Diving Project Plan (DPP) Concordance Table

Form

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Completion of this table is not a requirement. However, doing so may help ensure that all required subject matter is covered in your submission to the operator for the diving project (or NOPSEMA, if there is no operator for the diving project). If completed, please attach a copy to your DPP.

**Contents of a diving project plan (DPP) – Regulatory contents requirements**

This table should be used to indicate which section(s) of the DPP address the regulatory content requirements of regulation 4.16 of the Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 and/or Victorian regulatory equivalent, including reference and comments as applicable. Note: all regulatory references below are to the Commonwealth regulations unless otherwise specified. All references to the diving contractor’s diving safety management system (DSMS) should specify the relevant DSMS section to assist with the DPP verification and approval/acceptance process. For further details, please refer to the ‘Contents of a diving project plan’ section of guidelines made by NOPSEMA under sub-regulation 4.4(1), as in force from time to time.

| **Reg** | **Regulation** | **Document reference and comments** |
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| **Contents of DPP**The DPP is a detailed plan developed for a specific diving project. It forms the bridging document between the operator’s safety case and the diving contractor’s DSMS. The DPP must therefore identify assess and document the controls for all hazards associated with the diving project. It must also provide contingency procedures for any foreseeable emergency. |
| 4.16(1)(a) | **A DPP must set out a description of the work to be done.**For example:* location of diving activities (host facility)
* the scope of work
* diving techniques to be used.
* project-specific work methodologies and procedures
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| 4.16(1)(b) | **A DPP must set out a list of the Commonwealth, and state or Territory legislation (including these regulations) that the diving contractor considers applies to the project.**Acts and regulations applicable to the area of operation are to be detailed in the DPP*.* |   |
| 4.16(1)(c) | * **A DPP must set out a list of standards and codes of practice that will be applied in carrying out the project.**

Including, but not necessarily limited to:* class society certifications and IMO codes for vessels and diving systems
* codes and standards applicable to safety-critical equipment and project personnel training
* IMCA guidelines applicable to all hyperbaric systems and diving activities to be conducted.
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| 4.16(1)(d) | **A DPP must set out a hazard identification.**This may include, for example:* a hazard register containing the diving generic and site-specific hazards, such as:
	+ diving hazards identified in the DSMS
	+ diving related MAEs identified in the host facility safety case
	+ diving related MAEs identified in the DSV safety case (if applicable)
	+ project-specific hazards
* includes hazards relevant to SIMOPs and emergency response (see reg. 4.16(1)(i))
* various types of hazards may fall under the following broad headings and should be considered in preparing the DPP:
1. activity
2. physical environment, including the vessel or structure from which the diving takes place
3. environmental
4. human factors
5. procedural
6. equipment and tools
7. physiological
8. breathing gases
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| 4.16(1)(e) | **A DPP must set out a risk assessment.**For example:* a documented assessment of the project-specific hazards and implemented control measures
* includes risks associated with emergency response and hyperbaric evacuation systems
* includes procedures for conducting onsite reviews and updating the risk assessments.
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| 4.16(1)(f) | **A DPP must set out a safety management plan**In setting out a safety management plan (SMP), the DPP should include:* how activity-specific risks to be managed to as low as reasonably practicable (ALARP)
* how project-specific PTW and SIMOPs arrangements are managed
* details of training related to any third party systems, for example, operator PTW systems, specialist subsea equipment/tooling.
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| 4.16(1)(g) | **A DPP must set out job hazard analyses for the diving operations.**The DPP should describe how the project will provide for JHAs. |   |
| 4.16(1)(h) | **A DPP must set out an emergency response plan (ERP).**In setting out an ERP, the DPP must provide sufficient detail of:* chain of command and lines of communication
* hierarchy of diving contractor/operator and diving vessel procedures (as applicable)
* communication protocols
* an emergency contact list
* emergency drills and exercises to be conducted.

The ERP may be a separate document to the DPP but must be included as part of the DPP documentation provided to the operator of the diving project as part of the DPP approval process. For example, if the ERP is not a specific section within the DPP, it will typically be an appendix or addendum to the DPP. The ERP is specific to the project, its location and reflects the combined diving contractor/operator and diving vessel procedures (as applicable). The project ERP should include, but not necessarily be limited to:* up to date names and contact numbers for key personnel and organisations
* a schedule of emergency drills and exercises conducted for each relevant scenario, for example:
* emergency drills as described in IMCA D 022 Revision 1, Section 15.21 (including First Aid and other emergency drills as described in IMCA C 013)
* diver / bell recovery for adjacent hydrocarbon facility gas release
* diver / bell recovery for DSV loss of position
* diver and bell recovery drills are to establish the relevant emergency response performance standards for each type of diving drill e.g. phases A to D in Section 8 of IMCA D 052.
* chain of command and lines of communication during an emergency
* roles and responsibilities of essential personnel, outlining basic procedures for responding to emergencies
* arrangements for the hyperbaric evacuation of saturation divers (if applicable).

Hyperbaric evacuation of saturation divers (if applicable) should include details of, but not necessarily be limited to:* the permitted evacuation time/distance requirements, e.g. operation emergency, phases A to D in Section 8 of IMCA D 052
* hyperbaric rescue vessel (HRV) support
* the HRV’s life support package (LSP)
* the hyperbaric rescue unit (HRU) emergency services umbilical e.g. Item 12 of Section 16 of IMCA D 024
* HRU to provide life support for at least 72 hours
* HRU’s arrival at the HRF within 75% of the HRU designed life support endurance
* HRU thermal balance analysis, listing the duration that habitable conditions can be maintained in the event of failure of the environmental control
* systems
* hyperbaric evacuation during adverse weather or a cyclone response sail away events (if applicable)
* the hyperbaric rescue facility (HRF)
* documented hyperbaric evacuation trials should include, but not necessarily be limited to:
* HRU launch and recovery
* HRU towing and emergency umbilical trial
* HRU’s environmental control unit function test for a road transit phase (as applicable)
* HRU to HRF mating trial.
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| 4.16(1)(i) | **A DPP must set out the provisions of the DSMS and the safety case that are relevant to the diving project, in particular the arrangements in the DSMS and the safety case for simultaneous operations and emergency response**For example, the DPP should:* form the bridging document between the various safety management systems that may be involved in a single project
* Identify all aspects of the DSMS and operators safety case relevant to the project, such as:
* identifying the host facility’s (facility being worked on) major accident event (MAE) controls applicable to the diving operations
* identifying the DSV’s (facility/vessel where personnel are diving from) MAE controls applicable to the diving operations, if appropriate
* clearly define the processes to manage SIMOP’s, PTW and emergency response.
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| 4.16(1)(j) | **A DPP must set out details of consultation with divers and other members of the workforce working on the project.**This may include, but not necessarily be limited to:* details of the consultation that has taken place with divers and other members of the workforce who are involved in the diving project, for example:
* HAZID/ALARP workshop attendance registers.
* DPP review comments sheet and register.
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| 4.16(2) | **The DPP must describe each diving operation that is part of the diving project.*** all planned diving operations shall be identified and described in the project plan.
* a separate DPP for each diving start-up notice if significant changes to the diving work scope, location, equipment, procedures are applicable.
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| 4.16(3) | **The DPP must not specify as a diving operation a task that is too complex, or too big, to be supervised safely by 1 supervisor.**The DPP should commit to, for example:* enough supervisors should be appointed to cover the entire diving project
* when more than one supervisor is on duty, the DPP should specify the areas and duration of the project that are controlled by each supervisor
* for continuous air or saturation diving projects, an additional supervisor should be available on each shift to act as relief for the primary supervisor. This may be achieved by utilising an appointed superintendent.
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| 4.16(4) | **The DPP must provide for adequate communications between persons undertaking the project and any relevant:****(a) contractor****(b) facility****(c) vessel or aircraft****(d) on-shore installation.**The DPP must provide for, for example:* established communication links between project sites, facilities, vessels and aircraft
* alternative communications links in the event of an emergency
* all team members should be able to, and have the equipment to communicate clearly with each other at all times.
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