

**From CEO John Clegg**

Promotion of the benefits of health and safety to the offshore workforce is an important activity that will reward investment.

Effective health and safety promotional campaigns can have significant benefits for the workforce individually as well as the operators. The cost of treating injuries, medivac flights, rehabilitation, let alone any insurance claims or legal actions mean that prudent operators are continually looking for ways to promote health and safety.

We have recently seen a very effective health promotional initiative by a titleholder which was implemented offshore during a series of drilling campaigns. This initiative was well planned, well resourced and had significant commitment from all parties. Campaign organisers concentrated on a range of health and fitness issues to raise awareness amongst the workforce. Within our industry, campaigns involving health in particular are often seen as "nice to have" rather than "must-do" therefore it is pleasing to see a well resourced campaign that highlights not only safety but the overall health of the workforce as well.

I would like to finish by challenging you to see how your company, or the organisations your company may belong to, can contribute to long term health initiatives, particularly coordinated approaches, so initiatives do not stall at the end of one particular campaign. If you do have successful health and safety promotions you would like to share with NOPSA please contact me.

Industry matters

Warning on use of utility systems for process duties

An incident on an FPSO operating in Australian waters where hydrocarbon gas was introduced to the facility's potable water system and was later detected in the facility's accommodation space is the subject of a new [safety alert](#)¹ issued by NOPSA and available on its website. The alert warns that connecting a utility system (the potable water system) to a process system should not be treated as routine and should only be carried out as a last resort under a permit-to-work system with risks assessed and barriers in place.

Two incidents of tensioner failure prompt safety alert

Two separate incidents involving [tensioner failure](#)² on semi-submersible MODUs in Australian waters have prompted the issue of a safety alert now available on NOPSA's website. Both of these incidents had the potential to cause fatal injuries if people had been in the vicinity.

Asbestos management arrangements emphasised

As mentioned in earlier issues of these newsletters, where facilities are known to have 'in-situ' asbestos, NOPSA has committed to carry out an inspection within 2-6 weeks of that facility arriving in Australian waters with the management of asbestos as a targeted topic.

NOPSA regulates the management of asbestos on offshore facilities by assessing the facility safety case and then inspecting to verify that the operator is complying with the commitments in it. The safety case must contain a detailed description of the arrangements in the Asbestos Management Plan.

The use of all asbestos material is prohibited except for certain permitted circumstances. One of these is the use of asbestos in products that are 'in situ' or fixed or installed in a way that does not constitute a risk to users until the asbestos contained in the product is disturbed. NOPSA has published a guideline on [asbestos management](#)³ that explains the regulations.

If the operator of the facility is not complying with its commitments in the safety case and the regulations, NOPSA may take enforcement action.

Development of safety case guidance

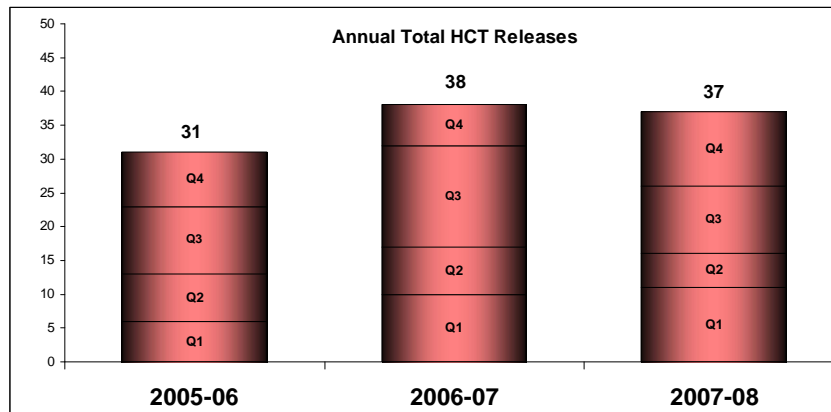
A [presentation](#)⁴ delivered at sessions in Perth and Melbourne on NOPSA's development of safety case guidance notes is now available on its website. The safety case is a regulatory requirement that forms part of the duty of care regime. This regime supports high standards of health and safety behaviour within the offshore industry by requiring operators of facilities to take all practicable steps to ensure the facility is safe and that activities at the facility are carried out safely and without risk to health.

NOPSA's guidance note development sessions were aimed at operators, safety case custodians and developers, risk engineers and members of the workforce and its representatives. They explained the development process, the structure of the guidance notes and progress to date as many of the guidance notes are still in development. There will continue to be full consultation with interested parties. NOPSA has a dedicated page under the [Projects](#)⁵ heading which provides details of the individual guidance notes and how they will be developed.

NOPSA's annual report released

The NOPSA [annual report](#)⁶ 2007-08 is now available on the NOPSA website. The report reflects a period of increasing activity in the offshore petroleum industry. New fields came on stream and there were more drilling rigs operating in Australian waters in this period. Issues of concern in this

year's health and safety performance include a failure to reduce the lost time injury rate and an unacceptably high number of gas releases. Both are indicators of the potential for more serious incidents with the gas releases indicating that industry needs to maintain a focus on facility integrity. This need to 'keep it in the pipe' has been highlighted by international experience regarding hydrocarbon leaks. The chart below is taken from the annual report and shows total gas releases over a 12 month period and the rolling trend:



Further information on hydrocarbon leak incidents can be found in the Norwegian Petroleum Safety Authority report in the International section of this newsletter.

Links between fatigue and fitness explored

Fatigue is not always about sleep. Poor health and lifestyle choices can contribute to fatigue - the greater the fatigue, the poorer the performance outcome and the higher the risk of injury.

Many offshore workers have an unhealthy lifestyle which can lead to depression, lack of concentration, fatigue and low morale.

A titleholder, in conjunction with the operator of a drilling rig (as noted in the CEO's comments above), has embarked upon a health and safety initiative to create awareness about the link between fatigue and fitness. This initiative uses the combined efforts of a psychologist, lifestyle coach / personal trainer and a physiotherapist to address issues including diet, weight management and fitness. Initial reports indicate a high level of positive feedback from members of the workforce

Some of the goals of this performance enhancement training include:

- Enhanced safety and well-being
- Enhanced productivity

- To train personnel to be able to deliver performance enhancement training
- To create a positive performance culture

Investigation report of incident at Apache Varanus Island facilities

The Western Australian Department of Industry and Resources (DoIR) has released the final report of the findings of the investigation into the gas pipeline rupture and fire at the Apache facilities on Varanus Island. DoIR has made printed copies of the report available to the public and these can be obtained from DoIR at Minerals House, 100 Plain Street, East Perth.

Who is the 'The Proper Officer'?

When NOPSA issues Improvement Notices they are typically addressed to the 'Proper Officer'. The intention of addressing a notice to the Proper Officer is to ensure that the company receiving the notice directs it to the correct person who is responsible for dealing with it.

Identifying the person responsible for dealing with the notice is a matter for the company or organisation receiving the notice.

Stakeholder relations

International regulators meet in Sydney

Offshore occupational health and safety trends in nine major oil and gas producing regions were on the agenda when NOPSA hosted an annual meeting of the International Regulator's Forum (IRF) in Sydney in October. The IRF is committed to driving improvements in the sector through collaboration on joint programmes and through sharing information. Issues discussed included life extension of ageing offshore facilities and how the quality of management of companies can contribute to the reduction of major accident risk.

Learn by example

Here we provide examples of good and bad practice seen in the offshore industry during recent NOPSA inspections.

GOOD PRACTICE



Junction boxes on an FPSO installed, inspected and maintained to IEC60079 standards showing adequate labelling, correct cabling, appropriate fastening and excellent surface conditions

BAD PRACTICE



Corrosion on the flame paths of this 'flameproof' hazardous area electrical junction box could increase the risk of ignition in the event of a hazardous atmosphere being present.

International

Report into North Sea incident now available

A report into a [hydrocarbon leak](#)⁷ which occurred in one of the shafts on the Statfjord A facility in the North Sea is now available on the website of the Petroleum Safety Authority Norway (PSA). The authority says this incident had the potential to develop into a major accident given slightly different circumstances.

Managing fatigue offshore

The UK Health and Safety Executive has released [guidance for managing shiftwork](#)⁸ and fatigue offshore. Long working hours and lack of sleep are widely recognised as causal factors in occupational stress. Monitoring and control of working hours and fatigue can reduce or prevent subsequent problems with work related stress, the guidance notes.

Policy on working hours offshore

Basic principles for setting a policy on working hours offshore are explored in an [information sheet](#)⁹ issued by the UK's HSE. While it is obvious that long working hours and shift work are closely associated there are benefits to having a policy for working hours that stands alongside that for shift work, according to the HSE.

Website

New safety alerts

Two new [safety alerts](#)¹⁰ issued by NOPSA on warnings over use of utility systems for process duties and tensioner failure are now on the website.

Presentations from Safety Case Guidance launch

[Presentations](#)¹¹ on the development of safety case guidance notes by NOPSA are now available on the website. NOPSA has a dedicated page under the [Projects](#)¹² heading which provides details of the individual guidance notes and how they will be developed.

Appeal processes for notices issued under the Offshore Petroleum Act

An updated [guideline on the appeal processes](#)¹³ available to operators regarding enforcement actions taken by OHS inspectors is now available on the website. This appeal process relates to the issuing of improvement notices, prohibition notices, directions not to disturb and notices to take possession by OHS inspectors. Appeals can also be made when an OHS inspector makes a decision when dealing with a disputed provisional improvement notice.

Help on completing a provisional improvement notice

New guidance providing advice on how to [complete a provisional improvement notice](#)¹⁴ (PIN) is now available on the website. As explained in the HSR Handbook produced by NOPSA, a PIN should only be used if agreement cannot be reached through the normal consultation processes. The guideline points out that it is important to quote the legislation (Commonwealth, State or Northern Territory) that applies at the affected facility when completing a PIN.

Regulatory activities

As at 29th October 2008

Disclaimer: Activity and incident quantities identified here may vary as further information becomes available. Statistics are prepared just prior to the last Friday of the month

Safety Case Assessment

October 2008					
Assessment Type	Submitted	Accepted / Completed	Rejected	Exemption	Being Assessed
Safety Case NEW	3	1	1		10
Safety Case REVISED	4	3			16
Safety Case OTHER				1	
Pipeline SMP NEW					1
Pipeline SMP REVISED					
Diving SMS		2			
Diving Project Plan					
Scope of Validation	6	2			8
Field Development Plan					
TOTALS	13	8	1	1	35

Inspections

Five inspections were conducted in October. Issues included:

- Close-out of Improvement Notices
- Anchor winches
- Electrical equipment
- Marine Operations manual
- Corrosion of hot oil system pipework
- Oil contamination in instrument air
- Scaffolding risk assessment
- Benzene monitoring
- Noise control plan schedule

Incidents and complaints

There were 27 incidents and two complaints (about five issues) in total.

The incidents included 26 dangerous occurrences and one lost time injury.

The Major incidents included:

- Two collisions – one involving a supply vessel, one involving a tug
- One fire – crane engine

Some of the Significant incidents included:

- One lost time injury – struck in chest, later exacerbated by lifting load
- Three incidents that could have caused LTIs
- Five incidents causing damage to safety-critical equipment
- One gas release
- One oil spill
- Seven alarms leading to muster

The Complaints included:

- Working contracts – insufficient days off
- Substandard commissioning
- Technical integrity
- Technical support
- Cyclone response evacuation in the Timor Sea

Enforcement

Five Written Advice/Warnings were issued:

- For failure to manage hazardous substances (asbestos, isocyanate-based paint)
- Enforcement letter to person in control of well testing operation
- Failure to expedite the development and implementation of an adequate Marine Operations Manual
- Failure to comply with improvement notices
- Failure to operate facility in accordance with accepted safety case

Six Improvement Notices were issued:

- One for failure to provide original equipment manufacturer's information in English
- One for failure to effectively implement a maintenance management system
- One for failure to ensure integrity of permanent well testing pipework
- One for failure to maintain physical environment that is safe and without risk to health
- One for failure to implement and maintain emergency response equipment and procedures
- One for failure to maintain firewalls

No Prohibition Notices were issued

Subscribe

[Past issues of this newsletter](#)¹⁵ are available from the NOPSA website. Operators and other employers are encouraged to circulate this newsletter to their workforce. Please add your details to our [distribution list](#)¹⁶ to receive future copies of this newsletter.

Find out more

¹ <http://www.nopsa.gov.au/alert/>

² <http://www.nopsa.gov.au/alert/>

³ <http://www.nopsa.gov.au/document/N-09000-GL0254%20-%20Asbestos%20Management.pdf>

⁴ <http://www.nopsa.gov.au/presentation/>

⁵ <http://www.nopsa.gov.au/projects.asp>

⁶ http://www.nopsa.gov.au/document/NOPSA_Annual_Report_2007_08.pdf

⁷ <http://www.ptil.no/news/investigation-of-hydrocarbon-leak-in-utility-shaft-on-statfjord-a-article4884-79.html>

⁸ <http://www.hse.gov.uk/offshore/infosheets/is7-2008.pdf>

⁹ <http://www.hse.gov.uk/offshore/infosheets/is8-2008.pdf>

¹⁰ <http://www.nopsa.gov.au/alert/>

¹¹ <http://www.nopsa.gov.au/presentation/>

¹² <http://www.nopsa.gov.au/projects.asp>

¹³ <http://www.nopsa.gov.au/document/N-05000-GL0069%20-%20OHS%20Inspector%20Enforcement%20Decision%20Appeals.pdf>

¹⁴ <http://www.nopsa.gov.au/document/N-05000-GL0517%20-%20Completion%20of%20a%20Provisional%20Improvement%20Notice.pdf>

¹⁵ http://www.nopsa.gov.au/CEO_emails/index.asp

¹⁶ info@nopsa.gov.au