

XI. Employee Participation Program

Nevada Division of Environmental Protection Chemical Accident Prevention Program

Element Audit Checklist

Revision 0, 03/10/09



Facility:	Process(es) Covered:	Date:	
A. PROCEDURE/POLICY REVIEW			
1) EXISTENCE, STRUCTURE AND FORMAT OF WRITTEN EMPLOYEE PARTICIPATION PLAN		Percentage Completion Score – Total 100% (Weighting of Elements is Defined Below)	
Overall NDEP-CAPP Element Audit Checklist Score for Employee Participation (as evaluated in sections 2 and 4 below)		%	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			
2) CONTENT OF THE EMPLOYEE PARTICIPATION PLAN		NAC Ref.	Resp. Code
Item #2 Completion Score – Weighted 45% of Total		%	
i. Does the written plan define how employees are consulted about conducting and developing the process hazard analysis, how employee input is provided and who is responsible for consulting with the employees and documenting that consultation?		459.95431(1) 459.95431(2a) 459.95341	
ii. Does the written plan define how employees are consulted about developing and implementing the following CAPP program elements; and does the plan define how employee input is provided and who is responsible for consulting with the employees and documenting that consultation?		459.95431(1) 459.95431(2b) 459.95341	
a. Process Safety Information		459.95431(1) 459.95431(2b) 459.95341	
b. Standard Operating Procedures		459.95431(1) 459.95431(2b) 459.95341	
c. Training		459.95431(1) 459.95431(2b) 459.95341	
d. Mechanical Integrity		459.95431(1) 459.95431(2b) 459.95341	
e. Management of Change		459.95431(1) 459.95431(2b) 459.95341	

Response Code (Point Value): Y = Yes (1), N = No (0), NA = Not Applicable (Not Scored), U = Undetermined (0), P = Partially Satisfied (½), NR = Not Reviewed (Not Scored), R = Reviewed (1)

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f.	Pre-Startup Safety Review		459.95431(1) 459.95431(2b) 459.95341	
g.	Compliance Audits		459.95431(1) 459.95431(2b) 459.95341	
h.	Incident Investigation		459.95431(1) 459.95431(2b) 459.95341	
i.	Hot Work Permit		459.95431(1) 459.95431(2b) 459.95341	
j.	Contractor Program		459.95431(1) 459.95431(2b) 459.95341	
k.	Emergency Response Program		459.95431(1) 459.95431(2b) 459.95341	
iii.	Does the written plan define how employees have access to the information referenced in items i and ii above; and does the plan define the individual(s) responsible for ensuring the information is available?		459.95431(3) 459.95341	
Notes/Comments Pertaining to Responses to Questions under Issue 2):				
3) MANAGEMENT PLAN AND DOCUMENT CONTROL			NAC Ref.	Resp. Code
<i>Item #3 Completion Score – Weighted 5% of Total</i>			%	
i.	Is there a site-specific plan that addresses how the Employee Participation 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 Employee Participation Program Requirements?		459.95341	
b.	How is facility program monitored for compliance with NAC 459.95431, CAPP Employee Participation Program?		459.95341	
ii.	Is there a site-specific policy or procedure that addresses how the Employee Participation 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 3):				

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4) VERIFICATION OF EMPLOYEE PARTICIPATION PLAN IMPLEMENTATION	NAC Ref.	Resp. Code
<i>Item #4 Completion Score – Weighted 50% of Total</i>	%	
i. Is there documented evidence that employee participation has been solicited as required by this program element? <i>Refer to Part B- 1</i>	459.95431(1) 459.95431(2a) 459.95431(2b)	
ii. Does there appear to be adequate employee access to the CAPP program information as required by this program element? <i>Refer to Part B-2</i>	459.95431(3)	
Notes/Comments Pertaining to Responses to Questions under Issue 4):		
General Procedure/Policy Review Notes/Comments:		

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B. ON-SITE INSPECTION - RECORDS AUDIT			
1) VERIFY IMPLEMENTATION OF EMPLOYEE PARTICIPATION PLAN		NAC Ref.	Resp. Code
a.	Is there documented evidence that employees were consulted on developing and conducting the process hazard analysis in accordance with the employee participation plan?	459.95431(1) 459.95431(2a)	
b.	Is there documented evidence that employees were consulted on developing and implementing the following program elements:	459.95431(1) 459.95431(2b)	
i.	Process Safety Information	459.95431(1) 459.95431(2b)	
ii.	Standard Operating Procedures	459.95431(1) 459.95431(2b)	
iii.	Training	459.95431(1) 459.95431(2b)	
iv.	Mechanical Integrity	459.95431(1) 459.95431(2b)	
v.	Management of Change	459.95431(1) 459.95431(2b)	
vi.	Pre-Startup Safety Review	459.95431(1) 459.95431(2b)	
vii.	Compliance Audits	459.95431(1) 459.95431(2b)	
viii.	Incident Investigation	459.95431(1) 459.95431(2b)	
ix.	Hot Work Permit	459.95431(1) 459.95431(2b)	
x.	Contractor Program	459.95431(1) 459.95431(2b)	
xi.	Emergency Response Program	459.95431(1) 459.95431(2b)	
c.	Is there documented evidence that employee input was actively considered?	459.95431(2)	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			

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2) VERIFY ACCESSIBILITY OF THE INFORMATION	NAC Ref.	Resp. Code
a. Is the information accessible to employees in the manner specified in the employee participation plan?	459.95431(3)	
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 EMPLOYEE PARTICIPATION PROGRAM USING THE FOLLOWING QUESTION SETS

Responses are to be Logged on Following Pages:

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 the CAPP program requirements in any way? Ask specifically about the PHA.
c	Are you familiar with the employee participation plan? (explain what it is if they don't recognize the title) Are you familiar with what information is available to you under the employee participation plan? How do you access the information?

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 _: