

From the CEO	1
Ageing facilities	2
Stand together for safety 2012 at NOPSEMA	3
Optimistic bias and risk-taking: it can't happen to me!	3
What does NOPSEMA look for to accept an environment plan?	4
HSR training update	5
New consultation regulations for environment plans	6
Environment plan guidance note project	6
Varanus Island report reinforces need for continuous improvement	7
Notifying and reporting of accidents and dangerous occurrences	8
New incident reporting form	8
Temporary refuge testing regimes	9
Progress on early engagement	10
Inherited environment plans	11
Response to the triennial review	11

"In a complex, high hazard industry such as offshore oil and gas, society expects a robust regulatory regime in which operators maintain safety to minimise the risk of a major accident event and regulators provide assurance that this is being done."

Offshore Petroleum Safety Regulation – Varanus Island Incident Investigation, K. Bills and D Agostini, June 2009

From the CEO

Our third issue of *the Regulator* for 2012 covers a period of much activity and continued publicity for Australia's offshore industry. This newsletter is just one of many avenues through which we, as the national regulator, engage with stakeholders. Many of our subscribers - dutyholders, operators, members of the workforce, health and safety representatives, industry associations, community groups, non-government organisations, regulatory counterparts, the government and the media - have separate interaction with NOPSEMA, either collectively or individually.

Within this dynamic and varied dialogue, NOPSEMA endeavours to maintain integrity in its expanded regulatory functions in order to deliver the Government's reform agenda. Crucial to meeting NOPSEMA's objectives is ensuring rigour in our approach; as an independent regulator, NOPSEMA must respect due process as it implements transparent, coherent policies and processes. Our processes have been shared with industry, are consistent with requirements of the law, administered by a critical mass of skilled professionals, and are focused on ensuring NOPSEMA and duty holders comply with legal obligations. Our team works to deliver timely and competent decisions in strict adherence to the legislation.

Consultation is a key way for NOPSEMA to share with industry and the community the principles of an objective-based regime, negotiate any challenges and drive continuous improvement in reducing the risk to lives and the environment. Independence does not preclude dialogue and effective regulation depends on consultation. We look forward to building on this important foundation.

The release of the third report on offshore industry performance coincided with the annual APPEA conference and exhibition in Adelaide last month, where some of the NOPSEMA team joined me in sharing ideas, expertise and experiences with industry members. I am pleased to see so many delegates also obtained copies of the latest *Offshore Health and Safety Performance Report*, containing trends and valuable safety lessons.

Also last month, we all were prompted to reflect on the obligations and responsibilities of developing and operating offshore petroleum projects, following the release of further findings into the June 2008 Varanus Island incident. This issue of *the Regulator* covers some of NOPSEMA's latest projects to develop and deliver clear, concise regulatory guidance on safety, structural integrity and environmental management. The projects complement our ongoing workshop series, briefings for government and non-government groups, regular operator liaison meetings and dedicated discussions to address queries or concerns.



Jane Cutler, CEO





Ageing facilities

Many of our subscribers would be aware that NOPSEMA recently released the *Offshore Health and Safety Performance Report* covering data and information collected by the Authority to 31 December 2011. Chapter 9 of the report covered “Ageing Facilities” as one of the key focus areas for topic-based inspections conducted during the 2010-11 financial year. This issue of *the Regulator* features the first of a series of articles on ageing facilities.

Introduction

Over the past two years, the Authority has conducted eight themed audits on offshore petroleum facilities on the topic of *Ageing facilities*. These audits have included manned, unmanned, fixed and floating facilities aged at least ten years and have covered five different facility operators.

When considering the management of ageing facilities, it is worth noting that the performance capabilities of a safety-critical item will generally change over time as a result of the occurrence or application of external factors. These factors could include:

- time-related degradation mechanisms, such as corrosion, erosion, vibration and fatigue
- changes to the system due to one-off damage, such as external impact or fluids in a flare system
- modifications to operating parameters, such as changes to operating pressures, temperatures or changes in fluid composition
- physical changes in configuration, such as addition or removal of modules or wells.

While conducting these themed audits, NOPSEMA focused on the operators’ systems and processes, to assess their effectiveness in capturing and addressing the above potential issues.

Some of the main findings from ageing facilities topic-based inspections will feature in this and upcoming editions of *The Regulator*, and focus on the following areas:

- application of knowledge (as discussed below)
- inspection and maintenance policy
- risk review
- involvement of senior management

Application of knowledge

One aspect of managing ageing facilities considered during these topic-based inspections was the application of improved knowledge, codes and standards and analytical techniques.

While it may not be reasonably practicable for operators of old facilities to meet fully all current codes and standards, it is expected that operators of facilities would keep abreast of emerging safety-related improvements and, where reasonably practicable, adopt new codes and standards. For example the ISO 19900 series of documents addresses a number of structural design issues in much greater detail and rigour than the previously and commonly used API standards.

Operators should continue to ensure they have reduced risks to a level that is as low as reasonably practicable (ALARP).

Visit the NOPSEMA website to access the latest *Offshore Health and Safety Performance Report*.



Health and Safety Executive 2006



Stand together for safety 2012 at NOPSEMA

In support of APPEA safety week, NOPSEMA organised a series of presentations and workshops to encourage staff to take some time to focus on safety issues closer to home.

NOPSEMA CEO, Jane Cutler, spoke to staff about the safety week theme, 'containing the risk', and how her experiences had influenced her safety priorities. The workshops drew on the expertise and interests of a number of staff members, covering topics like: human factors in risky behaviour (see the article below); cycling safety; and, process safety and NOPSEMA's role in driving improved industry performance.



Optimistic bias and risk-taking: it can't happen to me!

Have you ever done something 'stupid', and later wondered "What's wrong with me?" We have all experienced those moments when common sense appears to fly out the window and foolishness ensues. Cognitive biases explain many of these 'stupid' occurrences. Cognitive biases represent heuristics – simple judgement short-cuts that work well enough most of the time. However, these biases can also lead to flawed decision-making during risk assessment.

Optimistic bias is one example of a cognitive bias that can adversely affect our decision-making. This is the tendency to overestimate how good we are at things (i.e. "I won't get hurt because I'm an expert") and underestimate our susceptibility to harm, relative to other people (i.e. "It will happen to someone else, not to me").

Optimistic bias becomes problematic when our decisions will have an impact on safety. A good example of the risks of this type of bias might be a scaffolder who refuses to wear a harness, claiming "People hardly ever fall", or "I won't fall because I'm an expert". If we consider a standard risk assessment matrix, optimistic bias may lead us to underestimate our likelihood and consequence ratings, and also to overestimate our ability to prevent or control the incident, thus downgrading our residual risk score. This combination can result in insufficient controls and, potentially, to a near miss or major accident event.

By understanding how optimistic bias works, we can implement strategies to minimise its impact on our

safety. An independent review process can reduce the likelihood that someone will experience optimistic bias and also provide an opportunity to challenge assumptions, such as the likelihood of failure and susceptibility to harm. At all times, we should seek to verify our information sources rather than trusting our memories or experiences, and of course err on the side of caution.

Risk assessment matrix

Severity Likelihood	Higher		Lower	
	More	Less	More	Less
More	Acceptable with Mitigation	Acceptable	Acceptable	Unacceptable
Less	Acceptable	Acceptable	Acceptable	Acceptable



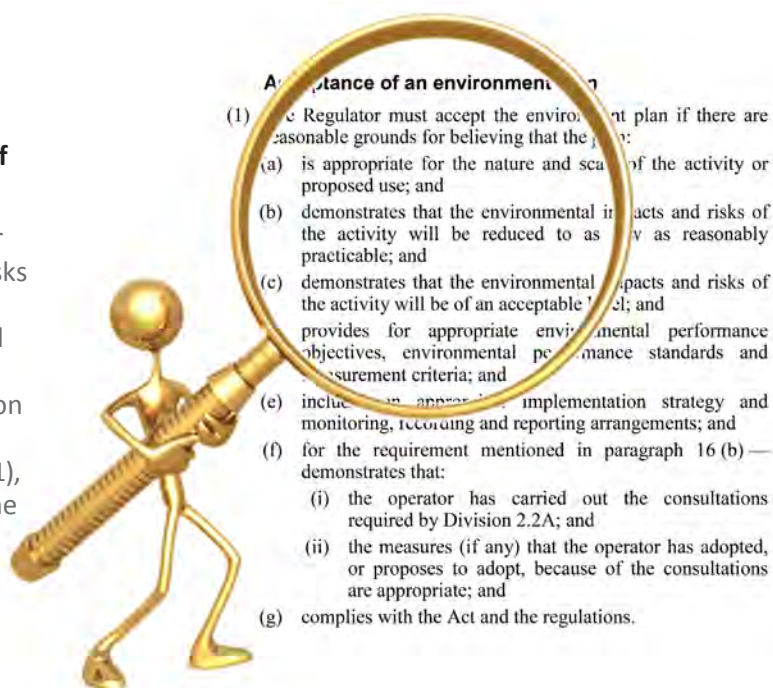
What does NOPSEMA look for to accept an environment plan?

One of NOPSEMA's primary environmental regulatory roles is to assess if an Environment Plan is acceptable under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009. NOPSEMA undertakes this assessment as an independent Commonwealth statutory agency and independently of the operator of the proposed activity.

Objective-based regulations recognise that an operator is best placed to identify and assess the impacts and risks of their activity and to control those risks and impacts in an acceptable manner. Consequently operators need sufficient detail and justification in their environment plan as NOPSEMA needs to base an assessment solely on information contained within the plan. In assessing an environment plan against the criteria in Regulation 11(1), NOPSEMA must have 'reasonable grounds' to accept the plan.

In providing reasonable grounds, operators should consider the following:

- are statements used by the operator to demonstrate that the criteria of Regulation 11(1) have been met adequately justified?
- does the justification of statements include sufficient supporting evidence or references such that NOPSEMA can reasonably determine their accuracy and veracity?
- are the environmental performance objectives, performance standards and measurement criteria clearly linked and related to the identified environmental risks and impacts and their related control measures?
- are the environmental performance objectives, performance standards and measurement criteria appropriate (e.g. S.M.A.R.T. - specific, measurable, achievable, relevant, time based)?



- is it clearly demonstrated how control measures and the environmental performance objectives, performance standards and measurement criteria will be implemented, monitored and reported?

As an oil spill contingency plan (OSCP) is part of an environment plan, the activities under an OSCP in conjunction with the activities under the plan need to meet the same requirements. For example the criteria outlined in Regulation 11(1) are equally applicable to the response strategies within the OSCP.

Details on [environment plan assessment policy](#) can be found on the NOPSEMA website.



HSR training update

Health and Safety Representatives play a valuable role in building safety awareness and helping to reduce the risks to workers offshore. Under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGSA), elected HSRs must undertake training to ensure they can fulfil their responsibilities confidently and effectively.

Clause 30 of Schedule 3 of the OPGGSA requires that a “health and safety representative for a designated work group must undertake a course of training relating to occupational health and safety that is accredited by NOPSEMA for the purposes of this clause”. Some training organisations provide generic HSR courses, but these may not be tailored for the offshore operating environment.

NOPSEMA conducts regular audits of accredited training courses across Australia and the contact details of accredited service providers are posted on the NOPSEMA website. Those not listed are not accredited by NOPSEMA and, therefore, do not meet the requirements of Clause 30 of Schedule 3 to the Act.

The criteria for accreditation are:

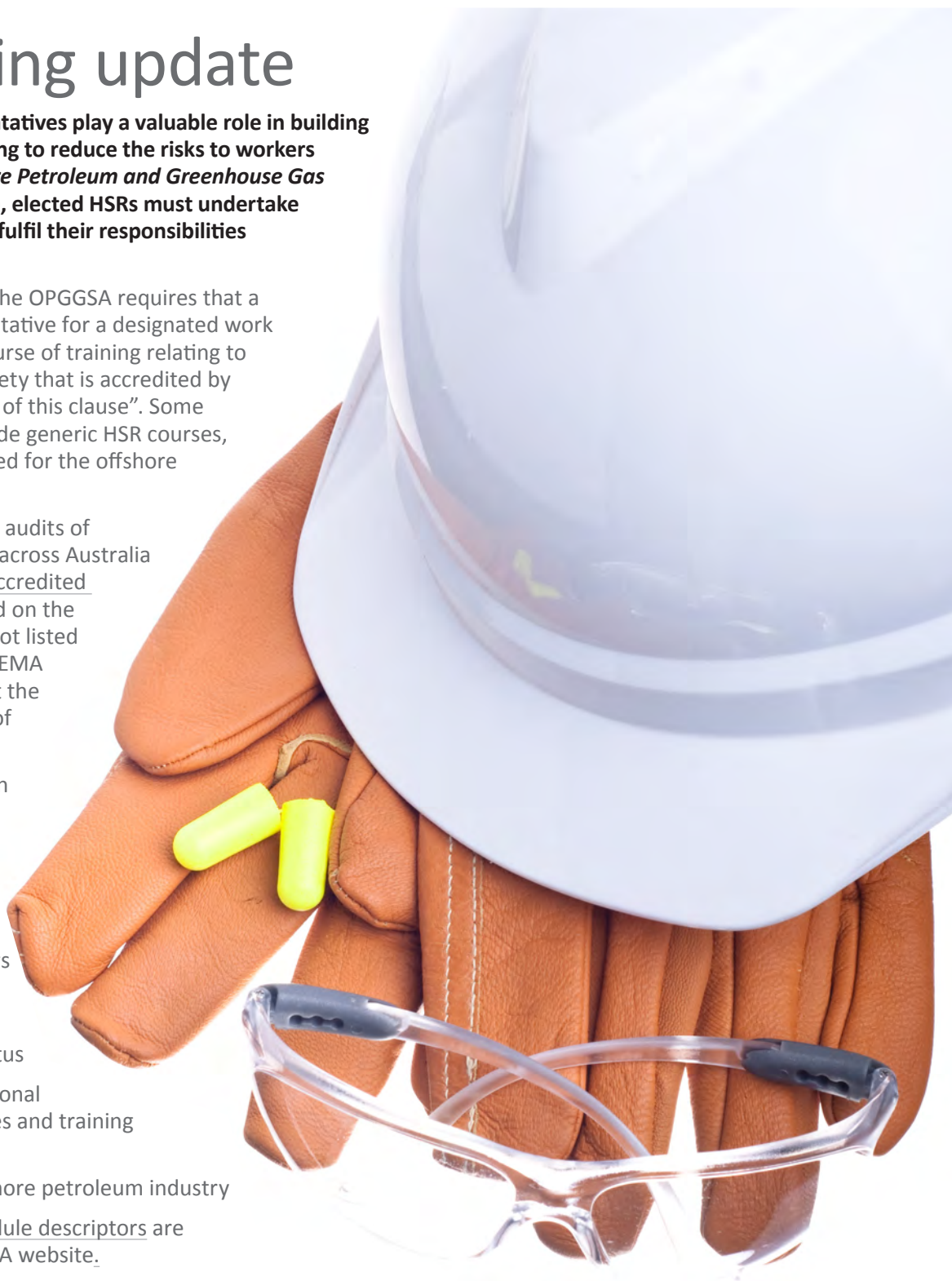
- training material conforms to the NOPSEMA endorsed training course outline and module descriptors
- confirmation of registered training organisation (RTO) status
- experience in occupational health and safety issues and training HSRs
- knowledge of the offshore petroleum industry

The course outline and module descriptors are available from the NOPSEMA website.

To maximise the benefits of the HSR role, NOPSEMA encourages HSRs and their employers to keep knowledge and skills up to date. This could include refresher training.

NOPSEMA has published a new edition of the HSR handbook, reflecting changes to the legislation since 2010. The handbook provides a ready reference to the powers and responsibilities given to HSRs under the legislation. It is also a useful learning aid during training. The HSR handbook is available on the NOPSEMA website and is also available in hardcopy by request (communications@nopsema.gov.au).

NOPSEMA will participate in the 2012 APPEA HSR Forum, to be held on 10 September in Perth. More details about the event can be found at: www.appeahsrforum.com.au.





Environment plan guidance note project

NOPSEMA has initiated the environment plan guidance note project. The aim of the project is to create a series of guidance notes outlining what is acceptable in meeting the intent of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 for an environment plan.

NOPSEMA's approach to the environment plan guidance notes is aligned with the successful approach used by NOPSEMA for the safety case guidance note project. NOPSEMA has identified several guidance note themes to allow for the development of small documents with user friendly formats that are concise and easy to navigate.

The guidance will be developed in keeping with an objective-based regulatory regime and will, therefore, not be prescriptive. The notes will not present the definitive approach and should only be seen as an approach that, if followed, may be acceptable. The guidance will not be mandatory and will not preclude any other reasonable interpretations of the regulatory requirements. NOPSEMA encourages industry to refer directly to regulations to discharge their environmental obligations.

NOPSEMA will invite feedback from operators and stakeholders on the draft environmental guidance notes as they are progressively released. Readers are encouraged to check NOPSEMA's website in the '[environmental management](#)' section for draft guidance notes released for comment.



Image courtesy of ExxonMobil

New consultation regulations for environment plans

As mentioned in Issue 1 2012 of *the Regulator*, as of 1 April 2012, the consultation requirements of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 have changed. This change reflects increasing community awareness and expectations for offshore petroleum operators to maintain their 'social licence' to conduct activities.

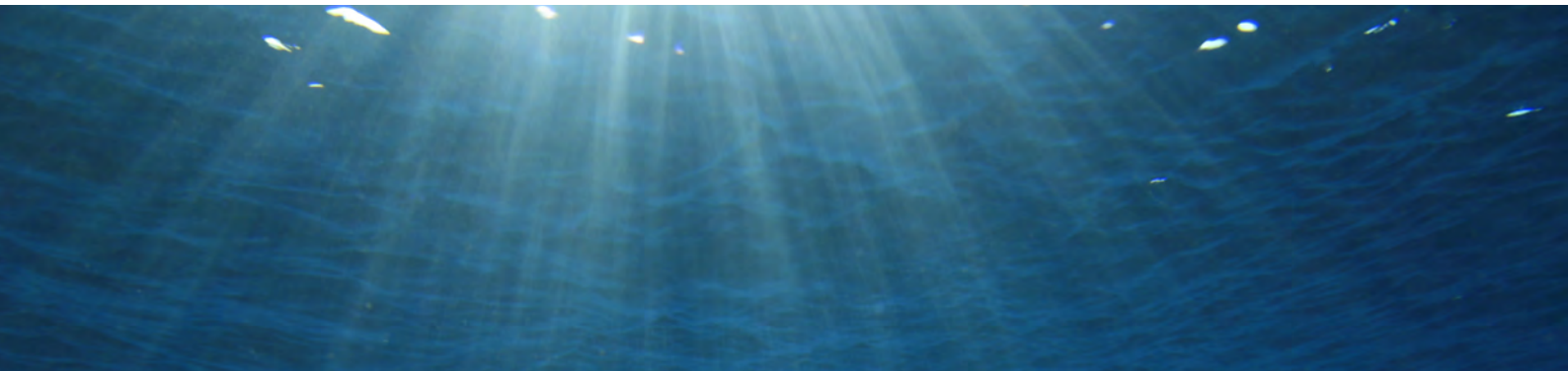
The requirements have been implemented via the introduction of new provisions into Regulations 11A and 16(b), available on the NOPSEMA website.

Regulation 11A now includes requirements to consult with Commonwealth and State/Northern Territory departments to which the activity may be relevant, and with people or organisations whose functions, interests or activities may be affected by the activity. Regulation 11A also requires that the operator provides sufficient information and a reasonable period to carry out this consultation.

Regulation 16(b) requires the operator to include within the environment plan:

- a summary of each response made by a relevant person
- an assessment of the merits of any objection or claim about the adverse impact of each activity to which the environment plan relates
- a statement of the operator's response, or proposed response, if any, to each objection or claim
- a copy of the full text of any response by a relevant person.

The consultation component of an environment plan can only be accepted by NOPSEMA if it meets the acceptability criteria of Regulation 11(1)(f), which now includes a demonstration that the operator has carried out all the required consultations, and that any measures adopted because of the consultations, are appropriate.



Varanus Island report reinforces need for continuous improvement

NOPSEMA CEO, Jane Cutler, has encouraged industry to use findings in relation to the Varanus Island incident in June 2008 to drive continuous improvement in their safety procedures. Ms Cutler said the *Offshore Petroleum Safety Regulation Varanus Island Incident Investigation* report provided a further reminder of the risks involved in petroleum operations and the need for vigilance.

“The fortunate fact that no lives were lost in the Varanus Island incident does not detract from the ongoing imperative for operators to ensure they have robust monitoring and audit systems necessary to protect lives and the environment,” Ms Cutler said.

In considering the report, Ms Cutler noted the findings relating to the pipeline operator, Apache Energy Ltd., reflect those delivered by inspectors from the National Offshore Petroleum Safety Authority (NOPSA) in October 2008. The 2008 NOPSA report submitted to the WA Department of Industry and Resources concluded that there was:

- ineffective anti-corrosion coatings and ineffective cathodic protection auditing by Apache Energy Ltd., particularly in high-risk corrosion environments affecting sections of the pipeline; and,
- ineffective inspection and monitoring by Apache Energy Ltd. of sections of the affected gas pipeline.

“The report provides another valuable tool in terms of lessons learnt and the obligations of operators to ensure they have appropriate monitoring and inspection regimes in place for their petroleum activities and facilities, including pipelines,” Ms Cutler said.

Noting recommendations in the report regarding regulatory arrangements at the time, Ms Cutler said investigations into offshore incidents, such as the Varanus Island pipeline rupture and Montara well blowout in the Timor Sea in August 2009, had prompted important changes to Australia’s offshore regulatory regime.

“The combination of safety, well integrity and environmental management responsibilities into a single

regulator, NOPSEMA, has provided for strengthened, informed and independent regulation of Australia’s offshore petroleum industry. NOPSEMA’s role and regulatory functions aim to provide certainty through consistent application of legislative requirements within a framework that matches internationally recognised best regulatory practice.”

“Our role as the national regulator is to independently challenge operators’ proposals and then monitor and secure compliance against their commitments.”

The reports can be obtained from the [Department of Mines and Petroleum website](#).



Ruptured 16 sales gas line: Photo from published NOPSA investigation report, October 2008



Image courtesy of the LA Times

Notifying and reporting of accidents and dangerous occurrences

Operators are reminded of their duty under Clause 82 of Schedule 3 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* to notify NOPSEMA of accidents and dangerous occurrences in accordance with the regulations. As per the regulations, the notification must be provided as soon as practicable after the first occurrence of the accident or dangerous occurrence. NOPSEMA has a dedicated phone line for receiving notifications (08) 6461 7090.

Failing to notify NOPSEMA of an accident or dangerous occurrence can be a criminal offence of strict liability with an associated penalty of 250 penalty units which equates to AUD 27 500 for individuals and up to AUD 137 500 for bodies corporate (at the discretion of the court).

What does 'as soon as practicable' mean in reality?

From NOPSEMA's perspective, for example, if it is practicable for the operator's representative on a facility to contact their shore-based management by telephone to notify them of an accident or dangerous occurrence, it is also practicable to notify NOPSEMA at the same time.

Operators are further reminded that it is an offence to interfere with the site of an accident or dangerous occurrence before the completion of an inspection of the site by an OHS inspector (Regulation 2.49). This is another reason to contact NOPSEMA by telephone, as a request for permission to interfere with the site can be discussed and, if appropriate, authorised by the duty OHS inspector.

If in doubt, always notify NOPSEMA by calling (08) 6461 7090. Please also refer to the guidance available on NOPSEMA's website, [Notification and Reporting of Accidents and Dangerous Occurrences](#).

New incident reporting form

NOPSEMA is reducing the burden on operators by providing a single form for reporting both OHS and environmental incidents. The two existing separate incident report forms will be withdrawn.

In addition, the completion of the uncontrolled hydrocarbon release form is no longer required.

The new [combined incident reporting form](#) is now available on the NOPSEMA website in two convenient locations via the [Safety and Environmental Management pages](#).

The use of this form is entirely voluntary and is provided to assist operators to comply with their notification and reporting obligations.



Accommodation HVAC air intake damper with gas detection

Temporary Refuge testing regimes

Over the past three years, NOPSEMA issued operators of 16 facilities with 28 recommendations and two improvement notices, relating to facility temporary refuge – heating, ventilation and air conditioning (TR-HVAC) arrangements and the implementation and maintenance of testing regimes for fire dampers and pressurisation requirements. These recommendations and associated enforcement action was aimed at encouraging operators to achieve compliance with their duty of care requirements under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGSA).

Learning from history

The public inquiry into the Piper Alpha disaster (July 1988) established that 109 of the 167 fatalities (including 79 cases recovered from the accommodation) were due to inhalation of smoke and fire. Recommendation 56 of the Cullen Inquiry called for regulations promoting fire protection against breach of accommodation, including by smoke and other contaminants, and measures to maintain breathable air within it.

Appropriate inspection, maintenance and testing regimes are necessary to ensure that the temporary refuge remains fit-for-purpose in an emergency.

Some examples of good maintenance practice observed during NOPSEMA inspections include:

- systems for routine inspections of potential TR air leakage paths (e.g. door seals, penetrations and HVAC fire dampers)
- periodic pressure decay testing
- pressurisation tests to determine the TR air leakage rate for comparison to the base line
- full loop testing routines for critical TR-HVAC dampers using gas/smoke detectors as the initiating event

The UK Health and Safety Executive observed insufficient

testing and maintenance of TR-HVAC systems and has produced an information sheet titled “Testing regime for offshore TR-HVAC fire dampers & TR pressurisation requirements” – [HSE Offshore Information sheet No. 1/2006](#). This provides guidance on good practice for operators in testing HVAC fire dampers, guidance on the basis for TR pressurisation and testing requirements to achieve a positive internal pressure for the specified TR endurance time.

Applicable legislation

As part of Regulation 2.16 Evacuation, escape and rescue analysis (EERA) of the OPGGS(S) Regulations 2009, the operator of the facility must identify the technical and other control measures necessary to reduce the risks associated with an emergency to a level that is as low as reasonably practicable (ALARP). These measures would reasonably include TR-HVAC and the associated procedural arrangements for inspection and testing. The regulations also require that facility safety cases specify the performance standards that apply to these measures.

Clause 9(2)(e) of Schedule 3 to the OPGGSA requires the operator of a facility 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.



Progress on early engagement

Since the introduction of offshore petroleum legislation in the late 1960s, there has never been a formal, and appropriately focused, mechanism for duty holders and the safety regulator to commence dialogue regarding concept selection and design of a proposed production facility – or ‘early engagement’.

The key benefit of early engagement is the potential for lower levels of risk on offshore facilities through, for example, consideration of inherent safety in design principles at an appropriately early point in a facility’s lifecycle.

At the APPEA annual conference and exhibition in Adelaide in May, NOPSEMA delivered a presentation on the experiences with early engagement. The paper highlighted the historical lack of formal provisions for engagement between the operator and the regulator until just prior to the commencement of field activities. This situation changed in 2010 with amendments to both Offshore Petroleum and Greenhouse Gas Storage Safety and Levies Regulations to make provisions for formal early engagement.

NOPSEMA (and NOPSA before it) has undertaken five early engagement safety case assessments, noting that such assessments are of partial safety cases and hence can only either be rejected by the regulator or withdrawn by the operator, the latter being the preferred option in all cases to date.

NOPSEMA recommends that early engagement should commence no later than the submission of a field development plan to the National Offshore Petroleum Titles Administrator. This view recognises the impact of the passage of time on what risk reduction measures would be reasonably practicable to implement. It is also NOPSEMA’s view that early engagement should be focused on concept selection and design and the extent to which all reasonably practicable steps have been taken to ensure a facility is safe and without risk to the workforce. To this end, NOPSEMA has evaluated a range of approaches by international offshore petroleum safety regulators and concluded that the design notification scheme administered by the UK Health and Safety Executive presents the most effective and efficient basis for legislative change to the OPGGS Regulations.

The [paper](#) and [accompanying presentation](#) are available from the NOPSEMA website.



Existing environment plans

On 1 January 2012, responsibility for regulation of environmental management for offshore petroleum activities changed from designated authorities to NOPSEMA. The transition provisions within the amended OPGGS (Environmental) Regulations specified that environment plans (EPs) that were accepted prior to this date remain in force and as such were 'inherited' by NOPSEMA. The corresponding offshore activities which are the subject of the EP must continue to comply with the existing EP. The amended OPGGS (Environment) Regulations also provide that *"NOPSEMA, as the new Regulator, may consider it appropriate to request revision of environment plans that were accepted by a different Regulator"* (see Notes to Regulation 18(7)).

NOPSEMA has now commenced a process of reviewing all the inherited EPs in order to:

- To understand those existing EPs and their related offshore petroleum activities
- Determine if a 'notification of appointment of operator' under the OPGGS(E) Regulations is available to NOPSEMA and, if not, to request this
- Determine whether the EPs meet the acceptance criteria contained in OPGGS (Environment) Regulations and if required request that the operator submit a proposed revision of the plan in accordance with Regulation 18(8)

Any proposed revision submitted to NOPSEMA will need to meet all the requirements of the current regulations and will attract the environment plan levy, which is payable by the instrument holder.

Please note, that operators undertaking petroleum activities under an inherited EP are able to submit a revision of their EP if there has been a change in circumstances or operations, or a change is proposed (in accordance with Regulation 17).

NOPSEMA will be writing to all titleholders with EPs with further information on the review process.



Response to the triennial review

NOPSEMA has commenced work on implementing recommendations of the Second Triennial Review of the National Offshore Petroleum Safety Authority, after the Commonwealth Government released its response to the report of the independent review panel in May. The Minister for Resources and Energy has sought a progress report by October this year.

The [December 2011 issue](#) of the Regulator featured an article about the second operational review, which involved input from stakeholders including peak industry bodies, major industry operators, other Australian and international regulators and the ACTU.

The review panel's report addressed 12 themes, including effectiveness of NOPSA, stakeholder engagement and compliance policy and powers, and concluded that the Authority has firmly established itself as a "respected and competent" safety regulator. The review panel's report and submissions to the review are available on the [NOPSEMA website](#).

The Department of Resources, Energy and Tourism is also responsible for implementing some of the review recommendations. More information is also available on the [RET website](#), including the [Government response](#).



Regulatory activities

As at 26 June 2012

Note: Data presented here may vary as further information becomes available.

Assessments

The number of assessments submitted was relatively stable over the last two months. Five assessments were rejected in May 2012.

ASSESSMENT		Submitted			Accepted / agreed / advised			Rejected / refused / returned/declined		
		2012			2012			2012		
Assessment type	Subtype	Apr	May	Jun	Apr	May	Jun	Apr	May	Jun
Safety case	New	2	3	3		1	2	1	2	
	Revision	14	4	2	8	7	1	5		
Diving project plan	Not applicable									
Diving safety management system	New	1							1	
	Revision									
Pipeline safety management plan	New									
	Revision									
Proposed pipeline	Not applicable									
Field development plan	Not applicable									
Scope of validation	Not applicable	2	1	6	4	2	4			
Advice	Not applicable									
Request for exemption under OHS regs	Not applicable									
Well activity application	Not applicable	8	17	16	17	11	7			
Environment plan	New	7	6	3	3	4	1		2	
	Revision									
	Resubmission (of a new plan)			2						
	Resubmission (of a revised plan)									
Well operations management plan	New	3	4	5	3	2	1			
	Variation			1						
Diving start-up notice	Not applicable	4	3		2	3		2		
PSZ application	New									
	Renewal		1		1					
PSZ access application	Not applicable						1			
ATBA access application	Not applicable	1		2		1	1			
TOTAL		42	39	40	38	31	18	8	5	0

Note : In some instances, a single assessment may be submitted for multiple facilities.



Inspections

The number of planned inspections can fluctuate according to operator availability and activities. Inspections in June related to safety (15), well integrity (2) and environmental management (2).

Type	2011						2012					
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Facilities/Activities Inspected	2	7	4	12	11	6	5	7	11	7	13	19

Inspection scopes

The most common topic scopes covered in May and June 2012 inspections included:

Inspection scopes – examples – May 2012 to June 2012	
Following up previous recommendations	Emergency management
Meeting with HSRs	Inspection maintenance and repair
Loss of containment	Fall from height

Inspection recommendations

Below is a selection of recommendations regarding loss of containment issued in the May 2012 inspections.

Inspection recommendations – examples – May 2012	
Implement permanent repairs and/or replace where required the fire water and foam lines systems to ensure that they perform as intended.	Confirm that all maintenance testing services will be completed prior to returning to production.
Repair firewater overboard dump valve.	Update the CFT checks lists and integrity critical drawings (P&ID's).
Ensure that all safety critical equipment maintenance plans linked to their performance standards are in place.	Reinstate No 2 pump room ventilation fan vibration monitor.
Ensure that all the defective ESD and BDV valves are rectified to comply with their performance standards and ensure that they work on demand.	Reinstate oil mist detectors in the pump room and provide NOPSEMA with evidence of a full loop function test to demonstrate full functionality.

Accidents and dangerous occurrences

NOPSEMA was notified of 57 reportable OHS incidents and one reportable environmental incidents during May and June 2012.

TYPE		2012		
		Apr	May	Jun
OHS incidents	Accidents			
	Death or Serious Injury	1		
	Incapacitation >= 3 days LTI	2		
	Accidents total	3	0	0
	Dangerous Occurrences			
	Could have caused death or serious injury	1	2	3
	Could have caused incapacitation >= 3 days LTI	4	2	2
	Fire or explosion		1	
	Collision marine vessel and facility		1	
	Uncontrolled HC release >1 – 300 kg		1	
	Uncontrolled HC release >300 kg			
	Uncontrolled PL release >80 – 12 500 L			
	Unplanned event - implement emergency response plan	9	7	12
	Damage to safety-critical equipment	16	7	12
	Other kind needing Immediate Investigation	2	2	5
	Pipeline – kind needing immediate investigation			
	Dangerous occurrences total	32	23	34
OHS incidents (accidents and dangerous occurrences) total		35	23	34
Environmental incidents	EM - Hydrocarbon / petroleum fluid release			
	EM - Chemical release	1		
	EM - Drilling fluid / mud release	2		1
	EM - Fauna incident			
	EM - Other			
		3	0	1
Not reportable incidents	OHS – not notifiable		2	1
	OHS – exercise		1	
	EM – not notifiable			
	EM – exercise		1	
	Other non reportable			
		0	4	1
Grand total		38	27	36

(As notified under OPGGS(S) Regulation 2.41.)

Complaints

Two complaints were received in May 2012: one was not a safety issue and the other was regarding high noise levels.

TYPE	2011						2012					
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Complaints	0	1	2	0	2	0	1	2	0	1	2	0

Injuries

There were five lost time injuries reported in April and May.

TYPE	2011						2012					
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
INJURIES												
Lost time injuries (LTI >1 day)*	3	1	2	2	4	2	0	0	1	3	2	data not yet available
Alternative duties injuries (ADI)	3	2	1	2	2	3	1	2	6	4	3	
Medical treatment injuries (MTI)	0	3	1	4	7	3	4	5	2	1	3	
Total recordable cases (TRC)	6	6	4	8	13	8	5	7	9	8	8	
* LTI includes lost time injuries less than three days												

As reported under OPGGS(S) Regulation 2.42. (written injury summaries submitted not less than 15 days after the end of each month)

Enforcement actions

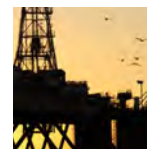
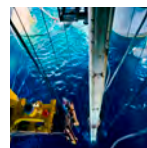
Nine enforcement actions were issued in May and June to five facilities for a range of issues including inadequate management of hazardous substances and food handling.

ENFORCEMENT ACTION TYPES	2011						2012					
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Verbal advice/warning										1		
Written advice/warning	1	3	1			1	1		3	1		
Improvement notice		1	10	5	1	11	4	2	1	2	6	3
Prohibition notice	1			3					1			
Intent to withdraw SC acceptance	1											
Withdrawal of acceptance												
Prosecution brief												
Directions							4					
TOTAL	3	4	11	8	1	12	9	2	5	4	6	3



Upcoming events

- 26 July 2012 NOPSEMA environmental management operators mid-year review workshop, Perth
- 30 August 2012 NOPSEMA environmental management operators questions and answers workshop, Perth
- 10 September APPEA HSR Forum, Perth
- 11–13 September 2012 SPE/APPEA International Health Safety and Environment Conference, Perth
- 14 September 2012 Australasian Petroleum Regulators Forum, Perth
- 24–25 September 2012 IOPER Meeting, Rio de Janeiro, Brazil
- 25–27 September 2012 IRF Annual Meeting, Rio de Janeiro, Brazil



Feedback

NOPSEMA welcomes your comments and ideas on offshore health and safety and environmental management regulation, NOPSEMA's role and your preferred communication methods and publications. Please direct media enquiries, requests for publications, and enquiries about NOPSEMA events to communications@nopsema.gov.au. Operators and other employers are encouraged to circulate this newsletter to their workforce. Past issues of this newsletter are available from NOPSEMA's website at nopsema.gov.au.

To subscribe or cancel a subscription

Subscribe to *the Regulator* or cancel your subscription by sending an email to communications@nopsema.gov.au. Please include your first name, surname, preferred email address, position, company and mobile phone or other contact details.

Contact details

Perth office

Level 8,
58 Mounts Bay Road Perth,
Western Australia

p: +61 (0) 8 6188 8700
f: +61 (0) 8 6188 8737

GPO Box 2568
Perth WA 6001