

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
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(API RP 75 Element 11) § 250.1919 Investigation of Incidents

This management program establishes procedures for investigation of all incidents with serious safety or environmental consequences. This program also requires investigation of incidents that are determined by facility management to have possessed the potential for serious safety or environmental consequences. Incident investigations must be initiated as promptly as possible considering the necessity of securing the incident scene and protecting people and the environment

In appropriate circumstances, consideration should be given to establishing a "work-in-progress privilege" covering any documents generated during the course of an incident investigation or to conducting the entire investigation under attorney client privilege.

Investigation

All incident investigations must address the following:

1. The nature of the incident;
2. The factors (human or other) that contributed to the initiation of the incident and its escalation/control; and
3. Recommended changes identified as a result of the investigation.

Significant incidents such as those classified as OSHA recordable and/or having the potential for considerable safety or environmental consequences may warrant the use of formal investigation techniques. Examples may include the use of TapRoot or other failure analysis protocol.

Follow up

The intent of the investigation is to learn from the incident and help prevent similar incidents. A corrective action program must be established based on the findings of the investigation. Incidents must also be analyzed for common causal factors. The corrective action program is a follow-up system to the incident analysis procedures. The investigation should be expedited and findings and recommendations resolved in a timely manner.

A corrective action program must be established based on the findings of the investigation in order to analyze incidents for common casual factors. The corrective action program must:

1. Retain the findings of investigations for use in the next hazard analysis update or audit;
2. Determine and document the response to each finding to ensure that corrective actions are completed; and
3. Implement a system whereby conclusions of investigations are distributed to similar facilities and appropriate personnel within their organization.