

- Safe Operating Limits:
- Common (Broad) Definitions:
- The envelope beyond which a process cannot be intentionally operated
- The point beyond which normal troubleshooting ends and pre-determined action occurs to return the process to a known safe state



- NWR Identification of Safe Operating Limits (SOL):
- Design HAZOPs/LOPAs used as starting point
 - Limit associated with a primary safeguard/action to prevent <u>high severity H&S consequence</u> <u>loss of</u> <u>containment scenarios</u>
- Other Considerations:
 - Process Licensor recommendations
 - Operating experience
 - Industry best practices



- SOL Process Development:
- Unit process engineers developed the base case
 SOL's based on the criteria above
- SOL registers maintained in Unit Safeguarding Manuals
- Integrity Operating Windows managed by pressure equipment integrity engineering
- Unit SOLs and IOWs reviewed jointly to address gaps or overlaps
- Changes to SOL require MOC



- SOL Monitoring:
- Owned by Unit Process Engineer
- Limits are monitored in PI
- Control Room Operators also check (shift rounds)
- PI SOL status summaries are checked daily, and exceedances verified
- Verified SOL exceedances are entered as incidents (may be coincidental with another event – PSV lift, emergency trip, etc.)
- SOLE events reported to leadership weekly, monthly



- Other Implementation Notes:
- SOL mainly correspond to:
 - PSV set pressures
 - SIS thresholds
 - Other Trips, Emergency Shutdowns or Depressuring
 - High-high or low-low alarms with operator action
 - Lab results outside specified limits
- Some SOL did not have DCS pre-alarms configured
- A revalidation/reconciliation exercise is needed based on 2 years operation



General Remarks:

Using the original criteria, with discretion of unit engineers, the SOL registers are generally larger than was anticipated:

Unit	SOL's
Crude	142
Resid. Hydrocracker	181
Gas Oil Hydrocracker	84
Light Ends	74
Utilities	164