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Interoffice
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SUBJ: DRAFT MOC PROCESS GUIDELINES

VISTA

Attached is the most current draft of the MOC guidelines developed by the sub-team. As we have discussed, this can be used for discussion purposes but may change in detail depending on the upcoming management and plant manager meetings.



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VISTA
MANAGEMENT OF CHANGE
GUIDELINE

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PURPOSE AND SUMMARY OF DOCUMENT

The attached information should be considered as a guide and as a starting place for compliance with the OSHA Process Safety Standard. The attached procedures can be modified to meet the needs of the individual plants. However, we are recommending that a formal procedure be established to ensure that the appropriate steps are taken and that the required documentation is updated.

The MOC system for capital projects is similar to what occurs in most of the plants with the following exceptions:

1. A hazard analysis step has been added to the process flow after the class A design has been completed.
2. A "final class A design" step has been added to represent the design after completion of the hazard analysis.
3. Operating manuals are prepared prior to the hazard analysis.
4. The approval process has been expanded.

The work order system is affected by the Management of Change Process if the work order is defined as a change. If it is, then a separate process needs to be followed. Major changes included in the new procedure are:

1. Two decision steps have been added to determine the level of safety review required.
2. Several steps have been added to ensure that documentation has been updated.
3. Approval procedures have been modified to use a hazard level in addition to dollars to determine the approvals needed.

Revisions to the approval process are intended to accomplish 2 main tasks. These are to (1) ensure that all departments affected by a change have the opportunity to give their input prior to moving on to the next step, and (2) have a check to make sure that the appropriate documentation has been updated.

CHANGE DEFINITION FOR MANAGEMENT OF CHANGE

"Change", WITH RESPECT TO WORKORDERS AND DESIGNS, shall be defined as any work done that is not an exact replacement in kind. Examples may include, but are not limited to, the following:

- Line size changes
- Revisions to pipe routings
- Changes of materials (pipe, gaskets, packing, seals, equipment, P.G. diaphragms, valves, linings, etc...).
- Modifications to pumps or compressors that change their operating curves.
- Removal of any instrument from service
- Addition of any controlling instrument
- Adjustment affecting the operating range of any instrument
- Addition of a valve
- Removal of a valve
- Addition of a new line (jumpers)
- Revisions that change an equipment's service
- Changes to relief device settings

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