

Components of an Implementation Plan and Document Control System

Amendment Summary

NAC 459.95516, regarding management systems, was recently amended to require the owner or operator of a CAPP facility to:

1. Develop an implementation plan that covers each element of the prevention and emergency response programs (the implementation plan must define how each requirement of each such element will be implemented at the facility); and
2. Provide a system that requires all information and documentation be controlled in a manner that ensures that the current information and documentation is in circulation and in use.

The format of the implementation plan and document control system is not mandated by regulation. Minimum expectations are defined below.

Regarding ISO 9000

Several CAPP-regulated facilities have been certified in one of the International Organization for Standardization (ISO) 9000 family of international quality management standards. The quality manuals and plans developed under these standards will likely cover most, if not all, of the amendment requirements.

NDEP recognizes that the ISO 9000 format does not directly correspond to the CAPP prevention and emergency response program elements. In consideration of that fact, the owner or operator is not expected to produce a separate, reformatted version of these manuals or plans in order to satisfy the requirements of the amendment. However, the owner or operator must ensure that implementation for each element of the CAPP program is addressed in the ISO documentation. Of course, the owner or operator may choose to develop a separate implementation plan. Additionally note that NDEP will consider the document control requirements of the amendment satisfied if the facility is ISO 9000-certified.

Implementation plan in facilities that are not ISO 9000-certified

For each program element, define who (position is adequate), what, when, and if necessary, how. Prior to this regulatory amendment, some program elements such as management of change already required this plan by way of requiring the development of a procedure.

Document control system in facilities that are not ISO 9000-certified

The document control system required under this amendment is intended to ensure that all information and documentation that is developed and in use, is of the most recent version. Other control aspects related to creation, approval and modification of information and documentation are addressed in the requirements of the various CAPP program elements.