

Operator Qualification

LABOR PERSPECTIVE Arizona



OQ Labor Perspective

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- United Association of Plumbers and Pipe Fitters Local 32 Seattle Washington.
- Represent Gas Workers / Utility Puget Sound Energy
- Represent Contract Workers who work on PSE distribution System.

Goal of OQ

- Ensure the Safety and Integrity of Pipeline System
- Industry and OPS have to agree on adequate benchmarks(methods) to ensure compliance.
- Clarify and Reach Agreement on the 13 Protocols

13 Protocols

1. Scope of Operator Qualification
2. **Evaluation of Knowledge, Skills, and Physical Ability**
3. Re-Evaluation Intervals
4. Maintenance versus New Construction
5. **Treatment of Emergency Response**
6. Additional Covered Tasks
7. Extent of Documentation
8. Abnormal Operating Conditions
9. **Treatment of Training**
10. Criteria for Small Operators
11. **Direction and Observation of Non-Qualified People**
12. Noteworthy Practices
13. **Persons Contributing to an Incident or Accident**



Topics of Discussion

1. Evaluations of Knowledge, Skills, and Ability.
2. Treatment of Emergency Response
3. Treatment of Training
4. Direct Observation of Non-Qualified People
5. Persons Contributing to Incidents or Accidents

Knowledge, Skill and Ability

- Issue: Should Evaluation leading to qualification consider knowledge, skills & physical ability?
- Labor Perspective:
 - There are varying levels of knowledge, and skill.
 - Dependant on the Level of training someone has received or length of time performing the job.
 - Knowledge acquired through on the job training only.
 - Level of qualification isn't consistent from one contractor to another or craft to craft doing the same type of work.
 - To Ensure Knowledge skill and ability training should become a requirement.
- Concerns
 - Fear of painting everyone with the same brush,
 - How are those coming into the workforce today qualified?

cont.

- Is on the job training an exclusive acceptable method of qualification?
- Is OPS going to accept one set of evaluation requirement for the utility and different set of evaluation methods for the contractor doing work on their system?

Treatment of Emergency Response

- Issue- Does the rule Cover Emergency Response tasks, if not what are its bounds?
- Labor Perspective:
 - Utility's should not put their workers in Emergency situations they are not trained for.
 - At minimum should require direct observation.
 - Develop Emergency plans for each employee group. Most State utility commissions already require a plan.
 - Emergency conditions for Employees working for contractors should not be allowed with out class room training approved by the Utility.
 - Responding to broken blowing services and mains.
 - Leak Response Class A, etc.

Treatment of Training

- Issue: Should training practices be evaluated in OQ inspections?
- Labor Perspective:
 - Yes it's the only sure way to give the future workers coming into the Industry the background and the skills necessary to survive in this changing industry.
 - Training would be combined with On the job training, the operators Standards and procedures manuals, along with OQ requirements for specific tasks.
 - Contractors employee's who perform work for an operator should be held to same level of training. Suggest that some covered tasks if done by contractor require class room training along with evaluation.
 - Tapping and Stopping
 - Gas Welding
 - ARC Welding
 - Fusion

Direction & Observation of Non-Qualified People

- **Issue-** Is Guidance needed to support supervisors in determining how many non-qualified people can be directed and observed by one qualified person?
- **Labor Perspective:**
 - With the enactment of the OQ rule little was known about how it would affect the worker. It is becoming clear that more responsibility is on the worker in the field. (Need realistic expectations.)
 - A new employee working for an operator or contractor after a time should attend training.
 - We are uncomfortable that a span of control for specific covered tasks needs to be developed.
 - Should focus on types of work crews are doing for determining span of control.
 - Main Replacement Crews with Services
 - Service Replacement Crews

cont.

- To much burden on the person qualified to ensure that the work being done by others meets standards.
- The qualified person (*who may or may not be a foreman*) bears the entire OQ burden of the entire crew performing the work.
 - He may be limited in his knowledge of the work being done.
 - Example Main Replacement work for Contractors
- Quality Assurance Programs Create additional burdens of making sure all on the crew are qualified. (*To many stamps of approval.*)

Persons Contributing to an Incident or Accident

- Issue- Should operators have documented means to identify covered tasks whose performance may have contributed to incidents or accidents along with people who performed these tasks?
 - Labor Perspective
 - We agree with Industry's statement that the focus should be on the qualifications related to the covered tasks that contributed to the incident/ accident and not the individual.
 - Concerns
 - In the event of an incident or accident the length of time qualifications will be pulled?
 - Incident or accident was performed by someone not qualified under direct observation. Level of responsibility?

cont.

- Time lines for an investigation.
- No workforce protection language in bargaining agreements.
- Will the worker be sent home without pay until OPS, or the state agency, or the company they work for finishes its investigation?
- Fear that the rule allows you to protect yourself from your workforce.
- Mistakes and accidents do happen in the field. Can that cost me my job?

Finally

➤ Labor Perspective

- Contractors working for Operators seems to be a double standard.
- Engage Labor organizations to participate in the future.
- The enforcement of the rule is headed toward a rule that requires training to be successful.
- If you want to limit incidents and accidents invest in training.
- You have a responsibility to the public and your employees.