



# Director's Corner

As many of you already know, having good operating procedures that are regularly reviewed and updated is a vital part of the management process and helps ensure safety. Recently, an industry group conducted a survey on five major companies. In the table below, the survey questions and the responses of these surveyed companies is provided.

<b>Survey Question 1: Do you annually certify your procedures, while reviewing them on a longer frequency?</b>	
Response 1	Yes
Response 2	Procedures are reviewed and certified annually. The review is done to a greater depth on a tri-ennial basis, when all operators are re-trained on the procedures.
Response 3	Yes, annually
Response 4	Yes, reviewed every 3 years
Response 5	Yes, reviewed every 3 years
<b>Survey Question 2: Do you certify individual procedures, complete operating procedure manuals, or some other approach?</b>	
Response 1	---
Response 2	Individual procedures are certified.
Response 3	Entire manual is reviewed
Response 4	Complete manuals
Response 5	Complete manuals
<b>Survey Question 3: Do you do any sampling to confirm that there are no marked, unapproved changes or errors in the operating procedures available to operators?</b>	
Response 1	During audits
Response 2	Corporate audits and site-driven audits look for changes that have been made that may not have been red-lined into procedures; as well as for red-lines that are not incorporated into procedures within a prescribed time frame.
Response 3	Procedures should be reviewed to verify the requirements are still applicable.
Response 4	Manuals are electronic. The electronic version is the approved version and it is protected. Only controlling secretary can make changes to the manuals. MOC process dictates approved changes.
Response 5	5% of procedures posted on the Intranet are checked for errors. If any are found, 10% are checked, and so on.

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**Survey Question 4:** Do you do any sampling to verify that changes to operating procedures due to MOCs have been incorporated into the specific procedures impacted?

Response 1	During audits
Response 2	Yes, through corporate and site driven audits of the management of change process.
Response 3	No sampling, however site specific changes or MOC's should be incorporated into any applicable procedures.
Response 4	Visual check of review dates.
Response 5	For completed MOC's during the past year which required procedure changes, 10% (or 5 MOC's - whichever is larger) are checked to confirm if required procedure changes have been made. If not, then twice as many MOC's are checked, and so on.

**Survey Question 5:** Do you do any consultation with operators to solicit feedback on the accuracy of the operating procedures?

Response 1	Supposed to, but not sure how well this occurs. We do have a item on our MOC checklist to notify/train operators on changes.
Response 2	Yes, operators are requested to notify staff of any issues with respect to operating practices that differ from the procedure, or any errors in the procedure, especially during the tri-ennial re-training. Operators are also questioned on the accuracy of procedures during "deep-dive" reviews that are conducted every three years.
Response 3	Yes, they are part of the review/test process and can submit changes if needed.
Response 4	Operating procedures are assigned to operators to review. Also any significant changes to procedures go out to operators for review.
Response 5	The person signing the Certification form should directly consult with at least one area operator on each shift, who should have already consulted with other operators on their shift. Their names are listed on the form, and they date/initial it.

**Survey Question 6:** Are there any other unique activities in your procedure certification process?

Response 1	---
Response 2	Review history is maintained on the cover sheet of the OP. Reviews are conducted by staff and approved by the operations manager.
Response 3	No
Response 4	No
Response 5	The manager signing the form also signs off that any deficiencies found have been corrected.

**Survey Question 7:** Would you care to share your procedure (or portion of a larger procedure) on operating procedure certification?

Response 1	Ours is simply each area is to certify operating procedures are current and accurate on an annual basis.
Response 2	Procedure is currently being updated for our new company, business is currently operating under former parent company procedures, which our company has continued to follow. Basic requirements of the procedure can be shared.
Response 3	No
Response 4	No
Response 5	No

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