

PHMSA Pipeline Drug & Alcohol Questions

Instructions

1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses. Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	Puget Sound Energy	Op ID #	22189
Inspector	Patti Johnson, Dave Cullom, Lex Vinsel	Unit #	W King, Pierce, Thurston/Lewis, Sumas
Date of Inspection	7-27-2011		
Inspection Location City & State	Bellevue		
Operator Employee Interviewed	1.Darryl Hong, Program Coordinator 2.Cheryl McGrath, Manager of Gas Compliance 3.Scott Sammons, Damage Prevention Coordinator	Phone #	425 462 3911
Position/Title			
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)		Willie Abadill	
DER Phone #	425 462 3678		

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?		x	
Comments	<p>The substance abuse plan (Drug and Alcohol) plan is reviewed every 24 months. In August a 2011 review will be complete</p> <p>1. Does each contractor have an alcohol plan? Yes, and PSE review it annually. NCMS (National Compliance Management System) is company that keeps all contractors testing for both Drug and Alcohol. They monitor contractors. They do PHMSA reporting. They send notification to PSE when contractors are approaching out of compliance. PSE has process PV pg 78 of Anti Drug portion "A (a) "The company shall limit the scope of work for a contractor not in full compliance with all regulations to new construction functions. They shall not perform any work where live gas may be involved such as purging pipelines into service, tapping, service tie overs, or welding or fusion on active lines new construction" All new construction is a covered task per WAC 480-93-013. PSE was unsure if this referred contractor companies or individual contract employees. Either way the manual wording needs to be clarified. Issue will be addressed under the Sumas inspection.</p> <p>Gave PSE heads up on to ensure new construction in PSE O&M and field manuals is correct.</p> <p>2. Review plan to see what PSE requires contractor to do alcohol testing? YES, For new contractor PSE reviews Drug and Alcohol. Then gives to NCMS, NCMS do review and make sure they are in satisfactory compliance</p> <p>3. All definitions form 199.3 must be in D&A From review it appears that not all 199.3 definition in PSE's Drug Section of substances abuse plan are the same as 199.3: of Covered function, DOT procedure, Fail a drug test, Positive rate for random drug testing,</p> <p>4. Open 199.101 and ensure all there (a) Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and the DOT Procedures. The plan must contain— (1) Methods and procedures for compliance with all the requirements of this part, including the employee assistance program;</p>			

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	<p>(2) The name and address of each laboratory that analyzes the specimens collected for drug testing; and</p> <p>(3) The name and address of the operator's Medical Review Officer, and Substance Abuse Professional; and,</p> <p>(4) Procedures for notifying employees of the coverage and provisions of the plan.</p> <p>According to table of contents all items are covered</p> <p>5. 192.245 items are covered</p> <p>Reviewed PSE MIS Data Collection form for PSE employees and contractors</p>			
.3 .105(c) .225(b)	<p>2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions?</p> <p>Yes, all forms in back of portion of drug and alcohol manual</p> <p>For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.</p> <p>PSE HR for employees does random computer selection. Each contractor does testing and information sent to NCMS. Pag 79 Under contractor monitoring C 3.</p>	X		
Comments	<p>Reviewed PSE MIS Data Collection form for PSE employees and contractors</p> <p>1. 105 – 25% testing</p> <p>2. Open 225 (b) yes testing done,</p>			
.3 .105(b)	<p>3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident?</p> <p>Yes,</p> <p>Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.</p> <p>Yes, multiple positions. Pg 24 IV Drug Tests required B</p>	X		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	<p>4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?</p> <p>Reviewed June 24, 2010. Drug and Alcohol Training DOT supervisors. For contractors each company manages in accordance with their plan. NCMS monitors PSE did not have contractor information readily available</p> <p>.113 c – ok</p> <p>.117 – yes</p> <p>.227 b 2 - The operator's copy of the alcohol test form, including the results of the test. (ii) Documents related to the refusal of any covered employee to submit to an alcohol test required by this subpart. (iii) Documents presented by a covered employee to dispute the result of an alcohol test administered under this subpart. PSE has documentation and it is filed with</p> <p>.241 – pg 77 XIV Record Keeping Procedures has procedure and location of all records. And then XV had same for contractors</p>	X		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	<p>5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number?</p> <p>Yes, EBA, pg 72 XII Reviewed bulletin, PSE web information is not mentioned in O&M.</p>	X		

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	<p>Provide details in Comments below. Confirmed EAP assistance program phone number, Contractors maintain own EBA programs. Did not verify as part of inspection.</p>			
Comments				