

RCP Internal Audit Requirements Comparison of 2013 Standard to the **2014** Standard

RCP 2013

Currently In Effect

II-4, 5

G. Internal Audit and Review Procedures

- 1 1. Procedures for conducting annual internal audits,
 - a) Method for identifying nonconformities
 - b) Method of tracking corrective action including:
 - 1) Assigned responsibility
 - 2) Management review
 - 3) Follow-up timeframe (e.g., 90 days)
- 2 Procedures to ensure compliance with applicable federal laws and regulations concerning marine safety and environmental protection
- 3 Personal injury investigation
- 4 Spill investigation
- 5 Vessel accident investigation
- 6 Communication procedures for disseminating lessons
- 7 Document control, updating, and distribution
- 8 Performance measurement procedures, including
 - a) Manhours
 - b) Fatalities
 - c) Recordable injuries
 - d) Lost time injuries
 - e) Falls overboard

NEW – RCP 2014

Effective Date:

Implementation Phase In Period....

II-5

G. Audit and Review Procedures

1. Internal audits
 - a) The internal auditing program must:
 - 1) Periodically evaluate the effectiveness of the safety management system
 - 2) Review the safety management system in accordance with the established procedures of the company, when needed
 - 3) Require reporting of non-conformities
 - 4) Be included in the corrective action program (see II.A.6 above)
 - 5) Include a management review
 - b) Types and frequency of internal audits:
 - 1) Internal audits must be carried out annually, and initiated by the anniversary date of the last internal audit, for all towing vessels and managing offices (all offices with management oversight of towing vessels). Audits can be conducted up to three months before the anniversary of the original audit and will maintain the original anniversary date.
 - 2) Factors for determining selection of personnel responsible for conducting internal audits, to include:
 - i. Qualifications and training requirements
 - ii. Requirement that personnel are independent of the area being audited