



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

Summary	<p>This procedure outlines the requirements for applying drug and alcohol testing to any PG&E (Company) personnel involved in a gas-related event. This testing is done in order to meet <u>49 Code of Federal Regulations (CFR), Title 49, 199.105 (b), 49 CFR 199.221 and 49 CFR 199.225(a).</u></p> <p>Level of Use: Reference Use</p>
Target Audience	<p>All personnel involved with gas transmission and distribution (T&D) operations, engineering, customer field services, gas maintenance and construction (M&C).</p>
Safety	<p>Performing the procedures that implement this procedure does not raise the risk of a specific hazard to personnel, the public, or equipment.</p>
Before You Start	<ol style="list-style-type: none"> <li data-bbox="435 980 1495 1078">1.1 Compare the publication date and version number on your working copy of this document against the published version in the Guidance Document Library to verify that it is current. <li data-bbox="435 1110 1495 1175">1.2 Read this entire procedure before initiating drug and alcohol testing after a gas-related event. <li data-bbox="435 1207 1495 1709">1.3 Be familiar with: <ol style="list-style-type: none"> <li data-bbox="532 1282 1495 1709">1. <u>49 CFR § 199.105, "Drug tests required," Item (b) <i>Post-accident testing</i>, which states:</u> <p data-bbox="532 1379 1495 1709">“(b) <i>Post-accident testing</i>. As soon as possible but no later than 32 hours after an accident, an operator shall drug test each employee whose performance either contributed to the accident or cannot be completely discounted as a contributing factor to the accident¹. An operator may decide not to test under this paragraph but such a decision must be based on the best information available immediately after the accident that the employee's performance could not have contributed to the accident or that, because of the time between that performance and the accident, it is not likely that a drug test would reveal whether the performance was affected by drug use.”</p>

¹ *Accident* means an **incident reportable** under part 191 of 49 CFR involving gas pipeline facilities or LNG facilities; i.e. an **accident is a DOT reportable incident**.



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

2. 49 CFR § 199.211 *Use following an accident:* Each operator shall prohibit a covered employee who has actual knowledge of an accident in which his or her performance of covered functions has not been discounted by the operator as a contributing factor to the accident from using alcohol for eight hours following the accident, unless he or she has been given a post-accident test under 49 CFR § 199.225(a), or the operator has determined that the employee's performance could not have contributed to the accident.
 3. 49 CFR § 199.225(a) *Alcohol tests required:* Each operator shall conduct the following types of alcohol tests for the presence of alcohol:
 - (a) *Post-accident.* (1) As soon as practicable following an accident, each operator shall test each surviving covered employee for alcohol if that employee's performance of a covered function either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. The decision not to administer a test under this section shall be based on the operator's determination, using the best available information at the time of the determination, that the covered employee's performance could not have contributed to the accident
 - 1.4 Be familiar with Utility Standard TD-4413S, "Gas Event Reporting Requirements" regarding Department of Transportation (DOT) reportable gas incidents and associated procedures.
-



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

Table of Contents

Subsection	Title	Page
1	Incident Occurrence and Reporting.....	3
Appendix 1	Incident Scope Questions	10
Appendix 2	Drug and Alcohol Post Accident Testing (PAT) Decision Tree	11
Appendix 3	Process for Drug and Alcohol Post Accident Testing	12

Procedure Steps

1 Incident Occurrence and Reporting

1.1 When a gas-related event occurs, the following actions must take place:

1. The local supervisor reports the incident to gas control personnel.
 - a. The supervisor does not have to be onsite at the time of the incident, but can be notified of it.
 - b. IF it is clear that post-accident testing (PAT) is required, based on criteria outlined in Appendix 2, "Drug and Alcohol Post Accident Testing (PAT) Decision Tree,"
 THEN the supervisor performs the following tasks:
 - Initiates the PAT process by identifying personnel associated with the incident.
 - Calls the designated employer representative (DER), or directly contacts the third-party administrator.
 - c. The supervisor notifies gas control personnel of the event.
2. The DER and supervisor both perform the following steps:
 - a. Confirm the following:
 - (1) Known incident details
 - (2) Time of incident



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

1.1 (continued)

- (3) PAT testing deadlines
 - (4) PAT decision and document
- b. Initiate PAT per Steps 7 through 10 below if PAT was determined to be necessary.
3. Gas control personnel contact California Public Utilities Commission (CPUC) gas on-call personnel.
4. CPUC gas on-call personnel perform the following steps:
 - a. Review the event details and requests a list of personnel (Company employees and contractors) for potential testing from the supervisor. If the event meets DOT reportable criteria (i.e., a DOT reportable gas incident as defined in the Definitions Section), it may also meet the PAT requirement for drugs and alcohol.
 - b. Perform a decision analysis (Appendix 2), including available relevant information from gas control personnel and supervisor, to determine if PAT should be conducted, or if additional individuals should be tested.
 - c. Within two hours of the event, but not later than four hours of the event, develop a recommendation for testing including the list of personnel names.
 - d. Provide the recommendation and list to the regulatory compliance manager who makes a final decision to conduct testing and provides the results of the decision to the CPUC gas on-call personnel.
 - IF the regulatory compliance manager is not available,
THEN the decision is made by the director of regulatory compliance and support.
5. Regulatory compliance manager performs the following steps:
 - a. Assess information and recommendation provided.
 - b. Make a final decision to test or not to test personnel.
 - c. Make recommendation for testing any additional personnel.
 - d. Communicate final decision and any recommendations to CPUC gas on-call personnel.



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

1.1 (continued)

6. CPUC gas on-call personnel perform the following steps:
 - a. Notify the supervisor, DER, and gas control personnel of the decision to conduct the PAT or not to conduct the PAT.
 - b. Communicate the list of any additional personnel to be tested to supervisor, DER, and any other affected supervisors.
 - c. Notify affected directors of personnel determined to be tested.
7. The DER (or supervisor if DER unavailable) performs the following steps:
 - a. Contacts third-party administrator to request testing.
 - b. Instructs supervisor to proceed as follows:
 - (1) Remove personnel scheduled for testing from safety-sensitive duties
 - (2) Require selected personnel to remain at work until collector arrives and administers tests.
 - (3) *Replace personnel as needed* – PAT requires removing personnel from safety-sensitive duties until the results of the PAT are returned negative.
8. The local or on-call supervisor performs the following steps if testing is required:
 - a. Dispatches additional leaders (supervisors, managers, etc.) to locations to assist, as needed.
 - b. Works with local supervision to replace all personnel scheduled for testing.

NOTE

Personnel names or test results information are **not** entered in the Event Report Engine. This protects the privileged aspects of the DOT testing process.

- c. Notifies affected contractors that an incident meeting the testing requirement has occurred,

AND

To perform testing per contractor's approved drug and alcohol plan.



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

1.1 (continued)

- d. Documents decision to test or not to test and reason(s) why, in the Event Report Engine, using the **Additional Relevant Comments** data field. Data collected can be reviewed and audited to verify appropriate application of procedure.
9. The drug testing administrator dispatches collector to site.
10. The collector performs the following steps:
 - a. Arrives onsite.
 - b. Confirms incident details, including time of incident, in order to confirm testing deadlines and priorities.
 - c. Conducts post-accident alcohol and drug tests.
 - d. Submits results to lab.
 - e. Documents any issues with testing, including reasons testing was not completed as planned.
 - f. Submits report to the Company DER. The report is held as part of incident file.

END of Instructions

Definitions

Accident (per [49 CFR § 199.3, "Definitions"](#)): an incident reportable under [Part 191](#) of 49 CFR involving gas pipeline facilities or LNG facilities. An accident is a DOT reportable incident.

Applicable Company facilities: all gas T&D facilities owned by the Company, except gathering lines that are not within the limits of a city, town, or village (incorporated or unincorporated), or within a residential or commercial area such as a subdivision, business or shopping center, or community development.

CPUC gas on-call personnel: Company personnel who has CPUC gas on-call duties including making determinations if gas events meet reporting criteria and filing reports to the CPUC and DOT as required.

CPUC safety and reliability branch: part of the CPUC specifically responsible for utility safety and reliability.

Designated employer representative (DER): Personnel authorized by the employer to take immediate action(s) to remove, or cause personnel to be removed, from safety-sensitive duties and to make decisions required in the



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

testing and evaluation process. Redacted as of 8/15/2012).

DOT reportable gas incident: event involving a release of gas from a T&D pipeline (up to and including the meter set), or an LNG or CNG facility, that results in one or more of the following:

- Fatality or personal injury requiring admission to and an overnight stay in a hospital.
- Property damage (including labor costs) to the Company or others estimated at \$50,000 or more, not including the cost of lost gas.
- Unintentional estimated gas loss of three million cubic feet or more.
- An event that results in an emergency shutdown of a LNG facility.
- Events from a fire first and secondarily involve PG&E facilities (secondary ignition) are not reported unless the damage to the pipeline facility exceeds \$50,000.
- Other consequences or events deemed significant.

Gas event: an occurrence that impacts the safety or reliability of Company gas facilities. Examples include an unplanned occurrence, such as major equipment failure, operator/utility procedure error, insufficient design, natural disaster, or planned outage that resulted in an outage to customers, damage to major equipment, or impacts system reliability.

Gas incident: a gas event that is reportable to the CPUC or DOT which involves or is suspected to involve a release of natural gas from a Company facility and meets the regulatory criteria as described in Utility Standard TD-4413S, "Gas Event Reporting Requirements."

Significant event: For reporting purposes, a "significant event" is left to the judgment of the Company personnel involved with and knowledgeable of the details of the event. "Significant" events must involve Company facilities, and may include the following:

- Overpressurizations
- Fires and explosions
- Loss of large customers
- Loss of large facilities (e.g. compressor stations)
- Loss of large number of customers
- Near miss



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

- Any other significant gas event

Third-party administrator: a service agent that provides or coordinates one or more drug and/or alcohol testing services.

Implementation Responsibilities

The facility manager implements this procedure.

Governing Document

Utility Standard TD-4413S, "Gas Event Reporting Requirements" governs this document.

Compliance Requirement/Regulatory Commitment

49 CFR § 199.105, "Drug tests required," Item (b) *Post-accident testing.*

49 CFR § 199.211, "Requirement for notice."

49 CFR § 199.225, "Alcohol tests required," Item (a) *Post-accident.*

49 CFR § 199.245, "Contractor employees."

Reference Documents

Developmental References:

Anti-Drug and Alcohol Misuse Prevention Plan Drug and Alcohol Misuse Prevention Plan

PG&E's Drug-Free Workplace Program, DOT Drug and Alcohol Testing Program, Employee Policy and Handbook (Rev.4/12) DOT Handbook

Reference Guide for supervisors from the Drug and Alcohol training

Appendices

Appendix 1, "Incident Scope Questions."

Appendix 2, "Drug and Alcohol Post Accident Testing (PAT) Decision Tree."

Appendix 3, "Process for Drug and Alcohol Post Accident Testing (PAT)."



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

Attachments Attachment 1, "5 Minute Meeting."

Document Recision NA

Approved By Frances Yee
 Manager

Document Owner
 Program manager

Document Contact
 Program manager

Program manager

Revision Notes

Where?	What Changed?
NA	This is a new document.



Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

APPENDIX 1, Incident Scope Questions

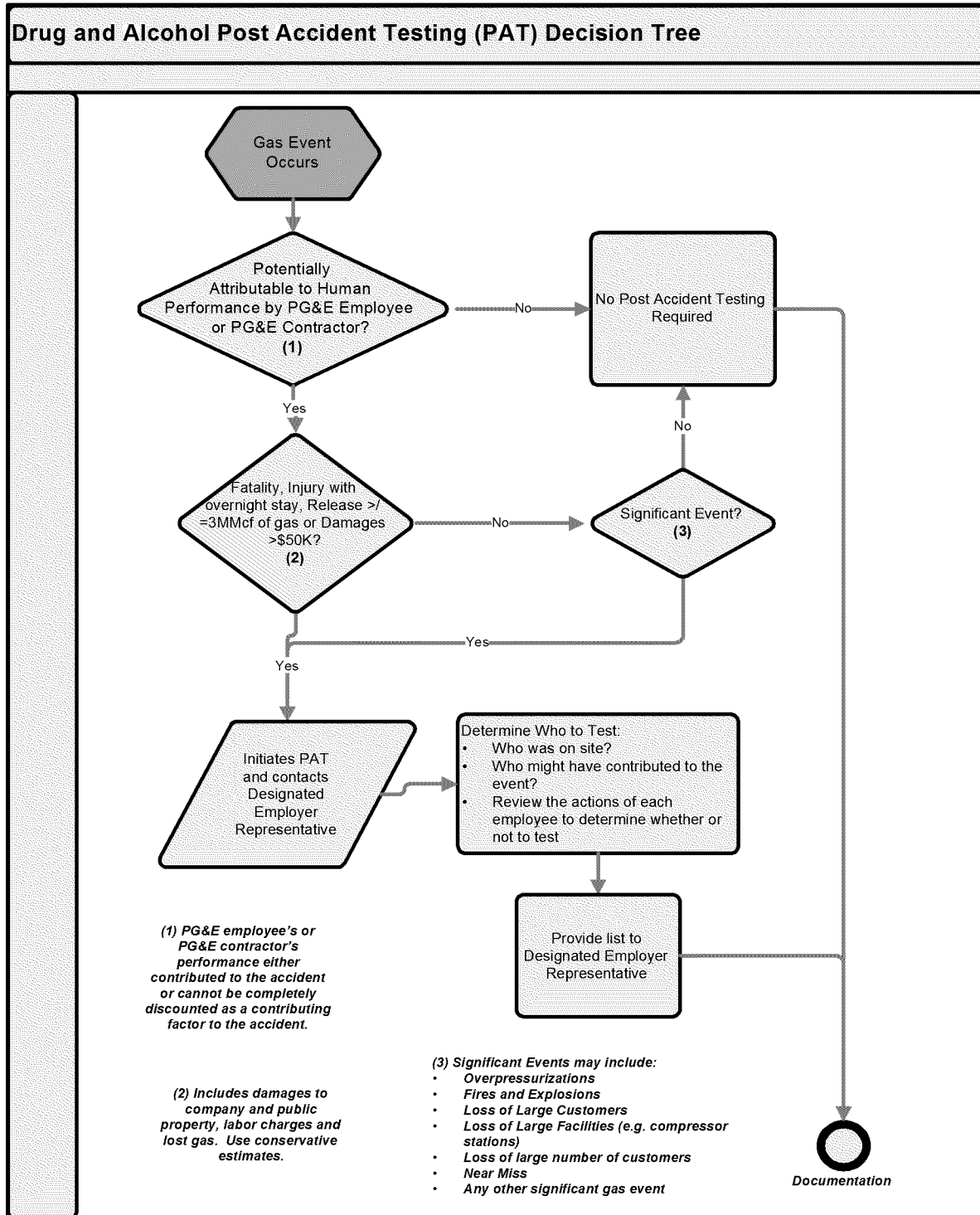
Suggested questions to evaluate incident scope and to determine personnel who are required for Post Accident Testing (PAT)

Write the word **Yes** or **No** to the right of each bullet point where indicated. Answering “**Yes**” to any of the following questions may indicate PAT is required:

- Were Company personnel or Company contract personnel performing gas-related work on the equipment or portion of the system that was involved in an accident, incident, or significant event? _____
- Was Company contract personnel performing gas-related work immediately prior to the incident? _____
- Was a Company crew involved? (onsite and performing work, or recently, within hours of, performed work.) _____
- Was gas-related work being performed in the “Area” near the site of the incident? _____
- Was a gas service representative (GSR) involved? (onsite and performing work, or recently performed work.) _____
- Is the gas control team involved through any of the activities listed below?
 - Remote control action by a gas control operator caused, or may have caused, the incident or overpressure event. _____
 - Direction provided by a gas control operator caused, or may have caused, the incident or overpressure event. _____
- Is the gas SCADA team involved through the activity listed below, or in another way?
 - Inadequate response to SCADA alarm led to delay in notifying local field personnel may have led to an incident or escalation of an incident. _____
- Was work being performed on the pipeline “upstream” or “downstream” from the site of the incident? _____
- Did a Company supervisor, manager, director, or other leader oversee or specifically direct work that may be associated with the incident? (i.e., performed immediately prior to, or during the incident.) _____
- Were Company personnel told to perform a specific activity that could have impacted this event? _____

Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

Appendix 2: DRUG AND ALCOHOL POST ACCIDENT TESTING (PAT) DECISION TREE





Determining the Scope of Drug and Alcohol Testing for Gas-Related Events

APPENDIX 3, Process for Drug and Alcohol Post Accident Testing (PAT)

