



Property Risk Consulting Guidelines

XL Risk Consulting

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PRC.1.0.2.4

AUDITING MANAGEMENT OF CHANGE

INTRODUCTION

PRC.1.0.2 describes Management of Change (MOC). It includes a warning that, as with all other management programs, it is subject to failure at the individual level. The only defense against such failures is periodically auditing the MOC system to make sure that procedures described on paper are being implemented in the field.

POSITION

Develop and implement an auditing protocol for each MOC system. Perform the audits. Then, utilizing the results of the audits, correct any deficiencies found.

DISCUSSION

A good auditing protocol for MOC systems addresses many issues. The following list divides these questions/issues into four categories: program verification; document review; field interviews, and equipment verification. The auditing protocol should also address other factors, such as availability of audit personnel, company/plant culture and regulatory concerns. The exact questions and issues addressed during an audit will depend on a variety of factors, including:

- Specific MOC system design;
- Availability of MOC records;
- Frequency of MOC reviews in the plant;
- Time since the last audit.

Sample Questions

Program Verification

- Is there a written program that describes the MOC system? Does it specifically address roles and responsibilities, scope, activities, authority and necessary documentation?
- Does the MOC system address the following types of changes: Technology? Equipment? Facilities? Chemicals? Procedures?
- Are the following issues specifically addressed in the MOC system:
 - Technical basis of the proposed change?
 - Safety and health considerations associated with the proposed change?
 - Authorization requirements for the specific class of change?

- If temporary changes are allowed, does the MOC system address the following issues:
 - Maximum time limit that the change can exist without further review?
 - Monitoring of special conditions required for the proposed change?
 - Explicit field verification that the change and any associated special conditions are removed at the end of the time allowed for the change?
- If emergency changes are authorized by the MOC system, do the requirements of the procedure meet the minimum regulatory requirements?
- Are specific means addressed for ensuring that affected plant personnel are trained prior to their involvement with the change?
- Is an explicit mechanism provided for ensuring that affected plant documentation is updated, if needed, in a timely fashion?
- Is MOC effectiveness considered in the performance reviews of people who participate in the MOC system?

Document Review

Scrutinize a representative sample of the MOC records on file for each plant area in which the audit is performed. The following issues should be considered.

- Are the documents complete? Is there a pattern for any information missing from the records?
- Do the change requests contain all of the proper authorizations?
- Were all the required reviews/analyses performed?
- Are all appropriate review documents appended to the MOC documents?
- As indicated by the MOC documents, were the analyses of safety and health considerations of adequate quality, thoroughness and depth?
- Are there any anomalies apparent with the times/dates associated with the reviews and authorizations?
- Was the emergency change review procedure frequently used? Is there a trend? Were the uses of the emergency change review procedure appropriate?
- Have there been any documented failures of the MOC system? Have any change situations not been reviewed by the MOC system as evidenced by the following types of surveys/inspections:
 - Logs of instrumentation “jumpers” installed;
 - Shift logbooks;
 - Incident investigation results;
 - Procedure reviews/certifications;
 - Preliminary Hazard Analysis (PHA) team reviews;
 - Periodic walk through safety inspections.

Scrutinize a representative sample of the work orders/maintenance requests/capital change requests on file for each plant area in which the audit is performed. The following issues should be considered.

- Take a representative sample of work orders, etc., and verify whether the proper MOC documentation exists.
- Review some of the Piping and Instrument Drawings (P&IDs) for the subject plant area and see if changes to these drawings can be traced back through an MOC request.
- Review some of the procedures for the subject plant area and see if changes to these procedures can be traced back through an MOC request.

Field Interviews

Perform several interviews with plant personnel responsible for using the MOC system (e.g., operations, maintenance, engineering, and safety).

- Are they aware of the MOC procedures? What is their role in the MOC system? Have they received the appropriate MOC system training?
- Have them explain the basics of the MOC procedures. Do they know who can approve changes? Do they know how to originate a change request? Do they know how to have changes approved during an off-shift?
- Do they feel the MOC system is being implemented in a reliable manner?
- Do they have personal knowledge of any failures of the MOC system (e.g., changes that have been implemented without appropriate review)?
- Have they received any process-specific training as a result of a specific change? Was the training performed before they had to interact with the process change while on the job?
- Was MOC effectiveness considered in their most recent job performance review?

Equipment Verification

Select a number of recent changes to equipment and confirm the following.

- The equipment arrangement in the field is consistent with the approved change.
- The updated P&IDs actually reflect the field installation.
- Isometrics and other diagrams used for inspection purposes have also been updated.
- Equipment specifications in the official files match the equipment items in the field (e.g., data sheets match nameplates).