

OHS IMPROVEMENT NOTICE

To: Woodside Energy Limited

In conducting an OHS inspection in relation to the Vincent facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again clause 9(2)(e) of Schedule 3 to the Act

at: Vincent facility

The reasons for my opinion are:

1. Records of depressurisation tests undertaken on 12 July 2014, 14 July 2014 and 27 July 2014 provided by the operator show that depressurisation of the HP Compressor "B" vessels associated with valves 36-BDV-3678B and 36-BDV-4701B did not meet the requirements of the performance standard (F09) specified in the facility safety case. The blowdown valves constitute equipment that is designed to control and respond to facility emergencies. This constitutes a breach of the Act in that the operator has not taken all reasonably practicable steps to implement and maintain appropriate equipment for the control of, and response to, emergencies at the facility;
2. The risk assessment ("deviation") document produced by the operator (operator reference number 92012518) concludes that there is a risk of two pressure vessels (HP compressor "B" 1st/2nd stage scrubber and HP compressor "B" 3rd stage scrubber) losing structural integrity in the case of a jet fire impingement on the vessel resulting from proximal loss of hydrocarbon containment;
3. The hydrocarbons remaining in the HP compressor "B" 1st/2nd stage scrubber and HP compressor "B" 3rd stage scrubber pressure vessels have the potential to escalate the initiating jet fire event, leading to fatalities or serious injuries, and impairment of escape routes;
4. The "deviation" document produced by the operator (reference number 92012518) states that "no short-term mitigations were initially identified. As of 10th Oct 2014, the application of a PFP blanket is under investigation as a short-term mitigation". The document briefly mentions other mitigations, including not operating the HP Compressor. However, no conclusions are shown and the document shows no change in the level of assessed risk between the initial and residual risk levels;
5. A document titled "HP Compressor Blowdown Possible Risk Reduction Strategies (DRIMS#989990-v1-92012518)" was submitted to NOPSEMA on 12 December 2014. This document does discuss actions that the operator might take, but does not, (a) make any commitments to actions or provide any target dates, (b) demonstrate that risk levels will be reduced to an ALARP level, or (c) commit that the HP Compressor "B" will not be operated until the risk has been reduced to a level that is ALARP.

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:

Potential for explosion of pressure vessel resulting in serious injury or fatality

You are required to take action within **90** days of the date of this notice to prevent or reduce the risk.

The following actions must be taken by the responsible person within the period specified above:

- A. Establish the depressurisation performance required of valves 36-BDV-3678B and 36-BDV-4701B by reference to the standard quoted in the facility safety case – American Petroleum Institute, Recommended Practice 521, Guide for Pressure-Relieving and Depressuring Systems (API RP 521), and ensure that valves 36-BDV-367B and 36-BDV-4701B comply with the requirements of API RP 521; or
- B. Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

██████████

NOPSEMA Inspector

Dated: 16 December 2014

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:

██████████

Position:

NOPSEMA Inspector

Address:

Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **573** has been complied with by:

Signed: _____

Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the 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.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.