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3 tips for gaining compliance with operating procedures

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I have visited several gas plants across the U.S. Gas plants are complex facilities. They operate at pressure with flammable materials and dangerous products. Gas plants are regulated by Process Safety Management standards to address the inherent hazards of operations.

When visiting gas plants, I make it a habit to stop in the control room and the maintenance office and engage operations folks in conversation. One thing I like to ask is if the operators can show me the procedure for whatever operation is being done at the time. From there, it's a discussion about how the procedures are used (or not), who wrote the procedures, whether or not the procedures work and how they are revised.

I had the opportunity to compare two gas plants operating for the same client. They weren't exactly the same in terms of size, age or complexity. But they were similar enough, operated by the same leadership team in the same country with some rotation of leaders between the sites. However, the approach to procedures varied significantly between the two.

One plant had operations procedures that were known, written and complied with; the other, not so much. Why would there be so much variation between two plants in the same country and the same company?

When writing procedures:

Engage the people who will use the procedures to write the procedures

Leaders need to engage employees in dialog about procedures

Keep the language in "operator speak"

1 Involve operators and keep it simple

A look back in time provides some insight to the variation. Both sites had procedures. Site One commissioned a revision of all operating procedures and hired a retired plant engineer to write the manuals. And write he did.

Volumes of detailed procedures were created. And when he was done, it was all codified in a manual. That sits on a shelf.

Thumbing through the manual, 1989 and 1996 seemed to be the latest revision dates of several policies. I didn't need Microsoft's analysis to tell me at what grade level the procedures were written. They had long, run-on sentences with big, complicated words and very few illustrations.

Site Two, however, was a different story. The plant had just completed a review of their procedures. The review was conducted by the operators who use them. Each page had lots of white space, a few diagrams and was written in simple language.

2 Ensure competence

At Gas Plant Two, operators carried their procedures in a notebook. Each notebook had a page for a signature that verified the employee was competent in that procedure. When competency was achieved, the signature was applied. While there are fancy systems available to do the same thing, this actually worked.

Supervisors and peers cared about certification. The notebooks made it visible. Other tools, like 'draw and describe' and competency tests, were used to support the certification process.

It should come as no surprise that Site Two used the procedures, and their operators knew what each procedure was and how to execute it. Leadership at the site focused on the use of procedures as part of their safety walkabouts. They made it important.

3 Review regularly

Procedures at Plant Two were also regularly reviewed. They were revised as if they were part of a regular PM schedule. They were also reviewed as part of MoC processes when equipment was added, modified or eliminated. And operators were confident that the procedures were right, because they created them and signed off on them. The culture of Plant Two was to follow the procedures. If the procedures didn't work, operators were empowered to revise them.

How does your plant measure up?

The way to make sure a procedure gets used is to engage operators (and maintenance) in writing the procedure. Ensure it's written plainly in a way that reflects how the work actually gets done. It's easy to delegate the assignment to an "expert" who will get the procedure technically correct but operationally unusable. Look to the way lean manufacturing describes "standard operating procedures." Few words. Step-by-step instructions. Illustrations.

The next time you are out in the field, review the procedures. Is your organization operating like Plant One or like Plant Two?

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