

Engineering Procedure

SAEP-302

12 October 2005

Instructions for Obtaining a Waiver
of a Mandatory Saudi Aramco Engineering Requirement

Document Responsibility: Standards Coordinator

Saudi Aramco DeskTop Standards

Table of Contents

1	Scope.....	2
2	Applicable Documents.....	2
3	Instructions.....	3
4	Responsibilities.....	5
5	Definitions.....	8

1 Scope

This Saudi Aramco Engineering Procedure (SAEP) establishes a standard procedure for obtaining a Waiver to Mandatory Saudi Aramco Engineering Requirements (MSAERs). The waiver is submitted electronically through SAP e-Waiver Process. See [SAEP-301](#) for the definition and additional information about MSAER documents.

- 1.1 The scope of an approved e-Waiver Request is limited to the facility, project, and MSAER. Extending the scope of an approved e-Waiver Request to cover additional facilities, projects, or requirements in MSAERs shall be accomplished by submittal of a new SAP e-Waiver Request, and its subsequent approval.
- 1.2 If a Standards User is aware that a Saudi Aramco Engineering document is in some stage of revision (i.e., it has not yet been approved), and desires to apply it to a project or other work activity, submit an e-Waiver Request and attach a complete copy of the document to be revised for evaluation and approval per the instructions of this procedure.
- 1.3 If a Standards User wants to apply a newer version of a MSAER to a project or other work activity with requirements "frozen" at an earlier date (such as the date of Project Proposal Approval), he may elect to use the newer version by adopting it in its entirety, including its references with no additional notification or permissions from the Standards Committee Chairman or Responsible Department. However, if only a portion of the MSAER's newer version is requested for use, a letter of concurrence shall be obtained from the Standards Committee Chairman or Responsible Department and the Proponent representative.
- 1.4 Generalized "blanket" requests for a project to be exempt from all MSAERs are not covered by this procedure. Such requests must be jointly approved by the Chief Engineer, Engineering Services, and an equivalent management level position in the Proponent organization.
- 1.5 Unless otherwise indicated, references in this procedure to manager's "approval" or "rejection" may be delegated to the next lower level in his organization.
- 1.6 Any uncertainty as to whether an e-Waiver to any of the MSAERs is required shall be resolved by the relevant Standards Committee Chairman or Responsible Department.

2 Applicable Documents

Saudi Aramco Engineering Procedure

[SAEP-301](#)

*Instructions for Establishing and Maintaining Mandatory
Saudi Aramco Engineering Requirements*

3 Instructions

3.1 Deviation from Mandatory Saudi Aramco Engineering Requirements

[SAEP-301](#), "Instructions for Establishing and Maintaining Mandatory Saudi Aramco Engineering Requirements" defines those Company documents that contain mandatory requirements. Approval to deviate from any of those requirements must be obtained from both the manager of the proponent organization affected by non-compliance with the requirement and the assigned Responsible Department Manager. Approval to deviate must be obtained prior to implementing noncompliance with a mandatory requirement. To minimize cost and schedule impacts, new projects are encouraged to obtain a waiver request approval during Project Proposal development.

3.2 Initiation of an e-Waiver Request

3.2.1 To request approval to deviate from established MSAER, the Originator shall initiate a SAP e-Waiver Request. To assist in expediting the waiver review, attach all supporting documentation.

3.2.2 The waiver request justification shall include a discussion of the impact of approving the deviation. Document and support cost benefits or penalties by addressing the following items, as applicable:

- Decrease in facility safety or reliability
- Increase in acquisition cost or life-cycle cost
- Lengthening of overall project schedule
- Adverse environmental impact.

3.2.3 The waiver request shall always identify and analyze other alternatives to waiving the mandatory requirements.

Commentary Note:

If the following information is missing and not supplied within 3 days, the waiver request will be returned to the Originator:

- *if complete justification, as described above, is not provided*
- *if it does not have sufficient technical information required for evaluation processing*
- *if it is not signed by the appropriate signature authority*

3.3 "After-the-Fact" e-Waiver Request

Normally, an e-WR shall be signed and submitted by the Project Manager or Superintendent of the Originator's organization. However, if deviation from the

mandatory requirement has already taken place and the e-WR is "After-the-Fact", the approval of an e-WR shall be elevated to the Originator's Department Manager, and may not be delegated to a lower position.

3.4 Proponent Approval of e-Waiver Request

After initiating an e-Waiver Request, the Originator shall review the e-WR with the Proponent and request approval. If the Proponent approves, he shall sign the e-WR. If he recommends rejection, he shall attach an explanation and return it to the Originator. If he requires further technical evaluation prior to making a decision, he shall attach an explanation of specific factors or concerns that are to be included in the "Analysis of Request".

3.5 e-Waiver Request Submittal and Logging

Submit an e-Waiver Request and its supporting documentation through SAP e-Waiver Process. The e-WR will be given a notification number and routed to the contact designated by the appropriate Responsible Department Manager assigned to analyze the request and recommend disposition.

Commentary Note:

To improve the timely processing of an e-WR, electronic handling (i.e., e-mail, Livelink, Intranet, etc.) should be investigated and used to the maximum extent possible.

3.6 e-Waiver Request Analysis and Conditions of Approval

The Responsible Department Manager will assign the task of review and analysis of the e-Waiver Request through normal department work procedures.

- 3.6.1 If the review determines that the e-Waiver Request is not required, due to misinterpretation or misapplication of a MSAER, it shall be returned to the Originator with an explanation note by the Responsible Department Manager.
 - 3.6.2 If the review and analysis determines that the e-Waiver Request is not supported and should be rejected, it shall be returned to the Originator with an explanation of the rejection by the Responsible Department Manager. See paragraph 3.8 for additional instructions.
 - 3.6.3 If the review and analysis determines that the e-Waiver Request should be supported and approved, then the analysis shall be documented. If the Proponent has identified specific factors or concerns, these shall also be included in the analysis documentation. If there are conditions associated with the approval of the e-Waiver Request, insert them.
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Standards Coordination (SC) or the Proponent will route the e-Waiver Request to the Inspection Department and Other Organizations that have been identified to participate in the evaluation process.

3.7 e-Waiver Request Approval

The e-Waiver Request is approved by obtaining the signatures of both the Proponent and Responsible Department Managers.

3.8 e-Waiver Request Rejection and Appeal

3.8.1 Any reviewing authority may recommend rejection of the e-Waiver Request by returning the e-WR to the Responsible Department Manager with an explanation of the rationale for rejection. The Responsible Department Manager shall accept the rejection recommendation by returning the e-Waiver Request per paragraph 3.6.2, or resolve the issue with the organization recommending rejection.

3.8.2 If the Originator disagrees with the rejection decision, he must submit an appeal for reconsideration to the Responsible Department Manager. The Responsible Department and Proponent Managers will attempt to resolve the issue. The final authority to approve or reject shall rest with them, and may not be delegated to a lower position.

4 Responsibilities

4.1 Originator

- Initiate an e-Waiver Request through SAP, including all supporting documentation to explain why waiving approved mandatory requirements is the best course of action available to the Company.
 - Forward to Other Organizations, as appropriate, that need to participate in the review and evaluation process.
 - Request approval of the e-waiver request from the Proponent. If the Proponent does not want to approve without additional information, obtain the Proponent's review requirements.
 - Prepare responses to questions or requests for additional information from reviewing authorities.
 - Where justified, submit an appeal of rejected e-Waiver Requests to the Responsible Department Manager.
 - Upon receipt of an approved e-Waiver, if it has Conditions of Approval (COA) associated, an estimated date of compliance with or completion of these COA's will need to be returned to CSD's Waiver Processing Desk. A
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blank Conditions of Approval Close-Out Report will be attached to the Approved Waiver for providing this information to CSD's Waiver Processing Desk.

- Submit a report to the Standards Coordination (SC) on the compliance with and or the completion of all the technical Conditions of Approval. A copy of the appropriate Mechanical Completion Certificate (MCC) associated will be required to verify and document that all the COA have been met, when appropriate.
- Submit a report to the Standards Coordination (SC) on the compliance with and or the completion of all the financial "Conditions of Approval." Back-up documentation is to be attached to the report, to verify all the financial "Conditions of Approval" have been met, when appropriate.

4.2 Initiating Department Manager

- Conduct a detailed review of all aspects of "After-the-Fact" e-waiver requests, including what allowed their occurrence. Approve the submittal of those that are justified. This approval may not be delegated to a lower position.
- Respond to notification of more than 10% "After-the-Fact" e-waiver requests during two consecutive quarters. Take appropriate management steps to eliminate future "After-the-Fact" e-waiver requests.

4.3 Standards Coordination (SC)

- Track the progress of each e-Waiver Request, as it moves between organizations for concurrence and approval. Notify the appropriate manager when the elapsed time for e-waiver processing by his organization exceeds the established "norm".
 - Request the Initiator to supply missing or incomplete information needed to process and evaluate the e-waiver request. Return the e-waiver request to the Initiator after 3 days, if the missing information has not been submitted.
 - Request the concurrence of the Standards Committee Chairman or Responsible Department on all e-Waiver Requests where the "Analysis of Request" determines that a revision to the waived standard is required.
 - Maintain historical files on all e-waiver requests and all supporting documentation, evaluation results, and other applicable information.
 - Issue monthly, quarterly, and other periodic reports, as may be required by management, on the number of e-Waiver Requests, processing time, "After-the-Fact" e-Waiver Requests, etc.
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- Maintain and publish periodic status reports on:
 - Compliance with and close-out of individual "Conditions of Approval". Copies of this status report/log are to be sent to all departments concerned with the specific e-waiver.
 - Approval of standards identified on e-Waiver Request that are required to be revised.
 - Average e-WR processing time for each Department.

4.4 Inspection Department and Other Organizations

The managers of these organizations, after appropriate review, shall concur with the approval or recommend rejection.

4.5 Proponent Department Manager

- Review and recommend approval or rejection of e-Waiver Requests that affect his facility. For rejected requests, attach an explanation and return to the Originator.
- To defer making a recommendation until the "Analysis of Request" is completed, attach an explanation of specific factors or concerns that are to be included in that analysis.
- Forward to Other Organizations, as appropriate, that need to participate in the review and evaluation process.

4.6 Responsible Department Manager

- Ensure that all e-Waiver Requests are processed in accordance with this procedure.
 - Using historical data and other information, establish e-WR processing time "norms" for each phase, and use the norms to trigger management follow-up when they are exceeded.
 - Forward to Other Organizations, as appropriate, that need to participate in the review and evaluation process.
 - Review and recommend approval or rejection of all e-Waiver Requests. For rejected requests, attach an explanation and return to the Originator.
 - Evaluate the merits of all appeals to rejected e-Waiver Requests. Confer with the Proponent to resolve the issue. In the end, to approve the e-Waiver Request, both the Proponent Manager and Responsible Department Manager must agree.
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5 Definitions

After-the-Fact: If deviation from the mandatory requirement has already taken place, the approval of an e-Waiver Request shall be elevated to the Originator's Department Manager. Approval of "After-the-fact" e-WR can not be delegated to a lower position.

Originator: The representative of the organization responsible for preparing and issuing the e-Waiver Request. The Originating organization may be a Project Management Team, Operations, Maintenance or any other organization with a vested interest in the waiving of a MSAER.

Proponent Department Manager: The Operations Department Manager of the facility which is the subject of the e-Waiver Request.

Responsible Department: The Department assigned responsibility to establish, update, and maintain specific MSAER documents when there is no associated Standards Committee. See [SAEP-301](#) for additional information.

Responsible Department Manager: The Department Manager assigned specific MSAER e-waiver approval authority by the Chief Engineer.

Other Organization: Any other organization with a special interest or expertise in the subject dealt with by the e-Waiver Request.

Standards Coordination (SC): The group who is responsible for the receipt, record keeping, and tracking of all e-Waiver Requests, regardless of the Responsible Department.

Revision Summary

30 June 2002	Revised the "Next Planned Update". Reaffirmed the contents of the document, and reissued with editorial changes.
26 February 2003	Minor revisions.
31 January 2005	Editorial revision to convert the waiver process from paper-based to SAP e-Waiver workflow.
12 October 2005	Editorial revision to add the definition of "After-the-Fact" in Section 5.