

Industry Concerns

- Ability of plant employees to comprehend (PMO) testing requirements
 - Currently no guidance from DATCP
- Access to PLC logic programming 24/7
 - Staffing concerns
 - Comprehension of logic and wiring schematics
- DATCP personnel reviewing logic and wiring at time of reseal
 - Will changes be required for systems that have been in place for many years based upon review?

Recommendations

PLC Logic and Wiring Diagram

- Many facilities do not have access to review logic program or even access the logic program
- Wiring diagrams are often archaic and few are reviewed by DATCP.
- Alternative to this requirement
 - Written acknowledgment
 - Many tests prove logic is still accurate

Industry Temporary Seal Program

- PMO 16p(D): On an emergency basis, pasteurization equipment may be tested and temporarily sealed by a milk plant employee provided:
 - (b) The individual has satisfactorily completed training, acceptable to the Regulatory Agency, on tests and controls for pasteurization equipment.
