

OHS Improvement Notice

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

Notice No: 1935

Date: 18/04/2024

To: Woodside Energy Ltd

In conducting an OHS inspection in relation to the Goodwyn Alpha 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 Woodside Energy Ltd (Woodside) 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 Goodwyn Alpha facility.

The provision that I am satisfied is being contravened is clause 9(2)(c) of Schedule 3 of the Act.

The reasons for my opinion are:

Woodside has failed to take all reasonably practicable steps to ensure the Explosion Protected (Ex) electrical equipment installed at the Goodwyn Alpha facility is safe and without risk to the health and safety of persons, as the current Ex management system is ineffective in ensuring the ongoing integrity of all Ex electrical equipment installed in zoned hazardous areas and outside external locations.

In particular during an inspection at the Goodwyn Alpha facility, I observed that the following systems of work relating to the management of Ex electrical equipment were deficient:

1. The Ex verification dossier:

- Is missing a significant amount of Ex electrical equipment details and information necessary for Ex equipment inspection and maintenance as required by AS/NZS 60079.17 (the standard specified in the Goodwyn Alpha facility safety case), including initial and previous inspection records for all Ex electrical equipment and several technical errors.
- Does not contain a record of all Ex electrical equipment installed at the Goodwyn Alpha facility. It was not demonstrated that Ex electrical equipment not in the Ex verification dossier is undergoing required Ex inspection and maintenance.

2. The Woodside Risk Based Inspection (RBI) Strategy:

- As a result of 1 above, the RBI Strategy and its implementation does not meet or exceed the requirements outlined in:
 - i. the Woodside 'Global Maintenance Strategy – Continuous Supervision of EEHA Equipment' (W0000AE1401765433), and

- ii. the Energy Institute 'Guidelines for managing ignition risk by inspection of Ex electrical equipment in hazardous areas (including support of IEC 60079-17)', Publication 246 referenced in section 2 (i) above.

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:

- A failure to ensure the integrity (largely by inspection and where necessary remediation) of the Ex electrical equipment increases the risk of ignition sources which increases the probability of an explosion in a loss of containment event. Explosions can result in fatalities or serious injuries to personnel at the permanently crewed facility.

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. Update the Ex verification dossier so it is complete, accurate and up-to-date and includes all Ex electrical equipment items installed in zoned hazardous areas or external outer deck locations, as per AS/NZS 60079.17 and Woodside's internal procedure. This includes ensuring that previous inspection records and initial inspection records are contained in the Ex verification dossier for all Ex electrical equipment.
2. Update the Woodside RBI Strategy for Ex electrical equipment so it is fit for purpose for managing ignition risk by inspection of Ex electrical equipment, including alignment of the following sections with the requirements in AS/NZS 60079.17 and guideline listed in the Woodside RBI Strategy:
 - a. sampling plans
 - b. inspection grades
 - c. inspection categories
 - d. key metrics.
3. Implement interim assurance measures to demonstrate that the integrity of the Ex electrical equipment will be assured and maintained until the above Ex management system actions have been effectively implemented.

You are required to take action for items 1 and 2 to reduce or prevent the risk within 270 days from the date of this notice.

You are required to take action for item 3 to reduce or prevent the risk within 14 days from the date of this notice.


NOPSEMA INSPECTOR


18 April 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 10, 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 Woodside Energy Ltd that the specified action described in Improvement Notice No. 1935 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 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.