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**From:** Tolbert, Hilton N  
**To:** Robinson, Foot D.  
**CC:**  
**BCC:**  
**Sent Date:** 2004-11-10 18:31:11:480  
**Received Date:** 2004-11-10 18:31:11:651  
**Subject:** FW: Response Requested  
**Attachments:**

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> From: Ralph, William H.  
> Sent: Wednesday, November 10, 2004 10:28 AM  
> To: Wiatrowski, Cindy M; Tolbert, Hilton N  
> Subject: RE: Response Requested  
>

> Mostly accurate > ...> revised wording below. As a point of clarification, although Hilton is a good guy and well qualified, FooT Robinson is the PSM Coordinator assigned accountability for the East Plant. You should endeavor to work with FooT. Of course, if FooT is not available, then anyone from the PSM Group will be happy to assist you.  
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> From: Wiatrowski, Cindy M  
> Sent: Wednesday, November 10, 2004 9:13 AM  
> To: Tolbert, Hilton N; Ralph, William H.  
> Subject: Response Requested  
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> Bill, Hilton,  
>

> Can you please confirm what I am stating below is accurate?  
>

> Thanks  
> Cindy  
>

> It is my understanding, from PSM, that:  
> \* HSE Action Item due dates cannot be changed. [Ralph, William H.] SH-PSM-3.1, Process Safety Action Item Resolution outlines the process for establishing completion dates and timely resolution. Under a very limited set of circumstances, the PSM Manager can authorize a change to the completion date. To date, the only circumstances that have been approved are when the timing guideline was not properly applied initially, or the scope of the resolution is different than

originally anticipated.

> \* if the commission date for an MOC has been pushed back, the due date for the MOC and it's action items can also be pushed back. Work directly with Bill Ralph or Hilton Tolbert to have these dates changed. [Ralph, William H.] Correct, but Anna Galvan is authorized to change the date if Operations sends her an explanatory note.

> \* Temporary and commissioned overdue MOCs are straight out illegal. [Ralph, William H.] Temporary MOC's past their targeted removal date violate our MOC policy. Non-commissioned MOC's (permanent or temporary) that are past their targeted commissioning date raises the question as to whether or not the MOC has actually been commissioned without all of the MOC requirements being satisfied; this is a violation of our MOC policy.

> \* TAR Action Items should be kept on a TAR list and at anytime there is an unexpected 2 week or more shutdown, these should be addressed and resolved. [Ralph, William H.] Action items that require a shutdown for implementation still have a targeted completion date. This date represents the date by which the resolution should be confirmed, the "construction" package completed, and any reasonable interim safeguards are implemented. If an opportunity outage occurs and the resolution can be implemented during the outage duration (may require additional manpower), then we have an obligation under due diligence to implement the resolution during the opportunity outage rather than waiting for the planned shutdown. The due diligence effort is not limited to 2-week or greater outages. If the outage is 2 days and an action item only requires a 1 or 2 day outage, then we need to implement that resolution.

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