Using IEC 61508 to Guide the Investigation of Computer-Related Incidents and Accidents

Chris Johnson,

Dept. of Computing Science, University of Glasgow, Glasgow, G12 9QQ. Tel.: +44 141 330 6053, Fax: +44 141 330 4913 johnson@dcs.gla.ac.uk

Abstract. Relatively few investigation techniques have been specifically developed to identify the This is a causal factors that contribute to mishaps involving safety-critical computer systems. significant omission because a number of factors distinguish this class of incidents from other mishaps. For example, the Rand report into NTSB investigation methods observed that the introduction of software control systems has greatly increased the integration and complexity of many applications. This has had 'knock-on' effects in terms of the complexity of any incident investigation. The following pages, therefore, present two complementary investigation techniques that are intended to support the analysis of Electrical, Electronic or Programmable, Electronic Systems (E/E/PES)-related mishaps. One is intended to provide a low-cost and lightweight approach that is appropriate for low consequence events. It is based around a flowchart that prompts investigators to identify potential causal factors through a series of questions about the events leading to a failure and the context in which they occurred. The second approach is more complex. It involves additional documentation and analysis. It is, therefore, more appropriate for incidents that have greater potential consequences or a higher likelihood of recurrence. This approach uses Events and Causal Factors (ECF) modelling together with particular forms of causal reasoning developed by the US Department of Energy (1992). Both approaches provide means of mapping causal factors back to the lifecycle phases and common requirements described in the IEC 61508 standard. This provides an important bridge from the products of mishap analysis to the design and operation of future systems. The UK Health and Safety Executive sponsored this work as part of an initiative to develop analysis techniques for E/E/PES related incidents. The events leading to an explosion and fires in a fractional distillation unit are used to illustrate the application of our techniques.

Introduction

Very few accident analysis techniques support the investigation of adverse events involving programmable systems. There are some notable exceptions, including Leveson's (2002) STAMP and the Why-Because Analysis proposed by Ladkin and Loer (1998). Unfortunately, these techniques provide limited support for the generation of recommendations. They say little about possible intervention in the software or hardware development processes. In contrast, this paper presents two causal analysis techniques that are well integrated with development techniques for E/E/PES-related systems. In particular, we focus on methods for using the findings of incident investigations to inform the application of the IEC 61508 standard. This approach is justified by the current commercial acceptance of 61508, although both of our approaches can be integrated with other standards.

The Case Study Incident

The following pages describe an incident involving a fluidised catalytic cracking unit, part of a UK refinery complex, further details can be found in the official report into this incident (HSE, 1997). The plant receives crude oil, which is then separated by fractional distillation into intermediate products, including light and heavy diesel, naptha, kerosese and other heavier components. These heavier elements are eventually fed into the fluidised catalytic cracking unit. This is a continuous process to convert 'long'

chain hydrocarbons into smaller hydrocarbon products used in fuels. The immediate events leading to the incident started when lightning started a fire in part of the crude distillation unit within the plant. This led to a number of knock-on effects, including power disruption, which affected elements in the fluidised catalytic cracking unit. Initially, hydrocarbon flow was lost to the deethaniser, illustrated in Figure 1. This caused the liquid in the vessel to empty into the next stage debutanizer. The control system was programmed to prevent total liquid loss in these stages and so valve A was closed. This starved the debutanizer of feed. The programmable system again intervened to close valve B. The liquid trapped in the debutanizer was still being heated even though both valves now isolated it. Pressure rose and the vessel vented to a flare. Shortly afterwards, the liquid level in the deethaniser was restored, the control system opened valve A and the debutanizer received further flow. Valve B should have opened at this time to allow fluid from the pressurised debutanizer into the naptha splitter. Operators in the control room received misleading signals that valve B had been successfully reopened by their control system even though this had not occurred. As a result the debutanizer filled with liquid while the naptha splitter was emptied.

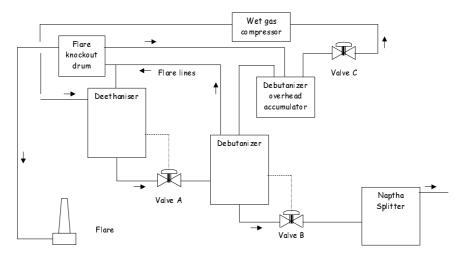


Fig. 1. High-level Overview of Components in the Fluidised Catalytic Cracking Unit

The control room displays separated crucial information that was necessary to diagnose the source of the rising pressure in the debutanizer. Rather than checking the status of valve B, the operators took action to open valve C. This allowed liquid in the full overhead accumulator to flow back into a recovery section of the plant but was insufficient to prevent the debutanizer from becoming logged with fluid entering from the deethanizer. Again, the debutanizer vented to the flare line. Opening valve C created a flow of fluid into previous 'dry' stages of the process that eventually caused a compressor trip. Large volumes of gas now had nowhere to go within the process and had to be vented to the flare stack to be burned off. At this stage, the volume of materials in the flare knockout drum was further increased by attempts to use fire hoses to drain the flooding from the dry stage directly into the flare line. However, this enabled the wet gas compressor to be restarted. This should have made matters better by increasing the flow of materials through the unit but had the unwanted effect of causing a further increase of pressure in the debutanizer. The operators responded again by opening valve C causing a further trip of the compressor. More materials were vented to an already full flare drum. Liquid was forced into a corroded discharge pipe, which broke at an elbow bend causing 20 tonnes of highly flammable hydrocarbon to be discharged. The resulting vapour cloud ignited causing damage estimated to be in excess of £50 million.

This case study has been chosen to illustrate the remainder of the paper because it is typical of the way in which incidents stem from the interaction between E/E/PES-related failures, operator 'error', hardware faults and management issues. Figure 2 illustrates both the stages in our proposed analysis techniques and also the structure for the remainder of the paper. A section on information elicitation is followed by detailed discussions of our two proposed techniques. Later sections describe how recommendations can be

derived from the results of a causal analysis. The closing sections of this paper identify a number of conclusions and areas for further work.

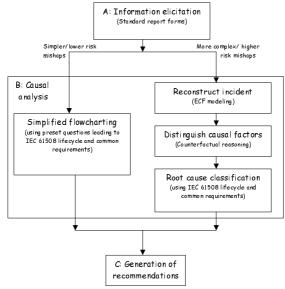


Fig. 2. Structure of the paper and an overview of the two candidate investigation schemes

Elicitation

Incident reporting forms need to be specifically tailored to elicit information about E/E/PES-related For example, end-users who initially observe a failure may have little reason to suspect the failures. involvement of programmable systems. In such circumstances, reporting forms should prompt operators to consider the involvement of such systems and take appropriate actions. These can include the preservation of automated logs and data sources. Similarly, reporting forms can be revised to request details about both hardware and software version numbers. Such distinctions are not routinely made in existing forms but can be crucial when reporting adverse events back to manufacturers and regulators. The nature of the information obtained will largely be determined by their knowledge of the systems involved. For instance, someone involved in the development or integration of an E/E/PES will be able to provide additional detail and insight beyond that which might normally be expected of a system operator. Conversely, someone involved in the operation of the application can provide information about the previous operating history that might not be available to system developers. Different forms must be developed to elicit the different information available to these different groups of people. Brevity prevents a detailed discussion of form design for the elicitation of information about computer-related mishaps. This topic is discussed and sample forms are provided in Emett et al (2002). Additional requirements for the processing of system logs and other forms of automated records that must be safeguarded in the aftermath of an incident are discussed in Johnson, Le Galo and Blaize (2000).

Root Causes of E/E/PES Related Incidents Under IEC 61508

Most computer-related incidents stem from problems in the development lifecycle. Latent causes occur in risk assessment, design, implementation, testing, maintenance etc. Other problems, such as poor project management; affect many stages of development. It is for this reason that both of the causal analysis techniques in this paper exploit the lifecycle and process requirements embedded within the IEC 61508 standard. This standard is one of several that could have been used (Johnson, 2003). The decision to

adopt this standard is justified by its relatively widespread adoption for E/E/PES development within the process industries. The UK Health and Safety Executive have identified this application area as a focus for our work. Table 1 provides a high-level classification of the potential problems that affect phases of the IEC 61508 lifecycle or the common requirements that hold across several phases. These issues are enumerated in the middle column. The right column provides a reference to areas of the standard that provide additional detail about each requirement. The rows in this table will be used in the remainder of this report to provide a taxonomy or checklist of causal factors. As our analysis progresses we will attempt to identify which of these potential failures contributed to the particular causes of our case study.

Flow Charting Scheme

Figures 3 and 4 provide an overview of our flow-charting technique¹. Analysis begins by asking a series of high-level questions about the nature of the E/E/PES-related incident. Investigators must determine whether or not the system correctly intervened to prevent a hazard, as might be the case in a near miss incident. If the answer is yes, then the analysis progresses by moving horizontally along the arrows to identify the nature of the failure. If the system intervened to address problems created by maintenance activities then the investigator would follow the arrow in Figure 3 down to the associated table entry. By reading each cell in the column of the table indicated by the arrow, investigators can identify potential causes in the simplified stages of the IEC 61508 lifecycle. Latent failures that might have been the source of computer-related incident could also be considered by examining the items listed under all six of the common requirements in the third row from the bottom. Investigators continue along the top horizontal line repeating the classification against the cells in the table in the same manner described for maintenance related incidents. Analysis progresses by following the top-level questions down the flow chart. For some incidents, there will be failures identified by analyzing several of these different questions. A system may operate correctly to prevent a hazard although in the process there may also be further subsystem failures or operator interventions that initially fail to rectify the situation. In this case, analysts would focus on the top line in Figure 3 and the further line of analysis continued on Figure 4.

It is difficult to justify this exhaustive form of analysis for relatively minor incidents. In such cases, investigators may choose to stop once they have identified an initial selection of potential causes from the IEC 61508 flowcharts. In this case, it is important that Safety Managers consider the order of questions in Figures 3 and 4. For instance, the current format asks whether maintenance issues potentially caused an incident before it elicits information about operator failures. This ordering can bias partial analyses towards the initial causal factors. It is for this reason that we recommend a more sustained and exhaustive analysis of the flow charts. If this is not possible then safety managers should monitor the products of any causal analysis to identify the effects of any potential ordering bias.

The flowcharts illustrated in Figures 3 and 4 have been validated against a series of case study incidents. These were identified by the Health and Safety Executive as in some way 'typical' of the E/E/PES related failures that occur in the process industries. Each of the incidents that we have examined has helped to drive further refinements to the flowchart. This process is continuing as we have now begun a series of usability studies and validation exercises involving safety managers from across the process industries, including nuclear power generation and petrochemical production. These validation exercises also include participation from companies who supply and integrate E/E/PES applications. This is important because they are often called upon to identify the causes of mishaps that are reported by end-users. It is expected that further revisions will be made to the flowcharts as a result of this consultation exercise. However, Figures 3 and 4 do provide an indication of the general approach that we have adopted to support the analysis of less complex incidents and accidents.

¹ Initial ideas for this technique were provided by Bill Black and are documented in Emmet et al (2002).

Oncept 1. Hazard identification 7.2,7.3,7.4 Werall Scope 2. Consequence and likelihood estimation 7.2,7.3,7.4 Warall Scope 2. Consequence and likelihood estimation 7.2,7.3,7.4 Warall Step 1.specification 7.2,2.2,7.4 Verall Step 1.specification 7.2,2.2,7.4 Requirements 2. selection of equipment 7.4,2.2,2.2,7.4,4/5.2,2.2,2.7 Janing of L&C, 5. maintenance facilities 7.4,4.3,2.2,7.2,7.4,4/5.2,2.3,2.7 Illocation 4. installation design 7.4,4.3,2.2,7.3,7.4 valuation dation facilities 7.4,4.3,2.2,7.3,7.4 7.4,4.3,2.2,7.3,7.4 stallation and 1. installation 7.5 7.13,2.1,2.7 validation testing 7.13,2.1,2.3,7.4 7.13,2.1,2.7 7.13,2.1,2.7 validation testing 7.7,2.1,2.3,2.5 7.13,2.1,2.7 7.13,2.1,2.7 7.13,2.1,2.7 validation testing 3. operation procedures not applied 7.6,2.2,1.7,2.7 7.6,2.2,1.2,3 peration and 3. operation procedures not applied 7.6,2.2,1.2,3 7.6,2.2,1.2,3 peration and operation procedures not applied oriex of s	IEC 61508 Lifecycle phase	Detailed taxonomy	IEC 61508 ref		
berait Scope 2. Consequence and likelihood estimation tarant & its Assessment . verail Safety 1.specification sequirements 2. selection of equipment 3. design and development 7.4.2.2 (2) alcoard 4. installation design 7.4.4.3 (2) 1. installation design 7.4.4.3 (2) anning of I & C, ., and O&M 6. operation facilities 7.4.4.3 (2) stallation and 1. installation 7.5 ommissioning 2. commissioning 7.13.2.1/2, 2. discrepancies analysis 7.7.2.1/2/3 (2) 3. validation techniques 7.7.2.1/2/3 (2) 4. invaintenance procedures not applied 7.7.2.1/2/3 (2) 2. discrepancies analysis 7.7.2.1/2/3 (2) 3. validation techniques 7.6.2.1 4. operation procedures not applied 7.6.2.1 5. permit/hand over procedures not applied 7.6.2.1 6. test interval not sufficient 7.6.2.1 7.6. 2.1 (2) 7.6.2.4 (2) 9. LTA procedures to motingat assessed 7.6.2.1 (2) 9. LTA procedures to motingate assessed 7.6.2.1	Concept	1. Hazard identification	7.2,7.3,7.4		
Instant & Sessment 7.2 (2) Requirements 2. selection of equipment 7.4 (2) Idecation 4. installation design 7.4 (2) Janing of I & C. 5. maintenance facilities 7.4 (3) aning of I & C. 6. operations facilities 7.4 (3) stallation 6. operations facilities 7.4 (3) stallation 6. operations facilities 7.4 (3) stallation 1. installation 7.5 ommissioning 7.13.2.1/2, 7.13.2.1/2, alidation 1. function testing 7.7.2.1/236 2. discrepancies analysis 7.7.2.5 (2) 7.7.2.5 (2) 3. validation techniques 7.7.2.7 (2) 1. maintenance procedures not applied 7.6.2.1 1. maintenance procedures not applied 7.6.2.1 7.6.2.1 7.6.2.1 1. maintenance procedures not applied 7.6.2.1 7.6.2.1 2. maintenance procedures not applied 7.6.2.1 7.6.2.1 3. operation procedures not applied on inflaction of faults 7.6.2.1 7.6.2.1 3. operation procedures not applied oninthate modification in the event of systematic faibures	1	2. Consequence and likelihood estimation	,		
isk Assessment	Hazard &	*			
Worall Safety 1.specification 7.2 (2) Requirements 2. selection of equipment 7.4.2.2 (2) Jlocation 3. design and development 7.4.2.2 (2) Jlocation 4. installation design 7.4.4.75 (2) Jaming of I& C. 5. maintenance facilities 7.4.4.3 (2) dealization 6. operations facilities 7.4.5.1/3 stallation and 1. installation 7.5 validation techniques 7.13.2.1/2, 'alidation techniques 7.7.2.7 (2) . discrepancies analysis 7.7.2.7 (2) . unintenance procedures not applied 7.7.2.7 (2) . unintenance procedures not applied 7.6.2.1 . maintenance procedures not applied 7.6.2.1 . maintenance procedures not applied 7.6.2.1 . maintenance procedures not applied 7.6.2.1 . peration procedures not applied 7.6.2.1 . peration procedures not applied 7.6.2.1 (2) . peration procedures not applied or rectly 7.6.2.4 (2)					
Requirements 2. selection of equipment 7.4.2.2 (2) Adesign and development 7.4.4/3 (2) 4. installation design 7.4.4/3 (2) smaintenance facilities 7.4.4/3 (2) calization 7.4.5.2/3 (2) attransport 7.4.5.2/3 (2) rational operations facilities 7.4.5.2/3 (2) stallation and 1. installation 7.5 ommissioning 7.13.2.1/2, attransport 7.13.2.3/4 'alidation 1. function testing 7.7.2.1/23 (2) 3. validation techniques 7.7.2.7 (2) 3. validation techniques 7.7.2.7 (2) 4. maintenance procedures not applied 7.6.2.1 1. maintenance procedures not applied 7.6.2.1 1. maintenance procedures not improvement 7.6.2.1 (2) 5. permit/hand over procedures 7.6.2.1 (2) 7. TA procedures to monitor system performance 7.6.2.1 (2) 1. TA procedures to monitor system performance 7.6.2.1 (2) 1. TA procedures to monitor system performance 7.6.2.1 (2) 1. TA procedures to monitor systestheperformance 7.8.2.2 (2) </td <td></td> <td>1 specification</td> <td>7.2.(2)</td> <td></td>		1 specification	7.2.(2)		
Jocation 3. design and development 7.4 (2) Janning of I & C 4. installation design 7.4.4/5 (2) Janning of I & C 5. maintenance facilities 7.4.4/3 (2) 6. operations facilities 7.4.4/3 (2) stallation and 1. installation 7.4.5.1/3 stallation and 1. installation 7.5 7.13.2.1/2, 7.13.2.1/2, alidation 1. function testing 7.7.2.1/23 (2) 3. validation techniques 7.7.2.7.2 (2) 3. validation techniques 7.7.2.7.2 (2) 1. maintenance procedures not applied 7.6.2.1 (2) 2. maintenance procedures net applied 7.6.2.1 (2) 1. trap procedures to monitor system performance 7.6.2.1 (2) 1. TA procedures to monitor system performance 7.6.2.4 (2) 1. Instaltation competency 7.6.2.1 (2) 1. Instaltation competency 7.6.2.1 (2) 2. LTA refication and validation 7.8.2.2 (2) 3. operation procedures applied to initiate modification in the event of systematic failures or vendor notification of paplied correctly<					
4. installation design 7.4.4/5 (2) Janning of J. & C. 5. maintenance facilities 7.4.4/5 (2) tealization 7.4.5.2/3 (2) 7.4.5.1/3 stallation and 1. installation 7.5 stallation and 1. installation 7.13.2.1/2, alidation 1. function testing 7.7.2.1/2/3 (2) alidation 1. function testing 7.7.2.1/2/3 (2) alidation echniques 7.7.2.1/2/3 (2) 3. validation techniques 7.7.2.1 2. discrepancies analysis 7.7.2.1 3. validation techniques 7.6.2.1/2/3 (2) 4. operation procedures not applied 7.6.2.1 1. maintenance procedures need improvement 7.6.2.2.1/2/3 (2) 3. operation procedures not assessed 7.6.2.1 1. maintenance procedures not supplied 7.6.2.1 (2) 1. to bin incorrectly selected or not applied correctly 7.6.2.4 (2) 1. UtA procedures to monitor system performance 7.6.2.1 (2) 1. UtA procedures to monitor system performance 7.8.2.2 (2) 1. tools incorrectly selected or not applied correctly 7.8.2.2 (2) 1. tools incorrectly selected or not applied correctly 7.8.2.1 (2) 1. tools incorrectly selected or not applied correctly 7.8.2.2 (2) 1. tTA maintenance competency 6.2.1 h	1				
and O&M 6. operations facilities 7.4.5.2/3 (2) realization 7.4.5.1/3 stallation and 1. installation 7.5 ommissioning 2. commissioning 7.1.3.2.1/2, 'alidation 1. function testing 7.1.3.2.1/2, 'alidation 1. function testing 7.7.2.1/2/3 (2) 'alidation techniques 7.7.2.7 (2) 'alidation techniques 7.7.2.7 (2) 'alidation techniques 7.7.2.7 (2) 'amintenance procedures not applied 7.7.2.1 'amintenance procedures not applied 7.6.2.1 (2) 'peration and -operations procedures not applied 7.6.2.1 (2) 'amintenance -operation procedures not supplied to initiate modification in the event of systemation failures or vendor notification of faults 7.6.2.4 (2) '1. tools incorrectly selected or not applied correctly 7.6.2.1 (2) '1. tools incorrectly selected or not applied correctly 7.8.2.2 (2) '1. tools incorrectly selected or not applied correctly 7.8.2.2 (2) '1. tools incorrectly selected or not applied correctly 7.8.2.2 (2) '1. tools incorrectly selected or not applied correctly 7.8.2.1 (2)	Allocation	4. installation design	7.4.4/5 (2)		
Installation and stallation and stallation and stallation and ommissioning 7.4.5.1/3 1 installation 7.5 ommissioning 7.13.2.1/2, 7.13.2.3/4 7alidation 1 function testing 7.13.2.3/4 7alidation 1 function testing 7.7.2.1/2/3 (2) 1 maintenance procedures not applied 7.7.2.1 (2) 2 maintenance procedures need improvement 7.6.2.1 (2) 1 maintenance procedures need improvement 7.6.2.1 (2) 1 maintenance procedures not applied 7.6.2.1 2 peration procedures not import system performance 7.6.2.1 (2) 3 operation procedures not impact assessed 7.6.2.4 (2) 4 operation procedures not impact assessed 7.6.2.4 (2) 5 permit/hand over procedures 7.6.2.1 (2) 6 test interval not sufficient 7.8.2.2 (2) 10 LTA procedures applied to initiat modification in the event of systematic failures or vendor notification of taplied correctly 7.6.2.1 (2) 10 LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of applied corre	Planning of I & C,	5. maintenance facilities	7.4.4.3(2),		
Contraction installation 7.5 ommissioning 2. commissioning 7.13.2.1/2, 'alidation 1. function testing 7.7.2.1/2/3 (2 'alidation 1. function testing 7.7.2.1/2/3 (2 2. discrepancies analysis 7.7.2.5 (2) 3. validation techniques 7.7.2.7 (2) 2. maintenance procedures not applied 7.6.2.1 (2) peration and operation procedures not applied 7.6.2.1 (2) anaintenance operation procedures not applied 7.6.2.1 (2) beginstion procedures not sufficient 7.6.2.1 (2) 7.6.2.4 (2) 7. maintenance procedures not impact assessed 7.6.2.1 (2) 8. operation procedures not system performance 7.6.2.1 (2) 10. LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults 7.8.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 12. LTA manufacturers information 7.8.2.2 (2) 3. full lifecycle not implemented 7.8.2.3 (2) <td>V, and O&M</td> <td>6. operations facilities</td> <td></td> <td></td>	V, and O&M	6. operations facilities			
ommissioning 2. commissioning 7.13.2.1/2, 7.13.2.3/4 'alidation 1. function testing 7.7.2.1/2/3 (2) 'alidation 1. maintenance procedures not applied 7.7.2.7 (2) 'anintenance procedures not applied 7.7.2.7 (2) 'anintenance procedures not applied 7.7.2.7 (2) 'anintenance procedures need improvement 7.6.2.1 'anintenance 7.6.2.1 'anintenance 7.6.2.1 'anintenance 7.6.2.1 'anintenance 7.6.2.1 'anintenance procedures not applied 7.6.2.1 'anintenance procedures not improvement 7.6.2.1 'anintenance procedures not impact assessed 7.6.2.1 'anintenance procedures not impact assessed 7.6.2.1 'anintenance procedures applied to initiate modification in the event of systematic failures or vendor notification of faults 7.6.2.1 (2) 'I. 'I. anintenance rorectly selected or not applied correctly 7.6.2.1 (2) 'I. I. tooks incorrectly selected or not applied correctly 7.8.2.1 (2) 'I. LTA manufacturers information 7.8.2.2 (2) 'I. LTA manufacturers information 7.8.2.4 (2) <tr< td=""><td>Realization</td><td></td><td>7.4.5.1/3</td><td></td></tr<>	Realization		7.4.5.1/3		
ommissioning 2. commissioning 7.13.2.1/2, 7.13.2.3/4 'alidation 1. function testing 7.7.2.1/2/3 (2) 'alidation 1. maintenance procedures not applied 7.7.2.7 (2) 'anintenance procedures not applied 7.7.2.7 (2) 'anintenance procedures not applied 7.7.2.7 (2) 'anintenance procedures need improvement 7.6.2.1 'anintenance 7.6.2.1 'anintenance 7.6.2.1 'anintenance 7.6.2.1 'anintenance 7.6.2.1 'anintenance procedures not applied 7.6.2.1 'anintenance procedures not improvement 7.6.2.1 'anintenance procedures not impact assessed 7.6.2.1 'anintenance procedures not impact assessed 7.6.2.1 'anintenance procedures applied to initiate modification in the event of systematic failures or vendor notification of faults 7.6.2.1 (2) 'I. 'I. anintenance rorectly selected or not applied correctly 7.6.2.1 (2) 'I. I. tooks incorrectly selected or not applied correctly 7.8.2.1 (2) 'I. LTA manufacturers information 7.8.2.2 (2) 'I. LTA manufacturers information 7.8.2.4 (2) <tr< td=""><td>Installation and</td><td>1. installation</td><td>7.5 (2</td><td>2),</td></tr<>	Installation and	1. installation	7.5 (2	2),	
'alidation 1. function testing 7.13.2.3/4 'alidation 1. function testing 7.7.2.1/23 (2) 3. validation techniques 7.7.2.5 (2) 1. maintenance procedures not applied 7.7.2.7 (2) 1. maintenance procedures need improvement 7.6.2.2.1/2/3. peration and 3. operation procedures need improvement 7.6.2.2.1/2/3. 1. maintenance procedures need improvement 7.6.2.2.1/2/3. 1. maintenance procedures need improvement 7.6.2.1 2. maintenance procedures need improvement 7.6.2.1 3. operation procedures need improvement 7.6.2.1 6. test interval not sufficient 7.6.2.1 7. maintenance procedures not assessed 7.6.2.4 (2) 9. LTA procedures applied to initiate modification in the event of systematic 7.8.2.2 (2) 10. LTA procedures applied to initiate modification in the event of systematic 7.8.2.2 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 12. LTA manufacturers information 7.8.2.2 (2) 13. full lifecycle not implemented 7.8.2.3 (2) 14. LTA verification and validation 7.8.2.4 (2) 15. LTA definition of operations accountabilities 7.1.4	commissioning		`	<i>,,</i>	
Validation 1. function testing 7.7.2.1/2/3 (2 2. discrepancies analysis 7.7.2.7 (2) 3. validation techniques 7.7.2.7 (2) 1. maintenance procedures not applied 7.7.2.7 (2) peration and operation procedures need improvement 7.6.2.1 /27 naintenance 4. operations procedures need improvement 7.6.2.1 5. permit/hand over procedures 7.6.2.1 7.6.2.1 6. test interval not sufficient 7.6.2.1 7.6.2.1 (2) 7. maintenance procedures not assessed 7.6.2.1 (2) 7.6.2.1 (2) 9. LTA procedures on onitor system performance 7.6.2.1 (2) 7.6.2.1 (2) 10. LTA procedures applied to initiate modification in the event of systematic failures or vendor not applied correctly 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.8.2.2 (2) 12. LTA verification and validation 7.8.2.2 (2) 13. full lifecycle not implemented 7.8.2.1 (2) 14. LTA verification competency 6.2.1 h <td>6</td> <td>6 B</td> <td>· · · · · · · · · · · · · · · · · · ·</td> <td></td>	6	6 B	· · · · · · · · · · · · · · · · · · ·		
2. discrepancies analysis 7.7.2.5 (2) 3. validation techniques 7.7.2.7 (2) 0 1. maintenance procedures not applied 7.7.2.7 (2) 1. maintenance procedures need improvement 7.6.2.2.1/2/3 1. operation procedures need improvement 7.6.2.1 2. permit/hand over procedures need improvement 7.6.2.1 3. operation procedures need improvement 7.6.2.4 (2) 6. test interval not sufficient 7.6.2.4 (2) 7. maintenance procedures not assessed 7.6.2.4 (2) 9. LTA procedures not assessed 7.6.2.1 (2) 10. LTA procedures not asplied to initiate modification in the event of systematic failures or vendor notification of faults 7.8.2.2 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.8.2.2 (2) 12. LTA manufacturers information 7.8.2.2 (2) 13. full lifecycle not implemented 7.8.2.2 (2) 14. LTA verification and validation 7.1.4 13. LTA definition of operations accountabilities 7.1.4 <td>Validation</td> <td>1. function testing</td> <td>7.7.2.1/2/3 (2)</td> <td></td>	Validation	1. function testing	7.7.2.1/2/3 (2)		
3. validation techniques 7.7.2.7 (2) 1. maintenance procedures need improvement 7.7.2.1 peration and 3. operation procedures need improvement 7.6.2.2.1/23. 1. operation procedures need improvement 7.6.2.1 2. maintenance procedures need improvement 7.6.2.1 4. operation procedures need improvement 7.6.2.1 5. permit/hand over procedures 7.6.2.1 7. maintenance procedures not impact assessed 7.6.2.4 (2) 8. operation procedures not monitor system performance 7.6.2.1 (2) 9. LTA procedures to monitor system performance 7.6.2.1 (2) 10. LTA procedures information of faults 7.6.2.2 (2) 11. tools incorrectly selected or not applied correctly 7.8.2.2 (2) 12. LTA manufacturers information 7.8.2.2 (2) 13. till lifecycle not implemented 7.8.2.1 (2) 14. LTA verification and validation 7.8.2.2 (2) 15. LTA maintenance competency 6.2.1 h 16. LTA verification or modification accountabilities 7.1.4 15. LTA					
2. maintenance procedures need improvement 7.6.2.1/2/3 operation procedures need improvement 7.6.2.1 naintenance 4. operations procedures need improvement 7.6.2.1 5. permit/hand over procedures 7.6.2.1 6. test interval not sufficient 7.6.2.4 (2) 7. maintenance procedures not impact assessed 7.6.2.4 (2) 8. operation procedures not assessed 7.6.2.1 (2) 10. LTA procedures to monitor system performance 7.6.2.1 (2) 10. LTA procedures applied to initiate modification in the event of systematic 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 12. LTA mandracturers information 7.8.2.2 (2) 3. full lifecycle not implemented 7.8.2.3 (2) 4. LTA verification and validation 7.8.2.2 (2) 13. LTA maintenance competency 6.2.1 h 14. LTA definition of operations accountabilities 7.1.4 2. LTA definition of operations accountabilities 7.1.4 3. LTA definition of operations 7.1.8.2,7.9 (2 3.		3. validation techniques	7.7.2.7 (2)		
2. maintenance procedures need improvement 7.6.2.1/2/3 operation procedures need improvement 7.6.2.1 naintenance 4. operations procedures need improvement 7.6.2.1 5. permit/hand over procedures 7.6.2.1 6. test interval not sufficient 7.6.2.4 (2) 7. maintenance procedures not impact assessed 7.6.2.4 (2) 8. operation procedures not assessed 7.6.2.1 (2) 10. LTA procedures to monitor system performance 7.6.2.1 (2) 10. LTA procedures applied to initiate modification in the event of systematic 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 12. LTA mandracturers information 7.8.2.2 (2) 3. full lifecycle not implemented 7.8.2.3 (2) 4. LTA verification and validation 7.8.2.2 (2) 13. LTA maintenance competency 6.2.1 h 14. LTA definition of operations accountabilities 7.1.4 2. LTA definition of operations accountabilities 7.1.4 3. LTA definition of operations 7.1.8.2,7.9 (2 3.		1. maintenance procedures not applied	7.7.2.1	-	
naintenance4.operations procedures need improvement7.62.25.permit/hand over procedures7.62.16.test interval not sufficient7.62.17.maintenance procedures not impact assessed7.62.4 (2)8.operation procedures to monitor system performance7.62.2 (2)9.LTA procedures to monitor system performance7.62.1 (2)10.LTA procedures or notification of faults7.82.2 (2)11.tools incorrectly selected or not applied correctly7.62.1 (2)7.601.impact analysis incorrect7.82.2 (2)12.LTA manufacturers information7.82.2 (2)13.full lifecycle not implemented7.82.3 (2)4.LTA verification and validation7.82.4 (2) IEC 61508 common requirements ompetency1.LTA operations competency2.LTA definition of operations accountabilities7.1.43.LTA definition of modification accountabilities7.1.44.LTA verification of operations7.18.2, 7.9 (23.LTA verification of modification7.18.2, 7.9 (23.LTA verification of modification7.18.2, 7.9 (2afety1.LTA safety audits62.1anagement2.LTA safety culture62.1anagement2.LTA safety audits62.1anagement2.LTA management of suppliers62.5bocumentation nuclear or ambiguous5.2.65.2.33.documentation nuclear or am			7.6.2.2.1/2/3 (2	2)	
5. permit/hand over procedures 7.6.2.1 6. test interval not sufficient 7.6.2.1 7. maintenance procedures not impact assessed 7.6.2.4 (2) 8. operation procedures not assessed 7.6.2.1 (2) 9. LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults 7.6.2.1 (2) 10. LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 12. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 13. full lifecycle not implemented 7.8.2.2 (2) 3. full lifecycle not implemented 7.8.2.4 (2) 4. LTA operations competency 6.2.1 h 3. LTA modification competency 6.2.1 h 3. LTA definition of poerations accountabilities 7.1.4 2. LTA definition of modification accountabilities 7.1.8.2, 7.9 (2) 3. LTA definition of modification accountabilities 7.1.8.2, 7.9 (2) 3. LTA verification of operations 7.1.8.2, 7.9 (2)	Operation and	3. operation procedures not applied	7.6.2.1		
6. test interval not sufficient 7.6.2.1 7. maintenance procedures not impact assessed 7.6.2.4 (2) 8. operation procedures not assessed 7.6.2.1 (2) 9. LTA procedures to monitor system performance 7.6.2.1 (2) 10. LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 12. LTA manufacturers information 7.8.2.2 (2) 2. LTA manufacturers information 7.8.2.3 (2) 3. full lifecycle not implemented 7.8.2.3 (2) 4. LTA operations competency 6.2.1 h 2. LTA maintenance competency 6.2.1 h 3. LTA definition of operations accountabilities 7.1.4 2. LTA definition of operations 7.1.4 3. LTA verification of operations 7.18.2, 7.9 (2) afety 1. LTA verification of maintenance 7.18.2, 7.9 (2) afety 1. LTA safety culture 6.2.1 nangement 2. LTA verification of maintenance 7.1.8.2, 7.9 (2)<	maintenance	4. operations procedures need improvement	7.6.2.2		
7.maintenance procedures not impact assessed7.6.2.4 (2)8.operation procedures not assessed7.6.2.4 (2)9.LTA procedures to monitor system performance7.6.2.1 (2)10.LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults7.6.2.1 (2)11.tools incorrectly selected or not applied correctly7.6.2.1 (2)12.LTA manufacturers information7.8.2.2 (2)2.LTA verification and validation7.8.2.2 (2)3.full lifecycle not implemented7.8.2.3 (2)4.LTA verification and validation7.8.2.4 (2) IEC 61508 common requirements ompetency1.LTA operations competency6.2.1 h3.LTA definition of operations accountabilities7.1.42.LTA definition of porations accountabilities7.1.43.LTA verification of maintenance2.LTA verification of maintenance7.1.8.2, 7.9 (2)4.LTA verification of maintenance7.1.8.2, 7.9 (2)3.LTA verification of modification7.1.8.2, 7.9 (2)4.LTA verification of maintenance7.1.8.2, 7.9 (2)afety1.LTA safety culture6.2.1anagement2.LTA safety culture6.2.1anagement3.LTA management of suppliers6.2.5ocumentation1.documentation incomplete5.2.63.documentation unclear or ambiguous5.2.65.2.11		5. permit/hand over procedures	7.6.2.1		
8. operation procedures not assessed 7.6.2.4 (2) 9. LTA procedures to monitor system performance 7.6.2.1 (2) 10. LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults 7.6.2.1 (2) 10. LTA procedures applied to not applied correctly 7.6.2.1 (2) 11. tools incorrectly selected or not applied correctly 7.6.2.1 (2) 12. LTA manufacturers information 7.8.2.2 (2) 3. full lifecycle not implemented 7.8.2.3 (2) 4. LTA verification and validation 7.8.2.3 (2) IEC 61508 common requirements ompetency 1. LTA operations competency 6.2.1 h 2. LTA maintenance competency 6.2.1 h 6.2.1 h 3. LTA definition of operations accountabilities 7.1.4 3. LTA definition of modification accountabilities 7.1.4 3. LTA verification of modification 7.18.2, 7.9 (2) 4. LTA verification of operations 7.1.8.2, 7.9 (2) afety 1. LTA safety culture 6.2.1 aaagement 2. LTA safety audits 6.2.1 3. LTA verification of modification 5.2.6 2.2.6 3. documentation in		6. test interval not sufficient	7.6.2.1		
9.LTA procedures to monitor system performance7.6.2.1 (2)10.LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults7.8.2.211.tools incorrectly selected or not applied correctly7.6.2.1 (2)10.impact analysis incorrect7.6.2.1 (2)11.tools incorrectly selected or not applied correctly7.8.2.2 (2)12.LTA manufacturers information7.8.2.2 (2)3.full lifecycle not implemented7.8.2.3 (2)4.LTA verification and validation7.8.2.4 (2)IEC 61508 common requirementsompetency1.LTA operations competency2.LTA maintenance competency6.2.1 h3.LTA definition of operations accountabilities7.1.43.LTA definition of operations accountabilities7.1.44.LTA verification of operations7.18.2, 7.9 (2)4.LTA verification of maintenance7.18.2, 7.9 (2)3.LTA verification of modification7.18.2, 7.9 (2)3.LTA verification of modification7.18.2, 7.9 (2)3.LTA verification of modification7.18.2, 7.9 (2)3.LTA verification of modification6.2.14.LTA verification of modification7.18.2, 7.9 (2)3.LTA verification of modification6.2.14.LTA verification of modification7.18.2, 7.9 (2)5.LTA verification of modification7.18.2, 7.9 (2)5.LTA safety culture6.2.1 <td></td> <td></td> <td>7.6.2.4 (2)</td> <td></td>			7.6.2.4 (2)		
10.LTA procedures applied to initiate modification in the event of systematic failures or vendor notification of faults7.8.2.211.tools incorrectly selected or not applied correctly7.6.2.1 (2)Modification1.impact analysis incorrect7.8.2.2 (2)2.LTA manufacturers information7.8.2.2 (2)3.full lifecycle not implemented7.8.2.3 (2)4.LTA verification and validation7.8.2.3 (2)7.4.LTA verification competency6.2.1 h2.LTA maintenance competency6.2.1 h3.LTA modification competency6.2.1 h3.LTA definition of operations accountabilities7.1.43.LTA definition of operations7.1.44.LTA verification of operations7.1.8.2, 7.9 (2)4.LTA verification of modification7.1.8.2, 7.9 (2)3.LTA verification of modification7.1.8.2, 7.9 (2)4.LTA safety culture6.2.14.LTA verification of suppliers6.2.14.LTA verification of modification7.1.8.2, 7.9 (2)4.LTA verification of modification7.1.8.2, 7.9 (2)4.LTA verification of modification7.1.8.2, 7.9 (2)4.LTA verification of suppliers6.2.1<					
InterferenceInterference7.16.2.211.tools incorrectly selected or not applied correctly7.62.1 (2)Modification1.impact analysis incorrect7.8.2.1 (2)2.LTA manufacturers information7.8.2.2 (2)3.full lifecycle not implemented7.8.2.3 (2)4.LTA verification and validation7.8.2.4 (2) IEC 61508 common requirements ompetency1.LTA operations competency2.LTA maintenance competency6.2.1 h3.LTA modification competency6.2.1 h3.LTA definition of operations accountabilities7.1.42.LTA definition of maintenance accountabilities7.1.43.LTA verification of operations7.18.2, 7.9 (2)4.LTA verification of modification7.18.2, 7.9 (2)3.LTA verification of modification6.2.1anagement2.LTA safety culture4.3.LTA management of suppliers6.2.54.JCA management of suppliers6.2.54.JCA management of suppliers6.2.54.JCA management of suppliers5.2.64.JCA unentation unclear or ambiguous <t< td=""><td></td><td></td><td></td><td></td></t<>					
11. tools incorrectly selected or not applied correctly7.6.2.1 (2)Modification1. impact analysis incorrect7.8.2.1 (2)2. LTA manufacturers information7.8.2.2 (2)3. full lifecycle not implemented7.8.2.3 (2)4. LTA verification and validation7.8.2.4 (2)IEC 61508 common requirementsompetency1. LTA operations competency3. LTA maintenance competency6.2.1 h3. LTA modification competency6.2.1 h3. LTA definition of operations accountabilities7.1.43. LTA definition of maintenance accountabilities7.1.43. LTA verification of modification accountabilities7.1.44. LTA verification of modification accountabilities7.1.45. LTA verification of modification accountabilities7.1.46.2.1 LTA verification of modification accountabilities7.1.8.2, 7.9 (2)6.2.1 LTA verification of modification7.18.2, 7.9 (2)7.1.4 verification of modification7.18.2, 7.9 (2)3. LTA verification of modification7.18.2, 7.9 (2)3. LTA verification of modification7.18.2, 7.9 (2)3. LTA verification of modification6.2.1anagement2. LTA safety cultureanagement6.2.5ocumentation1. documentation unclear or ambiguous5.2.62. documentation incomplete3. documentation not up to date5.2.11		F		2),	
Iddification1.impact analysis incorrect7.8.2.1 (2)2.LTA manufacturers information7.8.2.2 (2)3.full lifecycle not implemented7.8.2.3 (2)4.LTA verification and validation7.8.2.4 (2)IEC 61508 common requirementscompetency1.LTA operations competency2.LTA maintenance competency6.2.1 h3.LTA modification competency6.2.1 h3.LTA definition of operations accountabilities7.1.42.LTA definition of maintenance accountabilities7.1.43.LTA verification of operations7.1.8.2, 7.9 (2)4.1.LTA verification of maintenance7.1.8.2, 7.9 (2)3.LTA verification of modification7.1.8.2, 7.9 (2)4.1.LTA verification of modification7.1.8.2, 7.9 (2)4.2.LTA verification of modification7.1.8.2, 7.9 (2)3.LTA verification of modification7.1.8.2, 7.9 (2)4.3.LTA verification of modification7.1.8.2, 7.9 (2)4.1.LTA safety culture6.2.14.2.LTA safety culture6.2.14.3.LTA management of suppliers6.2.54.3.LTA management of suppliers6.2.54.					
2.LTA manufacturers information7.8.2.2 (2)3.full lifecycle not implemented7.8.2.3 (2)4.LTA verification and validation7.8.2.4 (2)IEC 61508 common requirementscompetency1.LTA operations competency6.2.1 h2.LTA maintenance competency6.2.1 h3.LTA modification competency6.2.1 h3.LTA definition of operations accountabilities7.1.42.LTA definition of maintenance accountabilities7.1.43.LTA verification of operations7.1.8.2, 7.9 (2)2.LTA verification of maintenance7.1.8.2, 7.9 (2)3.LTA verification of modification7.1.8.2, 7.9 (2)3.LTA verification of modification7.1.8.2, 7.9 (2)3.LTA verification of modification7.1.8.2, 7.9 (2)afety1.LTA safety culture6.2.1anagement2.LTA safety culture6.2.1anagement3.LTA management of suppliers6.2.5ocumentation1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.35.2.11					
3. full lifecycle not implemented7.8.2.3 (2)4. LTA verification and validation7.8.2.3 (2)TEC 61508 common requirementsompetency1. LTA operations competency6.2.1 h2. LTA maintenance competency6.2.1 h3. LTA modification competency6.2.1 h3. LTA definition of operations accountabilities7.1.42. LTA definition of maintenance accountabilities7.1.43. LTA definition of operations accountabilities7.1.44. LTA verification of operations7.1.8.2, 7.9 (2)2. LTA verification of modification7.18.2, 7.9 (2)3. LTA verification of modification7.1.8.2, 7.9 (2)4afety1. LTA safety culture6.2.1anagement2. LTA safety culture6.2.13. LTA management of suppliers6.2.54. Occumentation unclear or ambiguous5.2.65.2.33. documentation not up to date5.2.11	Modification				
4. LTA verification and validation 7.8.2.4 (2) IEC 61508 common requirements competency 1. LTA operations competency 6.2.1 h 2. LTA maintenance competency 6.2.1 h 3. LTA modification competency 6.2.1 h 3. LTA definition of operations accountabilities 7.1.4 2. LTA definition of maintenance accountabilities 7.1.4 3. LTA definition of modification accountabilities 7.1.4 3. LTA definition of modification accountabilities 7.1.4 3. LTA definition of modification accountabilities 7.1.4 4. LTA verification of operations 7.1.8.2, 7.9 (2 3. LTA verification of operations 7.1.8.2, 7.9 (2 3. LTA verification of modification 7.1.8.2, 7.9 (2 afety 1. LTA safety culture 6.2.1 anagement 2. LTA safety audits 6.2.1 3. LTA management of suppliers 6.2.5 bocumentation 5.2.6 5.2.3 3. documentation unclear or ambiguous <td< td=""><td></td><td></td><td></td><td></td></td<>					
IEC 61508 common requirements ompetency 1. LTA operations competency 6.2.1 h 3. LTA maintenance competency 6.2.1 h 3. LTA modification competency 6.2.1 h 3. LTA definition of operations accountabilities 7.1.4 2. LTA definition of maintenance accountabilities 7.1.4 3. LTA definition of modification accountabilities 7.1.4 3. LTA definition of modification accountabilities 7.1.4 3. LTA verification of operations 7.1.8.2, 7.9 (2 2. LTA verification of operations 7.1.8.2, 7.9 (2 3. LTA verification of modification 7.1.8.2, 7.9 (2 afety 1. LTA safety culture 6.2.1 anagement 2. LTA safety audits 6.2.1 3. LTA management of suppliers 6.2.5 bocumentation 5.2.6 5.2.3 3. documentation incomplete 5.2.11					
ompetency1.LTA operations competency6.2.1 h2.LTA maintenance competency6.2.1 h3.LTA modification competency6.2.1 h3.LTA definition of operations accountabilities7.1.42.LTA definition of maintenance accountabilities7.1.43.LTA definition of modification accountabilities7.1.43.LTA definition of modification accountabilities7.1.44.1.LTA verification of operations7.1.8.2, 7.9 (22.LTA verification of modification7.1.8.2, 7.9 (23.LTA verification of modification7.1.8.2, 7.9 (24.1.LTA safety culture6.2.14.3.LTA safety culture6.2.14.3.LTA management of suppliers6.2.54.1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.33.documentation not up to date5.2.11			7.8.2.4 (2)		
2.LTA maintenance competency6.2.1 h3.LTA modification competency6.2.1 h3.LTA modification competency6.2.1 hifecycle1.LTA definition of operations accountabilities7.1.42.LTA definition of maintenance accountabilities7.1.43.LTA definition of modification accountabilities7.1.44.1.LTA definition of operations7.1.8.2, 7.9 (22.LTA verification of operations7.1.8.2, 7.9 (23.LTA verification of modification7.1.8.2, 7.9 (24.LTA safety culture6.2.14.1.LTA safety culture6.2.14.3.LTA management of suppliers6.2.54.1.documentation unclear or ambiguous5.2.65.2.documentation incomplete5.2.33.documentation not up to date5.2.11			(0.11		
3. LTA modification competency 6.2.1 h ifecycle 1. LTA definition of operations accountabilities 7.1.4 2. LTA definition of maintenance accountabilities 7.1.4 3. LTA definition of modification accountabilities 7.1.4 3. LTA verification of operations 7.1.4 4. 1. LTA verification of operations 7.1.8.2, 7.9 (2 2. LTA verification of maintenance 7.1.8.2, 7.9 (2 3. LTA verification of modification 7.1.8.2, 7.9 (2 afety 1. LTA safety culture 6.2.1 nanagement 2. LTA safety culture 6.2.1 3. LTA management of suppliers 6.2.5 vocumentation 1. documentation unclear or ambiguous 5.2.6 2. documentation incomplete 5.2.3 5.2.11	Competency				
ifecycle1.LTA definition of operations accountabilities7.1.42.LTA definition of maintenance accountabilities7.1.43.LTA definition of modification accountabilities7.1.44.1.LTA verification of operations7.1.8.2, 7.9 (22.LTA verification of maintenance7.1.8.2, 7.9 (23.LTA verification of modification7.1.8.2, 7.9 (2afety1.LTA safety culture6.2.1anagement2.LTA safety culture6.2.13.LTA management of suppliers6.2.5bocumentation1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.33.documentation not up to date5.2.11					
2.LTA definition of maintenance accountabilities7.1.43.LTA definition of modification accountabilities7.1.4ierification1.LTA verification of operations7.1.8.2, 7.9 (22.LTA verification of maintenance7.1.8.2, 7.9 (23.LTA verification of modification7.1.8.2, 7.9 (2afety1.LTA safety culture6.2.1anagement2.LTA safety culture6.2.13.LTA management of suppliers6.2.5bocumentation1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.33.documentation not up to date5.2.11	T '£				
3. LTA definition of modification accountabilities 7.1.4 Verification 1. LTA verification of operations 7.18.2, 7.9 (2 2. LTA verification of maintenance 7.18.2, 7.9 (2 3. LTA verification of modification 7.18.2, 7.9 (2 3. LTA verification of modification 7.18.2, 7.9 (2 afety 1. LTA safety culture 6.2.1 nanagement 2. LTA safety audits 6.2.5 ocumentation 1. documentation unclear or ambiguous 5.2.6 2. documentation not up to date 5.2.11	Lifecycle				
ferification1.LTA verification of operations7.18.2, 7.9 (22.LTA verification of maintenance7.18.2, 7.9 (23.LTA verification of modification7.18.2, 7.9 (2afety1.LTA safety culture6.2.1nanagement2.LTA safety audits6.2.13.LTA management of suppliers6.2.5bocumentation1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.33.documentation not up to date5.2.11					
2.LTA verification of maintenance7.18.2, 7.9 (2)3.LTA verification of modification7.18.2, 7.9 (2)afety1.LTA safety culture6.2.1nanagement2.LTA safety audits6.2.13.LTA management of suppliers6.2.5bocumentation1.documentation unclear or ambiguous5.2.62.documentation not up to date5.2.11	Varification				
3.LTA verification of modification7.18.2, 7.9 (2)afety1.LTA safety culture6.2.1nanagement2.LTA safety audits6.2.13.LTA management of suppliers6.2.5bocumentation1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.33.documentation not up to date5.2.11	vernication	· · · · · · · · · · · · · · · · · · ·			
afety1.LTA safety culture6.2.1nanagement2.LTA safety audits6.2.13.LTA management of suppliers6.2.5ocumentation1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.33.documentation not up to date5.2.11					
nanagement2.LTA safety audits6.2.13.LTA management of suppliers6.2.5bocumentation1.documentation unclear or ambiguous5.2.62.documentation incomplete5.2.33.documentation not up to date5.2.11	Safaty				
3. LTA management of suppliers 6.2.5 bocumentation 1. documentation unclear or ambiguous 5.2.6 2. documentation incomplete 5.2.3 3. documentation not up to date 5.2.11					
bocumentation 1. documentation unclear or ambiguous 5.2.6 2. documentation incomplete 5.2.3 3. documentation not up to date 5.2.11	management				
2.documentation incomplete5.2.33.documentation not up to date5.2.11	Documentation	0 11			
3. documentation not up to date 5.2.11	Documentation				
		· · · · · · · · · · · · · · · · · · ·			
anctional satety I LEA () & Massessment 8.2	Functional safety	1. LTA O & M assessment	8.2		
	assessment				
3. assessment incomplete 8.2.3	assessment				
•••••••••••••••••••••••••••••••••••••••		r	8.2.11/12/13/14	4	

Key: LTA is Less Than Adequate, IEC 61508 references are to Part 1 except as indicated by parentheses e.g. (2)

 Table 1. Taxonomy for Analyzing Computer Related Failures Under IEC 61508 (Emmet et al 2003).

tem operates cor to prevent hazar		Demand caused by maintenance action	Demand caused by operation error	Demand caused by equipment degradation		Demand caused by malfunction	
stem fails on prod	of test	If yes	If yes	If yes	If yes		
System fails to ta quired action or action not requin	takes	Failure caused by maintenance If yes	e		Equipment failure due to degradation	Failure caused by malfunction If yes	Random hardware failure
	· · · · · ·	<u> </u>	<u> </u>	•	•	<u> </u>	<u>, ▼</u>
Hazard and	- hazard and risk analysis h	ad - hazard and risk	Would the incident have been - hazard and risk analysis h				Log failure and
Risk Assessment	- hazard and risk analysis h considered all modes of operation and causes	analysis had considered analysis had considered all modes of operation and causes	- nazard and risk analysis n considered all modes of operation and causes	au			check -if dangerous failu rate is in line with
Design	- different equipment selected? - installation design differen - configuration was correct	- maintenance facilities had been designed adequately	- operations facilities had been designed correctly	- different equipment se - installation design had different?	been - the been	fferent equipment selected? e installation design had n different? nfiguration was correct	rate is in line with design assumption -if all expected actions occurred a no unexpected actions occurred -if safe failure cau any unexpected actions
Installation & Commission	- the equipment had been installed according to desig	- the maintenance	- the operations facilities ha been installed according to design	d - the equipment had bee installed according to de	n - the	e equipment had been alled according to design	
Validation	- the setting had been check during validation		- operations facilities had been fully checked	 equipment condition h fully checked 		uipment condition had been y checked	Log demand and check if
Operation & Maintenance	maintenance procedures were applied maintenance procedures were improved maintenance tools better test interval was reduced	 - correct maintenance procedure had been used - maintenance procedure was improved - permit procedures better 	- correct operation procedu was used - operation procedure was improved - permit procedures improv	applied - maintenance proc. bet - test interval was reduc	dures - maintenance procedures v improved better - maintenance tools improv duced - test interval was reduced		line with design assumptions -demand cause wa
Modification	- setting had been reviewed during impact analysis		- operation facilities or procedures had been reviewed during impact analysis	- equipment used or ins design has been review during impact analysis	ed desi	uipment used or installation gn has been reviewed ng impact analysis	-
			Would the inside	at have been prevented if.			
. ↓	Competency	Lifecycle	Verification	nt have been prevented if: Safety manageme	nt	Documentation	Safety assessme
Operation & Maintenance	- operation or maintenance staff were more competent	- responsibilities were defined better	- a better verification schem had been in place		roved - do	cumentation was clear and ficient	- assessment had been carried out o O&M phase
Modification	- modification carried out by more competent	 modification lifecycle was better defined 	- a better verification schem had been in place	 accountabilities better suppliers not reviewed 		cumentation updated	- assessment carri out on modification

Continued ...

Fig. 3. High-Level Flow Chart to Support Causal Analysis of E/E/PES Related Incidents Using IEC 61508 Taxonomy [Cont. in next figure] (Emmet et al, 2003)

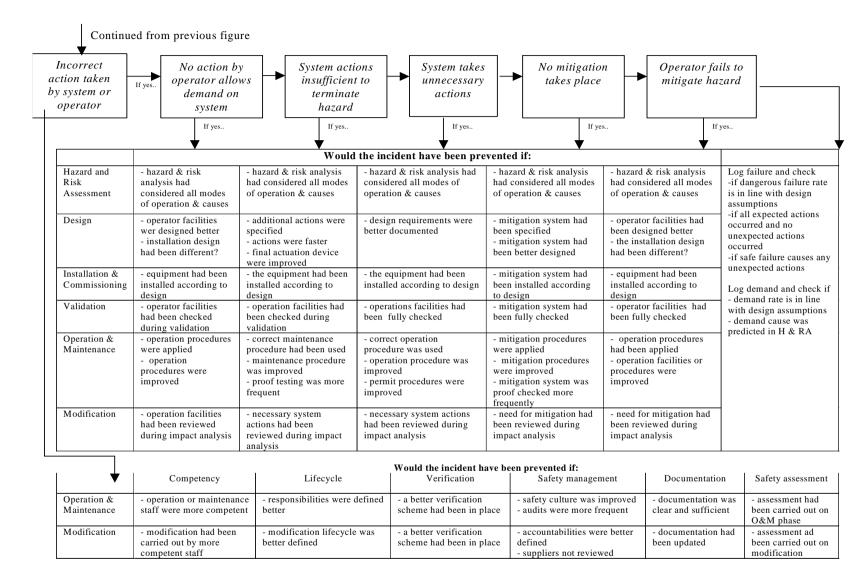


Fig. 4. High-Level Flow Chart to Support Causal Analysis of E/E/PES Related Incidents Using IEC 61508 Taxonomy (Emmet et al, 2003).

Most incidents involve multiple causes. Our case study, amongst other things, stemmed from the operators decision to open valve C as a means of decreasing pressure in the debutanizer whilst failing to notice that the E/E/PES had failed to open valve B. Their decision was informed by erroneous information from their control system, which indicated that valve B was open and from a sensor malfunction that indicated the flow and level in the debutanizer had not reached their maximum values. These problems were compounded by poor interface design. Fractal distillation takes one primary source material and produces five product streams. Critical information about the volume of production on each of these streams was distributed across several displays. The analysis might identify several requirements or lifecycle activities that might have prevented this incident from occurring in the manner described. It is important to document the outcome of this flowchart analysis. This is done using the form illustrated in Table 2. Immediate events that are identified in incident reporting forms are related back to failures in the lifecycle stages and common requirements of IEC 61508. This allocation process is guided by the questions in Figures 3 and 4. The allocation is also supported by a justification that is intended to document any intermediate reasoning to other investigators and co-workers.

Causal Event	IEC 61508 Classification	Route through flow chart	Rationale
Decision to open valve C.	Validation	Incorrect action taken by system or operator-> Operator fails to mitigate hazard -> Accident would have been avoided if operator facilities had been fully checked.	The operators intervened in the automated control system to open valve C this twice led the compressor to trip and forced excess fluid into the flare system. The poorly designed displays prevented them from diagnosing the source of the increased pressure in the debutanizer and the potential hazard from their actions in opening C. Improved display design might have occurred if they had been validated against a wider range of operational scenarios.
Failure to open valve B.	Operation and maintenance	System fails to take required action -> Failure caused by maintenance -> Accident would have been avoided if maintenance procedure were improved.	The computer control system was designed to automatically open valve B when flow was restored to the debutanizer. This command failed. Subsequent investigation found of 39 instrument loops 24 needed attention ranging from minor mechanical damage to major maintenance faults.

Table 2. Abridged IEC 61508 Flowchart Causal Summary for Case Study

Event & Causal Factor Analysis

As can be seen, the flowchart analysis in Table 2 is relatively superficial. It provides a causal analysis that might be performed in the initial stages of an investigation. In order to look more closely at detailed design issues, additional questions would be needed in the Flowcharts of Figures 3 and 4. The resulting diagrams would sacrifice many of the benefits associated with this simple causal analysis technique. The following section, therefore, presents a more sophisticated approach.

First Stage: Information Elicitation and ECF Modelling

Figure 5 shows a simplified form of Events and Causal Factors (ECF) diagram. This modeling technique was developed by the US Department of Energy (1992) to provide an overview of events leading to an incident. Rectangles represent events. Ovals represent the conditions that make those events more likely. The diamond shape represents the outcome of the E/E/PES related mishap.

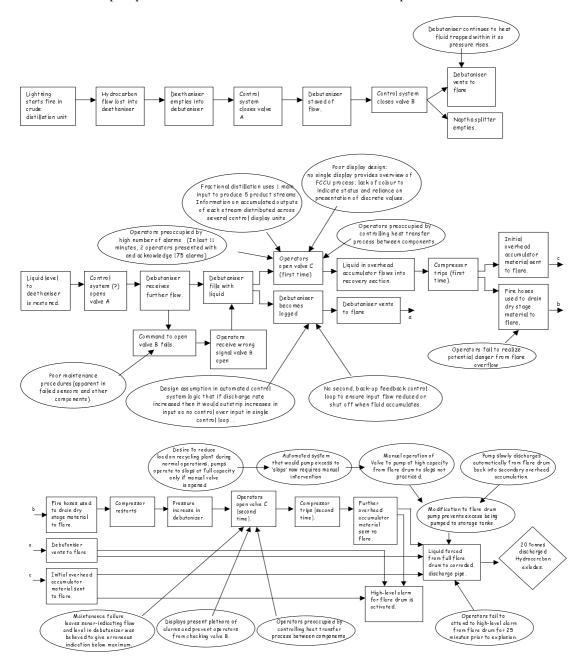


Fig. 5. ECF Diagrams Including Developer/System Integrator Information

This figure is in three parts. The top line represents the chain of events that created the immediate preconditions for the accident. The lightning strike leads to a loss of flow into the debutanizer and an E/E/PES intervened close valve B. The middle line describes a series of intermediate events in which, in

particular, the E/E/PES fails to open valve B. The flow of materials into the deethanizer and debutanizer creates a build-up, which in turn, leads to materials being passed to the flare.

The middle diagram includes continuation symbols marked a, b and c. These feed into the bottom row of the ECF diagram. This illustrates the events and conditions that ultimately lead to the flare drum being filled beyond its capacity so that materials are forced into a corroded discharge pipe and out into the environment. The development of a detailed ECF chart continues until all of the parties involved in an investigation agree that it provides a reasonable representation of the events that contributed to an adverse occurrence or near miss. This decision is influenced by the scope of the investigation and by pragmatics. For instance, we could extend Figure 5 to consider the circumstances that led to 'poor maintenance procedures (apparent in failed sensors and other components)'. This could only be done if incident investigators gain access to the appropriate site documentation or witness statements.

Second Stage: Causal Reasoning

A further stage of analysis is required in order to distinguish potential causal factors from more contextual information. Starting at the outcome event, investigators must ask whether the incident would have occurred if that event had not taken place. If the incident would still have happened then the event cannot be considered as a casual factor. For example, the incident would arguably not have happened if material had not been forced from the full flare drum into the corroded discharge pipe. This is, therefore, a cause of the incident. Similarly, we can argue that the incident would not have happened if further overhead accumulator material had not been sent to the flare. Conversely, the high-level alarm for the flare had no impact on the course of the incident and so cannot be considered a causal factor. The incident would still have occurred even if the alarm had not sounded.

The causal factors in the ECF diagram are then used to identify potential problems in the development stages and common requirements of IEC 61508, illustrated in Table 1. One means of doing this is to identify the conditions that contributed to each causal event in the ECF chart. These conditions typically capture latent issues, including development and operation decisions that create the context for E/E/Pes-related mishaps. For instance, the operator's second intervention to open valve C as a means of reducing pressure in the debutanizer was made more likely by the maintenance failure that prevented them from accurately observing the state of the debutanizer. Poor display design also contributed to their decision, as did their preoccupation with heat transfer within the plant. Heat generated as a by-product of a process was not directly dissipated but was instead used to support other processes in the plant. If either too much or too little heat was generated within the plant then these delicate dependencies that could be disturbed. Table 3 presents some of the results from this analysis. A justification helps others to understand why investigators found violations of common requirements in particular phases of the IEC 61508 lifecycle. Table 3 also included causes that stem from particular stages in the IEC 61508 lifecycle but that are unrelated to any failures in the common requirements.

The causal analysis of our case study illustrates an important point about adverse events involving programmable systems. As can be seen, it is difficult to extract the contribution of computer-related systems from wider failures in the maintenance, operation and safety-management systems. Operators did not intervene to address the automated flare drum alarm because they were busy trying to diagnose the causes of the pressure increase in the debutanizer. They failed to diagnose the problems with the debutanizer because they assumed that the automation had closed valve B. Their task was further exacerbated by their systems' presentation of erroneous sensor readings from the debutanizer. As mentioned, we have exploited the lifecycle and common requirements of IEC 61508 to provide a taxonomy for the causal factors involved in computer-related incidents. This decision was motivated partially by the commercial uptake of this standard and also by the organizational objectives of the specialist unit of the UK Health and Safety Executive who sponsored this work. If another taxonomy were to be used for this purpose then it too would have to support the analysis of incidents in which the failure of programmable devices formed a component of more complex failures in operation, management and the equipment under control.

Causal Event	Associated Conditions	IEC 61508 Lifecycle Classification	Justification	IEC 61508 Common Requirements Violation	Justification	
Liquid forced from full flare drum to	Modification to flare drum pump prevents excess being pumped to storage tanks.	Modification: 1 impact analysis incorrect.	After modification in normal operation automated pumps would now reclaim materials from the flare. Manual intervention was required to restore high	Functional Safety Assessment: 2. Modification assessment LTA.	Assessment of the modification had identified the need to override low capacity transfer of materials in flare but had not considered what would happen if manual intervention did not occur.	
corroded discharge pipe.			velocity pumping to slops under 'emergency' conditions. Operators did not intervene in this manner and the impact of this was not considered.	Verification: 3 LTA verification of	There appears not to have been any verification to determine whether operators could or would intervene to perform the necessary manual reconfiguration that was necessary to start high velocity pump transfer to storage tanks from the flume tank.	
		Modification: 4 LTA verification and validation	Inadequate testing to see if operators would intervene once switch was made away from automated default use of high velocity pumps to slops.	modification		
	Operators fail to attend to high- level alarm for flare drumOperation and maintenance:Operators were presented with deluge of automated alarms and lackedduring 25 minutes prior to explosion.9 LTA procedures to monitor system performancetechnical/procedural support to discriminate high priority alarms.					
Operators open valve C	Maintenance failure leaves sensor indicating that the flow and level in the debutanizer was believed to give erroneous indication below maximum.	Operation and maintenance: 2: maintenance procedures need improvement	The programmable systems and operator alarms depended on accurate sensor information. Inadequate maintenance created systemic vulnerabilities that were likely to lead to mishaps.	Functional Safety Assessment: 1. LTA Operations and	The incident was caused by a number of problems in the way in which the system was both maintained and operated. Maintenance failures meant that automated systems and operators could not rely on	
	Display presents plethora of alarms that prevent operators from checking status of valve B.	Allocation: 4. Installation design	Operators had to acknowledge almost 400 alarms in the last 12 minutes of the mishap. This took away from time to diagnose the problem and plan their intervention.	Maintenance assessment. Safety management: 2. LTA Safety Audits	some sensor readings. The tight integration of heat transfer operations together with poor alarm handling created immense burdens for system operators under abnormal situations and these demands appear not the have been assessed in a systematic manner.	
	Operator preoccupied by controlling heat transfer process between components	Overall safety requirements: 4. Installation design.	Heat generated as a by-product of one sub-process was used elsewhere in the system rather than dissipated by cooling systems. This created delicate dependencies that would be disturbed and impose additional burdens on operators during emergency situations.			

Table 3. IEC 61508 Causal Summary Chart for Case Study Incident

12 Chris Johnson,

Causal Event	Associated Conditions	IEC 61508 Lifecycle Class.	IEC 61508 Common Requirements Violation	Recommendation	Priority	Responsible authority	Deadline for response	Date Accepted/ Rejected
Liquid	Modification to flare drum pump prevents excess being pumped to storage tanks.	Modification: 1 impact analysis incorrect	Functional Safety Assessment: 2. Modification assessment LTA	1. Flare system must be redesigned to provide effective removal of slops from knock-out drum at adequate rate to prevent overfilling.	High	Production engineering team manager	1/4/2003	Accepted 15/2/2003
forced from full flare drum to			Verification: 3. LTA verification of modification	2. There should be a formal controlled procedure for hazard identification following all modification proposals.	High	Plant safety manager	1/6/2003	Accepted 15/2/2003
corroded discharge pipe.		Modification: 4 LTA verification and validation		 Control and protection systems should be independent, particularly where they involve programmable systems. 	High	Plant safety manager	1/6/2003	Accepted 15/2/2003
	Operators fail to attend to high-level alarm for flare drum during 25 minutes prior to explosion.	Operation and Maintenance: 9. LTA procedures to monitor system performance.		4. Display systems to be redesigned to provide clearer indication of source of flow problems. Greater prioritisation of alarms will assist in this (see rec 7).	Medium	Production engineering team manager & Plant safety manager	1/5/2003	
Operators open valve C	Maintenance failure leaves sensor indicating that the flow and level in the debutanizer was believed to give erroneous indication below maximum.	Operations and maintenance: 2. maintenance procedures need improvement.	Functional Safety Assessment: 1. LTA Operations and Maintenance assessment. Safety management: 2. LTA Safety Audits	5. Safety management system to record and review incident information from other similar plants, causes of mishap already well documented.	Medium	Plant safety manager	1/5/2003	
				6. Safety management system to include monitoring of its own performance – for instance over assessment of modifications.	High	Plant safety manager	1/4/2003	Accepted 15/2/2003
	Display presents plethora of alarms that prevent operators from checking the status of valve B.	Allocation. 4. installation design.		7. Training of staff will focus on high-stress situations as well as production critical issues. (see also recommendation 4)	Medium	Plant safety manager	1/5/2003	
	Operators preoccupied controlling heat transfers process between components.	Overall safety requirements: 4. installation design.						

 Table 4. Recommendation Summary Form (LTA – Less Than Adequate)

Generating Recommendations

The final activity in our simple and complex causal analysis techniques is to produce recommendations that help to avoid any recurrence of an incident or near miss. The generation of recommendations uses the outcome of previous stages to identify potential recommendations. These recommendations are clearly domain and incident dependent. It is important, however, that investigators document the actions that are intended to avoid any recurrence of an incident involving programmable systems. Each recommendation should be associated with a priority assessment, with an individual or organization responsible for implementing it and with a potential timescale for intervention. Typically, a safety manager will then respond with a written report stating whether each recommendation has been accepted or rejected (Johnson, 2003).

It is important when drafting a recommendation that investigators consider whether similar interventions have been advocated in the past. Electronic information systems can be used to assist in this task. The key point, however, is that ineffective recommendations should not continue to be issued in the face of recurrent incidents. Similarly, it is important to identify situations in which recommendations are consistently rejected or inadequately implemented. Any accepted recommendations must be disseminated to those who are responsible for acting upon them. Safety managers must also assume responsibility for checking that any necessary changes are implemented according to the agreed timescale. System documentation must be updated to reflect any subsequent modifications. Table 4 provides an example of a form that can be used to record recommendations from incidents involving programmable systems. As can be seen, different deadlines may be associated with actions that have different priority levels. This does not imply that high priority items will have an immediate deadline. Additional time is often necessary to ensure that subsequent interventions do not introduce further flaws in the design, operation and maintenance of safety-critical systems.

A key concern behind the design of Tables 3 and 4 is that investigators should be accountable for their recommendations. By this we mean that co-workers, safety managers and regulators should be able to trace back particular recommendations through the previous stages of any causal analysis so that it is possible to identify the reasons why particular interventions are proposed in the aftermath of an adverse event. For example, recommendation 4 proposes a redesign of the control system displays. This is based on the observation that operations and maintenance assessments had been less than adequate prior to the incident. In particular, these assessments had failed to predict the impact that multiple alarms had upon their ability to correctly diagnose the status of valve B. If they had not been forced their observation of multiple low priority warnings then they might have been better able to recognize that their control system had failed to complete their command to open the flow from the debutanizer.

Conclusions

A range of techniques has been developed to support the analysis and investigation of adverse events and near miss incidents. Very few of these techniques have been specifically designed to support the investigation of incidents involving programmable systems. This report, therefore, introduces two investigation methods for this class of adverse events. The first builds on a relatively simple flowchart. Investigators can identify and categorize the causes of a mishap by answering a series of questions. The responses that they provide guide the causal analysis to underlying problems in the design, development or operation of E/E/PES hardware and software.

The second, more complex, approach introduces several additional stages of analysis. It is appropriate for more complex incidents where the questions that guide a simpler form of analysis may not be

14 Chris Johnson,

directly applicable. These additional stages also provide intermediate documentation that is necessary when investigators must justify their conclusions to other investigators, safety managers and courts of law. In particular, this second approach relies upon a timeline reconstruction of an adverse event using a technique known as Events and Causal Factors (ECF) charting. This produces a graphical sketch of the events leading to an incident. This can then be used to distinguish contextual information from causal factors. In our proposed method, these causal factors are then analyzed to identify potential failures in the lifecycle of programmable systems using a checklist approach.

Both of our investigation techniques have been tailored to provide information that guides the future development and operation of safety-critical systems. In particular, the flowchart and checklist help investigators to map from the causes of hardware and software related incidents to the clauses of the IEC 61508 standard. IEC 61508 provides guidance on the activities that should be conducted during the concept development, overall scoping, hazard and risk assessment, overall safety requirements analysis, integration, commissioning and verification, realization, validation, operation and maintenance, and modification of safety critical computer systems. In addition there are a range of requirements that are common to all lifecycle phases. These include the need to ensure the competency of those involved in the operation, maintenance and modification of the system. They also include requirements relating to the 'safety culture' of the organizations involved in the development and operation of programmable systems. Our use of this standard is justified because it provides a means of feeding the insights derived from any incident investigation back into the future maintenance and development of hardware and software within safety-critical applications.

There are a number of directions for future work. In particular, previous sections have argued that our taxonomy provides insufficient support for the analysis of human factors issues, including display design and task allocation. This concern could be addressed by introducing an additional human factors component under the common requirements of table 1. More detailed categories could include 'LTA identification of human actions or errors leading to hazards', 'human failure to respond effectively to alarms or take other necessary operational action due to deficient design', 'human failure in testing and maintenance due to inadequate procedures or design'. It would also be possible to introduce additional questions into the flowchart of Figures 3 and 4. This would be justified even though there is a danger that the gradual introduction of additional elements will complicate the simplified analysis technique. The key point here is that our techniques should be refined to reflect particular operational needs as experience in incident investigation reveals potential omissions in the taxonomy and flow chart.

Our techniques are likely to identify incidents that cannot easily be attributed to lifecycle phases or common requirements in IEC 61508. The link between constructive design standards and analytical investigation techniques can, therefore, yield insights into the limitations of these standards. An implicit motivation in our work is to provide the feedback mechanisms that are necessary to improve the application of standards, such as IEC 61508 and DO-178B.

Acknowledgements

Thanks are due to Bill Black (Black Safe Consulting), Mark Bowell (UK HSE) and Peter Bishop (Adelard) for providing comments on the initial draft of this document.

References

P.G. Bishop, R.E Bloomfield, L.O. Emmet, C.W. Johnson, W. Black, V. Hamilton and F. Koornneef (2003 in press), Learning from Incidents – Outline Scheme for E/E/PE Safety-Related Systems, HSE Contract Research Report.

- Department of Energy, DOE Guideline Root Cause Analysis Guidance Document, Office of Nuclear Energy and Office of Nuclear Safety Policy and Standards, U.S. Department of Energy, Washington DC, USA, DOE-NE-STD-1004-92, http://tis.eh.doe.gov/techstds/standard/nst1004/nst1004.pdf, 1992.
- HSE (1997), The Explosion and Fires at the Texaco Refinery, Milford Haven, 24th July 1994. HSE Books, Norwich, UK.
- International Electrotechnical Commission (2003), IEC 61508 Functional Safety of Programmable Electronic Safety-Related Systems. Available via http://www.iec.ch/functionalsafety
- C.W. Johnson (2003 in press), A Handbook for the Reporting of Incidents and Accidents, Springer Verlag, London, UK.
- C.W. Johnson, G. Le Galo and M. Blaize, (2000), Guidelines for the Development of Occurrence Reporting Systems in European Air Traffic Control, European Organisation for Air Traffic Control (EUROCONTROL), Brussels, Belgium.
- P. Ladkin and K. Loer (1998), Why-Because Analysis: Formal Reasoning About Incidents, Bielefeld, Germany, Document RVS-Bk-98-01, Technischen Fakultat der Universitat Bielefeld, Germany.

N. Leveson, (2002), A Systems Model of Accidents. In J.H. Wiggins and S. Thomason (eds) Proceedings of the 20th International System Safety Conference, 476-486, International Systems Safety Society, Unionville, USA.