 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 88992 (115)  
Result Notes No such event occurred, or condition existed, in the scope of inspection review. No contractors worked on Enumclaw's system during this time period. IFS did some work in 2019 for the city for a project.

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 **88992 (115)**  
 Result Notes **They would if they did – no occurrences. 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 **88992 (115)**  
 Result Notes **AOCs are covered in MEAs OQ program materials and performance evaluation portions of the qualification test.**
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 **88992 (115)**  
 Result Notes **The performance based tests have portions that address AOCs during the practical evaluation checklists. Records were suitable.**
25. 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 **88992 (115)**  
 Result Notes **I had no issues with the operator performing covered tasks during my standard inspection portion for the gas system in 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 **88992 (115)**  
 Result Notes **Section 5A 8 of the O&M manual contains this.**

## **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 **88992 (115)**  
 Result Notes **Manual 2-0 Section 1.2 contains this.**
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 **88992 (115)**  
 Result Notes **Chuck Speece is a NACE Level II and I checked the MEA qualification records before he performed any tasks.**
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 88992 (115)

Result Notes Section 4-L 3 A of the O&M manual contains this.

## 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 88992 (115)

Result Notes Section 4-L 3.2 of the O&M manual contains this.

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 88992 (115)

Result Notes Section 4-L 3.5 of the O&M manual contains this.

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 88992 (115)

Result Notes Records for both welders were reviewed. They were requalifying when I was there for the inspection. They have their own tensile testing machine to perform the API 1104 destructive tests.

33. Question Result, ID, References Sat, 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 88992 (115)

Result Notes

There were records reviewed for 2019, but that is out of the inspection time period.

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