

Manual Section 7	Issue Date 12/21/09	Revision Date 06/15/21	Policy Number LLCP-091
	Management of Change		

Purpose

The purpose of this procedure is to establish requirements for identifying and controlling hazards and/or potential process improvements associated with change, and to maintain accurate Health, Safety and Environmental (HSE) information within the management of change system.

Scope

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries; hereafter identified as “Company”.

Definitions

Change: Replacing an item with something other than an identical item. Making a modification to existing equipment. Change in personnel. Changing procedures, control systems, or technology used.

Replacement in Kind: Replacing existing equipment or procedures with equipment or procedures that perform the same technical function and do not impact the original design, control system or safety.

Examples of: “Replacement in kind” is generally construed to mean:

- Replacement of equipment with equipment having the same technical specifications;
- Operating procedures that are in agreement with approved operating practices;
- Routine testing and setting of safety devices and alarms; and
- Making repairs to structural components that are consistent with original design.

Examples of: Not replacement in kind” is generally construed to mean:

- Valves – if style, material, pressure rating, size or service change;
- Piping and Flanges – if size, schedule, material, flange rating, facing or gasket type changes;
- Pumps and Compressors – if material (including internals), flange size, rating, capacity, head, or type of seals change;
- Drivers – if horsepower (hp) rating, motor electrical rating classification, or lubrication systems change;
- Vessels / Tanks – if nozzles, service or configuration, Maximum Allowable Working Pressure (MAWP) or relief capacity are changed, or welding on shell, heads, or walls;
- Maintenance – if conducting in – service welding, hot tap, stopple work or changes to standard welding procedures;
- Cranes / Winches – This includes fixed, rental, portable or devices installed for lifting. Changes include but are not limited to boom, lifting capacities and structural characteristics.

Procedures

- A. Any employee (including contractor employees) shall notify his or her immediate supervisor of any proposed change in the process equipment, technology, procedures, chemicals or structure, personnel changes or when any modifications will impact the original design, safety, environmental concerns or control system. (Supervisor shall assure all above concerns are assessed)
- B. The supervisor must review the proposed change.

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- C. If the proposed change is determined *not to be a* “Replacement in Kind”, a Management of Change form MOCF shall be prepared and approved prior to the change. The management shall review the change, sign the MOCF and indicate which sections of the form apply.
- D. Affected employees shall be informed of all changes requiring a Management of Change (MOCF) in a timely manner. In addition, appropriate training shall be provided prior to startup of the process or affected part of the process.
- E. Copies of all changes or modifications, specific training, or safe work practices along with all MOC documentation shall be kept in an accessible location to ensure that design changes are available to operating personnel.
- F. A final copy of the completed MOCF, including documentation updates, shall be sent to the MOC Coordinator once the work is completed and all activities are initialed as completed by the responsible party.
- G. The MOC Coordinator must complete a review of all unfinished MOCF’s every six (6) months until final closure.
- H. MOC Records shall be maintained in the Company’s electronic database for a minimum of two (2) years.

Emergency Procedure

In emergency situations, changes may be implemented with verbal approval of the line manager / supervisor who reports directly to senior management. However, appropriate personnel, at the earliest practical opportunity, using the Management of Change Standard, must review the change.

Use the MOCF to ensure:

- Proper documentation and communication of change(s).
- Responsible parties are assigned to tasks, and
- Appropriate approvals are obtained prior to start up.