

POST INSPECTION MEMORANDUM

Inspector: Scott Rukke, WUTC John Haddow
PHMSA lead, Warren Miller

Reviewed: _____

Follow-Up Enforcement:

NOA

Director Approval* _____

Date: October 12, 2011

Operator Inspected: **OPID:** 31684 **Region:** Western
 ConocoPhillips Pipe Line Company
 600 North Dairy Ashford
 Houston, TX 77079

Inspection Type: O09 Headquarter Team OQ inspection

Record Location: Houston, TX

Inspection Dates: August 29-September 2, 2011

AFOD: 5.0

SMART Activity Number: 133416

Operator Contact: Todd Tullio, Manager Regulatory Compliance

Phone: 832-379-6255

Fax:

Emergency: 1-877-267-2290

Pipeline Description:

Jurisdictional to Part 192 (Gas) Mileage

Company (Gas Operator)	Operator ID	State	Interstate Gathering	Intrastate Gathering	Interstate Transmission	Intrastate Transmission	Interstate Distribution*	Intrastate Distribution*	Remarks
ConocoPhillips	31684	CA	0	0	9.6	0	0	0	Natural Gas not in HCA
		LA	0	0	0	1.49	0	0	Hydrogen 0.27 HCA miles
		TX	0	0	0	30.22	0	0	LNG 3.70 NOT OQ

Jurisdictional to Part 195 (Hazardous Liquid) Mileage

Company (Liquid Operator)	Operator ID	State	Interstate Transmission	Intrastate Transmission	Remarks
ConocoPhillips	31684	Various	9076	1550	4178 mi. interstate in HCA 673 mi. intrastate in HCA

Team Members:

OPS/State Representatives	Region/State
Warren Miller	CR PHMSA
John Haddow (lead)	WR PHMSA
Scott Rukke	UTC WA

Facilities Inspected:

Operators OQ Plan and records.

Persons Interviewed:

Persons Interviewed	Title	Phone Number
Janet Wentroth	OQ Administrator	832-378-6266
Dianne Petty	OQ Administrator	269-628-5244
Brian Gibbs	OQ Coordinator	562-290-1511
Mark Becker	Training Administrator	832-379-6267

Probable Violations/Concerns:

1. **1.02 Contractor Qualification**
In the plan a 8.3.2, CP states “and/or” for qualifications by performance and written, but are actually doing both, waiting for official follow-up by ISNetworkworld.
2. **2.02 Evaluation Method(s) (Demonstration of Knowledge, Skill and Ability) and Relationship to Covered Tasks**
In Section 8.1.3, evaluation methods are addressed evaluation methods for company employees and those tasks that CP does not accept any other evaluation method (even for contractors).
In Section 8.3.2 addresses specific evaluation methods for contractors, which is addressed in NCCER/ISNetworkworld process. CP is in the process of making both written and performance evaluations for the evaluation methods.(Possible NOA that will be remedied before the letter goes out)
3. **4.02 Evaluation of Individual’s Capability to Recognize and React to AOCs**
Section 6.1 address what AOCs are and what the employees are responsible for. Appendix G addresses the generic AOCs. Were shown the covered task CPPL-MPR-6018, which has task specific AOCs addressed as corrective actions in the procedure. The team was shown the “draft” of proposed responses for generic AOCs.
4. **5.02 Reevaluation Interval and Methodology for Determining the Interval**
Appendix D addresses the span of control. Found the DIF did not have a legend on the 1-1-1, 3-3-3 or 5-5-5 interval justifications.
*Recommend review of the DIF.

5. **7.01 Qualification "Trail" (i.e., covered task; individual performing; evaluation method(s); continuing performance evaluation; reevaluation interval; reevaluation records)**

Prior to April 2006, CP had three databases. Welders, other employees, and contractors. Welders are still kept on manual program. Prior to March 2011, all information was not online.

Since March 2011, all qualification information storage and display is available through the OQ management system.

Review of records: Looked at records of qualification for personnel performing OQ tasks on specific jobs.

New system was timing out, not allowing an adequate review of company personnel.

Team was able to review contractors on ISNetworld. Questioned the number of tasks that one individual (contractor) was qualified to perform from the ISNetworld database.

Follow up on the history of prior offenses that are still open:

Prior Offenses (for the past 5 years)		
CPF #	What type of open enforcement action(s)?	Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)

Recommendations:

Maintain normal inspection cycle.

Continue to review above Probable Violations/Concerns with other team members and issue NOA for items not satisfactorily addressed.

Comments:

None

Attachments:

None.