

OpsPilot

Pre-Startup Safety Review — User Manual

The Safety Gate Before Startup · OSHA 1910.119(i) · AI Engineering Co-Pilot



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What this guide covers — what a PSSR is, how the OpsPilot module runs the five-element verification, what to have ready, and the document you receive.

Safety-critical gate. PSSR bypass preceded BP Texas City. The five OSHA confirmations are non-negotiable. OpsPilot challenges anything marked verified without evidence and flags it SITE VERIFICATION REQUIRED. The PSSR is authorised by named, accountable persons — not by the tool.

1. What is a Pre-Startup Safety Review?

A Pre-Startup Safety Review (PSSR) is the final safety gate before a new or modified process is started up — the disciplined confirmation that everything required to start safely is genuinely in place. It exists because starting up against an incomplete review has killed people; the discipline is to verify, with evidence, rather than assume the work was done.


2. The five non-negotiable confirmations

Per OSHA 29 CFR 1910.119(i), a PSSR confirms five things before startup:

#	Confirmation
1	Construction and equipment are in accordance with the design specifications.
2	Procedures — operating, safety, maintenance and emergency — are in place and adequate.
3	PHA recommendations have been resolved or implemented, and actions closed.
4	Training of operating personnel is complete.
5	For modified facilities, Management of Change requirements have been met and closed.

3. What the OpsPilot module does

Role	Responsibility
AI Coach — Senior Process Safety Engineer (OpsPilot)	Guides the five-element verification, challenges anything marked verified without evidence (flagging it SITE VERIFICATION REQUIRED), and builds the punch-list and the authorisation decision.

Role	Responsibility
 PSSR Leader / Operations Manager (you)	Provide the ground truth — what work is done, what's verified, what's still open — and authorise the final PSSR with named signatures. The tool cannot substitute for your accountability.

4. What you will be asked — have this ready

- Evidence that construction and equipment match the design.
- The status of operating, safety, maintenance and emergency procedures.
- The closure status of PHA recommendations and any MOC actions.
- Training completion records for the operating personnel.

5. What you receive — the output

A complete PSSR (Word): a formal record of the five-element verification, the punch-list of open items, and the authorisation decision — Authorised / Conditional / Not Authorised — with named signatures and any unverified items flagged SITE VERIFICATION REQUIRED.

6. Worked example (illustrative)

A modified unit is ready to restart and the schedule pressure to start is intense. The PSSR walks the five confirmations. Four are evidenced — construction matches design, procedures are updated, training is done, the MOC is closed. But two PHA recommendations from the modification's hazard study are still open. That is not a “start now, close them later” situation: the honest verdict is Conditional or Not Authorised until those actions are closed, because an open PHA recommendation is an identified hazard with no control yet in place. OpsPilot won't let the review record those as done without evidence, and the named authoriser carries the decision. That discipline — refusing to start against an incomplete review under pressure — is exactly what was bypassed before Texas City.

7. Getting the best result

- **Verify with evidence.** “It should be done” is not a confirmation — show the record.
- **All five, every time.** The five OSHA confirmations are non-negotiable, however tight the schedule.
- **Don't start on open PHA actions.** An unresolved recommendation is an uncontrolled hazard.
- **Name the authoriser.** The decision to start carries personal accountability — it isn't the tool's.

OpsPilot — AI Engineering Co-Pilot. Learn more at opsinnovatech.com