BEST PRACTICES FOR MANAGEMENT OF CHANGE (MOC) AND PRE START-UP SAFETY REVIEWS (PSSR)

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ABSTRACT

Situation/Problem
Since the Occupational Safety & Health Administration (OSHA) implemented its Process Safety Management Program (PSM) in 1992, two elements; Management of Change (MOC) and Pre Start-up Safety Reviews (PSSR) continue to be two of the more challenging elements for companies to implement and maintain. These two elements alert and inform personnel that a process change is taking place, and that change has been looked at and reviewed by the relevant facility personnel. Pre Start-up Safety Review also ensures that the change, once completed but before startup or operation;

- has been properly implemented,
- with necessary documentation, including P&IDs and SOPs, updated,
- and that affected personnel have been properly informed and trained on the changes.

It takes diligent efforts of many working in concert to ensure that change is properly identified, analyzed, and executed in a quality and complete way. Conditions including large employee turnover, ever changing rules and regulations, overly worked or insufficiently trained personnel may hinder or make it hard to manage change and conduct Pre Start-up Safety Reviews efficiently and effectively. “We are not a PSM covered process,” “It’s an emergency situation,” and “We are so far behind in our documentation, that it would take years to get caught up and complete” are some of the excuses given for why MOCs and PSSRs are not performed or completed. When skipped or not comprehensively managed, deficient MOCs and PSSRs, two of
the very important elements in the PSM program, have led to catastrophic results and some of the biggest incidents at process facilities.

**Resolution/Problem**

MOCs and PSSRs are not just documentation and paperwork burdens performed for regulatory compliance. They are essential safety processes that require personnel and management to know and understand the chemical or manufacturing process and the hazards and risks involved in operating that process. They require knowledgeable and trained personnel to think through the process and be attentive on the job when a change needs to occur for production or safety reasons. As added bonuses, MOC and PSSRs are both excellent cost-effective process safety and business loss prevention tools for almost any business.

**Results**

This presentation will examine the rules for MOC and PSSR according to the OSHA 29 CFR 1910.119(l)(1) and OSHA 29 CFR 1910.119(i)(1) and (2) standards respectively and will also discuss some best practices and examples of appropriate documentation and forms for MOC and PSSRs, including a risk-based approach.

**Lessons Learned**

Improperly conducted or ignored MOCs and PSSRs have led to catastrophic events in industry. This presentation examines the elements of effective MOC and PSSR elements, their requirements according to the OSHA standard, best practices and examples of good documentation and forms. When properly conducted and applied, MOC and PSSR programs will help take both personnel and their companies from a hopefully compliant process safety management program to one of Process Safety Excellence.