

IX. Verification of Compliance Audits Program

Nevada Division of Environmental Protection Chemical Accident Prevention Program

Element Audit Checklist

Revision 2, 03/10/09



Facility:	Process(es) Covered:	Date:	
A. PROCEDURE/POLICY REVIEW			
1) EXISTENCE, STRUCTURE AND FORMAT OF VERIFICATION OF COMPLIANCE AUDITS PROGRAM		Percentage Completion Score – Total 100% (Weighting of Elements is Defined Below)	
Overall NDEP-CAPP Element Audit Checklist Score for Verification of Compliance Audits (as evaluated in sections 2 and 6 below)		%	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			
2) CONDUCTING THE AUDIT		NAC Ref.	Resp. Code
<i>Item #2 Completion Score – Weighted 15% of Total</i>		%	
i. Does the program procedure require that the audit be conducted and the evaluation certified at least once every three years; and does the procedure define the responsible individual who certifies the evaluation?		459.95427(1a) 459.95341	
ii. Does the program procedure define the review criteria, acceptance criteria, and responsible individual(s) who conduct the review of each of the following elements:		459.95427(1a) 459.95341	
a. Process Safety Information		459.95427(1a) 459.95341	
b. Process Hazard Analysis		459.95427(1a) 459.95341	
c. Standard Operating Procedures		459.95427(1a) 459.95341	
d. Training		459.95427(1a) 459.95341	
e. Mechanical Integrity		459.95427(1a) 459.95341	

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IX. Verification of Compliance Audits Program
Nevada Division of Environmental Protection
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Element Audit Checklist

Revision 2, 03/10/09



f.	Management of Change		459.95427(1a) 459.95341	
g.	Pre-Startup Safety Review		459.95427(1a) 459.95341	
h.	Incident Investigation		459.95427(1a) 459.95341	
i.	Employee Participation		459.95427(1a) 459.95341	
j.	Hot Work Permit		459.95427(1a) 459.95341	
k.	Contractor Program		459.95427(1a) 459.95341	
l.	Emergency Response Program		459.95427(1a) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 2):				
3) PERSON CONDUCTING THE AUDIT			NAC Ref.	Resp. Code
<i>Item #3 Completion Score – Weighted 15% of Total</i>			%	
i.	Does the program procedure require that the audit be conducted by at least one person that is knowledgeable in the process being audited; and does the procedure define the criteria for auditor selection?		459.95427(2) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 3):				

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Nevada Division of Environmental Protection
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Revision 2, 03/10/09



4) REPORT AND RECOMMENDATION TRACKING	NAC Ref.	Resp. Code
<i>Item #4 Completion Score – Weighted 15% of Total</i>	%	
i. Does the program procedure require that a report of the findings be generated; and does the procedure define the individual(s) responsible to generate the report?	459.95427(1b) 459.95341	
ii. Does the program procedure require that appropriate responses to deficiencies be determined and documented; and does the procedure define how responses are generated and the individual(s) responsible?	459.95427(1c) 459.95341	
iii. Does the program procedure require that actions taken to correct deficiencies be documented; and does the procedure define how actions are tracked and the individual(s) responsible?	459.95427(1d) 459.95341	
iv. Does the program procedure require that the two most recent reports be retained?	459.95427(1e)	
Notes/Comments Pertaining to Responses to Questions under Issue 4):		
5) MANAGEMENT PLAN AND DOCUMENT CONTROL	NAC Ref.	Resp. Code
<i>Item #5 Completion Score – Weighted 5% of Total</i>	%	
i. Is there a site-specific plan that addresses how the Verification of Compliance Audits 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 Verification of Compliance Audits Program Requirements?	459.95341	
b. How is facility program monitored for compliance with NAC 459.95427, CAPP Verification of Compliance Audits Program?	459.95341	
ii. Is there a site-specific policy or procedure that addresses how the Verification of Compliance Audits 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 5):		

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Revision 2, 03/10/09



6) VERIFICATION OF COMPLIANCE AUDIT IMPLEMENTATION	NAC Ref.	Resp. Code
<i>Item #6 Completion Score – Weighted 50% of Total</i>	%	
i. Have the two most recent reports been retained? <i>Refer to Part B-1</i>	459.95427	
ii. Has the most recent audit report been implemented in accordance with regulation? <i>Refer to Part B-2</i>	459.95427	
Notes/Comments Pertaining to Responses to Questions under Issue 6):		
General Procedure/Policy Review Notes/Comments:		

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Revision 2, 03/10/09



B. ON-SITE INSPECTION - RECORDS AUDIT					
1) AUDIT DOCUMENTATION RETENTION <i>List the Last Two Reports in the Following Table:</i>					
Subject Audit	Were there recommend-ations?	Are all the recommendations implemented?	Audit Start Date	Audit End Date	Report Date
Most Recent Report					
Previous Report					
Notes/Comments Pertaining to Responses to Questions under Issue 1):					
2) AUDIT THE MOST RECENT VERIFICATION OF COMPLIANCE AUDIT REPORT				NAC Ref.	Resp. Code
a. Does the most recent audit report indicate that a review was performed for the program elements pursuant to the procedure review criteria:				459.95427(1a)	
i. Process Safety Information				459.95427(1a)	
ii. Process Hazard Analysis				459.95427(1a)	
iii. Standard Operating Procedures				459.95427(1a)	
iv. Training				459.95427(1a)	
v. Mechanical Integrity				459.95427(1a)	
vi. Management of Change				459.95427(1a)	
vii. Pre-Startup Safety Review				459.95427(1a)	

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Revision 2, 03/10/09



viii. Incident Investigation		459.95427(1a)	
ix. Employee Participation		459.95427(1a)	
x. Hot Work Permit		459.95427(1a)	
xi. Contractor Program		459.95427(1a)	
xii. Emergency Response Program		459.95427(1a)	
b. Was the audit performed within 3 years of the initial startup or the previous audit?		459.95427(1a)	
c. Was the audit certified?		459.95427(1a)	
d. Does the report list deficiencies found during the audit?		459.95427(1b)	
e. Are recommendations for correcting deficiencies documented?		459.95427(1c)	
f. Are the recommendations tracked through completion?		459.95427(1d)	
g. Are persons who performed the audit identified?		459.95427(2)	
h. Is at least one person knowledgeable in the process being audited?		459.95427(2)	
i. Based upon the response codes to complete items a through h above, is it possible to confirm that the verification of compliance audits program is being implemented in accordance with regulation?		459.95427	
Notes/Comments Pertaining to Responses to Questions under Issue 2):			
General On-Site Inspection and Records Audit Notes/Comments:			

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C. INTERVIEWS			
1) SELECT TWO OR MORE PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVE-NESS OF THE VERIFICATION OF COMPLIANCES AUDITS PROGRAM USING THE FOLLOWING QUESTION SETS <i>Responses are to be Logged on Following Pages:</i>			
Question Set	Question to Consider		
a	What is your job description and associated tasks?		
b	Are you familiar with the CAPP program (mention PSI, PHA, SOP, etc. if CAPP is not recognized)? Were you ever consulted on the development of or participated in the CAPP verification of compliance audits program?		
c	Are you familiar with the verification of compliance audits program? (explain what it is if they don't recognize the title)		
2) RECORD RESPONSES OF SELECTED PERSONNEL TO QUESTIONS FROM THE QUESTION SETS <i>Refer to Part C-1</i>			
Employee Profile			
Job Title/Position	Department/Unit/Group	Time in Job	Time w/Co.
Response to Question Set _: 			

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