

Date



2022 IMP OQ PAP CRM Update



OKLAHOMA

Integrity Management

- We continue to review plans and records in HCA's
- As stated earlier—DW & ECO USA's are harder to determine—spending more time on USA's & HCA
- Remember City limits change—therefore your HCA segments could change
- [USA's in Oklahoma](#)



Integrity Management

- Data collection— for ECDA
- Assessment and Repair ensure when using DA-- SP0502 requires operators to collect Data in accordance with section 5.3.
- Ensure you are using SP0502 not RP0502.



Integrity Management

FACILITIES

- FACILITIES ONLY REQUIRE EVALUATION TO DETERMINE COULD EFFECTS AND P&Ms
- FACILITIES **DO NOT** HAVE TO BE ASSESSED—SEE 195.452 (c)(1) (J)(1)—line pipe

MEANING WHAT

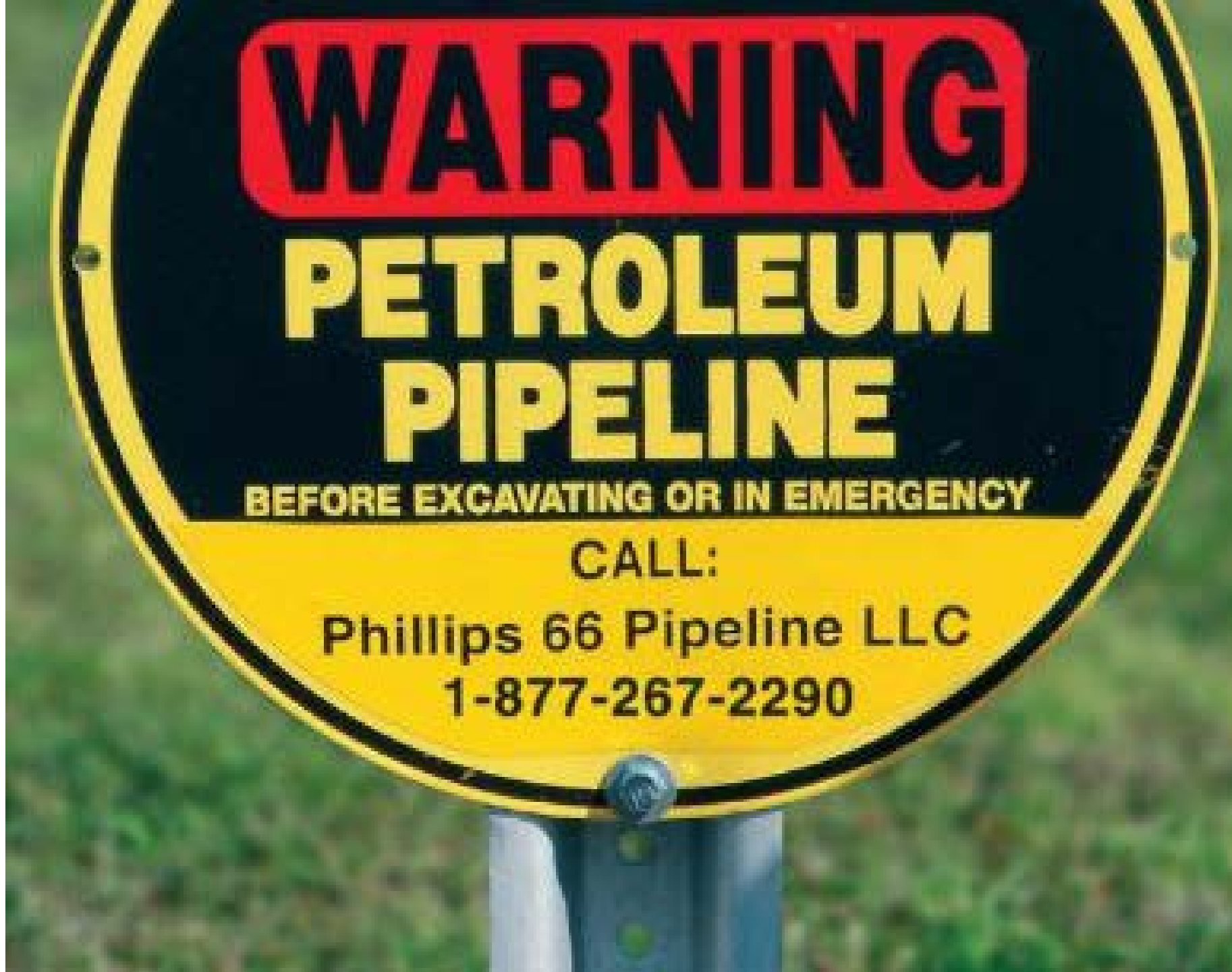
- AT TRAP---FROM SIDE WALL VALVE TO TANK???????



Integrity Management

- ECDA Quals cont

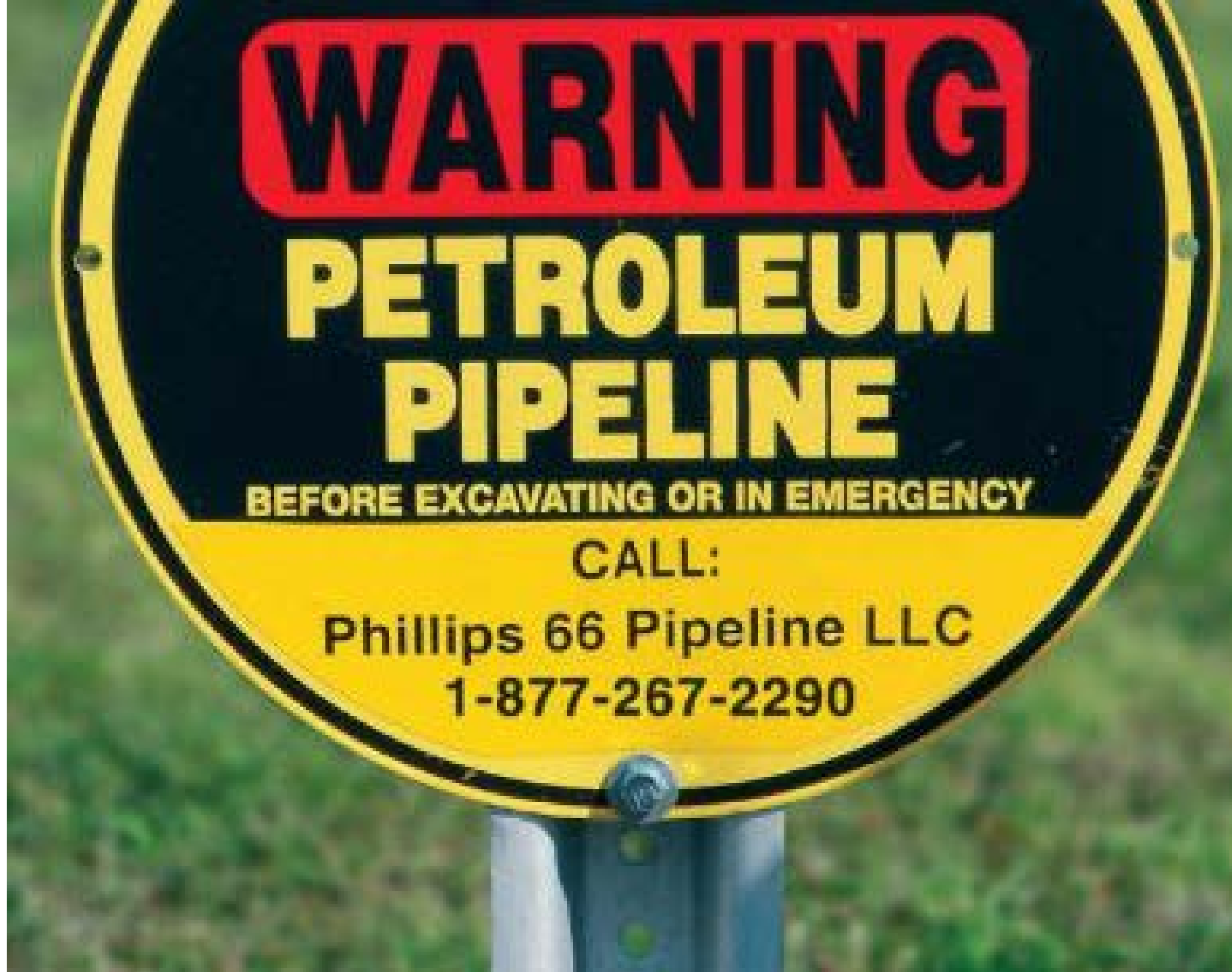
1.3.1 The provisions of this standard should be applied under the direction of competent persons who, by reason of knowledge of the physical sciences and the principles of engineering and mathematics acquired by education and related practical experience, are qualified to engage in the practice of corrosion control on buried or submerged metallic piping systems. Such persons **may** be registered professional engineers or persons recognized as Corrosion Specialists, CP Specialists, or Corrosion or CP Technologists by NACE if their professional activities include suitable experience in the collection and evaluation of these types of data used to monitor external corrosion control of buried or submerged metallic piping systems.



Integrity Management

- ECDA Qualifications—1.3 of SP0207

1.3.2 Persons performing these types of surveys (for the purposes of this standard, called surveyors) must be qualified to understand and follow the applicable procedures contained in this standard or work under the direct supervision of a person that is qualified. Such persons **may** be recognized as NACE CP Testers, Corrosion or CP Technicians, Technologists, Specialists, or equivalent if their professional activities include suitable experience in performing surveys of buried or submerged metallic piping systems.



Integrity Management

Using pressure test as an assessment method

Who signs off on the test being acceptable--ANYONE

- Maybe Project Engineer someone other than the contractor
- Hydro failure outside of a HCA—send it off for lab analysis—do not just assume a “seam failure”



Integrity Management

195.452(g) *What is an information analysis?*
Effective 10-1-2022

- (1) Integrate information and attributes about the pipeline that include, but are not limited to:
 - (i) Pipe diameter, wall thickness, grade, and seam type;
 - (ii) Pipe coating, including girth weld coating;
 - (iii) *Maximum operating pressure (MOP)* and temperature;
 - (iv) Endpoints of segments that could affect high consequence areas (HCAs);
 - (v) Hydrostatic test pressure including any test failures or leaks - if known;
 - (vi) Location of casings and if shorted;
 - (vii) Any in-service ruptures or leaks - including identified causes;
 - (viii) Data gathered through integrity assessments required under this section;
 - (ix) Close interval survey (CIS) survey results;



Integrity Management

(g) *What is an information analysis? Effective 10-1-2022*

- (x) Depth of cover surveys;
- (xi) Corrosion protection (CP) rectifier readings;
- (xii) CP test point survey readings and locations;
- (xiii) AC/DC and foreign structure interference surveys;
- (xiv) Pipe coating surveys and cathodic protection surveys.
- (xv) Results of examinations of exposed portions of buried pipelines (i.e., pipe and pipe coating condition, see §[195.569](#));
- (xvi) Stress corrosion cracking (SCC) and other cracking (pipe body or weld) excavations and findings, including in- situ non-destructive examinations and analysis results for failure stress pressures and cyclic fatigue crack growth analysis to estimate the remaining life of the pipeline;
- (xvii) Aerial photography;



Integrity Management

(g) *What is an information analysis? Effective 10-1-2022*

- (xviii) Location of foreign line crossings;
- (xix) Pipe exposures resulting from repairs and encroachments;
- (xx) Seismicity of the area; and
- (xxi) Other pertinent information derived from operations and maintenance activities and any additional tests, inspections, surveys, patrols, or monitoring required under this part.

FIELD FORMS

- If it is a question of the Field form—populate it—may not be applicable-but Data is Data—IE Soil Resistivity



Integrity Management

ILI DATA REVIEWERS

Level II & III ILI reviewers

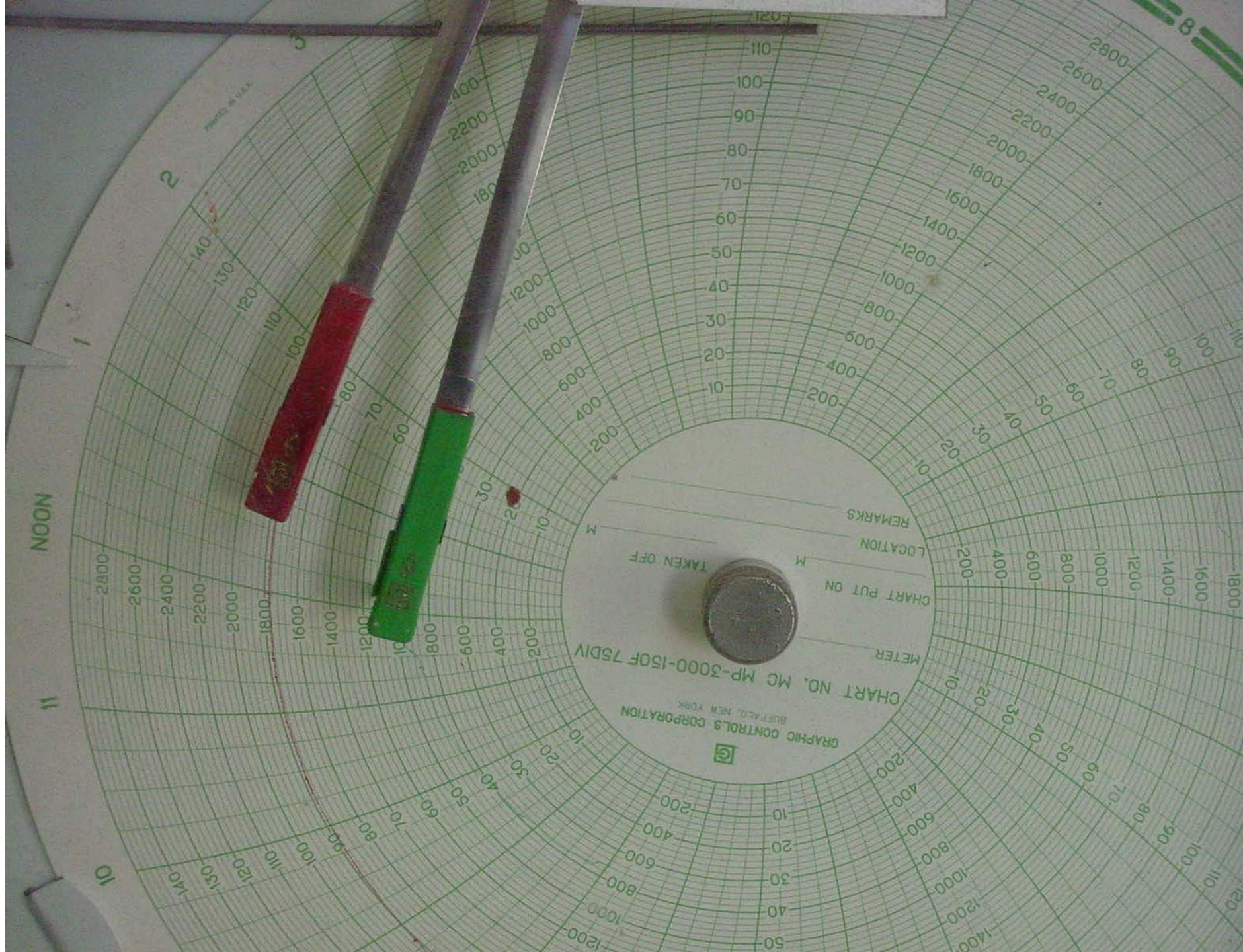
In accordance with ASNT ILI-PQ-2005 Several hours of training are recommended based on the tool type & Level of individual. Ranges from 40-500

Get a copy of ILI-PQ and review sections 8-14.



Integrity Management

- Pressure testing Documentation—Operators welded up in the yard, pressure tested and taken to job site.
- Operator must be able to substantiate where each foot of pipe is.
- Some type of pipe log
- How do you document scrap—charge out 15 ft but only install 8 ft.



Integrity Management

- SRC reporting if applicable—it is a FAQ
- OQ on repairs
- Welding Procedures & Welder Qualifications



Integrity Management

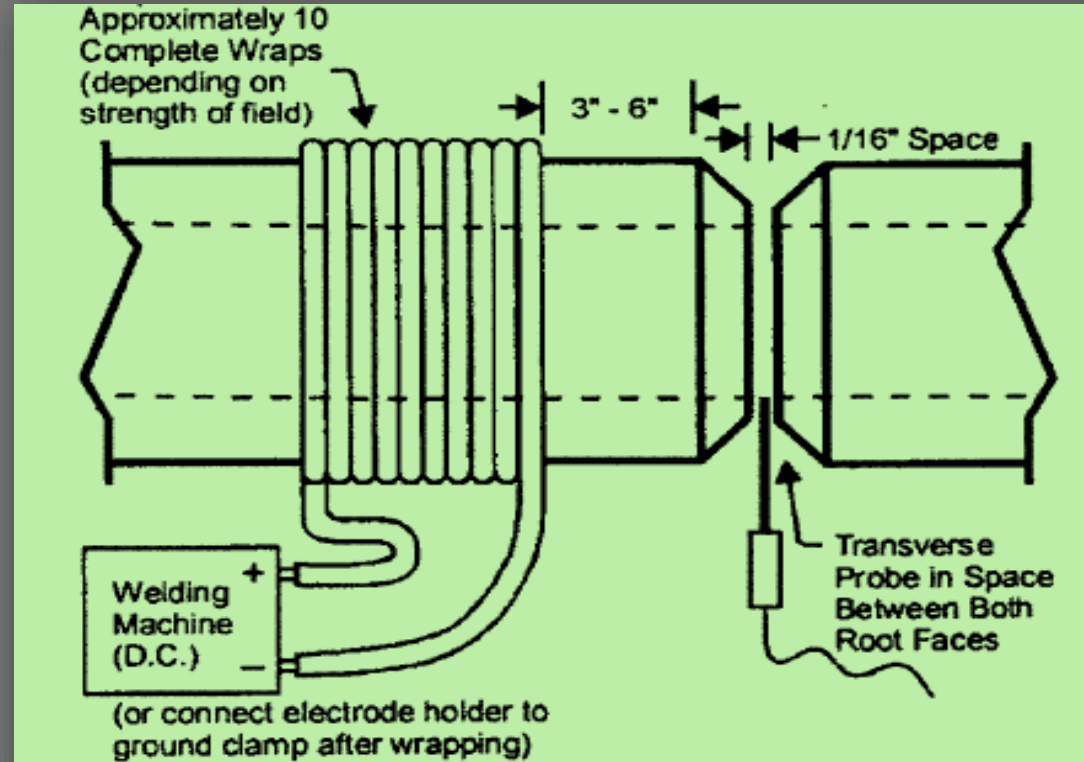
- Air dispersion model—use local data—
- Water transport—is a 100 year flood study accurate—we had a 500 year flood just a few years ago.
- Do not use the 1996 NPMS Earthquake data—way too old—USGS has better more up to date data. Have seen risk models reference this document



Integrity Management

- Magnetism after an ILI run — any procedures to degauss
- Our Pipe must be weldable
- If pipe remains magnetized it can lead to root bead cracking and x-ray may not pick it up
- Only document in which magnetism is talked about is API 5L on new pipe

Reducing or Temporarily Eliminating Magnetic Field



NOTE: On some projects, placing the coils one-half the diameter of the pipe from the joint to be welded reduced the field more than having the coil close to the joint.

Integrity Management

- With all the retirements-
New personnel are trying to
streamline plans—they are
taking it too far—it will get
you in a bind



Integrity Management

QUESTIONS

Operator Qualification

- SPAN OF CONTROL
- 1:0 on the following:
 - Welding
 - NDT—195.234(b)(2) requires training
 - Hottapping-(Operators decision—does not actual meet 4 part test)
 - Rare occasions Plastic Fusion



Operator Qualification

FROM AN OPERATORS PLAN

- **Span of Control** –The maximum number of **non-qualified individuals** that a **Qualified Individual** can direct and observe for the conditions under which the task is being performed.
- **Span of Control (SOC) Limit** – ratio of **non-qualified individuals** who may perform a covered task under the direction and observation of a **qualified person**, provided such is allowed.
- Covered Task List 1:3—the way it is written that is **1 non-qualified being observed by 3 qualified**

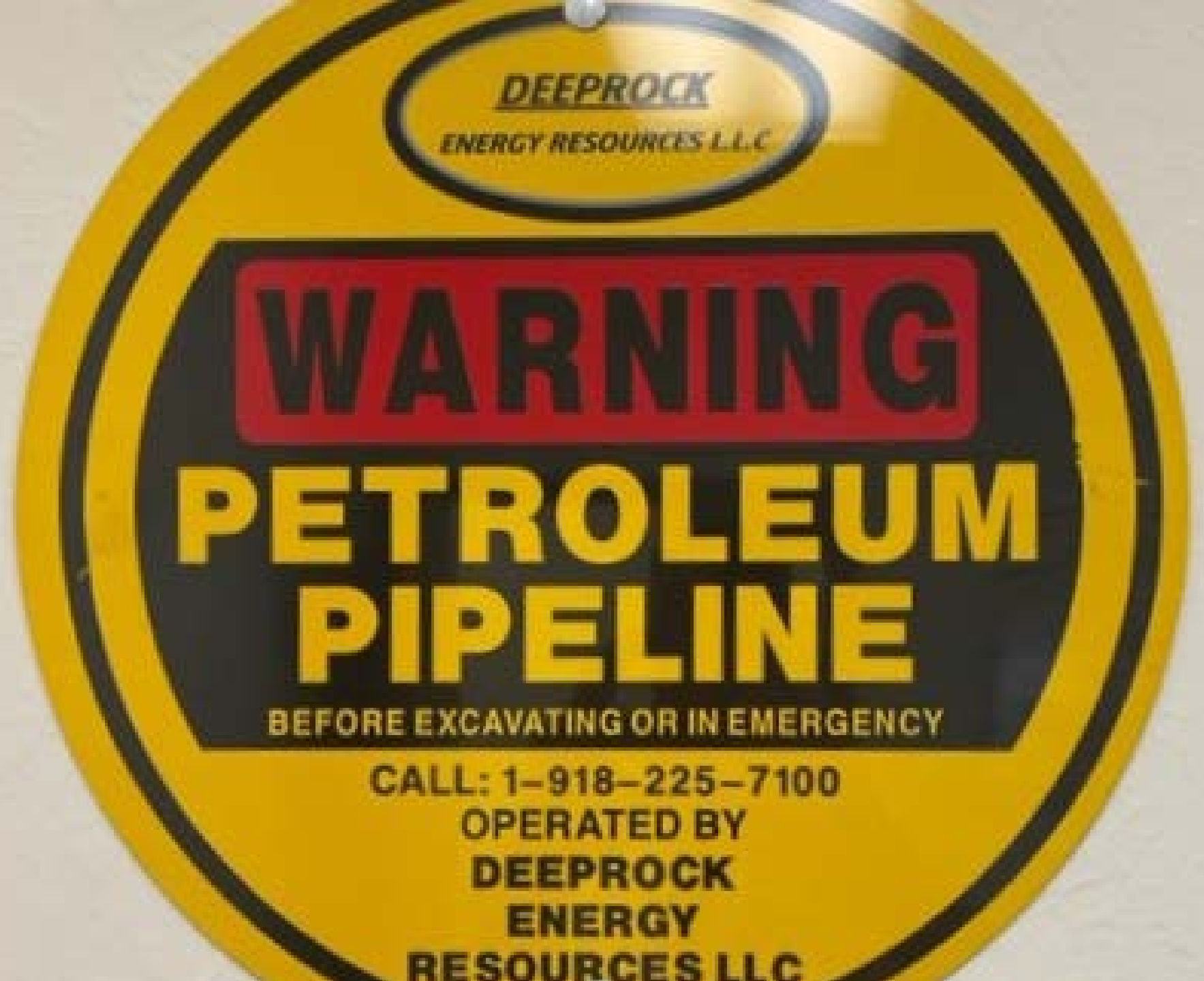
Task ID	Task Description	49 CFR 192	49 CFR 195	Evaluation Method	Perf by Non Qualified Indiv Allowed?	Span of Control Limit	Requai Interval (Years)
707OP	Permanent Field Repair Using Bolt-On Clamp/Sleeve	192.717	195.422(a) 195.585(a)(2)	Observation & Oral Exam.	Yes	1:3	3
708OP	Permanent Field Repair Using Full Encirclement Weld Sleeve	192.717	195.585(a)(2) 195.422(a)	Observation & Oral Exam.	Yes	1:3	3
709OP	Inspection and Testing of Relief Devices (Compressor Stations, Meter Stations, Regulating Stations)	192.731(a) 192.731(b) 192.739 192.743	195.428	Observation & Oral Exam.	Yes	1:3	3
710OP	Inspect/Test Compressor Station Remote Control Shutdown Devices (ESD/EBD)	192.731(c)	N/A	Observation & Oral Exam.	Yes	1:3	3
711OP	Inspect, Test, and Maintain Control Systems	192.731(c)	195.428(a) 195.428(a)	Observation & Oral Exam.	Yes	1:3	3
712OP	Programmable Logic Controllers	192.731(c)	195.428(a) 195.408(b)(1)	Observation & Oral Exam.	Yes	1:1	3
713OP	Test/Maintain Gas Detection and Alarm Systems	192.736(c)	N/A	Observation & Oral Exam.	Yes	1:3	3
714OP	Inspect and Maintain Pressure Limiting and Regulating Devices	192.739 192.743(a) 192.619(b)	195.428	Observation & Oral Exam.	Yes	1:3	3
715OP	Test and Maintain Pressure Switches and Transmitters in Pressure Limiting and Regulating Service	192.739 192.743(a) 192.619(b)	195.428	Observation & Oral Exam.	Yes	1:3	3
716OP	Inspect, Maintain, and Operate Valves	192.745 192.747	195.420(a) 195.420(b)	Observation & Oral Exam.	Yes	1:2	3
718OP	Monitoring for Internal Corrosion with Liquid Samples	192.751 192.477 192.620	195.579	Observation & Oral Exam.	Yes	1:3	3

Please Double Check Your Plan

Operator Qualification

- Qualification dates—still seeing where an individual is qualified on numerous task(20-25) in one day--- HARD TO DO
- Ensure contractors quals are for your company
- Have seen where it states—

“These qualifications only apply to Bruce’s Brother in Law Pipeline” that means they will not work for “Bruce’s Sister in Law Pipeline”



Operator Qualification

- Reevaluation intervals
- **§195.507 Recordkeeping**
 - (a) Qualification records shall include:
 - (3) Date(s) of current qualification;
and

Will need to see the actual date(s)---NOT the date of the next reevaluation. Must ensure you are in compliance with your plan. Some contractors may have a different reevaluation interval and they are working under your plan.



Operator Qualification



**Operator
Qualification**

Questions

Public Awareness

- With all the retirements- New personnel are trying to streamline plans—they are taking it too far—it will get you in a bind—WOW HEARD THAT STATEMENT TODAY
- Do not change your PAP without talking to us



PUT A NOTE ON THE COVER

OF EVERY PLAN

DO NOT CHANGE PLAN

WITHOUT TALKING TO

REGULATORY AUTHORITIES

Public Awareness

- Print material must indicate the operators name as associated with the PHMSA OPID
- Cannot use the parent name alone
- If so, the 1st time was for practice.
- REMEMBER SPILL CONSEQUENCES IF IT HITS WATER—IT COULD REQUIRE APPROPRIATE NOTIFICATION BE SENT SEVERAL MILES DOWNSTREAM



Violation—is not 1” tall



Public Awareness

- Is this really a violation?
- § 195.410 Line markers
 - (i) The word “Warning,” “Caution,” or “Danger” followed by the words “Petroleum (or the name of the hazardous liquid transported) Pipeline”, or “Carbon Dioxide Pipeline,” all of which, **except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high** with an approximate stroke of 1/4 inch (6.4 millimeters).



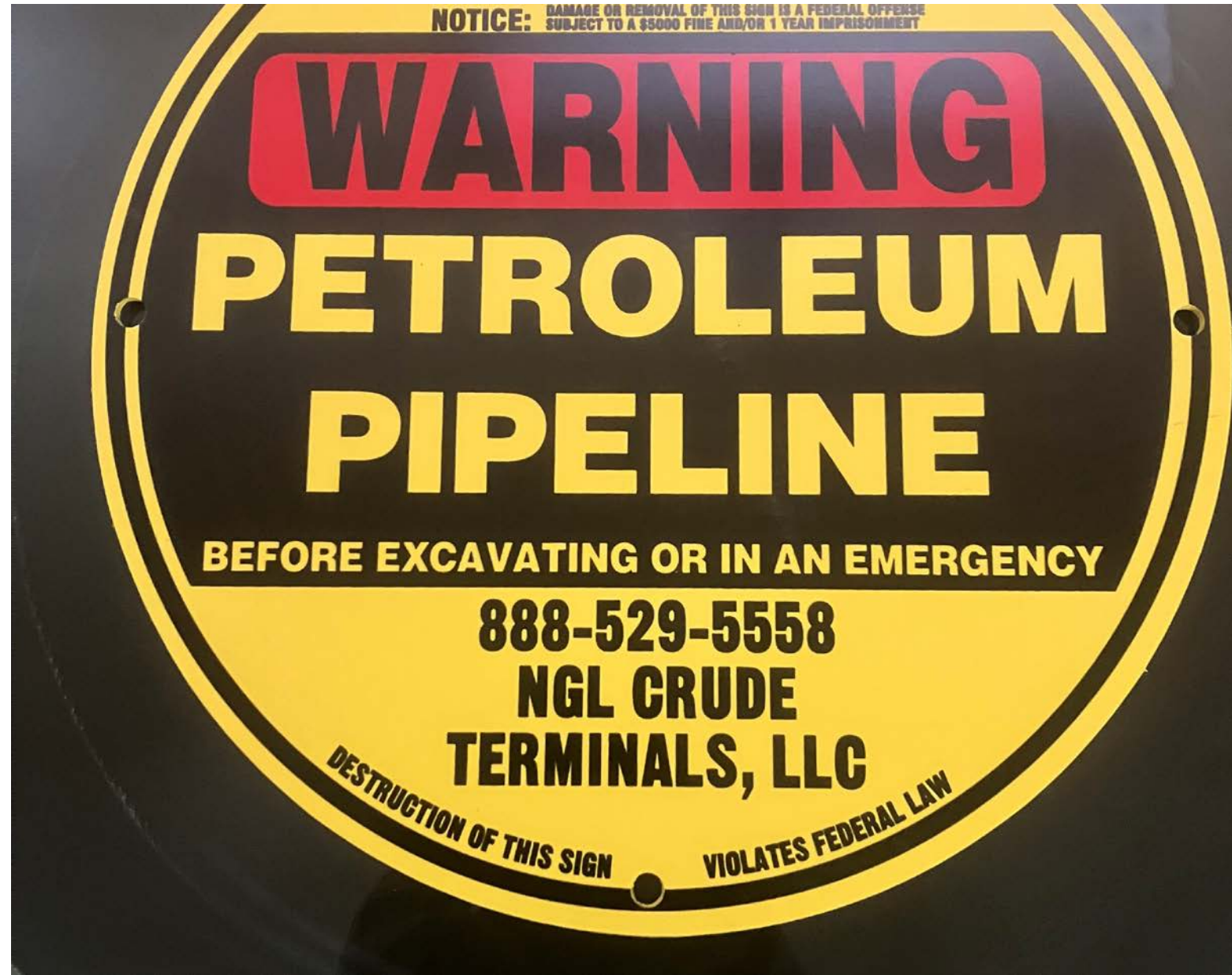
Violation—is not 1” tall



Public Awareness

- OPERATORS ARE TAKING ADVANTAGE OF PAP FOR LIAISON---AND THAT IS PERFECTLY OK

- JUST REMEMBER WHAT I SAID EARLIER ABOUT LIAISON



Public Awareness

- SMALL OPERATORS USING BUSINESS REPLY CARDS—"BRC" FOR EFFECTIVENESS—WE MAIL HUNDREDS AND NO BRC'S ARE RETURNED—ARE BRC'S A GOOD MECHANISM. CAN I FACE TO FACE OR TELEPHONIC SURVEY
- OVERMAILING STILL
- IT BECOMES JUNK MAIL
- CHECK YOUR MAILING LIST FOR DUPLICATES
- WE ARE MAILING TO US SENATORS AND HOUSE OF REPRESENTATIVES MEMBERS---WHY --THEY DO NOT MEET THE DEFINITION IN 1162 OF LOCAL PUBLIC OFFICIALS—THEY WILL NOT RESPOND



**PUBLIC
AWARENESS**

Questions

Control Room Management

- Be careful on Span of Control while training
- Encourage you TO OQ and perform Pipeline Specifics 195.446(h)(4) (4) Training that will provide a controller a working knowledge of the pipeline system, especially during the development of abnormal operating conditions;
- AND THEN HAVE A TRAINEE ON THE CONSOLE WITH A QUALIFIED CONTROLLER



Control Room Management

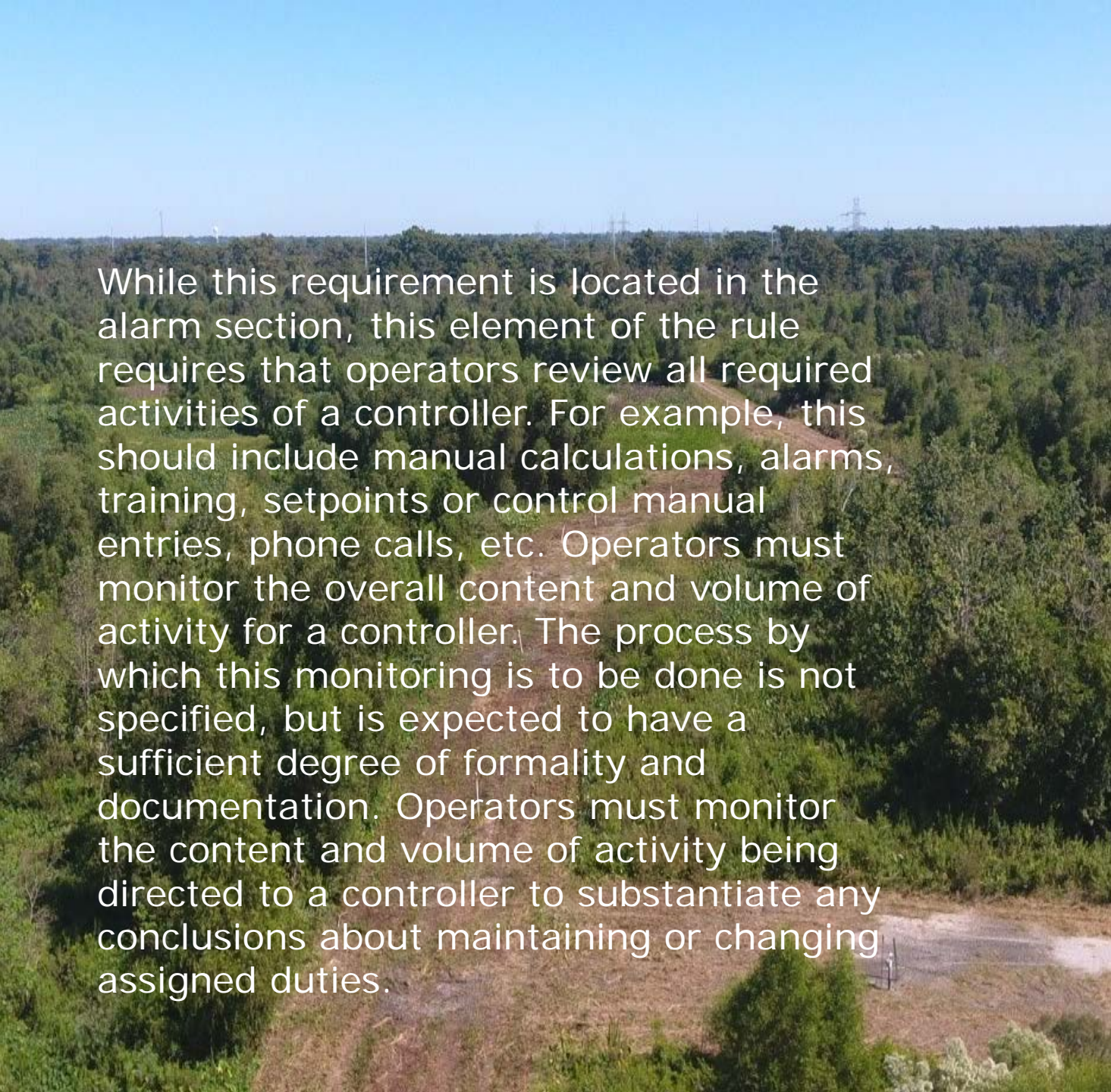
- *Controller* means a qualified individual who remotely monitors and controls the safety-related operations of a pipeline facility via a SCADA system from a control room, and who has operational authority and accountability for the remote operational functions of the pipeline facility.



Control Room Management

- 195.446(e)(5)
- (5) Monitor the content and volume of general activity being directed to and required of **each controller** at least once each calendar year, but at intervals not exceeding 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms; and

That means actual time of activities—not a average



While this requirement is located in the alarm section, this element of the rule requires that operators review all required activities of a controller. For example, this should include manual calculations, alarms, training, setpoints or control manual entries, phone calls, etc. Operators must monitor the overall content and volume of activity for a controller. The process by which this monitoring is to be done is not specified, but is expected to have a sufficient degree of formality and documentation. Operators must monitor the content and volume of activity being directed to a controller to substantiate any conclusions about maintaining or changing assigned duties.

Control Room Management

- WITH THE CHANGES ON KNOWING 911 JURISDICTIONAL AREAS—SUGGEST YOU USE THE CONTROL ROOM TO SET THAT UP



Control Room Management

SHIFT CHANGE

INFORMATION TO DISCUSS

As an operator you must discuss everything as required by 195.446(c)(5)

Implement section 5 of API RP 1168 (incorporated by reference, see § [195.3](#)) to establish procedures for when a different controller assumes responsibility, including the content of information to be exchanged.

[1168](#)

Pipeline Control Room Management

API RECOMMENDED PRACTICE 1168
FIRST EDITION, SEPTEMBER 2008

Control Room Management

SHIFT CHANGE LOG

GO BACK AND LOOK TO SEE IF YOUR CHANGE LOG ADDRESS' EVERYTHING IN 1168 SECTION 5

OUR 1ST REVIEW INDICATED MOST ITEMS WHERE IN PLACE BUT NOT ALL

REMEMBER

PRINT & SIGN

MOST COMPANIES HAVE DOCTORS WORKING FOR THEM AND THE SIGNATURES ARE NOT LEGIBLE



Questions
