



**Weyerhaeuser**

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March 4, 2005

Washington Utilities and Transportation Commission  
Attention: Alan E. Rathbun, Pipeline Safety Director  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

RECEIVED  
05 MAR -9 AM 8:59  
UTILITY  
COMMUNICATIONS

Re: Docket PG-040984

Dear Mr. Rathbun:

Attached is our response to each of the nine "Finding" identified in the subject Docket, which addressed issues identified in a November 17, 2004, Operator Qualification inspection performed by Ms. Patricia Johnson, WUTC Pipeline Safety Engineer.

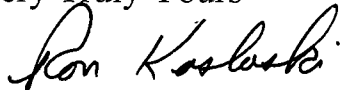
A copy of our recently revised Natural Gas Operator Qualification Program (OQ Plan) is enclosed. The OQ Plan document was revised to address the items in the inspection protocols used by Ms. Johnson during her inspection. As a result of the inspection and of further discussion since that inspection, we have made changes that will ensure that operator qualification records are readily accessible in the future.

Weyerhaeuser Company believes that we have been in compliance with the spirit of the OQ regulations, as evidenced by the records that we made available during the inspection and by the safe operation of the pipeline since construction in 1991. We believe that the Weyerhaeuser employees and contract pipeline operators have been properly trained and are qualified to perform their duties. The contract pipeline operators respond nearly daily to events identified by our information gathering system. Additionally, Weyerhaeuser employees and the contract pipeline operators have responded appropriately to the rare "significant" Operating Events that have occurred since the pipeline was constructed.

Weyerhaeuser Company is committed to Safe and Healthy Operations, which includes our commitment to comply with the OQ regulations. We

believe that the revised OQ Plan ensures full compliance with the OQ regulations and addresses all nine findings from the November 17, 2004 inspection.

Very Truly Yours



Ron Kosloski  
Weyerhaeuser Company Pipeline Operations Manager, Longview

Enc: Response to Docket PG-040984  
Natural Gas Operator Qualification Program

cc: Frank Busch  
Paula Stoppler  
Steve Oxford, Industrial Gas Services, Inc.

**Response to Washington Utilities and Transportation Commission  
Docket PG-040984: 2004 Weyerhaeuser (Longview Mill Natural Gas Pipeline)  
Operator Qualification Inspection**

**1. 192.805(a) Qualification Program**

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

*(a) Identify covered tasks;*

**Finding:**

At the time of the inspection, Weyerhaeuser's Operator Qualification plan (The Plan) had not identified and documented all applicable covered tasks. Tasks such as excavation of pipelines, lubricating valves, calibrating and operation of leak detection instruments and locating equipment, and inspection of exposed pipe are not included in the covered task list. The Plan did not state how the four-part test was applied to identify covered tasks.

**Weyerhaeuser Company Response:**

At the time of inspection, Weyerhaeuser had identified only those tasks that were being performed on the pipeline operation. The current Natural Gas Operator Qualification Program (OQ Plan) has identified many more tasks, using the Iowa Municipal Association of Municipal Utilities (IAMU) "Model" Operator Qualification Plan as a guide. The current OQ Plan specifies that the "four part test" was applied when developing the list of covered tasks.

**2. 192.805(b) Qualification Program**

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

*(b) Ensure through evaluation that individuals performing covered tasks are qualified;*

**Finding:**

At the time of the inspection, The Plan did not include evaluation methods for covered tasks and abnormal operating conditions (AOCs). Weyerhaeuser could not provide documentation demonstrating that the evaluation and qualification of individuals performing covered tasks and recognizing and reacting to AOC's had been performed.

**Weyerhaeuser Company Response:**

At the time of the inspection, documentation for contractor personnel training was not being maintained at the Longview mill site. By June 30, 2005, contractor training records and Weyerhaeuser employee training records will be assembled on site in paper form or in a readily accessible computer database.

We are confident that all Weyerhaeuser personnel and all contract personnel working on the pipeline operations are appropriately trained to recognize and

react to AOC's. In fact, the contract pipeline operators inspect for AOC's nearly daily, as identified in their pipeline patrols or as identified by the Weyerhaeuser information gathering system and communicated to the pipeline operators by the Weyerhaeuser Communications Center (COMM CENTER) operators. For example, all Weyerhaeuser and contract personnel responded appropriately during the railroad trestle fire that occurred several years ago and during the seismic events that have occurred over the past ten years.

3. **192.805(c) Qualification Program**

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

- (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;*

**Finding:**

At the time of the inspection, The Plan did not make provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual.

**Weyerhaeuser Company Response:**

Division 1.8 of the current OQ Plan provides for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual.

4. **192.805(d) Qualification Program**

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

- (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;*

**Finding:**

At the time of the inspection, The Plan did not address the evaluation method to be used if the operator had reason to believe that the individual's performance of a covered task contributed to an incident.

**Weyerhaeuser Company Response:**

Division 1.9 of the current OQ Plan addresses the evaluation method to be used if Weyerhaeuser has reason to believe that an individual performing a covered task contributed to an incident.

5. **192.805(e) Qualification Program**

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

- (e) *Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;*

**Finding:**

At the time of inspection, The Plan did not address evaluations of an individual if the operator had reason to believe that the individual was no longer qualified to perform a covered task.

**Weyerhaeuser Company Response:**

Division 1.9 of the current OQ Plan provides for evaluation of an individual if Weyerhaeuser believes that individual is no longer qualified to perform a covered task.

6. **192.805(f) Qualification Program**

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

- (f) *Communicate changes that affect covered tasks to individuals performing those covered tasks; and*

**Finding:**

At the time of the inspection, The Plan did not address communication of change. The Plan did not reference or include written procedures to communicate and document communicated changes.

**Weyerhaeuser Company Response:**

Division 1.10 of the current OQ Plan addresses the method of communicating and documenting changes made to the pipeline operations that would affect covered tasks performed by qualified individuals.

7. **192.805(g) Qualification Program**

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

- (g) *Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed.*

**Finding:**

The Plan does not identify covered tasks and AOC reevaluation intervals.

**Weyerhaeuser Company Response:**

At the time of the inspection, the WUTC reviewed a task list for tasks that are currently being performed by pipeline operators. The current OQ Plan incorporates an expanded list of covered tasks and incorporates re-evaluation intervals for AOC's and covered tasks.

8. **192.807 Record Keeping**

*Each operator shall maintain records that demonstrate compliance with this subpart.*

- (a) *Qualification records shall include:*

- (1) *Identification of qualified individual(s);*
- (2) *Identification of the covered tasks the individual is qualified to perform;*
- (3) *Date(s) of current qualification; and*
- (4) *Qualification method(s).*

(b) *Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.*

**Finding:**

At the time of inspection, Weyerhaeuser did not have records documenting evaluations or qualifications for covered tasks and recognizing and reacting to AOC's.

**Weyerhaeuser Company Response:**

At the time of the inspection, it was discussed that Weyerhaeuser employees currently responding in the event of an emergency are management employees considered to be qualified by virtue of education, experience, and training. Documentation of those items was not available at the time of the inspection but will be assembled in paper form or in a readily accessible computer database by June 30, 2005. As previously stated, documentation for contractor personnel will also be assembled in such a manner.

9. **192.809(b) General**

(b) *Operators must complete the qualifications of individuals performing covered tasks by October 28, 2002.*

**Finding:**

At the time of the inspection, Weyerhaeuser did not complete the qualification of individuals performing covered tasks by October 28, 2002. Weyerhaeuser written OQ Plan did not have evaluation methods for covered tasks or AOCs and did not provide documentation of the evaluation process to qualify individuals.

**Weyerhaeuser Company Response:**

Weyerhaeuser believed that it had complied with the spirit of this requirement, if not the precise letter of this requirement. Covered tasks were identified as early as 2000 and hands-on training was performed to provide for qualification of contract personnel that perform covered tasks on the pipeline. Pipeline operators and Weyerhaeuser employees have been properly trained since the pipeline was constructed in 1991, as evidenced by the safe operation of the pipeline since that time and particularly as evidenced by the appropriate response of Weyerhaeuser and contract operators to "significant" Operating Events that have occurred since 1991.

As a result of this review, which is the first time an OQ review has been held for this pipeline operation, Weyerhaeuser has developed written procedures to address the nine "Findings" listed above. Weyerhaeuser intends to fully comply with the spirit as well as the letter of the DOT OQ regulations and will continue to modify the current OQ Plan as necessary to meet future OQ compliance requirements.