HSRs and NOPSEMA Inspections

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Regulatory activities

Assessment
- Challenge operators: “Have you done enough?”

Inspection
- Challenge operators: “Are you doing what you said you would do?”

Investigation
- Challenge operators: “What wasn’t done? What can we learn?”

Enforcement
- Take action: Within powers to secure compliance.
Inspections
• Risk Based
• Initial inspection on arrival into Australia
• Normally-manned facilities (eg. FPSOs, platforms, MODUs) – twice per year
• Normally unattended facilities, diving operations, multi-purpose vessels – once per year
• Pipelines – depending on proximity to persons – once per 2 or 4 years
Inspection Purpose

• Confirm controls and systems described in safety case or DSMS are in place
• Obtain evidence that controls are functional
• Obtain evidence that controls are maintained
• Seek evidence that workforce are competent
• Verify previous actions have been completed
• Seek evidence of continuous improvement
• Communication with Health and Safety Reps and the workforce
• Read previous NOPSEMA inspection report
• Find out scope of upcoming inspection
• Let workforce know about upcoming inspection
• Be available for entry- & exit-meetings with FMT and inspectors
• Be prepared for separate HSR meeting with inspectors – any questions for NOPSEMA?
• Bring copies of facility safety meeting minutes to meeting with NOPSEMA
Health & Safety Reps

- List of all HSRs – up to date and available to HSRs & NOPSEMA for inspection - Clause 27, Schedule 3 of the OPGGS Act
- NOPSEMA accredited training – Clause 30
- Good coverage of the work groups on the facility, including third party / contractor employees
- Functional system – minutes, action-tracking
- Relationship with management
Workplace Involvement
• Regulations require that operators must demonstrate consultation with and participation of workforce in safety case development and revision, AND provide adequately for:
  • Consultation with, and participation of workforce so that they may arrive at informed opinions about risks and hazards at the facility
  • Annual Operating Plan 2014/15 – Scope Topic
  • 13 facilities from 9 operators inspected
Positive Observations

- Safety case commitments generally met
- Onshore management communications with offshore workforce
- Workforce involvement in:
  - HAZIDs, JSAs
  - Audits (eg. permits)
  - Exercise-planning and debriefs
  - Incident investigations
Opportunities for Improvement

• Awareness of MAEs and bowties among workforce
• Knowledge of Management of Change processes could be better
• Actions arising from safety meetings not always tracked / not visible to the workforce

These are all opportunities for HSRs
• Inspectors noted the poor external condition of a MODU’s 20” diverter overboard lines and recommended further investigation. Operator undertook NDT & found holes in the lines which were then rectified.
• Temporary scaffold was used in the turret of an FPSO for the workforce to perform disconnection activities. As a result of an inspection recommendation, the operator implemented designed permanent platforms.
During a diving inspection on a production platform, the inspectors identified that safety drills critical to emergency diver recovery had not been conducted. The operator suspended operations to conduct the drills. The drills identified areas that required further education of the workforce.
While inspecting a complex lifting operation it was apparent that the lift was not going according to plan. The inspectors requested that the lift be halted and the work group meet to reassess the lift. It was then identified that the object being lifted included additional items that were not identified in the lift plan.
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Questions?