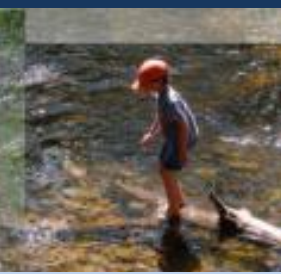




Connecticut Department of Energy and Environmental Protection



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

Training and Operator Qualification

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Connecticut Department of Energy and Environmental Protection

Before OQ

- Prior to the Operator Qualification Rule
 - Training departments
 - Training staff
 - Hands on training
 - Many days or weeks of training per year
 - Both company employees and contractors



Before OQ

- Training mentioned in the code 5 times
 - §192.241 Inspection and test of welds
 - §192.243 Nondestructive testing
 - §192.285 Plastic pipe: Qualifying persons to make joints
 - §192.287 Plastic pipe: Inspection of joints
 - §192.615 Emergency plans



OQ Rule NPRM

On August 3, 1994, RSPA published a notice of proposed rulemaking to **establish specific training requirements for the qualification of pipeline workers** (59 FR 39506). This proposal would have introduced qualification standards for personnel that perform, or supervise persons performing, regulated operations, maintenance, and emergency response functions. The purpose of the proposal was to improve pipeline safety by requiring operators to ensure the competency of pipeline personnel through **training**, testing, and periodic refresher **training**.



OQ Rule NPRM

In response to this notice, RSPA received 131 comments that expressed a wide variety of interests and concerns. Most commenters asserted that the proposal should have taken a more general approach to qualification with broad requirements for persons performing "safety related" functions. Commenters stated that the proposal was **too prescriptive and that the many references to training requirements should be modified to focus the proposal on actual qualification, rather than on the method(s) of achieving qualification.**



OQ Final Rule

- Amendment 192-86
- Issued – 8/20/1999
- Effective – 10/26/1999
- Written plan in place by 4/27/2001
- Qualifications complete by 10/28/2002



OQ Final Rule

Only mention of the word training:

Sec. 192.803 Definitions.

Evaluation means a process, established and documented by the operator, to determine an individual's ability to perform a covered task by any of the following:

...(f) On the job **training**...



After OQ

- After the Operator Qualification Rule
 - ~~Training departments~~
 - ~~Training staff~~
 - ~~Hands on training~~
 - ~~Many days or weeks of training per year~~
 - ~~Both company employees and contractors~~



Pipeline Safety Improvement Act of 2002

- 49 U.S.C. 60131(d)(4)
- A qualification program adopted by an operator...shall include, at a minimum...
 - A program to provide **training, as appropriate**, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities.



OQ Amendment 192-100

- Effective 7/15/2005
- § 192.805 Qualification program.
 - Each operator shall have and follow a written qualification program. The program shall include provisions to:
 - (h) After December 16, 2004, provide **training, as appropriate**, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities;



After OQ

- Training mentioned in the code 12 times
 - §192.631 Control Room Management – 9 times
 - §192.915 Integrity Management Program
 - §192.935 Additional Preventive/Mitigative Measures
 - §192.947 Integrity Management Records



OQ 2.0 – PHMSA NPRM 2015

- Training mentioned:
 - Zero times in the original rule
 - One time in the existing rule
 - Ten times in the proposed rule



OQ 2.0 – STATES

- New Hampshire - IR 17-037 Investigation of Gas Operator Qualification Programs and Testing Practices
- New York - 17-G-0318 In the Matter of an Investigation Into Local Distribution Company Use of Northeast Gas Association Operator Qualification Program - OQ White Paper



OQ 2.0 – Connecticut

- Proposed Legislation
 - Two-part covered task – on a pipeline and affects safety
 - Evaluation requires exam and hands-on skill and ability testing for every task
 - Evaluation process must be performed by operator or independent third party
 - Must reevaluate if task not performed correctly, not just after an incident



OQ 2.0 – Connecticut

- Proposed Legislation
 - Training required, including minimum training time per task
 - Training and evaluation must match company's plans, procedures and standards
 - Inspectors must be OQ'ed for the task(s) they are observing
 - Engineering tasks added to OQ program



OOQ 2.0 – Connecticut



Questions?

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