

Examined, Unexamined, or Overexamined?

The over examined life, Claire, it's not worth living. – Colum McCann

The unexamined life is not worth living. – Socrates

Taking a lot of selfies doesn't mean you live an examined life. – Gina Barreca

When I was reading Let the Great World Spin, there is a scene where Claire is obsessing about many things and admonishes herself that the over examined life is not worth living. That made me think of the description of Socrates' trial in Plato's The Apology when Socrates explains why he would rather die than to cease the practice of philosophy. Those made me wonder if anyone had a quote about examining life, and I learned that examination requires more than selfies. Somewhere between too little examination and too much examination, I believe there is value in self-examination even if selfies are insufficient.

All of those quotes made me wonder how often CRM plans are examined, unexamined, or over examined. See how my brain works? I doubt any plans are over examined unless a company receives notification of a PHMSA CRM inspection. It is likely that some type of CRM examination is done at times. I do not know if selfies are involved or not, but suspect the examiners pause occasionally to look at social media posts.

How often does anyone examine your CRM plan? Are some parts examined more often than others? Who is involved? What is the purpose of the examination? Is the review cursory or comprehensive? Is a well-defined process used? Does the review include evaluations of the effectiveness of the CRM plan? What guidance does PHMSA provide?

A CRM Plan has to be reviewed at least once each calendar year, not to exceed 15 months, since it is part of the "Procedural manual for operations, maintenance, and emergencies." (49 CFR 195.402 (a)). That review needs to include a process of making necessary changes to ensure that the CRM plan is effective. There is no PHMSA guidance on what effectiveness means, but we have ideas and measures.

A quick look through the actual CRM regulatory language indicates that there is also an "at least once each calendar year, not to exceed 15 months" examination of an internal communications plan, backup SCADA system, alarm management plan, controller general activity volume and content, and controller training program content. Some other items require examination at more regular intervals.

For clients we assist with the CRM program review each calendar year, we have a comprehensive process with documentation and checklists. We review all CRM procedures and make any necessary changes. We recommend that a "required reading" process be used so that anyone with CRM responsibilities is informed of any changes. We use effectiveness checklists for the fatigue risk management system, the fatigue training and education program, the alarm management plan, and the controller training program. We have some measures of CRM program effectiveness that begin with a baseline of compliance with PHMSA regulatory guidance questions and FAQs.

When the review is complete, the CRM program has been examined and life is worth living. While the examination should be done regularly throughout the year, it has to be done at least once each calendar year. Live a worthy life that includes self-examination.