
From: Robins, Joel H
To: Robicheaux, Brian M; Halaska, Tom J; Andrus, Ted
CC: Fiedler, Andrew T; Willis, Willie L
BCC:
Sent Date: 2004-06-30 03:22:13:383
Received Date: 2004-06-30 03:22:14:024
Subject: RE: ACTION: HRO Survey teleconference
Attachments: Control of Work Audit Response , Control of Work Audit Response rev.10.doc

Brian, et. al, we have not gotten a response from Mike Hoffman yet. **Therefore, please do not distribute further until we hear back that it is acceptable.** I totally agree that there is tremendous overlap...I think we have some very good direction on the action plan and would encourage as broad use as possible to keep the number of new actions to a minimum and so we can keep the message outside the site focused. As we've put the response together I thought about trying to connect to HRO, but frankly, we just didn't have the time to touch more bases...I'd love to see how you make the connections.

-----Original Message-----

From: Robicheaux, Brian M
Sent: Tuesday, June 29, 2004 9:45 AM
To: Halaska, Tom J; Andrus, Ted
Cc: Robins, Joel H; Fiedler, Andrew T; Willis, Willie L
Subject: ACTION: HRO Survey teleconference

fyi.....amazing how the same findings keep coming up in all the different reviews we do (i.e. work processes are not up-to-date, Just Culture Issues; accountability being clear; Slow in implementing solutions; BPSH Strategy Work, Control of Work Audit, etc).

Reading through this was a bit like reading through the control of work audit and responses and the need to focus on the human and organizational aspects of what we do (i.e. Just Culture, accountability, communication and training, clear / concise and understandable policies and procedures that we can hold people accountable for, etc.)

I'd suggest that we need to try and be as consistent and focused on all these responses about "what we're going to do" back to the organization. Hence, the key things we say we're going to do in moving our organization towards and HRO and the things we say we're going to do in response to the Control of Work Audit should be linked and consistent. To that end, would you please send me a copy of your latest draft response on Control of Work Audit to check for consistency? We owe a response by July 2nd.

Thx

Brian Robicheaux
BP Texas City Refinery
Asset Superintendent Pipe Stills

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RobichBM@BP.com

<http://connect.bpweb.bp.com/search/record.asp?IDN=345044>

-----Original Message-----

From: Fiedler, Andrew T
Sent: Monday, June 28, 2004 6:47 AM
To: Willis, Willie L; Robicheaux, Brian M
Cc: Stein, Norine A; Dio, Susan W; Elgin, Mike; Robins, Joel H; Barnes, Joe; Frink, William A; Panozzo, Ken P; Peltier, Richard T
Subject: FW: HRO Survey teleconference

Willie, Brian, as you can see TC needs to respond to the HRO survey with actions that we are taking with respect to the HRO survey. I have made a first pass at this (see slides 16 - 21) I would appreciate yours and everyone else's comments before the end of the week.

Andy Fiedler

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(c) 409.771.0658
fiedleat@bp.com

-----Original Message-----

From: Maslin, Paul R
Sent: Wednesday, June 23, 2004 6:11 AM
To: Willocquet, Jacques; Allendorfer, Robert K.; Avery, Paul R; Bertram, Darryl A; Bischof, Hilmar (ERE); Caldera, Anthony A; Campbell, Jan A; Chimney, Rob S; Chmielek, Hans-Juergen (BP Gelsenkirchen Gmbh); Dement, Dan D; Duggan, Chris F.; Fiedler, Andrew T; Hirschfeld, Kathy A. (MOR); Maughan, John R; Notario, Sebastian; Rhoades, Jerry L.; Rosengarten, Bernhard (BP Gelsenkirchen Gmbh); Schwerha, Michael J; Warbeck, Ewan; Ward, Pat A.
Cc: Smith, Sylvia A; Richard Howells; Joe Griffith
Subject: HRO Survey teleconference

This is a summary of the June 22nd teleconference about the HRO Survey regarding our next steps. **I would appreciate your replies to the requests given below even if you were unable to participate in the call.**

Our turnout was excellent – attending were Jerry Rhodes, Rob Chimney, Ewan Warbeck, Mike Schwerha, Darryl Bertram, Pat Ward, Bernhard Rosengarten, John Maughan, Sebastian Notario, Hilmar Bischof, Paul Avery, Chris Duggan, Jacques Willocquet, Andy Fiedler, Joe Griffith, Richard Howells, and myself.

While individual BUs should take appropriate action based on their own HRO Survey reports, our focus now is on the overall SPU results. We're interested in developing conclusions about where the SPU has strengths in HRO behaviours and where there are opportunities for development. As we move forward, we want to identify high priority areas for action, to target initiatives to continue and possibly raise support, and areas in which to stop or do less.

The discussion about the key points in the aggregate HRO report was very useful. Some of the ideas that were talked about included:

- Across the SPU we're better at reacting to crisis than proactively putting preventative systems and programs in place (such as training)
- There is a big difference between the higher level employees response (69% agree) compared with the front line response (53% agree). We thought that there may be some frustration and cynicism on the part of the front line workers. Front line workers may also have an insufficient understanding of HRO, and may not be effectively engaged (with HRO, with operating envelopes, etc.), may lack an overview of the intent and purpose of initiatives they work on, and may not really appreciate their own impact and influence.
- We thought that a common area for improvement is in developing a better understanding of HRO and engagement of the front line in the behaviors and actions that can have the biggest difference on results.

The next step is to get input from all the BU HRO Tags about the following:-

1. What are the opportunity areas and actions for your BU, as you assimilate the results of your individual BU survey? For example, you might report:

Survey dimension or question	Opportunity Area	Actions
Work Processes	<ul style="list-style-type: none"> ▪ Rapidly assigning accountabilities and implementing solutions 	<ul style="list-style-type: none"> ▪ Using shift meetings to identify immediate actions and accountabilities for responding to weak signals. ▪ Tracking these actions using an "action log"

2. To improve HRO and BU results, what is your BU already doing in this area, what should be started, and what should be modified or stopped?
3. What actions are being taken, or could be taken, to better communicate with and engage the front line workforce?
4. Are there issues to be addressed at the SPU wide level, or are our issues best addressed separately in the individual BUs?

Please send your answers to the above four points in PPT slides to Sylvia Smith by July 2nd. Please don't be constrained by these questions – for example, if the 2nd question doesn't work for you just omit.

Sylvia will be sending you a request for information about your attendance, your arrival and departure plans, and if you cannot attend, your availability for participating on a teleconference call (July 15th, 1 PM GMT).

Thanks again for your efforts and support of this strategic area.

Paul

From: Parus, Donald L
To: Barnes, Joe; Robins, Joel H
CC: Morris, Connie M
BCC:
Sent Date: 2004-06-28 04:36:07:742
Received Date: 2004-06-28 04:36:37:773
Subject: FW: Control of Work Audit Response
Attachments:

Joe/Joel: Thanks for all your help in the past weeks pulling this together, sorry for the weekend drill but I felt it was necessary to be ahead on this one in light of the Manzoni visit on the 12th. I fully expect some further dialogue on this topic but I am VERY satisfied as to where the team landed on this one. I did modify the third paragraph in the cover letter to help reinforce our position with what will be a key discussion point from this audit. I am sure we will be pressed for a hard timeline when the education will end on each of the subjects we selected; we should be prepared for that discussion for this response and the visit. By copy to Connie, pls advise us when there is a response.

-----Original Message-----

From: Parus, Donald L
Sent: Sunday, June 27, 2004 11:19 PM
To: Gower, Patrick E; Hoffman, Michael P (GVP)
Cc: King, Patrick L; McDaniel, Stacey (SUN)
Subject: Control of Work Audit Response

Mike/Pat: Please find attached the draft Texas City BU response to the May 2004 Control of Work review. This response includes a detailed action plan that describes our plan forward to close both the physical and cultural gaps discovered during the review. If you would like to discuss this draft I can arrange a telecom at your earliest possible convenience.

With the coincidence of this review and the recent fatality suffered within our refinery, the results have confirmed our belief that the culture on our site fosters the lack of complete compliance to safety policies and regulations by members of our BP workforce, as well as members of the contract companies that we utilize within our site. The attached document reflects that the Texas City Leadership Team has taken complete ownership of the actions necessary to close this cultural gap, and to create an atmosphere of zero tolerance to willful violation of rules. Developing this response has served to galvanize the Leadership Team around a common approach to driving accountability for compliance.

We have recently accelerated the use of discipline where appropriate for gross

negligence including supervision (for example in the case of a frontline supervisor who chose not to wear proper protective gear while handling HF). However, we believe it is very important to separate external audits and discipline for the sake of future audit effectiveness. Therefore, we have developed an approach that will focus first on education of the workforce to ensure consistent application then reinforced by verification through structured auditing. Following these efforts the site leadership will ensure compliance using "just cause" principles to create a culture of discipline. The specifics are explained in more detail in our response. This process also enables us the highest chance of securing union support with this effort, a support which has dramatically improved in the past couple of months including support of the 1000-day goals.

We have built our plan on ideas that have been successfully used within BP and have also borrowed some concepts from other refineries. It is clear that our actions to expedite the culture change in Texas City will be necessary in our attempt to achieve our 1000-day goals.

Our response to the review has been reviewed by Pat King, who believes it has the potential to serve as a pilot for use throughout the Refining SPU, and possibly, the R&M Segment.

Again, please review our draft response to the review's findings in preparation for our final submittal and upcoming review with John Manzoni on July 12th.

Don

Draft - Texas City Control of Work Review Response to Findings

Introduction

A Control of Work review was conducted at the Texas City site during the week of May 10, 2004. Evidence of performance against the Golden Rules of Safety were observed and documented. The review team noted several excellent practices along with the need to improve consistency and accountability with policy and procedure compliance. The report stated that the site has robust policies and procedures which address all of the aspects of Control of Work described in the Golden Rules of Safety and that the Texas City workforce is genuinely supportive of working in a safe manner and complying with the Golden Rules of Safety. However, it also specified opportunities in three areas: risk assessment, use of nitrogen, and lifting operations.

The review findings support our objective to change our culture to have zero tolerance for willful non-compliance to our safety policies and procedures by both BP and Contract personnel working on our site. We will also stop allowing general acceptance of non-compliance due to lack of education on the rules. It is unacceptable that members of our workforce (BP and Contract employees) are accepting personal risk rather than adhering to policies. We will eliminate the culture that fosters this behavior. To do so, we will strengthen our systems to deliver compliance through education, verification and stronger leadership. We invite a follow-up review to monitor our progress on these commitments.

The specific findings from the review have been documented in Traction and have action items assigned to specific personnel with appropriate due dates. Many of the action items have been completed as of submittal of this report.

Culture Related Issues

“The Texas City workforce does not always see that 100% compliance to safety procedures and rules is necessary...” Quote from the Review results

The Leadership Team (LT) in Texas City is taking a zero tolerance stand on willful violations of safety policies and on non-willful violations due to lack of education. We commit to consistently driving accountability by applying a Compliance Delivery Process. This Compliance Delivery Process is focused on educating our entire workforce (including contractors) to fully understand and adhere to safety policy, confirming our level of compliance through stringent self verification, and providing stronger leadership in holding the workforce accountable to compliance. See Appendix C for details.

The Texas City LT has selected three of the Golden Rules of Safety that hold highest risk for the site (fatality or severe injury potential). These chosen rules are: Working at Heights, Energy Isolation, and Permit to Work. The first Golden Rule upon which we will focus is Working at Heights. We will start by holding a site wide safety standdown targeted for the week of July 12th that will deliver our message of a program leading to

zero tolerance, and share factual information from the recent fatality investigation results. We have begun development of a full-time auditing team for the site that will become experts on the context of each policy and will then consistently monitor our work activity against site policies and the Golden Rules. Their findings will be communicated to the site and will be visible to the leadership team. Our contract workforce will be similarly monitored by our BP job reps and frontline supervisors.

Through our leadership, consistent decisions will be made on the level of discipline necessary when willful violations of rules are discovered. This will be accomplished through the framework of a “Just Culture”, where the disciplinary action taken is appropriate to the circumstances of the incident (see Attachment B). This approach will provide us a method to distinguish between genuine mistakes and those that are willful breaches or neglect of established policies. When preceded by appropriate education and verification, the effective use of discipline will continue to be an important tool for site leadership to use to drive personal accountability for compliance.

Contractors working on our site and their management will be held to a similar level of accountability on safety and will be monitored and managed by the job representatives within our Maintenance Management system. Contract employees are often engaged in the highest risk work on our site. Therefore, it is imperative that we are explicit in our expectations of a safe and compliant work place. We will take extra diligence to ensure that we factor-in the particular challenges associated with managing contractors as an integral part of the Compliance Delivery Process.

Work Practice Issues

Risk Assessment:

“Among the Texas City workforce there is not a clear understanding of what an appropriate risk assessment entails...” Quote from the Review results

Our initial action will be development of a policy with clear and consistent expectations around when a risk assessment is required and what it must include. This policy will be completed by August 1, 2004. We will educate both our BP and Contract craftpersons on this policy and will self-verify the process on a routine basis.

Use of Nitrogen:

“Texas City operations did not show the sensitivity to the hazards associated with the use of nitrogen in open spaces that the team would have expected ...” Quote from the Review results

We will address the use of nitrogen in open areas through the following actions:

- The Process Safety Committee will conduct a unit-level review of all process facilities to verify that the requirements of Process Safety Minimum Expectation No. 18, Use of Nitrogen are in place. This documentation and verification process will begin in August 2004 and will be repeated triennially.
- Increase awareness and compliance by including Use of Nitrogen in the Compliance Delivery Process.

Lifting Operations:

“Small or routine lifts do not receive the same level of attention as do larger lifts. Use of JSAs and the Texas City rigging checklist are not embedded work practices...” Quote from the Review results

Actions to address small lifting operations include the following:

- Revise the site lifting policy to address the risk assessment requirements for small lifts and the specific inspection requirements for all lifting equipment (e.g., chain hoists). This will be completed by August 1, 2004.
- Include Lifting Operations in the Compliance Delivery Process. Initiate a certification process to verify lifting personnel competence in lift procedures.

Summary

The Texas City Leadership Team takes ownership of the proposed changes derived from the results of the Control of Work Review. Our plan forward, as described above, will be owned and managed by individual leaders within the organization. Our SPA for these changes will be one of the site's Manufacturing Delivery Leaders, Joe Barnes. We are determined to change the safety culture in Texas City to one of full compliance and mindfulness regarding adherence to rules and the safe keep of our workforce. A complete description of our Schedule for Action Delivery (Attachment A), a description of the Just Culture method of accountability delivery (Attachment B) and our Compliance Delivery Process (Attachment C) with time boundaries and owners can be found in the attachments to this document. We look forward to future reviews of our progress.

Don Parus
BUL, Texas City Site BU

Attachment A – Schedule for Action Delivery

Texas City Control of Work Review Action Plan				
ACTION	Category	Who	When	Criteria
Distribute a communication to frontline leaders, contract management, and job reps explaining our expectations for full compliance to rules and policies.	Leadership	Don Parus BUL	01-Jul-04	Communicate to both BP personnel and Contractor Management our expectations for full compliance to site rules and policies. Inform all of our plans to adopt a Compliance Delivery Process that will call for Education, Verification and Leadership to drive accountability for compliance.
Discuss the details of the Compliance Delivery Process and the concepts of a “Just Culture” with the Union Leadership	Leadership	Willie Willis MDL	01-Jul-04	Courtesy session of what we’re doing and why. Not intended as a negotiation session.
Develop a compliance metric to be included in the 1000-day goals.	Education	Bill Frink MDL	01-Jul-04	Metric should be based upon auditing and provide a quantifiable measure of compliance with targeted policies. This metric will be added to our existing 1000-day and Bold goals and communicated to the entire Texas City Site workforce.
Develop training packages around the 3 Golden Rules selected for Site awareness and self-verification in the Compliance Delivery Process.	Education	Bill Frink MDL	01-Jul-04	Focus on Golden Rules and educate workforce on chosen rules (e.g., Working at Heights, Energy Isolation, Permit to Work) for intense education and verification efforts over the next 6 months.
Develop a compliance delivery system based upon the US Compliance Framework	Verification	Ken Panozzo MDL	01-Jul-04	Emphasize workforce education of requirements, work practice verification for compliance and leadership actions to drive accountability. Marry compliance with standards and policies with those for laws and regulations

Initiate a dedicated audit review team within the refinery. Utilize the existing hourly HSE reps to initiate system. Provide refresher training for reps on Golden Rules to prepare for verification process.	Verification	Ken Panozzo MDL	01-Jul-04	Develop intervention program that involves members of line organization to improve compliance knowledge and drive sharing of good practices. Dedicated resources should be put in place from each operating area. Program should complement and enhance other ongoing line self-verification efforts and provide a quantifiable measure of compliance that can be integrated into the 1000-day safety goal. Focus should be initially to educate the workforce and coordinated with Education efforts. Eventually, will include use of consequences, where appropriate.
Conduct a Stand down to discuss the results of the fatality investigation and to deliver the compliance message.	Leadership	Rich Peltier MDL	7/12/2004 Note that date is dependent on the release of the final investigation report.	Share results of the fatality investigation with all individuals working on site, through the FLLs and Job Reps. Information packages will be distributed to the FLLs and Job Reps for use in their discussions with both BP and Contract employees.
Develop and communicate a well-defined risk assessment policy using new Compliance Delivery Process.	Education	Bill Frink MDL	01-Aug-04	The policy will state that: all tasks will be risk assessed; the type of risk assessment will depend on the level of risk of the activity or job; include the broad spectrum of risk assessments starting with routine individual tasks to high-risk, multi-component / multi-craft jobs; and must include those that will actually "put their hands on equipment".
Revise the Lifting Policy to include greater use of risk assessment and communicate using new Compliance Delivery Process.	Education	Bill Frink MDL	01-Aug-04	Address the risk assessment requirements for small lifts and the specific inspection requirements for all lifting equipment (e.g., chain hoists). Include a means to verify that individuals involved in lifting operations have the appropriate level of competence.
Develop and implement a training program for all supervisors and job reps on appropriate use of discipline based upon the "just culture" concepts	Leadership	Willie Willis MDL	01-Aug-04	Mandatory 1 hour session for all supervisors and job representatives.
Initiate use of "just culture" discipline consistent with Don's letter.	Leadership	Willie Willis MDL	01-Aug-04	Effectively communicate "Just Culture" principles and expectations which should include discipline as a last resort, but fairly administered based on the level of violation performed.
Conduct unit level reviews of compliance with PSME No. 18	Verification	Ken Panozzo MDL	01-Aug-04	Continuing efforts that started in late 2003 to ensure nitrogen stations were labeled correctly. Convert to at least an annual review and include in verification using ongoing observations and Traction reporting processes.
Evaluate BP contractor job rep role and recommend improvements	Verification	Andy Fiedler Maint.Mgr	01-Aug-04	Use benchmarking and past experience to ensure individuals in this role can effectively meet expectations. Include competency-based criteria. These individuals will be the key verifiers of contractor adherence to policy.

Communicate clear expectations for all job reps	Education	Andy Fiedler Maint.Mgr	01-Sep-04	Reinforce existing responsibilities, any changes. Also, review expectations for risk assessment.
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Attachment B - Just Culture

'Just Culture'

The purpose of this document is to provide guidance to those involved in educating, verifying and reinforcing expectations placed on employees and contractors that they work safely while employed on our BP site. This is emphasized in the statement "Working safely is a condition of employment".

We have raised our HSE performance over the years by learning lessons from incidents and adapting our equipment, procedures and training to avoid repetition. This has been achieved by pursuing a HRO culture, one that encourages open reporting in a 'No Blame' environment. The need for continuous improvement in our HSE performance can only move forward in this way. However, a "No Blame" culture is Not a "No Responsibility" culture.

Recent internal and external audits continue to indicate that our workforce has a casual attitude toward compliance with safety policies and procedures. This is often the underlying cause of personal injury and/or property damage.

When mistakes are made, we need to distinguish between those which are genuine and those which are willful/careless breaches or neglect of accepted procedures. Depending on the seriousness of these breaches, careless/careless breaches or neglect may be viewed as a disciplinary matter. This can be best described as a 'Just Culture', where the action taken is appropriate to the circumstances of the incident.

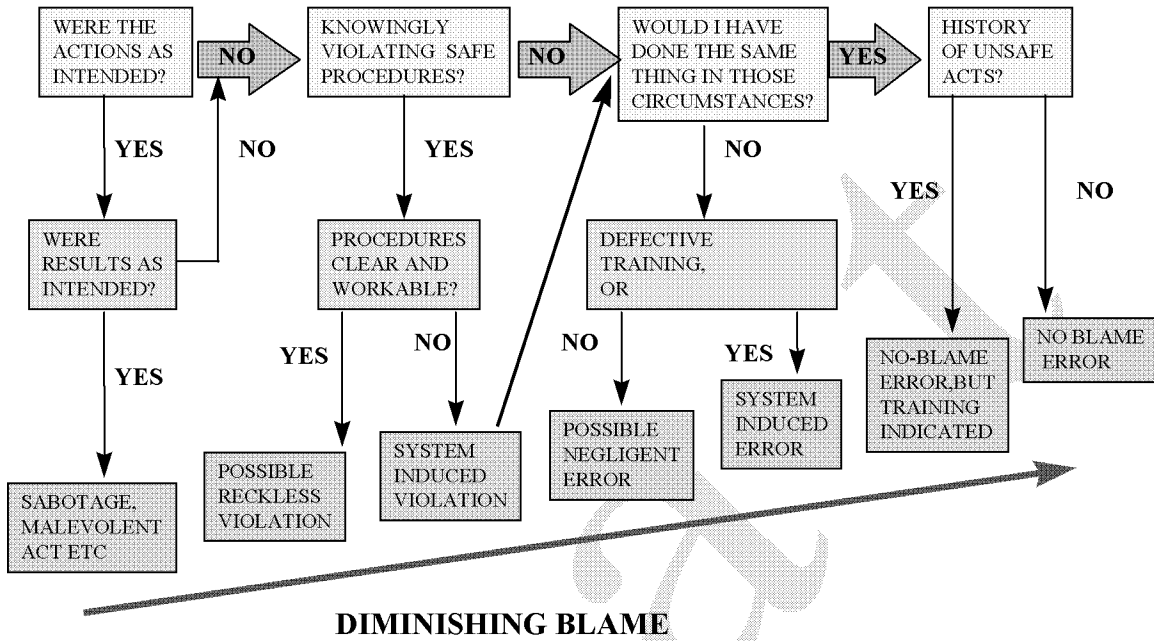
To explain this difference the attached diagram highlights an individual's responsibility for working safely, and serves as a timely reminder of the duties that are placed on all employees, namely:

- *Each individual is personally responsible for working safely.*
- *Staff should work safely and, if they identify unsafe conditions, they should stop immediately and only continue when the unsafe condition is rectified and work can continue in a safe manner. If they cannot rectify the deficiency safely it should be brought to the attention of their line manager.*
- *Correct use of Personal Protective Equipment is mandatory.*

Enforcement of these duties is an important part of any successful management system, and on this basis, deliberate and irresponsible breach of Company procedures may result in disciplinary action, or even dismissal. If a workable procedure or guidance note is in place then it must be followed.

If a procedure that is in place cannot be followed in full then this must be drawn to the attention of a senior line manager for review and approval for a safe option.

'JUST CULTURE'



The above diagram should be used as a set of Questions to be asked when reviewing an occurrence where a safety rule or procedure has been breached.

Attachment C – Compliance Delivery Process

Education



Verification



Leadership

“Define compliance”

- Target top 3 safety risks through the Golden Rules of Safety: Falls, LOTO, Permit to Work
- Communicate the Golden Rules and our intent to comply to BP and Contractor workforce
- Provide training and clarity to all persons that work on the units
- Test for Understanding of Rules

“Confirm compliance”

- Dedicate audit team of experts as a means of verification
- Visibly document findings and sharing with unit teams
 - Involve FLLs, Job Reps & Shift Directors in audit feedback process
 - Confirm that corrective action was taken
 - Develop a more robust job permit verification system
- Use job knowledge testing as a means of verification

“Drive compliance”

- Implement a culture of compliance
- Align consequence of non-compliance with the action utilizing “Just Culture” principles for both BP and Contract employees
- Apply proper discipline for willful violation as a last resort. Hold contractor management accountable for providing safe work output
- Reinforce expectations through action and support of frontline leaders