

Operator Qualification

Industry Perspective

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Background

- Rule developed under different Administration
- Several high profile incidents
- Pressure to ensure consistency & adequacy
 - Public
 - NTSB
 - Legislature
- Pipeline Safety Act → LAW

Performance Rule + Adequacy + Consistent Enforcement

=  GAP

Facts:

- Compliance dates
 - Plans 4/01
 - Qualification of Personnel 10/02
 - Law Passed 12/02
- Performance rule w/o prescriptive criteria / benchmarks
- Protocols to facilitate consistent enforcement
- Protocols drive intensive discussions (audits) about process & thinking
- Anxiety that protocols go beyond the rule

**GOAL: Focus effort on ensuring
that people are qualified**

Key Ingredients

Parallel Solutions
Enlist All Stakeholders

Can't have Performance without Prescriptive

Prescriptive



Performance

- Work jointly to prescriptively define acceptance → reduce ambiguity
 - Define
 - Who – what tasks
 - How – qualification verification
 - When – how often
 - Establish credible, effective, clear & actionable criteria / benchmarks
- Work jointly to develop “protocols” to carry process discussion of performance rule & close the gap

To Do:

- Prescriptive
 - Define acceptance criteria / benchmark
 - Provide clear target for both regulators & operators
 - Work jointly & quickly
 - Potentially revisit the OQ rule
- Performance
 - Develop effective protocols for acceptance
- Develop interim / transition enforcement plan

Pass the Red-Face Test → Ensure Qualified Personnel