

## Comparison Between MOC and PSSR

Aspect	Management of Change (MOC)	Pre-Startup Safety Review (PSSR)
<b>Purpose</b>	Ensures changes are evaluated for risks before implementation.	Verifies that new/modified systems are safe to operate before startup.
<b>When Conducted</b>	Before any change is approved.	After MOC, but before commissioning/startup.
<b>Focus</b>	Risk assessment of proposed changes (equipment, processes, personnel).	Final safety check confirming readiness for operation.
<b>Regulatory Link</b>	Required under OSHA PSM, EPA RMP.	OSHA PSM mandates PSSR after MOC.
<b>Key Activities</b>	<ul style="list-style-type: none"><li>- Hazard review</li><li>- Approval workflows</li><li>- Training updates.</li></ul>	<ul style="list-style-type: none"><li>- Inspection of equipment</li><li>- Verification of safety systems</li><li>- Training validation.</li></ul>
<b>Outcome</b>	Approval/rejection of the change.	Authorization to proceed with startup.
<b>Documentation</b>	MOC forms, risk assessments.	PSSR checklists, inspection reports.

## Example PSSR Checklist

A typical PSSR includes verification of:

### 1. Design & Installation

- Equipment meets specifications.
- Safety systems (e.g., pressure relief valves) are installed correctly.

### 2. Procedures & Training

- Updated operating/maintenance procedures are in place.
- Personnel are trained on changes.

### 3. Hazard Controls

- PHA/MOC recommendations implemented.
- Emergency shutdown systems tested.

### 4. Regulatory Compliance

- Permits (e.g., environmental, safety) are secured.
- PSM/RMP requirements are fulfilled.

#### 5. **Final Approval**

- All deficiencies resolved.
- Signed authorization from responsible personnel.

### **Key Takeaway**

- **MOC** = "Is this change safe to make?" (*Risk assessment before change*)
- **PSSR** = "Is everything ready to start safely?" (*Final validation before operation*)