

OHS Improvement Notice

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

Notice No: 1933

Date: 12/02/2024

To: Helix Well Ops (U.K.) Limited

In conducting an OHS inspection in relation to the Q7000 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

Helix Well Ops (U.K.) Limited (Helix) is contravening a provision of a listed OHS law

AND

As a result, there is, or may be, a risk to the health or safety of a person at the Q7000 facility.

The provision of a listed OHS law which I am satisfied is being contravened is Clause 9(1) of Schedule 3 to the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGGS Act).

The reasons for my opinion are:


- During inspection #3778 on the Q7000 facility, I observed that many of the fire doors leading from the main accommodation stairwell to adjoining corridors on all deck levels of the facility failed to self-close or latch after passing through them.
- The operator has provided a list of one hundred and twenty-two (122) doors requiring some form of repair or replacement.
- There is evidence that the operator has at least twenty-eight (28) replacement fire doors with A-60 fire protection rating in storage but has not yet scheduled their installation.
- Facility personnel reported that the fire doors had not functioned properly since the vessel was delivered from the shipyard in 2019.
- The extent of the issue was documented in a Damage Defect Report by facility personnel in 2020.
- The passive fire protection provided by self-closing doors with an A-60 fire protection rating in the accommodation stairwell is cited in the accepted facility safety case as key control measure for preventing the spread of a fire across deck levels of the facility.
- The number of faulty doors is such that it may also compromise the integrity of the temporary refuge space as a control measure for the preventing the ingress of toxic hydrogen sulphide gas.

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 arising from the faulty fire doors.

If there was a fire in the Q7000 accommodation area, or a release of toxic gas during well intervention operations, this could result in death or serious injury.

Fire doors are an integral part of the facility system of passive fire protection. Fire doors not only provide protection against fire but also restrict airflow and smoke propagation throughout the accommodation. The failure to ensure that the accommodation stairwell doors are self-closing and latching represents a serious compromise of the integrity of the facility's passive fire protection and temporary refuge which should be provided by bulkheads and decks. I am satisfied on reasonable grounds that the following action(s) must be taken by the responsible person to reduce or prevent the risk:

1. Install to the Q7000 facility within 90 days, the existing stock of replacement A-60 rated fire doors which are currently being held in storage.
2. Provide to NOPSEMA within 7 days an updated plan for the rectification of all fire doors requiring repair or replacement, which should include a complete list of doors as well as the time frames for rectification, and thereafter provide bi-weekly updates to NOPSEMA on the progress of the door rectification program.
3. Provide to NOPSEMA within 14 days a plan for the identification and implementation of any interim control measures necessary to reduce the elevated risk of an accommodation fire arising from the faulty fire doors and their impairment of the facility's passive fire protection.
4. Conduct a review (e.g. root cause analysis) to identify any failings in quality assurance and facility maintenance processes which allowed the condition of the faulty fire doors to persist from 2020 (when it was first documented) until the date of this notice.
5. Provide a copy of the report at (4) to NOPSEMA, including the responsible personnel and time frame of any corrective actions.


NOPSEMA INSPECTOR
wA795350

12 February 2024

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: +61 8 6188 8700

By signing below, I confirm on behalf of Helix Well Ops (U.K.) Limited that the specified action described in Improvement Notice No. 1933 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 be displayed in a prominent place at or near each workplace where 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.