

*Review during
PSM audit*

To: Herman Waltemate
From: Dennis O'Keefe

11/6/96

Subject: Status of 1994 PSM Audit Improvement Opportunities

Attached is the status of the 1994 PSM Audit Improvement Opportunities. Call if you have any questions.

Thanks,
Dennis

cc: Cil Knutsen
Greg Kaswell

NGC 12783

PSM AUDIT IMPROVEMENT OPPORTUNITIES PEDRICKTOWN PVC PLANT 1994

ELEMENT	ID#	DESCRIPTION	RESPONSIBILITY	TARGET DATE
Application 1910.119(a)	A9401	Provide a site plan which explains how the plant manages the PSM program. Graphically identify the PSM areas within the facility.	D. O'Keefe	Complete
Employee Participation 1910.119(c)	EP9402	Expand SP-2 Employees Participation policy to explain why employee involvement committees exist and document actions taken to closure.	D. O'Keefe	Complete
Process Safety Information 1910.119(d)	PSI9403	Each identified PSM area must develop all data required by this section.	C. DeGrazio B. Bacon J. Sovich	Complete
	PSI9404	Provide an index system for this information.	C. DeGrazio B. Bacon J. Sovich	Complete
Process Hazard Analysis 1910.119(e)	PHA9405	Document that facility siting and human factors are considered when PHA's are completed.	R. Bacon J. Houston	Complete
	PHA9406	Establish a tracking system to address PHA findings.	R. Bacon J. Houston	Complete
Operating Procedures 1910.119(f)	OP9407	Allow for consequences of deviation as W.P.S. converts operating policies and procedures.	R. Bacon C. DeGrazio J. Sovich	Complete
Training 1910.119(g)	T9408	Verify and document frequency of refresher training has been reviewed with appropriate employees and that they have had input into the training frequency.	R. Bacon J. Sovich C. DeGrazio	Complete
Contractors 1910.119(h)	C9409	Conduct post job evaluation on contractors required to perform work in a PSM area. This should be achieved on an annual basis or upon job completion.	D. O'Keefe	Complete
Pre Start-Up Safety Review 1910.119(i)	PSSR9410	Pre-startup punch list generated by walkthrough reviews prior to commissioning are to become part of project file.	R. Bacon C. DeGrazio J. Sovich	Complete
Mechanical Integrity 1910.119(j)	MI9411	Testing, inspection and documentation is required on piping systems and components in all covered processes.	D. O'Keefe	Complete

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IMPROVEMENT OPPORTUNITIES - 1994
PEDRICKTOWN PVC PLANT

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ELEMENT	TOP	DESCRIPTION	RESPONSIBILITY	TARGET DATE
Management of Change 1910.119(l)	MOC9412	Review the plant's M.O.C. policy from an administration standpoint to assure desired results are being achieved.	D. O'Keefe	Complete
Emergency Planning and Response 1910.119(n)	EPR9413	Revise emergency response plan to reflect correct personnel and telephone numbers of key personnel.	D. O'Keefe	Complete
Trade Secrets 1910.119(p)	TS9414	Consider secrecy agreement for contractors who work in sensitive areas of the plant.	D. O'Keefe	Complete

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