



Facility: Prelude FLNG
Operator: Shell Australia Pty Ltd
Regulated Business Premises 12/09/2019 – 30/10/2019
Inspection Dates:

Lead Inspector: [REDACTED]
Inspection Team: [REDACTED]
Inspection Number: 2079

REPORT DISTRIBUTION

Position	Company
Records management	NOPSEMA
	Shell Australia Pty Ltd

REVISION STATUS

Rev	Date	Description	Prepared By	Approved By
A	02/12/2019	Internal Draft	[REDACTED]	
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1. Abbreviations

FLNG	Floating Liquefied Natural Gas
IRATA	International Rope Access Trade Association
ICoP	International Code of Practice
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority
PAR	Performance Assessment Record
RA	Rope Access
Shell	Shell Australia Pty Ltd
SME	Subject Matter Expert
VoC	Verification of Competency

2. Introduction

The proposed scope for this inspection was to follow up in relation to a complaint received by NOPSEMA (notification #6055). The complainant alleged the Maintenance and Industrial Services Division of Monadelphous Engineering Associates Pty Ltd (Monadelphous) mobilised rope access personnel to offshore facilities without verifying their competency contrary to their own internal processes. Additionally, the complaint alleged that the rope access equipment risk registers in use at some facilities were copies of other asset or facility registers that did not pertain to rope access equipment in use at Shell Australia Pty Ltd's Prelude FLNG facility.

The complainant alleged that Rope Access (RA) technicians were mobilised without a valid verification of competency (VoC) for rope access as a result of falsified documents. These technicians were mobilised to Prelude FLNG and other non-Shell operated offshore facilities.

NOPSEMA informed Shell of the intent to conduct a Short Notice inspection at Shell's regulated business premises, and advised Shell of the proposed inspection scope, prior to arrival. The inspection commenced at Shell's offices on 12 September 2019, and the inspection team subsequently conducted a follow-up inspection meeting on 17 October 2019. Based upon discussions at this meeting, Shell provided concluding comments to NOPSEMA on 30 October 2019.

3. Conclusions and Recommendations

Directly after the inspection on 12 September 2019, Shell notified NOPSEMA that they had suspended all rope access activity on the Prelude FLNG facility until the competency of rope access personnel working for Monadelphous had been verified. Furthermore, Shell notified NOPSEMA that they would undertake an investigation to assess their process for verifying competency.

Shell indicated in email communication (NOPSEMA ID: A694735) to NOPSEMA on 1 October 2019 that they had assured themselves of the competency of Monadelphous RA technicians.

Shell concluded their investigation on 30 October 2019 and resumed RA works at the facility. Shell subsequently provided a timeline of their investigation (NOPSEMA ID: A705542).

The Prelude FLNG facility safety case identifies 'Personnel at Height/Fall from Height' as a Major Accident Event (MAE), with designation MAE-11. However, this MAE does not identify or assess the risks associated with rope access work.

NOPSEMA sighted the following documents as referenced in the facility safety case:

Document name	Document no.	Revision no.
Working at Heights Procedure	HSE_GEN_004179	3.0
Contractor HSSE Management Procedure	HSE_GEN_000908	3.2
Prelude Asset Training Strategy and Competence Management Plan	HRS_PRE_004622	3.0
Industrial Rope Access Trade Association (IRATA) International Code of Practice (ICoP)	N/A	N/A

The inspectors noted that in Section 1 of the "Prelude Asset Training Strategy and Competence Management Plan", the document is described as outlining how Shell will demonstrate that members of the workforce are competent. Section 8.2 indicates that contractors will be responsible for assuring the competency of their workforce prior to them commencing work at the facility. Furthermore, Shell commits to conducting audits of contractors to ensure they are providing a competent workforce.

It was unclear how Shell assured themselves of the competency of individual RA technicians prior to their mobilisation. In response to this Shell stated the following in an email dated 30 October 2019 (NOPSEMA ID: A705534):

"Shell has undertaken a thorough review of the competence records of personnel of those who are offshore conducting rope access for Monadelphous. The outcome was that the personnel offshore have been IRATA accredited and current (not longer than 6 months off ropes and deemed competent) prior to being on the ropes, at all times. The current status of certification is currently visible to Shell & Monadelphous via a live report which is reviewed regularly by Shell and Monadelphous. Shell formally audits Monadelphous' competence management processes annually in parallel with regular offshore 'LOD1' contractor in-field competence assurance checks to review compliance with competence requirements. Rope access technician IRATA currency is verified by a Level 3 Monadelphous employee. Included in our lessons learnt will be a recommendation that in addition to this step, a Shell employee shall sight the individual's card and log book each swing, and subsequently be assured by LOD1 audit process. This improvement has been initiated for implementation with offshore this week."

The inspectors have not yet sighted documentation that describes the process stated above. Consequently, the following recommendation is made in relation to development and implementation of improved competency assurance arrangements.

Recommendation 2079-1

Shell to ensure that an enhanced process for competency assurance of rope access technicians is developed and implemented.

4. Attachments

Attachment A – Meetings



Form

Entry and Exit Meeting Register and Notification of Entry

By initialling the 'Entry' column of the form below, I hereby acknowledge that on entering the regulated business premises the inspectors notified the entry meeting attendees of the purpose of entering the facility in accordance with Clause 51 (2): "Notification of entry" of Part 4 (OHS Inspections), Division 2 of Schedule 3 to the Offshore Petroleum and Greenhouse Gas Storage Act 2006 (OPGGSA).

Note: Page two of this form contains NOPSEMA Privacy Notice

OPERATOR:	Shell Australia Pty Ltd	REGULATED BUSINESS PREMISES:	Prelude FLNG	
Entry meeting date:	12/09/2019	Exit meeting date:		
NAME (Please Print)	COMPANY	POSITION	Entry	Exit
[Redacted]	NOPSEMA	Inspector		
	NOPSEMA	Inspector		
	Shell			
	Shell			
	Shell			
	Shell			
	Sitara			
Shell				

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National Offshore Petroleum Safety and Environmental Management Authority



Form

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OPERATOR:	Shell Australia Pty Ltd	REGULATED BUSINESS PREMISES:	Prelude FLNG	
Entry meeting date:	17/10/2019	Exit meeting date:		
NAME (Please Print)	COMPANY	POSITION	Entry (Please Initial)*	Exit
	NOPSEMA	Inspector		
	NOPSEMA	Inspector		
	Shell			
	Shell			
	Shell			
Shell				