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|  **Process Safety Management Program** |
| **Attachment B:** Management of Change – MOC Form Instructions**Document #:** PSM-SOP-UN-003 atb **Issued:** 08/20/2014 |

The following information is intended to assist the MOC Originator with completing the Management of Change Form. Any specific questions associated with completing this Form should be directed to the Process Safety Program Manager (PSPM) – EHS Department.

**Section I – Data on Request and Proposed Change**

1. Include a brief Title of the proposed change – this will enable reviewers to quickly assess the proposed change and enable quick searching of MOC records to locate historical changes.
2. Print the name and department proposing the change to the covered process area – this individual is also referred to as the “MOC Originator”.
3. This date represents the time when the MOC originator has collected the required information to complete the MOC Form and initiates the review/approval process.
4. Identify the specific type of change by six (6) categories provided – Note, in certain situations a proposed change may be represented by more than one category. For large changes, the MOC originator should consider breaking down the MOC review/approval process into smaller modifications to facilitate the review/approval process.
	1. If the MOC originator does not believe the change fits into the listed categories, they should describe the type of change
	2. List if the change is intended to be Temporary or Permanent – Note, all Temporary changes require an Expiration Date which must be less than 12 months
	3. See MOC Procedure for definition of a Tier 1 and Tier 2 change - circle the appropriate classification of the change
5. In detail describe the description of the proposed change, including attaching any diagrams, drawings, work instructions, photographs, etc. to provide the MOC reviewers a complete understanding of the proposed change. The MOC originator should remember that the reviewers may not be as familiar with the process or the proposed change as they are and sufficient detail must be provided in this section to facilitate timely review of the MOC Form. All questions for clarification on the change will be directed to the MOC originator.
6. Outline the technical, operational or process safety justification for the proposed change – in general the information in this section should describe why the change is being proposed. Additional documentation can be attached in support.
7. Identify and list the potential hazards, risk or operational impact if the proposed change is not made within the covered process area. All intended changes should improve operations, reduce hazards/risks or some other benefit.
8. Identify and list any aspect of the covered process area that are negatively impacted by the proposed change, either during or after the change has been implemented. Since existing safe guards cannot be eliminated without a full Process Hazard Analysis, outline what actions will be implemented to at a minimum maintain the existing level of safe guards.

**Section II – Approvals Required for Change**

1. Depending on the Tier selection will dictate who is required to review and approve the proposed change. The PSPM is responsible to ensure the MOC Form is moved through the review/approval process.

Note – if an approver authorizes the change but only if certain action(s), additional modifications, or enhanced safe guards are required, they should be identified in this section. The justification should include the technical basis for not approving the proposed change as originally submitted.

Typical examples could be adding an action item (e.g. Training for a specific group, MOC communicated to specific individuals/groups, etc.), requesting someone else besides the standard review/approval team to review and approve of the proposed change or certain data required to be collected/incorporated into the change.

**Section III – Process Safety management – Program Documentation**

This section is intended to evaluate, using a checklist approach, what additional impact the proposed change may have on other aspects of the covered process area and what actions are required to address either before or after the change is implemented

If the answer to the following Questions is Yes – a subsequent Action Item should be listed in Section IV that includes the responsible individual and the appropriate due date.

1. Do the individuals impacted by the change require only notification or more formal training regarding the proposed change. Procedural changes would typically require training sessions depending on the complexity of the modification. Both methods should be documented.
2. Are existing written operating procedures impacted by the proposed change and do they require revision - includes maintenance or other written procedures. If changes are required, how will the modifications be communicated to the affected individuals? Revisions to procedures would typically require some type of training
3. Evaluate if the proposed change requires revisions to existing drawings, P&ID’s, Block Flow Diagrams, BAS documentation, etc.
4. Evaluate if the existing Process Hazard Analysis (PHA), Emergency Response Procedures or Offsite Consequence Analysis is impacted by the proposed change.
5. Evaluate if the covered process area’s Process Safety Information (PSI) is impacted by the proposed change. PSI data includes hazards of the chemical(s), information associated with the technology of the process and data pertaining to the equipment in the process. It would be anticipated that any change classified in Question # 3 as Chemical, Equipment or Process Technology would most likely require a change to the PSI.
6. Does the propose change require a revision or re-evaluation of the Mechanical Integrity (MI) and/or testing/inspection requirements for the equipment. Any new equipment would require the appropriate MI data created.
7. Consider the potential impact of the proposed change to other elements within the Process Safety Management Program.

**Section IV – Follow Up and Action Items**

There will be certain action items generated with any proposed change including communications and associated updates to existing documentation relating to the covered process area. As noted above, any question in Section III that is answered with Yes – an Action Item should be listed in this Section.

1. Since communication is a key component associated with any change within the covered process area, individuals, groups, departments should be listed along with the date(s) they were notified or provided training on the change.
2. If a Pre-Startup Safety Review (PSSR) is required with the change (typically required with any equipment modifications), the element requirements for PSSR (Element #13) should be followed but the date and list of participants should be listed on the MOC Form.
3. All Action Items identified as part of the proposed change or generated by the Review Team shall be listed. Each Action Item should list the individual(s) primarily responsible to complete the action along with the associated Due Date.

**Section V – MOC Closure**

The MOC will remain Open after all signatures have been received from the Review Team until all Action Items identified with the change have been successfully closed. The MOC Originator is responsible to track progress associated with the Action Items and to ensure they are being addressed according to the agreed upon time schedule.

1. Any comments or observations associated with the review or change implementation should be noted by the MOC Originator in this section. Once all Action Items have been addressed, the MOC will be marked as Closed by the MOC Originator.

A copy of the completed MOC along with any supporting documentation should be sent to the PSPM to be maintained within the MOC records for the specific covered process area.