



# Memorandum

June 22, 2004

PSM-004-04

**To:** TGJohnson  
CJSonnichsen

**From:** DCHaring

**Subject:** Plant 5 Front End Revalidation K00S22R2 (Systems 81, 82, 83, 84, 85)

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## SUMMARY

The Plant 5 Front End Revalidation, K00S22R2, for Systems 81, 82, 83, 84, and 85 was due in October 2003. This revalidation was started April 19, 2004 and was completed on April 26, 2004 in 5.5 work days.

### Full-time participants:

John Ferguson  
Forrest Pipkin  
Malcolm Rooper  
Loretta Brown  
Dave Haring

### On-call participants:

Joe Pault  
Leslei Spalding  
Les Bender  
Dana Bassel  
Michelle Gryzbowski  
Steve Maltby  
Phil Pijahn

The team developed a list of 88 task assignments for your review (see attached list) that are listed as Health, Safety, Environmental or Regulatory Compliance. Many of those recommended task assignments are directed at improving programs and management systems; the remainder generally focus on specific equipment or procedures. Recommendations will need to be addressed per AP-15.2, (which needs revision). Assignments and due dates will need to be confirmed, and then entered into Incidenter for tracking. If you need more background or supporting information, the checklists, notes and other information from the study will be filed in the PHA files under reference # K00S22R2.

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An additional 13 recommendations were made which looked useful, but were judged as production or business issues instead of HESR. These are included at the bottom of the table for use as you see fit; however, tracking in Incidenter is not recommended for these.

### **METHOD**

The revalidation team used the Process Hazards Analysis Checklists as a guide to direct discussion, identify possible problem areas and solutions, and make recommendations for improvement.

Following is a list of topics and areas of discussion covered by the revalidation team.

- Brainstormed and discussed issues by P&ID
- Reviewed incidents, MOC and P&ID changes since last revalidation
- Reviewed previous recommendations
- Gathered Process Safety information for pump and PSVs
- Validated the relief valve design information
- Reviewed effectiveness of several PSM programs for affected equipment
- Validated the list of critical check valves
- Searched for other problem areas using the PHA checklists
- Reconciled all open issues

After the team meeting, desire was expressed to risk rank the recommendations (our current procedure calls for risk-ranking the non-HESR recommendations). An attempt to risk-rank the remainder was made, but it proved difficult when dealing with compliance issues or PSM program deficiencies. After reviewing the intent with TGJohnson, a small team (D. Haring, M. Rooper, F. Pipkin, C. Copple) met in June and reviewed the recommendations to confirm the category and check them for accuracy.

Attachments: K00S22R2 Recommendations List

cc:	CGCopple	<u>PHA Team Members:</u>	
	JMAverill	DCHaring – Team Leader	
	JOLandua	HMRooper	Leslei Spalding
		JRFerguson	DLBassel
		FAPipkin	MLGryzbowski
		LRBrown	LMBender
		JDPault	SCMaltby

PSM File: PS-3.9.1  
 PHA File: K00S22R2

DCH/lrb