

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 4, 2016

Mr. Mark Williams
West Coast Gas Company Inc.
9203 Beatty Drive
Sacramento, CA 95826

GI-2016-05-WCG34-07

SUBJECT: General Order 112¹ Gas Inspection of West Coast Gas Company

Dear Mr. Williams:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted Operator Qualification (OQ) inspection of West Coast Gas Company (WCG) on May 9-11, 2016.

The audit consisted of a review of the Operator Qualification Plan, operator training and evaluation methods, and operator qualification records of WCG employees for the years 2013 - 2015.

SED's findings are noted in the Summary of Inspection Findings (Summary) which contains probable violations and areas of concerns, recommendations, and observations. During the audit, WCG made changes to its OQ Plan and took corrective actions to incorporate some of the procedural and record keeping related deficiencies that SED identified.

Within 30 days of your receipt of this letter, please provide a written response indicating the corrective actions and preventive measures taken by WCG to address the violations and observations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the inspection.

If you have any questions, please contact Banu Acimis at (916) 928-3826 or by email at banu.acimis@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

Title 49, Code of Federal Regulations (CFR), §192.805 Qualification program

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (a) Identify covered tasks;*
- (b) Ensure through evaluation that individuals performing covered tasks are qualified;*
- (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;*
- (d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191;*
- (e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;*
- (f) Communicate changes that affect covered tasks to individuals performing those covered tasks;*
- (g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed;*

1. SED reviewed the covered task list provided in the OQ plan, titled "OQ 11.1: Identified Covered Tasks," as well as the subject matter expert survey that was used to create the covered task list.

SED identified the following covered tasks that are not listed in the covered task lists in WCG's OQ Plan.

- Leak repair by clamp
- Valve Maintenance: repair, replace, and/or refurbish a valve

SED noted that WCG must add the aforementioned tasks and all other unlisted tasks that WCG currently performs to its covered task list as per Title 49, CFR §192.805 (a) & (g).

Additionally, WCG must establish training and evaluation methods suitable to ensure its employees and contractors are qualified to perform the newly added covered tasks as per Title 49, CFR §192.805 (b). Training material and testing must include task specific Abnormal Operating Conditions (AOC) for the newly added covered tasks.

Moreover, WCG must communicate with WCG's personnel about changes to the OQ program which affect the individuals performing such tasks as per Title 49, CFR §192.805 (f).

Please provide SED with the revised sections of the OQ Plan, training & evaluation program along with reevaluation interval determined for the newly added covered tasks that address the identified deficiencies.

2. Title 49, CFR, §192.805 Qualification Program states in part:

"(d) Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an incident as defined in Part 191;
(e) Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;..."

WCG Procedure “OQ-6: Individual is No Longer Qualified to Perform a Covered Task” states, “if an individual has lost qualifications to perform a covered task or tasks, the individual may be re-evaluated by WCG and gain approval once more.”

SED noted that the above mentioned procedure is overly vague, and does not include a requirement to retrain, either fully or in part, an individual who is deemed no longer qualified to perform a covered task.

SED determined that WCG must state in greater detail the procedure to ensure adequate re-qualification of an individual whose qualifications had previously been brought into doubt as per Title 49, CFR §192.805 (e), especially if the individual may have contributed to an accident or incident involving the pipeline facilities as per Title 49, CFR §192.805 (d). WCG must consider providing additional or refresher classroom and/or field training necessary for the individuals to obtain qualifications to be able perform the covered tasks successfully.

Please provide SED with the revised version of the OQ Program procedures which address the deficiency identified above.

II. Areas of Concern/ Observations/ Recommendations

1. Title 49, CFR, §192.803 states in part:

“Qualified means that an individual has been evaluated and can:

- (a) Perform assigned covered tasks; and*
- (b) Recognize and react to abnormal operating conditions.”*

SED reviewed the OQ plan provided by WCG, as well as its computer-based modules that WCG uses as training materials, and the forms WCG uses during field tests to qualify individuals on certain tasks. SED found no comprehensive list of task-specific abnormal operating conditions (AOCs) within the OQ plan since most of the training modules reviewed only contained a single AOC related to a task.

SED is concerned that the AOCs presented during training as well as the AOCs reviewed during evaluation are not task specific. Therefore, SED recommends that WCG compile a more comprehensive list of AOCs that are specific to the tasks that qualified individuals must learn to be able to recognize and react to them while performing related covered tasks.

SED also noted that general AOCs listed in WCG’s Training Module 10.2 should also be incorporated into the OQ Plan. Additionally, task specific AOCs that appear on the new field forms should be expanded and employees should be trained accordingly.

Moreover, SED recommends these task-specific AOCs be incorporated into the training and evaluation portions of WCG’s OQ program.

Please provide SED with list of AOCs that are specific to each covered task and related sections of the OQ Plan that address the deficiencies identified above.

2. SED noted that since WCG’s training modules 10.1 & 10.2 provide essential information for natural gas, general abnormal operating conditions, and emergency preparedness; WCG should provide these training modules to all employees in the company.
3. WCG informed SED that it is in the process of hiring and training a new employee for its Castle gas distribution system. Please provide operator qualification records for the employee with the list of covered tasks that he is responsible for performing along with evaluations records.