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GUIDANCE FOR DEVELOPING A SEMS CORRECTIVE ACTION PLAN

SECOND EDITION | MAY 2023





GOOD PRACTICE DEVELOPMENT



DATA COLLECTION, ANALYSIS & REPORTING





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1. SCOPE / APPLICATION

This document provides guidance for developing a Corrective Action Plan (CAP) in response to Nonconformities identified in a Safety and Environmental Management Systems (SEMS) audit based on the requirements of the relevant edition of American Petroleum Institute Recommended Practice (API RP) 75, 3rd edition, and applicable local regulations.

2. ACRONYMS

- AB Accreditation Body
- API American Petroleum Institute
- ASP Audit Service Provider
- COS Center for Offshore Safety
- **CAP** Corrective Action Plan
- ISO International Organization for Standards
- **RP** Recommended Practice
 - SEMS Safety and Environmental Management Systems

3. DEFINITIONS

- Asset Equipment (individual items or integrated systems) and software used in offshore operations.
- Audit Service Provider (ASP) Independent third-party organization accredited by COS to conduct SEMS audits.
- Auditee Company being audited.
- **Component** A policy, standard, practice, process, procedure, or control.
- Correction Action to eliminate an identified deficiency.
- Corrective Action Plan (CAP) The action to eliminate the cause of deficiencies and to prevent a recurrence.
- **Deficiency** A Nonconformity. Deficiencies require corrective actions to be included in the Corrective Action Plan.

- **Management System** Interrelated or interacting elements and their components established, implemented, and maintained to achieve defined objectives.
- **Nonconformity** The Establishment, Implementation or Maintenance of management system elements or components are not conforming with requirements such that the intended results cannot be achieved.
- **Observation** Evidence that supports a Conformity, Nonconformity, or a Strength.



At the completion of an audit and upon receipt of the written audit report, the Auditee develops a Corrective Action Plan (CAP) to address reported Nonconformities.

The Center for Offshore Safety (COS) has developed guidance on the key steps in creation of a CAP to address Nonconformities identified during an audit of the Safety and Environmental Management System (SEMS). Consideration of the applicable requirements of API RP 75 *Development of a Safety and Environmental Management Program for Offshore Operations and Facilities, 3rd Edition*, and COS-2-03 *Requirements for Third-Party SEMS Auditing*¹, were incorporated into the guidance.

This guidance can be used when developing a CAP for any SEMS audit, including those intended for certification under COS-2-05 *Requirements for COS SEMS Certificates*.

API RP 75 3rd edition and parts of COS-2-03 1st edition have both been incorporated by reference under 30 CFR 250.198.

5. KEY STEPS OF A CORRECTIVE ACTION PLAN



5.1 NONCONFORMITY IDENTIFIED BY AUDIT SERVICE PROVIDER (ASP)

The Auditee should have full understanding of the identified Nonconformites. Full understanding should be achieved before the audit report is completed and distributed.

5.2 IMPLEMENT CORRECTIONS

As soon as a Nonconformity is identified, the Auditee should determine whether a Correction is appropriate. If the Auditee determines that a Correction is appropriate, the Auditee should begin the Correction. The Auditee should also determine whether Corrections should be applied to its other Assets/operations.

5.3 DETERMINE CAUSE(S)

Understanding the cause(s) and contributing factors of a Nonconformity is the initial step in planning effective Corrective Action and preventing recurrence of the Nonconformity. Some Nonconformities may have more than one cause and may require more than one Corrective Action to effectively prevent recurrence. An Auditee should utilize its process(es) for determining cause(s), using methods appropriate to the Nonconformities.

5.4 DEVELOP CORRECTIVE ACTION PLAN

- Accountability for the Corrective Action Plan A person should be assigned responsibility for the development of the CAP and monitoring its progress to closure.
- Develop Corrective Action One or more Corrective Actions should be developed that address each cause. Corrective Actions should be specific, measurable, achievable, relevant, and time bound. Corrective Actions should be evaluated to ensure they do not create other Nonconformities or unintended risk. Multiple actions may be necessary to address each cause of a Nonconformity.
- Assign Ownership for Corrective Action(s) Every Corrective Action should have a designated individual who is responsible for its implementation. This may be a person different than the one with overall accountability for the CAP.
- Set Completion Date Every Corrective Action should have a due date.
- Approval of the Corrective Action Plan A CAP should be approved by a person who understands the actions and associated risks and has the authority to assign necessary resources to implement the CAP (CAP Approver).

5.5 IMPLEMENT CORRECTIVE ACTIONS

As the responsible individual implements the assigned Corrective Action(s), results and completion dates should be documented. The documentation should contain supporting information that demonstrates that the actions have been closed pursuant to the plan.

5.6 MONITOR CAP IMPLEMENTATION AND VERIFY COMPLETION

The individual accountable for the overall CAP should monitor implementation progress and verify closure of the Corrective Action(s). The individual should report progress and closure to the CAP Approver.

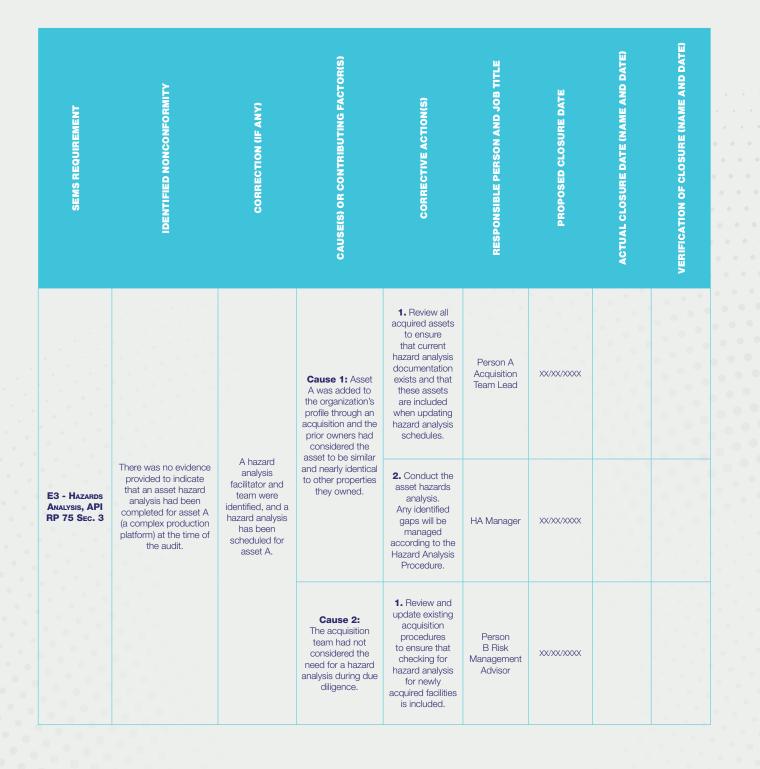
4.

5.7 EVALUATE THE EFFECTIVENESS OF CORRECTIVE ACTION(S)

Closed Corrective Actions should be evaluated to check that each are performing as intended. Effectiveness of CAP closure from the previous SEMS audit should be evaluated during the next audit and in accordance with the Auditee's other internal processes.

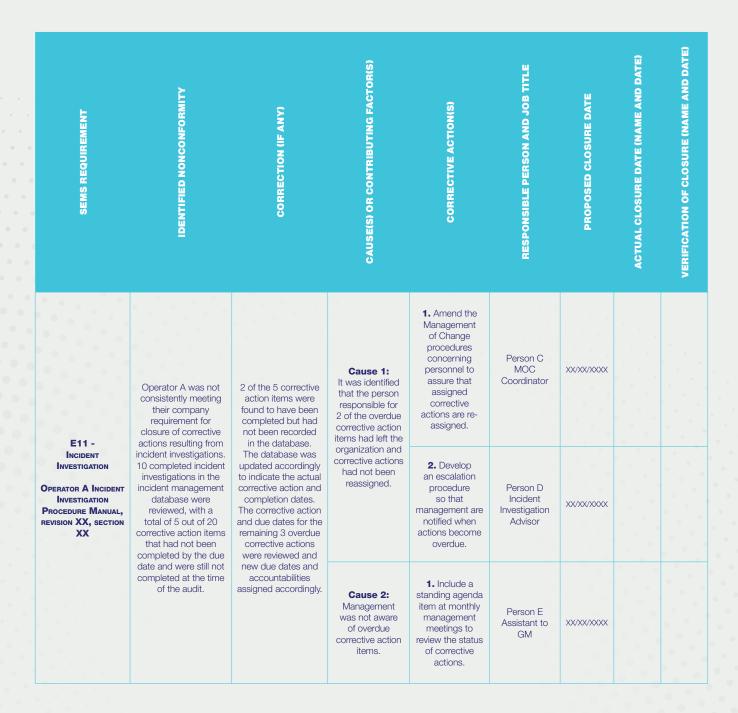
Organizations that are interested in obtaining a COS SEMS certificate should refer to COS-2-05 *Requirements for COS SEMS Certificates* for requirements associated with ASP verification of Corrective Actions.

5.8 EXAMPLES OF CORRECTIONS AND ACTIONS

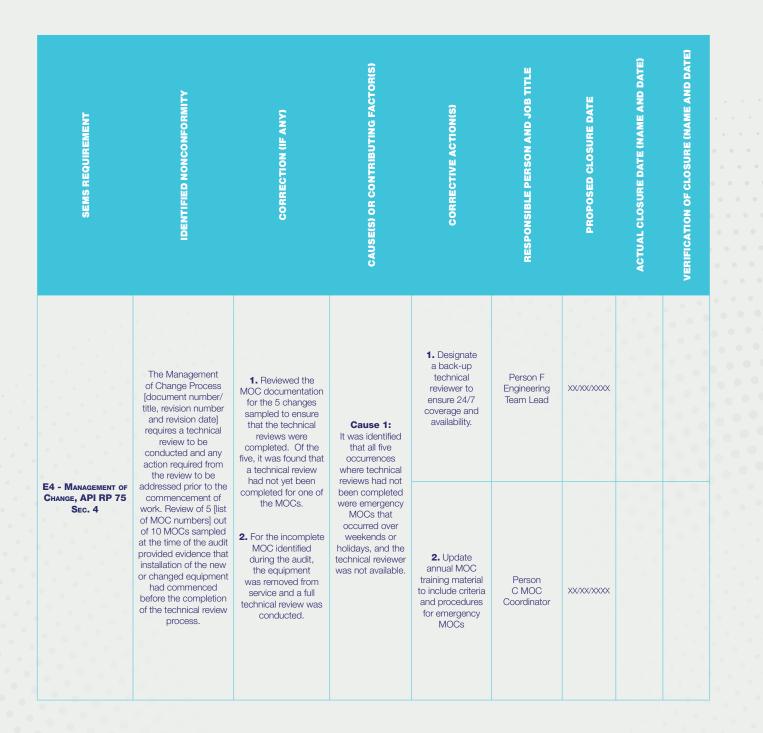


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