



24 January 2002

BP Pipelines (North America)  
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## U.S. DOT Operator Qualification Rule for Pipelines

Dear BP Pipelines Contractor:

On October 26, 1999 the U.S. Department of Transportation (DOT) issued Operator Qualification (OQ) regulations requiring many changes in the way we interact with our contractors and qualified personnel who operate and maintain our pipelines. Many of you have attended previously announced industry-sponsored Regional Contractor Meetings detailing the requirements and OQ compliance plans that took place around the country throughout the fall.

As was stated during these Regional Meetings, use of the National Center for Construction Education and Research (NCCER) qualification process is BP's much preferred method of qualification for contractors; NCCER is a non-profit education foundation. This **industry-standard** method of qualification represents a development investment of literally thousands of workhours and millions of dollars by all of the pipeline companies participating (with API) in the Consortium on Operator Qualification, which currently includes approximately 40 pipeline companies. To find additional information regarding the NCCER programs and locations where qualifications can be administered, please check their website at [www.nccer.org](http://www.nccer.org) and click on the API logo. The site contains links to the NCCER/API Pipeliner Training & Assessment Program (PTAP) documents as well as information on Accredited Sponsors (testing/assessment centers). As stated in previous letters and our contractor newsletter (Contractor News Notes), BP Pipelines has placed our OQ information on the web at [www.bppipelines.com](http://www.bppipelines.com).

In order to help our contractors better understand the requirements, we have summarized at a high level the most common OQ "Covered Tasks" that contractors perform for BP in the table attached. For a complete listing of all applicable BP OQ tasks and subtasks and their mapping to the NCCER listing of OQ tasks, access the [www.bppipelines.com](http://www.bppipelines.com) website and look for the Excel worksheet titled OQ Covered Task Index Matrix. This matrix also lists the current applicable NCCER written assessment that applies to each BP-accepted Covered Task.

The example discussed below will help you understand how to read and understand this chart, the matrix and the NCCER PTAP process. **The attached flow chart can be used to help follow along in this discussion...**

A very common pipeline task is in-service **Pipeline Lowering/Movement**; as indicated on the attached summary sheet, **Pipeline Lowering/Movement** has been identified by BP as an OQ Covered Task. This means it is subject to the DOT requirement that the person performing this task (foreman, equipment operators, laborers) be assessed as qualified to

perform this work. According to this summary chart (which is **only a summary** of the detailed matrix on posted on BP's website) the prescribed assessment that includes this task is NCCER Maintenance Assessment, Level 2. The detailed outline of the particular Assessment (exam) is contained on pp. 28 of NCCER's PTAP document available for download from NCCER's website, listed above.

A review of this outline shows that the entire Maintenance Level 2 assessment consists of an 81-question written exam, with 7 to 9 of those questions dealing with the particular corresponding API-defined task of **Moving in-service pipe**. In order to qualify for this task, it will be necessary to take the entire assessment exam, answering correctly a sufficient number of the questions dealing with this particular Covered Task. Following an established NCCER assessment development process, other questions on other subjects listed in the assessment outline will be included in random order in the same assessment (for example, 5-7 questions will address Conduct Pressure Tests). If the only qualification sought is for tasks related to **Moving in-service pipe**, then whether the other questions (dealing with other Covered Tasks) are answered correctly (or at all, in fact,) is irrelevant. Note that the person taking the test will need to use some care to select all the questions dealing with **Moving in-service pipe**, since, as stated above, the 81 questions dealing with all the topics covered on the assessment are presented in random order.

Once the completed assessment is returned under the supervision of the proctor at the assessment Sponsor (testing center), the assessment will be scored by NCCER. If a sufficient proportion of the questions dealing with **Moving in-service pipe** are scored with a correct answer, then the NCCER computerized National Registry will be updated to show that the person is OQ qualified for the **Moving in-service pipe** task by written assessment (or, in NCCER terminology, "Certified – Written"). The individual taking the assessment will receive a written transcript from NCCER showing the OQ qualification **Moving in-service pipe (Task 33)– Certified (Written)**. Any other Covered Tasks that were qualified under the same Maintenance Level 2 Assessment will likewise be shown on the same NCCER transcript. The craftsperson earning these task certifications now has an industry-standard qualification that will be accepted by many, if not all, of the companies participating with API in the NCCER PTAP program, which provides maximum flexibility for the contractor in offering their employees' services and expertise to the pipeline industry.

Note that the table attached only presents high-level summaries of information on OQ Tasks and qualification requirements. BP's official governing requirements, including detailed "Subtask" listings, are itemized on the computerized spreadsheet matrix and BP's OQ Plan as posted on our website (and are subject to change as necessary to comply with evolving DOT requirements and interpretation of the Federal rules governing Operator Qualification). A review of these documents will show that BP, as pipeline operator, will accept the NCCER written assessment as qualification evidence for this particular DOT OQ Covered Task for this initial 3-year requalification period. Note: at any time in the future, BP may amend its' OQ Plan (with or without direction from U.S. DOT) to add qualification requirements that would then apply to either subsequent initial or periodic requalification assessments.

Once the qualification **Moving in-service pipe** is obtained by an individual, it will be necessary for you, as a pipeline industry contractor, to maintain and manage this and all other individual Covered Tasks assignments for all your employees assigned to a given BP jobsite, Business District or project. As you can see, with 50-plus individual Covered Tasks and Subtasks, tracking employee status with respect to BP's sites (and all your other clients' sites) could become a record keeping and DOT-audit nightmare.

To ease this burden on all of us, BP has accepted NCCER's Automated National Registry designated partner, ISN Software Corporation, as our preferred record keeping system. If you choose to use ISN's record keeping product, ISNetworld, you will be able to:

- Manage your employees OQ Tasks;
- Select and assign the precise OQ tasks and qualifications methods we accept;
- Automatically incorporate assessment results from the NCCER and possibly other BP-recognized third party assessment organizations;
- Submit OQ1 reports electronically in a format that we can maintain and access for audits per the regulation;
- Automatically receive our documents and updates via email;
- To help with the transition, you may wish to utilize American Record Keeping Corporation (an ISN subsidiary) to input data, set-up accounts and help assure compliance.

We urge you to call ISN today at (281) 277-8283 and begin the steps to get ISNetworld in place at your company. This telephone number will also put you in contact with American Record Keeping if you wish to use their services. Use ISNetworld to begin assigning BP OQ Tasks to your employees, select an acceptable qualification method and get your employees assessed through the NCCER assessment process. BP will be providing instructions soon on its' website on how contractors should format OQ report submittals through the ISNetworld system (assignment information for your individuals to BP projects/regions, etc.).

Once again, please visit our website, [www.bppipelines.com](http://www.bppipelines.com), for answers (including access to a FAQ – Frequently Asked Questions - document) to additional OQ questions you may have. Please remember that all project and maintenance contractor personnel are subject to these DOT-mandated qualification requirements for “Covered Tasks” beginning October 28, 2002.

Thank you in advance for your assistance.

Sincerely,

Michael J. Schwerha  
Manager, Engineering & Maintenance

## Common Activities Summary

Based on the prior page (tab) Index, the following list summarizes the most common activities that are:

- Defined as OQ Covered Tasks (meet the four-part test)
- Are commonly performed by Contractors for BP
- Have an Assessment prepared and made available by NCCER under the API COOQs development process

**Note: All Contractors performing OQ Covered Tasks will also require BP-specific Abnormal Conditions assessment (and training if necessary to pass assessment)**

### Common Contractor Activities \* (summary):

\* For a complete description of all the Covered Tasks, see Index Matrix on prior tab in Excel workbook

	<u>NCCER</u>		<u>Other Requirements that may or may not be directly associated with the</u>
	<u>Assessment and Level</u>	<u>OQ "Covered Task" itself but are commonly associated with the work</u>	
			(Not all inclusive - other requirements may be imposed by BP engineering specifications, BP OM&ER manual, industry or national codes, and/or by Federal, State or local law, etc.)
Pipe Wall Thickness Measurements	Corrosion	1	
Inspect Buried Pipe When Exposed	Corrosion	1	
Prepare and Apply Coatings - Aboveground, Buried or Submerged	Corrosion	1	
Conduct Annual Surveys	Corrosion	1M or 2	Depending on particular task - see details on Matrix
Install Test Leads	Corrosion	1M	
Read Rectifiers/Critical Bonds	Corrosion	1M	
Monitor/Remediate Internal Corrosion	Corrosion	2 or 3	See details on Matrix
Install/Replace CP Groundbeds	Corrosion	3	
Place and Maintain Line Markers	Maintenance	1	
Backfill Pipe Trench	Maintenance	1	
Line Locates and Marking	Maintenance	1	
Inspect Navigable Waterway Crossing	Maintenance	2	
Inspection of Tanks (API 653)	Maintenance	2	API 653 qualification also required for Inspection
Movement/Lowering of PL	Maintenance	2	
Disconnect, Purging, Sealing of PL	Maintenance	2	
Install or Repair Aboveground PL Support Structures	Maintenance	2	
Visual and NDT Testing of Welds	Maintenance	2	
Virtually all Welding, Weld Repair on PL	Maintenance	2	Additive to all prior welder testing/qualification requirements
Mechanical Work incl Hot Tapping, Stopping or Plugging a PL	Maintenance	2	
Install Clocksprings	---	---	Appropriate vendor training, "hands-on" performance verification and written exam required
Pressure Testing (Hydrotesting) a PL	Maintenance	2	

