

Lack of Operational Integrity

A PHMSA accident investigation report indicated that the cause of a rupture and spill was “incorrect operation” because someone closed a manually operated valve. The controller did not have a valve indication in SCADA and pumped against the closed valve which caused a rupture. When the field personnel were interviewed, no one admitted closing the valve. I wonder why. What would you do if you had closed the valve? [Belle Fourche Report](#)

Lack of Operational Integrity is a failure to assume responsibility and accountability for actions or inactions. Individuals and groups can be guilty of Lack of Operational Integrity. It is easy and common to find individuals who might not have followed procedures, which is a sign of a lack of operational integrity. A thorough incident analysis would determine why, but most analyses stop at the “failure to follow procedure” cause. An inadequate incident analysis may indicate a lack of operational integrity also.

Operational Integrity has to start at the top of an organization and actions speak louder than lofty statements on a wall or a website. Sometimes the leaders of organizations do not practice what they preach. Consider these two recent examples and think if someone could find similar faults in your company. One of the only people I ever fired had falsified operating records, and I know he was not the only one. The errors of people on the frontlines are easy to see, but management failures may not come to light until a disaster. Yet employees know when managers are not practicing operational integrity. One should read the NTSB accident reports for valuable lessons.

- 2010 – San Bruno, CA: Pacific Gas and Electric Co. *“(PG&E) has reached a settlement to pay \$65 million for allegedly **falsifying natural gas and electric records** that in some cases led to contractors damaging utility infrastructure.”* These were line locate records.
- 2018 – Merrimack Valley, MA: *“Columbia Gas had agreed to plead guilty to felony violation of the Pipeline Safety Act after a federal investigation found **“wholesale management failure”** at the utility led to the disaster.”*

There are probably times when we make decisions on the job that could lead to a bad outcome, but do not because of our experience or other factor. Yet there are times when taking a shortcut or omitting a safety practice does lead to an accident, injury, or death. Anytime there is a Lack of Operational Integrity, we risk something even if it is our own integrity and ethics.

No matter your position in a company, avoid a Lack of Operational Integrity by doing these things:

- Know what integrity means and be a person of integrity.
- Let your actions match your words.
- Tell the truth and complete documentation correctly.
- Know the standards and follow the standards.
- Know the procedures and follow the procedures.
- Do what is right whether someone is watching or not.
- Speak up immediately if you make an error.
- Individuals in groups should display good “social proof.”
 - People generally look to the behavior of others to determine appropriate behavior.
- Organizations and groups should not “dilute responsibility.”
 - The presence of multiple people results in each person feeling less responsible.
- Always let your actions protect the public, employees, contractors, and the environment.

