

**From:** [REDACTED]  
**Sent:** Wednesday, 9 April 2014 12:26 PM  
**To:** [REDACTED],  
**Cc:** [REDACTED]  
**Subject:** RE: Response to Improvement Notice 532 CWLH Okha [DLM=For-Official-Use-Only]

### For Official Use Only

[REDACTED]  
The referenced documents in your response are not provided as evidence of closeout. I will need these to make a decision on acceptability.

Therefore please can you provide these for review.

Your response to a) appears to meet the requirements (subject to the referenced documents).  
B) appears to partially meet the requirements in that Part B actions appears to address Steady state excitations and flare blowdown transient events. (subject to the referenced documents).

It is unclear how you have risk assessed transient events such as fast acting valves adequately (apart from the blowdown system which you have stated had an acoustic study conducted on it).

You stated that transient events have been included in an FPSO piping stress specification.

My concerns regarding this document meeting the requirements of action b) are:

- There are no further details of this piping stress specification document and the date it was completed.
- A stress specification is not a transient event risk assessment study.
- Given that you had a failure from vibration induced fatigue, it could be assumed that any piping stress specifications have not considered vibration induced fatigue as a failure mechanism.

Further you mention visual inspections during transient events during start-up and shutdown as part of the assessment. While visual inspection may lead to issue identification they are not reliable and open to subjective opinion and therefore not a robust control.

Has a risk assessment study in accordance with the energy institute guidance (or similar) been conducted for transient events on the hydrocarbon process pipework?

Please can you Liaise with myself directly and Cc [REDACTED] on any correspondence regarding this

Thanks and Regards  
[REDACTED]

[REDACTED]  
OHS Regulatory Specialist

**NOPSEMA**

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**From:** [REDACTED]@woodside.com.au]  
**Sent:** Wednesday, 9 April 2014 8:45 AM  
**To:** Chris Bourne; [REDACTED]  
**Subject:** Response to Improvement Notice 532 CWLH Okha

Chris,

Please see attached the response to the above notice. Please could you indicate your acceptance to close out or otherwise.

Cheers,

[REDACTED]

Woodside Energy Ltd.

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