

Management Of Change Form

SECTION I: INITIATION OF REQUEST

COMMISSIONED

Requestor: **Breedlove, David L.**

MOC-NDU-2001-002

Change: **Permanent** Proposed Date OF Change: **01-Apr-03**

Date: **28-Nov-01**

Estimated Date of Temporary Change or Removal:

Facility: **NDU**

Type Of Change: **Personnel/Staffing/Org./Outsourcing**

S/D Requirement: **No Shutdown Required**

Description: **Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.**

Basis (Optional):

SECTION II: APPROVAL TO PROCEED

By: **Ralph, W. H.**

Date: **20-Feb-02**

SECTION III: REQUIREMENTS FOR CHANGE

Type Of Hazard Review: **What-if/Checklist**

Leader: **Ralph, W. H.**

	Required	Responsible	Complete	
			By	Date
MOC Process Hazard Analysis (PHA)	Yes	Ralph, W. H.	Ralph, W. H.	20-Feb-02
MOC PHA Safety Action Items Resolved	Yes	Track, A/I	Track, A/I	30-Apr-03
MOC PHA Report Received By PSM Group	Yes	Group, PSM	Levis, Sandra	25-Feb-02
Update Operating Procedures	Yes	Breedlove, David L.	Breedlove, David L.	22-Feb-03
Train Operating Personnel	Yes	Logan, Charles	Logan, Charles	12-Mar-03
Inform Maintenance Personnel	Yes	Breedlove, David L.	Breedlove, David L.	22-Feb-03

SECTION IV: AUTHORIZATION TO COMMISSION

(Electronic Signature confirms that pre-startup safety review requirements have been met)

PHA Documentation Received **Track, A/I**

Date **30-Apr-03**

Team Leader **Price, Rod**

Authorized By **Price, Rod**

Date **30-Apr-03**

MOC-NDU-2001-002 Action Items

Monday, April 04, 2005

Index MOC-NDU-2001-002-005 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 03/14/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** OPTIMIZATION **Ind:** Nowobilski, Pete **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Organize the Honeywell TDC 3000 keypad to distinguish between Isom and NDU functions.

Resolution: GUS keypad has two zones, one for ISOM, one for NDU.

Comments:

Index MOC-NDU-2001-002-006 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 04/25/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** OPTIMIZATION **Ind:** Breedlove, David L. **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Develop a simulator for the AU2/ISOM/NDU control board operator position, or in the alternative developing effective gun drills. The concern is that the control board operation will be so smooth that the control board operators will lose their feel for the unit.

Resolution: Gun Drill Program has been developed as required.

Comments:

Index MOC-NDU-2001-002-007 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 02/27/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** OPTIMIZATION **Ind:** Breedlove, David L. **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Review the routine duties time allocation with all existing AU2/ISOM control board operators.

Resolution: Reviewed with operators during start-up training.

Comments:

Index MOC-NDU-2001-002-008 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 03/05/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** ASSET **Ind:** Morrison, Leonard **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Address the I/E experience, expertise, backlog issue with maintenance supervision. The current situation is borderline acceptable.

Resolution: One I/E Tech will be added to the maintenance crew

Comments:

MOC-NDU-2001-002 Action Items

Monday, April 04, 2005

Index MOC-NDU-2001-002-009 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 03/05/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** ASSET **Ind:** Morrison, Leonard **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Address staffing of mechanical support for all crafts (I.e., I/E, Analyzer, Machinist, Pipe).

Resolution: One I/E Tech will be added to the maintenance crew

Comments:

Index MOC-NDU-2001-002-010 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 03/14/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** OPTIMIZATION **Ind:** Logan, Charles **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Develop a training plan for the AU2/ISOM/NDU control board operator position in accordance with SH-PSM-5, Training for Process Safety.

Resolution: Added the NDU training requirements to the ARU/AU2/Isom training matrix

Comments:

Index MOC-NDU-2001-002-011 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 03/14/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** ASSET **Ind:** Breedlove, David L. **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Consider including Process Automation Services in the NDU project scope to perform alarm management.

Resolution: Prioritized all NDU alarms for start-up and will assess the possibility of using PAS at a future date once we have gained some experience and history with operating the unit. Will reassess priorities after start-up to validate or adjust them.

Comments:

Index MOC-NDU-2001-002-012 **Type:** SAFETY **Status:** COMPLETE **Target:** 04/01/2003 **Actual:** 03/13/2003 **Incident Level:**
Supt: Hawkins, Ray **Group:** OPTIMIZATION **Ind:** Logan, Charles **TAR:** No

Ref: Combine NDU board operator responsibilities with the AU2/Isom board operator responsibilities.

AI: Extend the requirement to have two control board operators for any planned startup or planned shutdown activities to include the NDU.

Resolution: Added the NDU to the required training matrix

Comments:

Selected Action Items

17-Apr-06

Index MOC-ISOM-1999-006-021

Type: SAFETY

Status: COMPLETE

Target: 10/16/2000

Actual: 10/16/2000

Incident: N/A

Initiated: 06/09/1999

Supt: Yafuso, Wendy

Group: ASSET

Ind: Politte, Mark D.

TAR: No

Level: N/A

Ref: Consolidation of the Isom and AU2 optimization operator positions.

AI: Consider analyzing the Isom abnormal events and CCA's to determine if sufficient manpower exists to manage the situation. If not, consider establishing a management philosophy on when to execute a safe-off.

Resolution: Complete as recommended

Comments: M.O. Castillo and D.L. Breedlove reviewed the abnormal events and CCAs and determined that one board operator is sufficient since the unit has a semi-automated shutdown system.

Index MOC-ISOM-1999-006-022

Type: SAFETY

Status: COMPLETE

Target: 10/16/2000

Actual: 10/16/2000

Incident: N/A

Initiated: 06/09/1999

Supt: Yafuso, Wendy

Group: OPTIMIZATION

Ind: Breedlove, David L.

TAR: No

Level: N/A

Ref: Consolidation of the Isom and AU2 optimization operator positions.

AI: Consider reviewing the steam shed list, and the hydrogen shed list in light of the proposed Optimization Operator consolidation to determine if sufficient manpower will exist to perform as desired by the shed lists.

Resolution: Complete as recommended

Comments: The shed list only effects one unit at a time, generally the Isom and not AU2.

Index MOC-ISOM-1999-006-023

Type: SAFETY

Status: COMPLETE

Target: 10/16/2000

Actual: 10/16/2000

Incident: N/A

Initiated: 06/09/1999

Supt: Yafuso, Wendy

Group: ASSET

Ind: Mccardia, Jessie

TAR: No

Level: N/A

Ref: Consolidation of the Isom and AU2 optimization operator positions.

AI: Consider revising the Isom planned startup and shutdown procedures to require an independent/dedicated Optimization Operator during critical transitions.

Resolution: Complete as recommended

Comments:

Index MOC-ISOM-1999-006-024

Type: OPERABILITY

Status: COMPLETE

Target: 01/23/2001

Actual: 01/23/2001

Incident: N/A

Initiated: 06/09/1999

Supt: Yafuso, Wendy

Group: ASSET

Ind: Logan, Charles

TAR: No

Level: N/A

Ref: Consolidation of the Isom and AU2 optimization operator positions.

AI: Consider reviewing the current Isom scheduling practices (e.g., scheduled vacation, emergency vacation, special assignments, etc.) in relationship to the total operator pool availability following the optimization operator consolidation.

Resolution: Complete as recommended

Comments: