

OHS IMPROVEMENT NOTICE

To: MODEC Venture 11 B.V.

In conducting an OHS inspection in relation to the MODEC Venture 11 Facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

clause 9(2)(d) of Schedule 3 to the Act;

“to take all reasonably practicable steps to implement and maintain systems of work at the facility that are safe and without risk to health;”

at:

MODEC Venture 11 Facility

The reasons for my opinion are:

The MODEC Venture 11 Facility (MV-11) utilises a “Protection Device and Car Seal” program. This is a valve management program that contains: a list of safety critical valves, their SAFE positions (could be either open or closed), a description of their location, and specifies a seal that will prevent the valve from being inadvertently deviated from its SAFE position.

On inspection at the production facility, the 3 monthly planned maintenance routines and car seal register were viewed; these did not align with the car seals installed on the facility. Car-seals were either not installed or non-operational on valves isolating PZT transmitters, level transmitters and critical functions. These valves were not positively locked in the required position as per the car seal register. A similar finding relating to inadequately controlled critical valve management was raised as a recommendation in a previous inspection at the facility.

Personnel had signed off the planned maintenance routine stating that the valves had car seals in place. Level and pressure transmitters are hardwired into the ESD System, a lack of adequate control of isolation valves on this system could lead to loss of containment (MAE -01).

The MV-11 Safety case describes the following Major accident event:

“MAE-01 a release of process hydrocarbons from the risers in the moonpool or the topsides oil processing equipment could result in an oil spill and/or gas cloud. A pool fire or flash fire/explosion, followed by a jet fire, could result if the release is ignited. There is the potential for multiple fatalities and escalation to other hydrocarbon inventories”.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

Inadequate control of safety critical instrumentation and valves could lead to a loss of containment and MAE.

You are required to take action within **60** days of the date of this notice to prevent or reduce the risk.

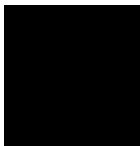
The following action must be taken by the responsible person within the period specified above:

Complete a management review of the safety critical protection device, car seal and isolation systems and procedures on the MODEC Venture 11 Facility and address any actions identified from this review to ensure that the systems of work on the facility are safe and without risk to health.

The review should include the following items:

- 1. Ensure that all personnel on the facility are trained and work in accordance with the safety critical protection device, car seal and isolation systems and procedures described in the facility safety management system; and**
- 2. Provide adequate supervision and monitoring of the planned maintenance routines for the safety critical protection device, car seal and isolation systems, and ensure they are co-ordinated, controlled and recorded; and**
- 3. Schedule regular audits of the facility safety critical protection device, car seal and isolation system procedures utilizing the MODEC audit systems ; or**

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.



Signed: 

NOPSEMA Inspector

Dated: 9/02/2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name: 

Position: NOPSEMA Inspector

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **0632** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.