

X. Incident Investigation Program
Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist

Revision 0, 03/11/09



Facility:	Process(es) Covered:	Date:	
A. PROCEDURE/POLICY REVIEW			
1) EXISTENCE, STRUCTURE AND FORMAT OF INCIDENT INVESTIGATION PROCEDURE		Percentage Completion Score – Total 100% (Weighting of Elements is Defined Below)	
Overall NDEP-CAPP Element Audit Checklist Score for Incident Investigation (as evaluated in sections 2 through 9 below)		%	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			
2) INITIATION OF AN INCIDENT INVESTIGATION		NAC Ref.	Resp. Code
<i>Item #2 Completion Score – Weighted 5% of Total</i>		%	
i.	Does the procedure require the investigation of any incident that meets the definition of a catastrophic release and designate the individual(s) responsible for determining if a catastrophic release occurred?	459.95429(1) 459.95341	
ii.	Does the procedure: require the investigation of any incident that could reasonably have resulted in a catastrophic release (near miss); establish the criteria to determine if a near miss occurred; and designate the individual(s) responsible for determining if a near miss occurred?	459.95429(1) 459.95341	
iii.	Does the procedure require initiation of the investigation within 48 hours after the incident and does it designate the individual(s) responsible for ensuring that the investigation commences within 48 hours?	459.95429(2) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 2):			

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3) CONDUCT OF AN INCIDENT INVESTIGATION		NAC Ref.	Resp. Code
<i>Item #3 Completion Score – Weighted 15% of Total</i>		%	
i.	Does the procedure require corrective action be taken to prevent recurrence of the incident?	459.95429(1)	
a.	Does the procedure establish criteria for determining causes?	459.95429(1) 459.95341	
b.	Does the procedure establish criteria for identifying the cause(s) that, if corrected, would prevent recurrence of this and similar incidents (root cause)?	459.95429(1) 459.95341	
c.	Does the procedure establish criteria for defining corrective actions that will prevent recurrence of the incident (such as corrective actions that will prevent recurrence of root causes)?	459.95429(1) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 3):			
4) ESTABLISHMENT OF AN INCIDENT INVESTIGATION TEAM		NAC Ref.	Resp. Code
<i>Item #4 Completion Score – Weighted 5% of Total</i>		%	
i.	Does the procedure require that the investigation team have at least two members and does it designate the individual(s) responsible for assigning the team?	459.95429(3) 459.95341	
ii.	Does the procedure require that one team member is an individual that is knowledgeable in the process where the incident occurred and does is establish the criteria to determine which individual fills this role?	459.95429(3a) 459.95341	
iii.	Does the procedure require that a contractor be a team member if that contractor’s work was involved in the incident?	459.95429(3a) 459.95341	
iv.	Does the procedure require that one team member have appropriate knowledge and experience necessary to conduct an incident investigation, and does it establish criteria to determine which individual fills this role?	459.95429(3b) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 4):			

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5) PREPARING AN INCIDENT INVESTIGATION REPORT	NAC Ref.	Resp. Code
<i>Item #5 Completion Score – Weighted 5% of Total</i>	%	
i. Does the procedure require development of an incident investigation report at the conclusion of the investigation that documents the investigation conducted under sections 2 through 4 above and includes:	459.95429(4) 459.95341	
a. Date of the incident?	459.95429(4a)	
b. Date the investigation began?	459.95429(4b)	
c. Incident description?	459.95429(4c)	
d. Factors contributing to the incident (causes)?	459.95429(4d)	
e. Recommendations based upon the investigation findings to prevent reoccurrence of the incident?	459.95429(4e)	
ii. Does the procedure designate the individual(s) responsible for development of the incident investigation report?	459.95429(4) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 5):		
6) ADDRESSING INCIDENT INVESTIGATION RECOMMENDATIONS	NAC Ref.	Resp. Code
<i>Item #6 Completion Score – Weighted 10% of Total</i>	%	
i. Does the procedure establish a system to ensure that all findings and recommendations are addressed (receipt of management concurrence in action) in a prompt manner and does it designate the responsible individual(s)?	459.95429(5) 459.95341	
ii. Does the procedure establish a system to ensure that all findings and recommendations are resolved (implemented) in a prompt manner and does it designate the responsible individual(s)?	459.95429(5) 459.95341	
iii. Does the procedure establish a system to track the implementation of the recommendations and does it designate the responsible individual(s)?	459.95429(5) 459.95341	

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iv. Does the procedure establish a system to document all problem solutions and corrective actions taken as a result of the incident investigation and does it designate the responsible individual(s)?	459.95429(6) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 6):		
7) REVIEWING INCIDENT INVESTIGATION AND REPORT RETENTION	NAC Ref.	Resp. Code
<i>Item #7 Completion Score – Weighted 5% of Total</i>	%	
i. Does the procedure establish a system to review the incident investigation report with affected employees and does it designate the responsible individual(s)?	459.95429(7) 459.95341	
ii. Does the procedure establish a system to ensure that affected contractors are included in the review and does it designate the responsible individual(s)?	459.95429(7) 459.95341	
iii. Does the procedure establish a system to retain incident investigation reports for five years?	459.95429(8) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 7):		
8) MANAGEMENT PLAN AND DOCUMENT CONTROL	NAC Ref.	Resp. Code
<i>Item #8 Completion Score – Weighted 5% of Total</i>	%	
i. Is there a site-specific plan that addresses how the Incident Investigation 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 Incident Investigation Program requirements?		459.95341
b. How is facility program monitored for compliance with NAC 459.95429, CAPP Incident Investigation Program?		459.95341
ii. Is there a site-specific policy or procedure that addresses how Incident Investigation Program documentation is controlled to ensure that the most current information is in circulation and use?	459.95341	

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Notes/Comments Pertaining to Responses to Questions under Issue 8):		
9) VERIFICATION OF INCIDENT INVESTIGATION IMPLEMENTATION	NAC Ref.	Resp. Code
<i>Item #9 Completion Score – Weighted 50% of Total</i>	%	
i. From the records audit in Part B, does it appear that all incidents were investigated as required? <i>Refer to Part B-1</i>	459.95429(1)	
ii. From the records audit in Part B, does it appear that incident investigation reports are being retained for the required 5-year period? <i>Refer to Part B-2</i>	459.95429(8)	
iii. From the records audit in Part B, does it appear that incident investigations are being conducted pursuant to CAPP regulation? <i>Refer to Part B-3</i>	459.95429	
Notes/Comments Pertaining to Responses to Questions under Issue 9):		
General Procedure/Policy Review Notes/Comments:		

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B. ON-SITE INSPECTION - RECORDS AUDIT				
1) DETERMINATION THAT INCIDENTS WERE INVESTIGATED AS REQUIRED	NAC Ref.	Resp. Code		
a. From information provided by the facility and on-site observation, does it appear that any incident that resulted in, or could reasonably have resulted in, a catastrophic release of a substance had a documented incident report?	459.95429(1)			
Notes/Comments Pertaining to Responses to Questions under Issue 1):				
2) DETERMINATION THAT INCIDENT INVESTIGATION REPORTS ARE BEING RETAINED AS REQUIRED	NAC Ref.	Resp. Code		
a. From information provided by the facility and on-site observation, does it appear that incident reports are being retained for at least 5 years after the date of the incident?	459.95429(8)			
Notes/Comments Pertaining to Responses to Questions under Issue 2):				
3) SELECT 2 TO 4 COMPLETED INCIDENT INVESTIGATION REPORTS TO REVIEW AGAINST ACTUAL PRACTICE <i>List on the Following Table:</i>				
#	Report ID #	Description/Summary of Incident	Date of Incident	Invest. Start Date
i				
ii				
iii				
iv				
Inquiry/Observation			Resp. Code :	
			i	ii
			iii	iv
a. Is date and time that the incident identified?				

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b. Is date that the investigation began identified?				
c. Did investigation begin within 48 hours of the incident?				
d. Is a description of the incident provided?				
e. Are the investigation team members identified?				
f. Does at least one team member appear to be knowledgeable of the process involved?				
g. Is there evidence that contractor staff was represented on the team, if a contractor employee's work was involved in the incident?				
h. Does at least one team member appear to have appropriate knowledge and experience to investigate and analyze the incident?				
i. Have contributing factors and root causes been identified?				
j. Are the team's proposed recommendations to reduce or eliminate chance of re-occurrence documented?				
k. Were the findings evaluated in the report, and were the recommendations tracked through an established system?				
l. Were any solutions and corrective actions taken documented?				
m. Is there documented evidence that the report was reviewed with all effected personnel whose job tasks are relevant to the report findings?				
n. Is there documented evidence that the report was reviewed with contractor employees whose job tasks are relevant to the report findings?				
o. Based on the Response Codes used to complete items a - n above, is it possible to confirm that an Incident Investigation was performed in accordance with program requirements?				
Notes/Comments Pertaining to Responses to Questions under Issue 3):				
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 INCIDENT INVESTIGATION 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 Incident Investigation program is, and why it exists? How does the Incident Investigation process work? Who performs Incident Investigations?
c	What types of incidents must be investigated?
d	How are you involved in the incident investigation process?
e	Have you ever been involved in an incident that was investigated? Have you ever been involved in investigating an incident?
f	Have the results of an incident investigation report ever been reviewed with you?
g	Are you aware of incidents that have not been investigated?
h	Do you think that the incident investigation reports accurately indicate what went wrong and that appropriate corrective actions were taken? Do you feel that the Incident Investigation program could be improved? How?

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.

Discussion Summary: