
From: [REDACTED]
Sent: Monday, 8 July 2019 2:16 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Request for CC meeting - Northern Endeavour [DLM=For-Official-Use-Only]

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Thanks [REDACTED] I have booked that in, please forward a decision/discussion paper at your earliest convenience.

Kind regards,
[REDACTED]

[REDACTED] | Regulatory Assistant

National Offshore Petroleum Safety and Environmental Management Authority
[REDACTED] | **W:** nopsema.gov.au

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From: [REDACTED]
Sent: Monday, 8 July 2019 1:33 PM
To: [REDACTED]
Cc: [REDACTED]

Subject: RE: Request for CC meeting - Northern Endeavour [DLM=For-Official-Use-Only]

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Hi [REDACTED]

New information [REDACTED] Northern Endeavour–NOGA FPSO facility was obtained today via a short notice inspection conducted by [REDACTED]

In relation to two recent notifications (Ref to email from [REDACTED] below)

I believe this information needs to be considered with regards to what I understand to be the current approach decided by CC based on *handover notes* from [REDACTED]

- *In relation to [REDACTED] Northern Endeavour–NOGA FPSO facility, the Compliance Committee agreed to continue with the development of ~ 5 draft improvement notices (RMS ID747-751) , however it was agreed (depending on the circumstances) that these might not be utilised. Two letters have been drafted (one to the operator and one to the titleholders suggesting that they consider shutting down until the numerous issues have been appropriately addressed (see attached email and links). Since that time there have been 2 dropped objects incident where corroded pipe supports have fallen to the deck... these incidents are likely to be included in the draft correspondence to support our position that the risks are not currently ALARP. It is proposed that [REDACTED] meet with both the operator and the titleholder on his return from leave to discuss the letters and then issue. TOGA came in a couple of weeks ago to go over their safety case rejection issues with a view to resubmitting. FPD team are still reviewing a workforce complaint regarding competencies. A draft direction (ID 753) is also being considered, however this doesn't appear to have been drafted yet.*

Could you look at the possibility of scheduling a CC tomorrow to discuss this new information

Regards

From: [REDACTED]
Sent: Monday, 8 July 2019 12:17 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Investigation 2040: Dropped Objects / Corrosion Risk - Northern Endeavour NOGA facility - Preliminary Findings [SEC=UNCLASSIFIED]

UNCLASSIFIED

DROPPED OBJECTS / CORROSION ISSUES

as discussed, there has recently been two incidents of corrosion related dropped objects (or potential dropped object) at the Northern Endeavour NOGA facility namely:

- Notification 6019 (30/6/2019) – Dropped object with potential fatality (5.7 kg x 5.9 m = potential fatality)
- Notification 6027 (04/7/2019) – Potential dropped object, pipe support failed and pipe slumped approximately 450 mm.

NOPSEMA [REDACTED] investigated on 8 July 2019 and could not establish that there was no immediate threat from:

1. Potential dropped objects (e.g. other pipe supports) due to severe corrosion leading to a single fatality (or severe injury),
2. Potential failure of the flare line where the pipe support is missing, leading to loss of containment and MAE.
3. Potential structural failure, due to corrosion leading to and MAE.

With respect to threat 1:

- The potential cause of the Notification 6019 was an emergency shutdown that caused severe pipe vibration; however this failure mechanism has not been eliminated by shutting down the facility until all remaining affect pipe supports have been verified as fit for purpose.
- There were insufficient mitigating measures in place to reduce the immediate threat of a dropped object, such as preventing access to areas where there is risk of a dropped object (area over coverage could be significant).
- In the event of a shutdown, the workforce is not allowed forward of the blast wall; this may mitigate the threat of dropped object due to vibration from a shutdown event.
- There did not appear to be any other defined plans to inspect all other areas on the facility, to determine if there are any other potential dropped objects due to corrosion.
- The second potential dropped object (notification 6027) has been repaired.

With respect to threat 2:

- [REDACTED] has sent people to the facility to inspect the location of the pipe failure, with rope access, and determine the follow up action (by an engineer); action is in progress.
- There are currently no other mitigating measures in place (e.g. temporary pipe support).
- [REDACTED] believe that the pipe is safe because the remaining supports are close, this has not been verified by an engineer.

With respect to threat 3:

- We believe that the two corrosion related failures are evidence of the severe corrosion on the facility and may be predictive of future more significant structural failures on the facility.

- In March 2019, NOPSEMA made recommendation 1826-20 to ensure that corrosion repairs are designed by an engineer to an appropriate standards (ISO 19901/2). It appears that this recommendation is being ignored and repairs are being conducted on the facility without being verified by an engineer in advance. The work appears to be undertaken by NOGA and UPS are allowing the work to take place.

Based on the threats described above, immediate enforcement may be warranted (subject to verification via the EMM process).

As an aside:

TRAINING STATUS

There is evidence that the claims made in the anonymous safety concern raised on 7 June 2019 (inspection 2029) can be substantiated, specifically:

- Compliance with training matrix training commitments appears to about 60%
- There is a significant number of individuals who have not received the training within the required refresher period.

[REDACTED] | OHS Regulatory Specialist

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[REDACTED] | A/ Head of Division

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From: [REDACTED]

Sent: Monday, 8 July 2019 2:08 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Request for CC meeting - Northern Endeavour [DLM=For-Official-Use-Only]

For Official Use Only

Hi [REDACTED]

Following your request for an urgent CC meeting this afternoon, I have checked everyone's calendar and there are no available slots.

Please discuss with [REDACTED] as Acting HoD to determine if the matter can wait for Thursday's regular CC meeting. If a CC decision is required before then, I will need to speak to CC to shuffle meetings to accommodate.

I will be sending confirmed Agenda and papers for Thursday's meeting by COB today, therefore please forward a decision/discussion paper for this matter accordingly.

Kind regards,
[REDACTED]

[REDACTED] | Regulatory Assistant

National Offshore Petroleum Safety and Environmental Management Authority

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