NOPSEMA – Topic-based inspections at offshore facilities

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• Why topic-based inspections?
• To identify and examine common issues in safety management across Australian offshore industry
  - In conjunction with ongoing NOPSEMA inspection program
  - Focuses development of compliance program
  - Provides lessons to share with industry.
Regulatory functions

- Monitor and Enforce
- Investigate
- Complaince

- Promote
- Advise
- Improvement

- Co-operate
- Report
- Governance
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
• OHS inspector’s powers come from the Act

• Control measures related to Major Accident Events and OHS controls

• Inspections carried out in an informed, risk-based and consistent manner
  – Is the reality consistent with Safety case?
  – Are robust systems in place to control risks?
HSRs and inspections
Inspections and HSRs

- Attend entry and exit meetings
- Dedicated meeting between HSRs and NOPSEMA inspectors
- Facility walk-around
- Operator obligated to provide a copy of final NOPSEMA inspection report to HSRs
• Normally attended production facilities and MODUs – twice a year

• Multi-purpose vessels and Not normally attended facilities – opportunistic inspections

• Pipelines – every 2 or 4 years
• Inspectors consider more than 80 scope items when planning an inspection

• A number of scope items for each inspection
  – Investigation and enforcement follow-up
  – Major accident event focus (e.g. loss of containment)
  – OHS focus (e.g. noise or Confined Space Entry)
  – Topics defined in NOPSEMA Annual operating plan.
Annual operating plan

• Inspection topics decided
• Representative sample of facilities
• Prompt sheet developed by NOPSEMA subject specialists
  – consistency and comparability
• Results analysed by NOPSEMA subject specialists
• Lessons shared with industry through the Annual Offshore Performance Report and Safety Alerts
Annual offshore performance report
Regulatory information about the Australian offshore petroleum industry

to 31 December 2012
Topic-based inspections

• **2011–12**
  – Ageing facilities
  – Contractor management
  – Maintenance management
  – Operator audits

• **2012–13**
  – Control of ignition sources – Hazardous Area Equipment
  – Emergency power generation
  – Maintenance management
  – Helicopter operations
Why these topics?

- **Ageing facilities** - represent an OHS concern if operators do not commit to systematic maintenance and repair
- **Control of ignition sources** – following a loss of containment, ignition sources escalate the scenario to the next level
- **Helicopter operations** – identified as an MAE in almost every safety case
• **Ageing Facilities**

  - **Asset Integrity Management** – inadequate organisational roles, responsibilities and processes
  - **Fabric maintenance and maintenance inspection scope** - delays and backlogs not risk-assessed, maintenance impacts of new materials not analysed (e.g. GRE gratings)
  - **Failure to apply knowledge** – failure to incorporate analysis results into revised work plans, integrity of ‘passive fire protection’ not reviewed, no ‘corrosion under insulation’ inspection program
Key observations

• Maintenance Management

  - Maintenance planning – failure to assess risks of delaying work on “safety critical” equipment, deficiencies in categorising equipment as “safety critical”, incomplete population of CMMS

  - Competency assurance – failure to check vendor competency before going offshore, some maintenance supervisors desk-bound and not supervising the worksite

  - Maintenance processes – differences between documented maintenance management system and observed practices (e.g. inadequate job histories, separate registers for SCE outside the CMMS)
Key observations

• **Helicopter Operations**
  - Lack of helicopter refuelling procedures and training uncertainty over helideck drainage system
  - Poorly maintained AFFF systems – checking foam levels and regular testing
  - Lack of helicopter operations policy - should address responsibilities, selection criteria of helicopter providers, emergency management, auditing and performance standards
• Control of Ignition Sources – Hazardous Area Equipment

• Well control equipment

• Operator audits

• Performance standards
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Thank you