

Ref. No. Docket PG-040984

VIA CERTIFIED MAIL

December 23, 2004

Ron Kosloski
Facilities Engineer
Weyerhaeuser Paper Company
PO Box 188
Longview, WA 98632-7117

Dear Mr. Kosloski:

Subject: 2004 Operator Qualification Inspection

On November 17, 2004, Pipeline Safety Staff (Staff) representing the Washington Utilities and Transportation Commission conducted an inspection of Weyerhaeuser Paper Company's (Weyerhaeuser) Operator Qualification Program (OQ).

The review of Weyerhaeuser's OQ Plan, practices and documentation identified nine violations of CFR 49, Part 192 Subpart N. The foregoing findings of probable violations constitute Staff's position at this time, based on its investigation. These findings of probable violations do not constitute Commission findings of violations.

There are several possible actions the Commission, in its discretion, may take with respect to this matter. For example, the Commission may consider the matter resolved without further Commission action. Or, the Commission may issue an administrative penalty under RCW 80.04.405. Or, the Commission may institute a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. This list of possible actions is not intended to be exhaustive, but it is intended to give the normal range of actions the Commission typically considers.

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Regardless what actions the Commission decides to take, if any, the company will have the opportunity to present its position on the merits of the matters involved. As of this date, the Commission has made no decision regarding what appropriate action it will take in this matter.

Staff requests a response to this letter by January 25, 2005, indicating how the findings, outlined will be addressed by Weyerhaeuser. Direct all inquiries to the attention of Patti Johnson, Pipeline Safety Engineer, and refer to docket number PG-040984 in any future correspondence regarding this investigation.

Please contact Patti Johnson at (360) 664-1266 or (360) 870-4915 for technical assistance or questions.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

Enclosure

cc: Steve Oxford, Industrial Gas Services

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-75 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting hazardous liquid in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49, Part 192 and 195.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2004 Operator Qualification Inspection Report
Weyerhaeuser Paper Company
Docket PG-040984

VIOLATIONS

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.

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.

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.

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.

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 the 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.

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.

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.

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

9. **192.809(b) General.**

- (b) *Operators must complete the qualification 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.