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**UNOCAL** 

July 14, 1999

Department of the Interior  
Minerals Management Service  
Mail Stop 4024  
381 Elden Street  
Herndon, Virginia 20170-4817  
Attn: Rules Processing Team

Dear Rules Processing Team:

I would like to submit these comments in response to Mineral Management Service's proposed changes to 30 CFR Part 250 (Subpart O).

Sincerely,



Terry James  
Training Program Coordinator  
(281) 287-5820

## Responses to Subpart "O" Changes

### MMS Questions:

1. Is there a specific written test score (re: threshold level) we should use to signify the competency of an individual?
  - 70% is the current standard used by most companies. The testing procedure should be primarily directed at testing an employees ability (skill) to perform his/her job.
2. If an individual or group of individuals receives a written test score below a level determined to signify competency, should we issue an INC, conduct a retest, or initiate some other type of enforcement action?
  - An individual or group of individuals that fail to successfully complete a written test should be given the opportunity to re-test within the next 45 consecutive days.
  - If the individual or group of individuals fail to successfully complete the re-test, they should retake the entire basic course.
3. What issues should we focus on when conducting employee interviews?
  - Does the employee feel the companies training program is adequate?
  - Does the employee feel he has been given all the skills necessary to safely perform his/her job?
  - Has the employee been given the opportunity to provide feedback to his manager concerning his training needs?
4. How often should these interviews be conducted?
  - Any time the MMS inspector is on the site, without interrupting operations.
5. What situations(s) should trigger MMS to conduct an interview?
  - MMS site visits should be scheduled only for poor performing operators and/or operators with a significant number of NOV/INC's.
  - Random Corporate level audits of Training Plans.
6. What type of enforcement action should we initiate if during an employee interview an employee exhibits only a minimal understanding of the employer's training program?
  - MMS should interview additional employees to determine if there is a training program deficiency or the suspect employee is a poor performer.

- In addition the employee should be given the opportunity to demonstrate his/her knowledge/competency via hands-on demonstration and/or written test.
7. Are there any situations where we should not allow an employee to continue working on the OCS?
- If an employee has completed the operators basic training program and cannot successfully pass the evaluation process he/she should be disqualified from working in the OCS.
  - The MMS must consider "Problem" employees who will go from company to company.
8. Under what circumstances should we initiate hands-on testing of employees?
- If the employee fails to demonstrate adequate knowledge during an interview process.
  - In scenarios involving NOV/INC's.
  - Auditing a poor performing operator.

#### Operator Questions/Comments:

1. Define Authorized Testing Representative?
  - We are against using industry or commercial training organizations. The MMS should bear the burden of guaranteeing impartiality and controlling cost.
2. Will there be a temporary extension granted to operators with programs expiring during the implementation phase of this revised regulation?
3. MMS should follow some sequence for their auditing protocol; i.e.
  - a. Employee Interviews
  - b. Corporate Audits
  - c. Written Test/Hands on
4. MMS should consider performing a Corporate Level audit of an operators training plan prior to conducting on-site evaluations.
5. MMS should carefully consider the added safety risks associated with conducting hands-on audits of a working process.
  - Hands-on evaluation and Simulator testing should be defined as distinct and separate. Hands-on should be specific to the employees required job description and skills as identified in the training plan. Simulator testing should only be conducted on shore and on the same type of simulator that he/she was trained on.
6. Simulator testing should be conducted on the same type system used by the operator.

7. Written tests should be randomly selected from the operators training plan evaluation data.
8. What is MMS's definition the term "Cultural" as referred to under other types of training employees need?
9. MMS should consider a longer implementation period for this revised regulation.

Final rule:

- 6 month development time for training plan. (employees certifications expiring during this timeframe should be re-certified via existing certified training program)
- 12 months after development to implement new training plan.