#### COS-1-07 / RP 75 3RD EDITION

## **GUIDANCE FOR DEVELOPING A SEMS CORRECTIVE ACTION PLAN**

SECOND EDITION | MAY 2023





GOOD PRACTICE DEVELOPMENT



DATA COLLECTION, ANALYSIS & REPORTING





### **SPECIAL NOTES**

Center for Offshore Safety (COS) and American Petroleum Institute (API) publications necessarily address topics of a general nature. Local, state, and federal laws and regulations should be reviewed to address particular circumstances.

COS, API, and their respective employees, members, subcontractors, consultants, committees, or other assignees make no warranty or representation, either express or implied, with respect to the accuracy, completeness, or usefulness of the information contained herein, or assume any liability or responsibility for any use, or the results of such use, of any information or process disclosed in this publication. COS, API, and their respective employees, members, subcontractors, consultants, or other assignees do not represent that use of this publication would not infringe upon privately owned rights.

COS publications may be used by anyone desiring to do so. Every effort has been made to assure the accuracy and reliability of the data contained in them; however, the COS and API make no representation, warranty, or guarantee in connection with this publication and hereby expressly disclaim any liability or responsibility for loss or damage resulting from its use or for the violation of any authorities having jurisdiction with which this publication may conflict.

COS publications are published to facilitate the broad availability of offshore safety information and good practices. These publications are not intended to obviate the need for applying sound judgment regarding when and where these publications should be utilized. The formulation and publication of COS publications is not intended in any way to inhibit anyone from using any other practices. Questions or requests for clarification regarding this document may be directed to the Center for Offshore Safety/API, 15377 Memorial Drive, Suite 250, Houston, TX 77079 and Global Industry Services Department, American Petroleum Institute, 200 Massachusetts Ave N.W., Suite 1100, Washington, DC 20001.

Questions concerning the interpretation of the content of API RP 75 or comments and questions concerning the procedures under which API Recommended Practice 75 was developed should be directed in writing to the Director of Standards, American Petroleum Institute, 200 Massachusetts Ave N.W., Suite 1100, Washington, DC 20001.

Requests for permission to use in other published works or translate all or any part of the material published herein should be addressed to Global Industry Services Department, American Petroleum Institute, 200 Massachusetts Ave N.W., Suite 1100, Washington, DC 20001.

All rights reserved. No part of this work may be reproduced, translated, stored in a retrieval system, or transmitted by any means, electronic, mechanical, photocopying, recording, or otherwise, without prior written permission from the publisher. Copyright © 2023 American Petroleum Institute

# **TABLE OF CONTENTS**

1. SCOPE / APPLICATION	
2. ACRONYMS	
3. DEFINITIONS1	
4. INTRODUCTION	
5. KEY STEPS OF A CORRECTIVE ACTION PLAN	
5.1 Deficiency Identified by Audit Service Provider (ASP)	
5.2 Implement Corrections	
5.3 Determine Cause(s)	
5.4 Develop Corrective Action Plan	
5.5 Implement Corrective Actions	
5.6 Monitor CAP Implementation and Verify Completion	
5.7 Evaluate the Effectiveness of Corrective Action(s) 5	
5.8 Examples of Corrections and Corrective Actions	

# **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*<sup>1</sup>, 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.

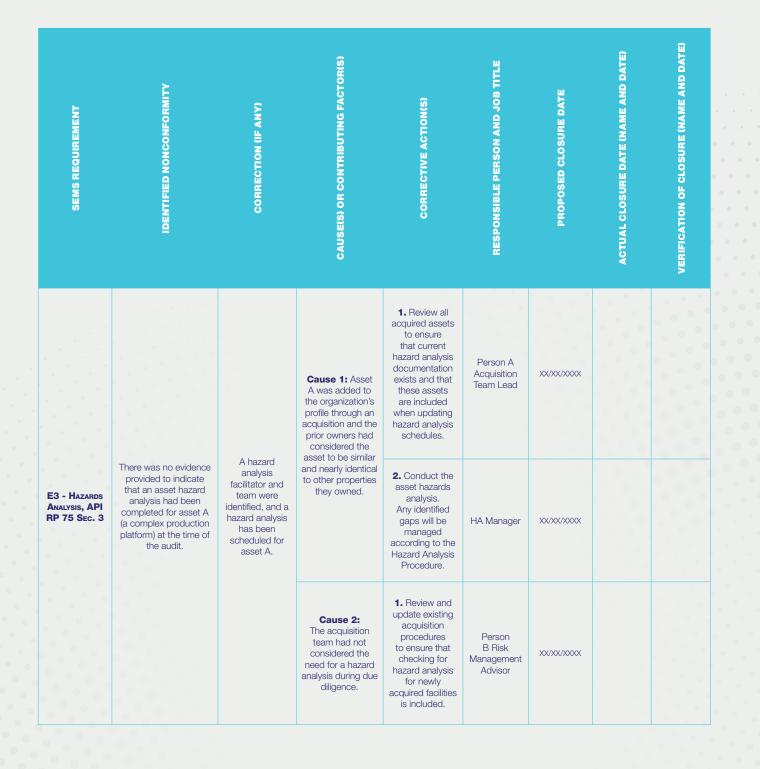
4.

# **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.

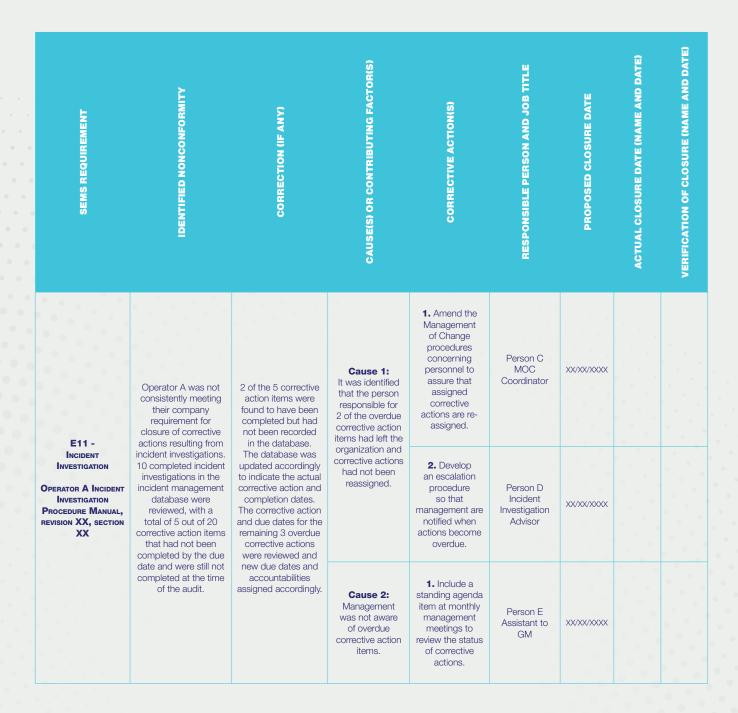
Organizations that are interested in obtaining a COS SEMS certificate should refer to COS-2-05 *Requirements for COS SEMS Certificates* for requirements associated with ASP verification of Corrective Actions.

#### **5.8 EXAMPLES OF CORRECTIONS** AND ACTIONS

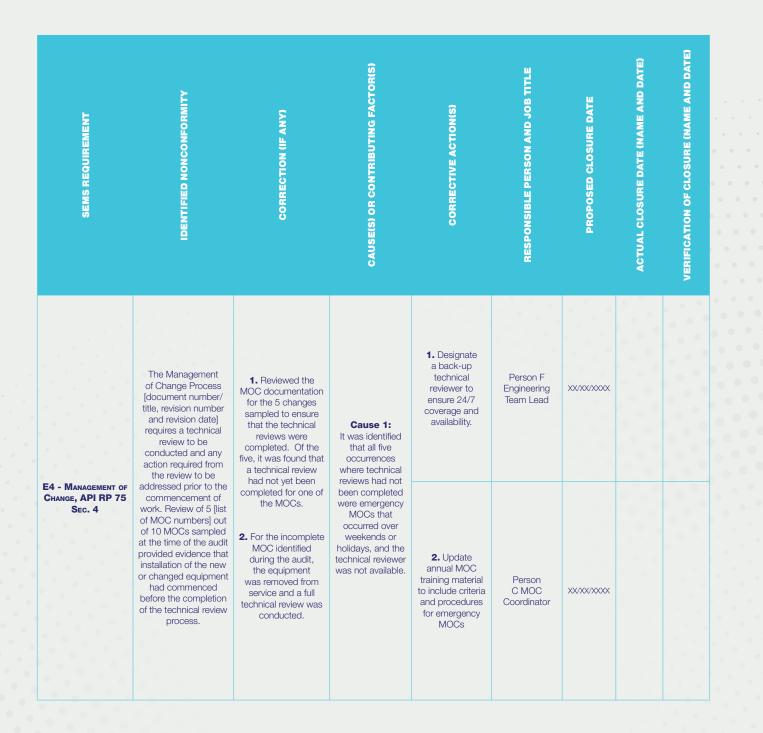


6.

# 5.8 (CONT)



# 5.8 (CONT)



8.





Copyright 2023 – Center for Offshore Safety, all rights reserved. Center for Offshore Safety and the COS logo are either trademarks or registered trademarks of the Center for Offshore Safety in the United States and/or other countries. API Global Marketing and Communications: 2023-094 | 06.01 | PDF