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# Webinar

## 9 February 2021

### Enforcement and monitoring Seveso sites during the pandemic

The new procedure for carrying out Seveso inspections during the pandemic



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# Conducting Seveso inspections

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**Problem: conducting inspections during pandemic**

**Solution: alternative method in compliance with the standard procedure**

**Remote mode**



## Phase I – Preparing the inspection

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- ▶ The first phase of the inspection is preparatory, through the acquisition of documentation in relation to the establishment to be inspected
- ▶ The information necessary for carrying out the inspection is acquired by the Commission at least through:
  - ▶ the acquisition of documentation relating to the state of the establishment from the C.A.;
  - ▶ the acquisition of the check list used for Seveso inspection, operational experience, critical systems;
  - ▶ any further documentation relating to the establishment relevant for the activities to be carried out.



## Preliminary phase of the control activity

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- ▶ Preliminary technical examination of the documentation sent by the Operator, identifying in advance, in preparation for Phase II, the points on the inspection checklist and any additional aspects that can be checked by means of a documentary examination and / or require a specific on site check



# Preliminary phase of the control activity

- the acquired operating experience;
- the trend of performance indicators identified.
- Verify that acquisition, updating, diffusion and storage of information on the regulatory evolution about design, construction, conduction and maintenance of the installations, and the evolution of the state-of-the-art on the field of plants, safety and corporate organization, are followed-up subjected .

## 4. Operational control

<b>i Identification of installations and equipment subjected to checking plans</b>
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- Verify that the criteria adopted to identify the critical elements of the plant has taken into account the risks assessment and the real situation of the establishment.
- Verify that the Operator has systematically identified the critical components based on the criteria adopted.
- Verify that the critical elements identified are included into the regular plans of maintenance, inspection and check, in relationship to their reliability, as assumed in the risk assessment, namely the life cycle or failure rates of the component, specified by the supplier or established based on the operation experience, and the results of previous checks.
- Verify, sample-wise, the coherence with the assumption taken as a reference in the safety report (upper tier) or in the risk assessment (lower tier) concerning in particular reliability, availability and the possibility of maintenance/maintainability.
- Verify that there is a clear plan for monitoring and controlling of risks associated with aging (corrosion, erosion, fatigue, creep) of equipment and systems that can lead to the loss of containment of hazardous substances, including the necessary corrective and preventive measures .
- Verify that the plans are drawn up in the face of technical specifications and rules clearly identified and updated and implemented through procedures of the safety management system in which such elements are found as:
  - assignment of roles, tasks and responsibilities about the

Check list 3.a for manufacturing, processes and blending

Managing Officer		Audit
Ref. Docum. SGS	NOTES	Outcome <sup>a</sup>

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According to the SMS elements

## Phase II – Starting the inspection: Document review and on site visit-1

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- ▶ Analysis activities: operational experience, points of the checklist, which must take into account the documentary evidence, requested from the Operator
- ▶ The analysis of the technical systems takes place with the examination of the inspection checklist for "operational control" and "emergency planning" and will subsequently take into account the functionality tests to be carried out during the on-site visit
- ▶ Document verification is carried out remotely via Videoconference



## Phase II - Document review and site visit-2

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- ▶ On-site visit and collection of all the evidence to complete the document verification, also through specific and targeted actions (on-site inspection, preparation of emergency simulations, functional tests of the technical systems, interviews with internal staff / contractors, workers rep., etc.).
- ▶ The inspection in the field and the presence in the plant are carried out for the minimum necessary time.
- ▶ Remotely it is possible to write one or more minutes that summarize the activities carried out.
- ▶ For the on-site visit, as far as foreseeable, a sufficiently detailed preventive plan will be drawn up on a time basis of the on-site activities to be carried out "in presence"



## Findings resulting from inspections (Phase II)

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- ▶ In analogy to what is already provided for in the normal procedure, all the findings emerged during the inspection (both relating to the documentary analysis and the on-site inspection) **must be brought to the attention of the Operator at the time of their acknowledgment** and reported in the IFR together with the documentary references, in order to adequately justify any recommendation
- ▶ In particular, the Commission must ensure that non-conformities are documented clearly and concisely and are supported by evidence.





## Phase III - Conclusion of the control activity

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- ▶ Once the documentary examination and on-site inspection activities have been completed, the drafting of the IFR is completed, after which the non-conformities found are exposed to the Operator in a final meeting via videoconference , making sure these are **clearly understood**.
- ▶ The drafting of one or more minutes takes place remotely where, in summary, the activities carried out are reported. In any case, the last report states the completion of the activities and the communication to the Operator of the non-conformities found.



- ▶ Ensure the possibility of being able to carry out these activities "in presence", ensuring the adoption of **specific measures** for the prevention and containment of the spread of the virus
- ▶ Provide preliminary information, to the Inspection Commission, for accessing and staying in safety in the environments identified for carrying out the control activity, in accordance with the legislation and protocols provided.



## Further information needed following the lock down-1

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- ▶ Indication of any changes or additions to the procedures of the SMS according to the situation that has resulted:
  - ▶ in relation to any work reorganization measures adopted and to the possible review of training activities, also with reference to the obligations established by current legislation;
  - ▶ relating to the risk assessment associated with any non-operational status or reduced operation of the plants, eg. also linked to the presence of dangerous substances
  - ▶ relating to the management of maintenance activities according to the planned schedule;



## Further information needed following the lock down-2

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- ▶ in relation to the management of maintenance activities of the **critical technical elements**, as identified in the risk analysis;
- ▶ in relation to the internal emergency plan and its implementation, with particular reference to the events to be managed in any **situations of limited availability of personnel or absence of personnel** (surveillance activity);
- ▶ regarding the composition of the emergency response team



*THANKS FOR THE ATTENTION*

