



*AGA DIMP Workshop
August 13, 2008*

Panel 3: Prevention Through People



The 7 Key Elements as noted in § 192.1007

- 1) Know your system
- 2) Identify threats to integrity of system, including a section titled “Assuring Individual Performance” to evaluate the contribution of human error and the intervention to risk (PTP-theme)
- 3) Evaluate and prioritize risk
- 4) Identify and implement measures to address risks
- 5) Measure performance, monitor results, and evaluate effectiveness
- 6) Periodic evaluation and improvement
- 7) Periodically report a limited set of performance



AGA Position on “Assuring Individual Performance”

- Human factors cited by Congress in 2006 PIPES Act, but only in relation to CRM.
- Existing programs & regulations sufficiently address the threat of inappropriate actions of various individuals:
 1. Operator Qualification (1999)
 2. Drug & Alcohol testing for both employees and contractors
 3. Damage prevention program under 192.614 encompassing 3rd party excavators and public (DIMP suggests enhancements to DP program be made)
 4. Public education programs under 192.616



*AGA Position on
“Assuring Individual Performance”*

- Proposal is extremely vague and would be too subjective to enforce fairly or effectively. (GPTC is not confident it can even craft guidance)
- No basis for fatigue management under DIMP
- PTP not included anywhere in DIMP Phase 1 Report



Final AGA Perspective

- People are confused on the intent and what it is trying to accomplish.
- The concept may well have some merit, but it must be considered in a separate forum apart from DIMP.
- AGA suggests a government–industry task group be formed to conduct full investigations on what added provisions might be warranted under the PTP concept.