

VIII. Pre-Startup Safety Review Program
Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist

Revision 0, 03/09/09



Facility:	Process(es) Covered:	Date:	
A. PROCEDURE/POLICY REVIEW			
1) EXISTENCE, STRUCTURE AND FORMAT OF PRE-STARTUP SAFETY REVIEW PROGRAM		Percentage Completion Score – Total 100% (Weighting of Elements is Defined Below)	
Overall NDEP-CAPP Element Audit Checklist Score for Pre-Startup Safety Review (as evaluated in sections 2 through 8 below)		%	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			
2) CONSTRUCTION VERIFICATION		NAC Ref.	Resp. Code
<i>Item #2 Completion Score – Weighted 10% of Total</i>		%	
i.	Does the PSSR procedure define criteria and responsible individual(s) to enable confirmation that installed equipment and materials are in accordance with design specifications?	459.95425(2a) 459.95341	
ii.	Does the PSSR procedure define criteria and responsible individual(s) to enable confirmation that installed instruments and controls are in accordance with design specifications?	459.95425(2a) 459.95341	
iii.	Does the PSSR procedure define criteria and responsible individual(s) to enable confirmation that construction work is in accordance with design specifications?	459.95425(2a) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 2):			

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3) VERIFICATION OF PROCEDURE DEVELOPMENT	NAC Ref.	Resp. Code
<i>Item #3 Completion Score – Weighted 10% of Total</i>	%	
i. Does the PSSR procedure define criteria and responsible individual(s) to enable confirmation that procedures are verified to be in place for:	459.95425(2b) 459.95341	
a. Standard Operating Procedures?	459.95425(2b) 459.95341	
b. Safe Work Practices?	459.95425(2b) 459.95341	
c. Maintenance Procedures?	459.95425(2b) 459.95341	
d. Emergency Procedures?	459.95425(2b) 459.95341	
ii. Does the PSSR procedure define criteria and responsible individual(s) to enable confirmation that procedures are verified to be adequate for:	459.95425(2b) 459.95341	
a. Standard Operating Procedures?	459.95425(2b) 459.95341	
b. Safe Work Practices?	459.95425(2b) 459.95341	
c. Maintenance Procedures?	459.95425(2b) 459.95341	
d. Emergency Procedures?	459.95425(2b) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 3):		

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4) PERFORMANCE OF A PROCESS HAZARD ANALYSIS AND MANAGEMENT OF CHANGE	NAC Ref.	Resp. Code
<i>Item #4 Completion Score – Weighted 10% of Total</i>	%	
i. Does the PSSR procedure require that a process hazard analysis be performed and designate the responsible individual(s)?	459.95425(2c) 459.95341	
ii. Does the PSSR procedure require that all PHA recommendations be resolved prior to startup and designate the responsible individual(s)?	459.95425(2c) 459.95341	
iii. Does the PSSR procedure require that an MOC be completed for all modifications of an existing process and designate the responsible individual(s)?	459.95425(2d) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 4):		
5) TRAINING	NAC Ref.	Resp. Code
<i>Item #5 Completion Score – Weighted 10% of Total</i>	%	
i. Does the PSSR require that operating personnel are trained in the new process or change prior to their operating the process; and does the procedure define criteria for training and testing and the responsible individual(s)?	459.95425(2e) 459.95341	
ii. Does the PSSR procedure require that maintenance personnel are trained in the new process or change prior to their performing maintenance on the process; and does the procedure define criteria for training and testing and the responsible individual(s)?	459.95425(2e) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 5):		

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6) CONFIRMATION OF COMPLETION	NAC Ref.	Resp. Code
<i>Item #6 Completion Score – Weighted 5% of Total</i>	%	
i. Does the PSSR procedure define how it is confirmed that all program requirements are satisfied prior to starting the new process or implementing the change; and does the procedure define the responsible individual(s)?	459.95425(2) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 6):		
7) MANAGEMENT PLAN AND DOCUMENT CONTROL	NAC Ref.	Resp. Code
<i>Item #7 Completion Score – Weighted 5% of Total</i>	%	
i. Is there a site-specific plan that addresses how the Pre-Startup Safety Review Program requirements will be developed and maintained, including:	459.95341	
a. Document the names of person(s) who are members of the team with overall responsibility for the development, implementation and integration of the Pre-Startup Safety Review Program Requirements?	459.95341	
b. How is facility program monitored for compliance with NAC 459.95425, CAPP Pre-Startup Safety Review Program?	459.95341	
ii. Is there a site-specific policy or procedure that addresses how Pre-Startup Safety Review Program documentation is controlled to ensure that the most current information is in circulation and use?	459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 7):		

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8) VERIFICATION OF PSSR IMPLEMENTATION	NAC Ref.	Resp. Code
<i>Item #8 Completion Score – Weighted 50% of Total</i>	%	
i. Does the review of actual PSSRs indicate that they are being completed pursuant to CAPP requirements? <i>Refer to Part B-1</i>	459.95425(1)	
ii. Has the PSSR been applied when required? <i>Refer to Part B-2</i>	459.95425(1)	
Notes/Comments Pertaining to Responses to Questions under Issue 8): 		
General Procedure/Policy Review Notes/Comments: 		

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B. ON-SITE INSPECTION - RECORDS AUDIT

1) REVIEW 1 TO 4 ISSUED PRE-STARTUP SAFETY REVIEWS AGAINST THOSE LISTED ON THE DATE FORM *List on the Following Table:*

#	PSSR ID #	Proposed Change	Issue Date	Approval Date	Startup Date	Resp. Code :			
						i	ii	iii	iv
i									
ii									
iii									
iv									
Inquiry/Observation									
						i	ii	iii	iv
a.	Is there documented evidence that any installed equipment and materials were confirmed to be in accordance with design specifications prior to introducing a substance into the process?								
b.	Is there documented evidence that any installed instruments and controls were confirmed to be in accordance with design specifications prior to introducing substance into the process?								
c.	Is there documented evidence that any construction work was confirmed to be in accordance with design specifications prior to introducing a substance into the process?								
d.	Is there documented evidence that the SOPs were confirmed to be in place and adequate prior to introducing a substance into the process?								
e.	Is there documented evidence that the SWPs were confirmed to be in place and adequate prior to introducing a substance into the process?								
f.	Is there documented evidence that the Maintenance Procedures were confirmed to be in place and adequate prior to introducing substance into the process?								
g.	Is there documented evidence that the Emergency Procedures, was confirmed to be in place and adequate prior to introducing a substance into the process?								
h.	Is there documented evidence that a Process Hazards Analysis (PHA) was performed prior to introducing a substance into the process?								

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i. Is there documented evidence that all recommendations resulting from the PHA were resolved or implemented prior to startup of the process?				
j. Is there documented evidence that a Management of Change (MOC) review was performed for a modified process, and that all MOC requirements were met, prior to introducing a substance into the process?				
k. Is there documented evidence that training was completed for each employee involved in operating and maintaining the process prior to their working in the process?				
l. Based on the Response Codes used to complete items a - k above, is it possible to confirm that the PSSR was performed in accordance with program requirements?				
Notes/Comments Pertaining to Responses to Questions under Issue 1):				
2) PRE-STARTUP SAFETY REVIEWS COMPLETED	NAC Ref.	Resp. Code		
a. Have PSSRs been completed for circumstances requiring such? (Answer is limited to auditor's observations and inquiries. List any activities for which a PSSR was not conducted as required.)	459.95425(1)			
Notes/Comments Pertaining to Responses to Questions under Issue 2):				
General On-Site Inspection Notes/Comments:				

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C. INTERVIEWS

1) SELECT TWO OR MORE PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE PRE-STARTUP SAFETY REVIEW PROGRAM USING THE FOLLOWING QUESTION SETS *Responses are to be Logged on Following Pages:*

Question Set	Questions to Consider
a	What is your job description and associated tasks?
b	Do you know what the PSSR program is, and why it exists? How does the PSSR process work?
c	When is a PSSR required? What is the connection between the MOC and PSSR programs?
d	How are you involved in the PSSR process?
e	How do you know when a PSSR is being performed on a process? How are you informed when it is OK to re-start a modified process? Are you trained in revised procedures, policies, practices, programs and process steps prior to process start-up?
f	Do you feel that the PSSR program could be improved?

2) RECORD RESPONSES OF SELECTED PERSONNEL TO QUESTIONS FROM THE QUESTION SETS
Refer to Part C-1

Employee Profile

Job Title/Position	Department/Unit/Group	Time in Job	Time w/Co.

Response to Question Set _ :