


Operator Qualification

ASME B31Q Update



Disclaimer

- I am presenting this based on my personal understanding of the process and document, and am not speaking on behalf of ASME.

Rule Dissatisfaction

- **CONGRESS** included language in H.R. 3609 “Pipeline Safety Reauthorization Act of 2002”
- **NTSB** labels Operator Qualification as “unsatisfactory” in 2002
- **Office of Pipeline Safety** issues 13 areas they consider as gaps in the rule and find rule violations
 - 36% of audits have findings
 - 12% of audits are given Notice of Probable Violations
- **Operators** find there to be inconsistent rule interpretations
- **Contractors** see no consistency in Operator programs and are required to qualify for the same task using different methods
- **Individuals** have been unable to link work experience, past training or certifications to qualifications

13 Perceived Gaps

- Scope of OQ inspections
- Lack of identified knowledge, skills and abilities
- Re-evaluation intervals
- Maintenance vs. new construction
- Treatment of Emergency Response
- Missing covered tasks (excavation)
- Extent of documentation
- Generic vs. task specific Abnormal Operating Conditions
- Treatment of training
- Criteria for small operators
- Use of directing and observing
- Noteworthy practices
- Persons contributing to an accident

Addressing the 13 Gaps

- Five public meetings held in early 2003
- New supplementary rule making was developed and was issued in 2004
 - Addresses training, requalification frequencies and requires changes to program to be submitted to OPS
- Industry and OPS agreed to develop a new standard that will holistically address qualification of pipeline personnel

ASME B31Q

- American Society of Mechanical Engineers (ASME) selected as entity to help develop and house standard
- ASME B31Q committee selected.
 - State and Federal Regulators
 - Operators from all segments of the industry
 - Contractor community
 - Industry Associations
 - Trade Associations
 - Vendors
- Started August 2003 and published 2006

B31Q Standard Content

- Foreword
- Introduction
- Definitions
- References
- Qualification Program
- Determining Covered Tasks
- Abnormal Operating Conditions
- Training
- Evaluation
- Qualifications
- Portability
- Program Effectiveness
- Communicating the Qualification Program and Managing Changes
- Documentation Requirements
- Bibliography

ASME B31Q Benefits

- Standardized task list
- Standardized requalification frequencies
- Identifies key qualification components
- Allows for portability
- Rationales are embedded in document
- Accepted by OPS
- Reduction in future changes to rule
- Meets many of the needs identified by the focus group working on certification of control center personnel

Standard/Rule Comparison for 13 Issues

Standard

- Safety & Integrity
 - 2-part Test
 - Inclusion of construction and excavation
- Emergency Response addressed
- Training addressed
- Subsequent qualification intervals required with guidance on development and a requirement for monitoring
- Program Review addressed
- Specific direction required for field supervision in the form of span of control for each covered task
- Analysis of appropriate evaluation method(s) required for each task
- Documentation requirements specified

Rule

- O&M
 - 4-part Test
 - Exclusion of construction and other tasks
- Emergency Response not addressed
- Training not addressed
- Subsequent qualification intervals required for each task
- Program Review not addressed
- General requirements for direction and observation of non-qualified individuals
- List of acceptable evaluation methods
- 4 specific documentation requirements

Current B31Q Topic Examples

- Tasks
 - Application of tasks as a job
 - Definition of specific tasks (e.g., Operate Auxiliary Gas Equipment – Manual)
- Portability
- AOCs
- New construction
- Qualification exemptions
- Determination of degradation of physical abilities
- Program effectiveness
- Typo's



Questions

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