

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006, Schedule 3 clauses 78, 78A and 78B

Notice No: 1864

Date: 18/02/2022

To: Technip Oceania Pty Ltd

In conducting an OHS inspection in relation to the Skandi Africa facility, I [REDACTED], a NOPSEMA inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act), am satisfied on reasonable grounds that Technip Oceania Pty Ltd has contravened a provision of a listed OHS law and is likely to contravene that provision again

AND

As a result, there is, or may be, a risk to the health or safety of a person at Skandi Africa.

The provision of a listed OHS law that I am satisfied has been contravened and is likely to be contravened again is Clause 9(2)(e) of Schedule 3 to the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*.

The reasons for my opinion are:

During an inspection of the Skandi Africa facility on 18-21 January 2022, it was identified that the facility gas detection system was only partially functional and maintained. This was due to the lack of a planned maintenance system for the gas detection system. The operator also lacked a system for the verification or assurance of competency of the personnel involved in maintaining and operating the gas detection system. These conclusions are based on the following observations:

- The gas detection system is not included in the facility planned maintenance system.
- Recommended weekly testing of the detectors had varied between weekly and daily without any documented reason for, or assessment of, the change. Weekly testing had also stopped because the test gas had run out and further test gas had not been re-supplied.
- Some gas detector units had been changed from battery powered to hardwired into the facility power supply without following the management of change process outlined in the facility safety case.
- There was no system in place to ensure that diagram used to determine the location of an alarm was updated with the correct serial numbers when the battery powered gas detection units are swapped for spare units to allow charging. The inability to correctly identify the location of a gas detection alarm in an emergency is likely to undermine the functionality of the emergency response.
- Personnel were not able to differentiate between high and low alarms. They reported not having received training in how the gas detection system operated. Competency assessments were based on "self-assessment" questions only and did not involve verification by an assessor or supervisor.

During the same inspection it was identified that the facility hydrocarbon release emergency response plan was also only partially functional. The operator also lacked a system for the verification or assurance of competency of the personnel responsible for carrying out the necessary actions in the hydrocarbon release emergency response plan. These conclusions are based on the following observations:

- The hydrocarbon release emergency response plan was only partially functional because the gas detector locations were not correctly identified, and personnel could not differentiate between high and low gas detection alarms. The plan is predicated on personnel identifying different levels and locations of alarms in order to provide a tiered, escalating response.
- The operator had not established a performance standard for the hydrocarbon release emergency response plan as described in the safety case.
- The hydrocarbon release emergency response drills do not provide for the assessment of competency or correct performance of the necessary tasks identified in the plan. The frequency of drills was varied from monthly to fortnightly but there was no evidence of a system for determining “*if more than 25% of the required emergency response personnel have not participated in the relevant drills*” and, if so, ensuring that a drill “*shall also take place within 24 hours*”, as described in Section 4.12.2.1 of the facility safety case.

For these reasons, I am satisfied that the operator failed to take all reasonably practicable steps to implement and maintain appropriate procedures and equipment for the control of, and response to emergencies at the facility. I also believe that the contravention is likely to occur again due to the lack of implementation of various assurance measures including:

- Lack of planned maintenance system for the gas detection system as evidenced by the persistent errors in unit identification and unresolved detector faults.
- Lack of a robust auditing process for the gas detection system as the current audit arrangements failed to identify any of the issues noted above.
- Lack of any auditing arrangements to verify the effectiveness or implementation of the hydrocarbon release emergency response plan.
- Lack of a system for ensuring emergency response personnel complete the necessary hydrocarbon release emergency response drills and that they can correctly perform the required tasks.

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:

Without the benefit of a fully functional gas detection system and hydrocarbon release emergency response plan, the risk of multiple fatalities resulting from fire and explosion following a loss of hydrocarbon containment from adjacent subsea or topside facilities.

I am satisfied on reasonable grounds that the following actions must be taken by the operator to reduce or prevent the risk:

1. Carry out a comprehensive investigation into the failure to identify the non-compliance with the facility safety case descriptions of the gas detection system and hydrocarbon emergency response plan as control measures for major accident events.
2. Based on the findings of the investigation from 1 above, develop a detailed schedule and commitment to timely implementation of all necessary corrective actions.
3. Implement a system for hydrocarbon emergency drills and reporting that uses the hydrocarbon release emergency response plan as the criteria for successful performance of the drill and includes assessment of the correct performance of role specific tasks.

4. Implement a comprehensive, integrated, documented, and planned maintenance management system for the gas detection system.
5. Establish and implement a plan for the auditing of the gas detection system and the hydrocarbon release emergency response plan to routinely monitor their implementation and effectiveness.

You are required to take action to reduce or prevent the risk within 30 days from the date of this notice.

██████████
NOPSEMA INSPECTOR
██████████

18 February 2022

When the required action(s) has been completed, the Responsible Person is to submit this part of the notice to the following person via:

Post: Level 8, 58 Mounts Bay Road
Perth WA 6000

Email: submissions@nopsema.gov.au

Name: [REDACTED]
Position: **NOPSEMA INSPECTOR**
Contact number: [REDACTED]

By signing below, I confirm on behalf of Technip Oceania Pty Ltd that the specified action described in Improvement Notice No. 1864 has been undertaken within the period specified.

Signed: _____ Date: _____

(to be signed by responsible person only when the notice has been complied with)

Notes

1. Under clause 78A of Schedule 3 to the Act, a responsible person who fails to ensure that this notice is complied with, to the extent that it relates to any matter over which the responsible person has control:
 - a. commits an offence and may be liable to a penalty of 300 penalty units for the offence; or
 - b. contravenes a civil penalty provision and may be liable to a civil penalty of 400 penalty units.
2. For every day proceeding the initial offence or contravention the notice is not complied with, the responsible person commits an offence or contravention in respect of each day (including a day of a conviction under this clause or any later day) during which the offence or contravention continues.
3. A copy of this notice must displayed in a prominent place at or near each workplace which work affected by the notice is being performed. It is an offence to tamper with or remove it until the notice has ceased to have effect.
4. The recipient of this notice must ensure that all relevant requirements for giving copies of the notice to certain persons and representatives are complied with in accordance with cl 78b to Schedule 3 to the Act.
5. Under clause 80A of Schedule 3 to the Act, any of the following persons may request the reviewing authority in writing to review the NOPSEMA inspector's decision:
 - the operator of the facility;
 - the titleholder, if the notice is issued to a titleholder;
 - any person to whom an improvement 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.