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FROM: T. G. Grumbles

DATE: March 28, 1991

Interoffice  
Communication

SUBJ: QUESTIONS ON THE AUDIT PROPOSAL

VISTA

The team has discussed your questions on the audit proposal (attached). Below are our responses to those issues raised.

1. How do we provide proper training for inspectors/auditors?

The basic concept proposed is that a Safety Director or me would be a team leader in all audits. Assuming that the group needing training is finite and training can be handled fairly efficiently. This would probably be done initially by the development team.

Getting other team members specifically operations personnel trained, would involve basic orientation on the how to use the audit manual and some pre-audit briefing on the specific plant being audited. This can be done prior to the audit by the team leader.

2. List of regulations and standards and brief description of each for auditors. How to acquaint them with these?

The plan at this time is to develop a regulatory appendix to the audit manual for those items to be covered in the audit. Summaries of the issues to be covered in each module will also be developed if this appears to be beneficial.

3. Suggested frequency of audits.

There is still a mixed opinion on the recommended frequency. The majority is leaning towards annual to assure progress is made and the emphasis on the program is maintained. Further discussion is needed on this issue.

4. Specific guidelines for grading.

We hope to construct the audit modules and worksheets such that the scoring will be as objective as possible, utilizing a yes/no and verification method where feasible. There will still be some areas that require "professional judgement" for assessment. These items will be clearly marked as such and some general guidelines are developed.

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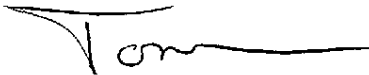
5. Should physical plant security be addressed as a module?

The absence of a physical security module was a conscious decision. Security is currently audited by an outside contractor on a periodic basis.

6. Should we add a module on management of change for process safety?

The MOC process can be added to the process safety section when we have a program. In fact, the OSHA standard will have an auditing requirement. The current module approach will give us the flexibility to add issues/programs as needed.

The team will also develop the written program covering administrative details and the general audit process. A key element of this document will be who manages the audit process. We need to discuss this further and reach consensus in the near future.



T. G. Grumbles

dlj

cc: K. Fogg-LCCP, B. White-Balt, M. Lunsford-Okc

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