

# Indiana Utility Regulatory Commission

*2018 Operator Qualification*





# Responsibilities

- **49 CFR 192 Subpart N**
  - *192.801*
    - *Covered Tasks that are performed on a pipeline facility, in operations or maintenance of a pipeline facility, or a task that will affect the operation/integrity of the pipeline.*
- **Identify covered tasks**
- **Ensure through evaluation of individuals performing the tasks**
- **Reevaluations**
  - *1 Year, 3 Years, 5 Years?*
  - *Work performance related*
- **Communicate changes**



# Contractors

- **Primary Contractors**
  - *Secondary Contractors*
    - *Covered Tasks?*
    - *Inspections?*
- **Your Procedures v. Their Procedures**
- **Qualifications**
  - *How are they qualified?*
  - *Records?*
- **Field Evaluations**



# Training

- Can the personnel perform the covered task and recognize/react to AOCs
- Training:
  - *Identified the requirements?*
  - *Off the Shelf?*
  - *Task Specific / Specific Equipment*
    - *Procedures dictate the OQs needed*
  - *Contractor\**



# Mutual Aide

- **Self Aid**
  - *Corporate Procedures*
  - *Personnel Tracking*
  - *Plan to Train, Qualify, Inspect*
- **Local Procedures**
  - *Equipment*
  - *Specific Regulations*



# Deficiencies

- All covered tasks are not identified
  - *Multiple tasks bundled into one task*
- “Off the Shelf” OQ programs which have not been reviewed or customized
- Task-specific reevaluation intervals have not been identified
- Task-specific AOCs not identified
- Basis for different reevaluation intervals ( $>3/ <3$  yrs) not explained
- Performance monitoring is either not in place or not enforced



**Questions?**



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