



## Management of Change Safety Moment

In this PSMS Safety Moment we look more deeply into the distinction between “In-Kind” and “Not In-Kind” changes.

In principle, this distinction is simple. If the replacement for piece of equipment is identical to the original item then the change is “In-Kind” — so there is no need to use the MOC system. However, as with so many other aspects of pipeline safety, things are not as simple as they seem to be. Consider the following issues.

- If a new vendor is used to supply a replacement part to the same specification as the old part then the change may be *Not-in-Kind*. After all, the reason for using the new vendor is that management wanted to make a change to the system (probably to reduce costs or improve system reliability). There must be some difference between the old and the new products in order to explain why the new vendor was chosen. For this reason, decision to change a vendor or a supplier should generally be validated using an *approved organization specific MOC process*.
- A replacement part was likely manufactured, shipped and stored under different conditions from the original. Normally these differences do not matter. But, on occasion, the differences may be significant enough such that the MOC system needs to be used.

For example, changing the storage location from indoors to outdoors could have an effect on the stored items (PE Piping for example), as could the use or non-use of environmentally conditioned storage facilities. For example, a very serious accident resulted when a supposedly In-Kind replacement gasket was inserted into a filter housing as part of a routine operation. The new gasket leaked, and a major fire ensued resulting in extensive equipment damage, and many weeks of lost production — fortunately, no one was injured. After the event it was determined that the new gasket was not in fact identical to the old one, even though all parties concerned had thought that it was. An inadvertent change had occurred in the supply chain process.

- The person who replaced the item may be different from the person who installed the original item. He or she may not be as experienced or unfamiliar with the replacement / substitute and may therefore install the item incorrectly.
- If the replacement work is urgent there may be a temptation to *declare an item “In-Kind”* without giving it sufficient scrutiny.



As with other aspects of pipeline safety, there are no easy answers to determining when a change can be considered to be “Not In-Kind”. In practice, most routine maintenance activities involving spare parts will be automatically treated as “In-Kind”. But it is worth at least reviewing the processes whereby spares are purchased, stored and installed **and follow your organization specific MOC process , policy and procedures !!!**

**More fundamentally, everyone at a job site / facility needs to be familiar with pipeline safety management principles associated with company / organization specific Management of Change considerations. These considerations apply across the board to all team members; regardless of what your formal job description is, we should always be asking ourselves, “Is what I am doing creating a change that *should be reviewed* before I begin taking action, or in some cases, while I am conducting work.?”**

*Adopted from Ian Sutton, Use of Safety Moments, 2020*