THE REGULATOR

2021 - ISSUE 1

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UNVEILING THE INVESTIGATION PROCESS

NOPSEMA's purpose is to assure the protection of lives and the environment

page 06



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ABOUT NOPSEMA

The National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) is Australia's independent expert regulator for health and safety, environmental management and structural and well integrity for offshore petroleum facilities and greenhouse gas storage activities in Commonwealth waters.

By law, offshore petroleum activities cannot commence before NOPSEMA has assessed and accepted detailed risk management plans that document and demonstrate how an organisation will manage the risks to health and safety to as low as reasonably practicable (ALARP) and the risk to the environment to ALARP and with acceptable environmental impacts. For more information, visit our website at **nopsema.gov.au**.

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FEEDBACK

NOPSEMA welcomes feedback from our stakeholders. Please direct all enquiries about this publication to communications@nopsema.gov.au.

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MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

Welcome to the first edition of The Regulator for 2021. In this edition we highlight NOPSEMA's role in investigating incidents and the various engagement pathways NOPSEMA embarks on to nurture collegiate stakeholder relationships.

With a global pandemic driving a tumultuous 2020, NOPSEMA has been reflecting on industry's responsiveness to balancing unprecedented events with existing legislative requirements to ensure a protected offshore workforce and the environment.

NOPSEMA's close regulatory oversight of offshore activities concluded that many duty holders had appropriate and reasonable arrangements in place for managing infection risks to personnel. Industry was generally quick to respond to changes in risk and was proactive in navigating the workforce impacts involving ongoing changes to Government COVID-19 health and transport directions.

NOPSEMA recognises the COVID-19 impacts will continue into this year and the ongoing risk and consequential effects of COVID-19 are likely to remain for some time. In the face of such continued uncertainty, the ability of workers to deal with issues like psychosocial risks and maintaining consistent performance over the longer-term represents an emerging challenge for industry. In this current environment, NOPSEMA's expectation is that industry should as a minimum maintain efforts on managing infection risks and should continue to work closely with all key stakeholders. If we work together, we can continue to meet present and future challenges and deliver strong safety and environmental outcomes.

66 NOPSEMA recognises the COVID-19 impacts will continue into this year

In this edition we examine several NOPSEMA engagement strategies and contributions to regulatory best practices. We also unveil NOPSEMA's investigations process that describes our approach to ensuring all incidents are carefully



examined by the inspectorate and are escalated where appropriate. Investigation outcomes often inform NOPSEMA regulatory alerts and bulletins and consistently form the backbone of NOPSEMA's compliance and enforcement actions.

With growing community interest in ageing assets, as a sector we must maintain and improve social licence throughout the entire lifecycle. NOPSEMA recognises that industry has increased its release of information to the public about proposed activities. Those operators that demonstrate social licence traits and behaviours best gain a favourable reputation in the eyes of the community and the offshore industry. That reputation is typically grounded in public engagement, trust, transparency, accountability, and competence. This is an important conversation we are having and will continue to have moving forward.

In the spirit of looking ahead, we welcome the new year to build on our shared learnings, our resilience, and our commitment to adapt to changes in risk.

I trust you find this latest edition of *The Regulator* informative.

Stuart Smith Chief Executive Officer

UNVEILING THE INVESTIGATION PROCESS

NOPSEMA's purpose is to assure the protection of lives and the environment.

NOPSEMA conducts investigations into the circumstances surrounding incidents and complaints to identify and share lessons learnt with the broader industry and its stakeholders and, in certain cases, to seek evidence of non-compliance with the law as a basis for potential enforcement.

The level of detail pursued during an investigation depends on several factors, including the severity and range of potential or actual harm to persons and the environment, and on the seriousness of any potential breach of the law.

NOPSEMA's Acting Investigations Manager, Peter Bell, describes the range of potential investigations as "an investigation may range from an inquiry by a single inspector about a minor incident, such as a fault discovered in a smoke detector, to a large-scale inquiry, involving a comprehensive investigation of a significant incident, such as an oil spill likely to lead to significant environmental damage, or a serious injury or fatality, which would typically involve a team of inspectors and could lead to prosecution," Mr Bell said.

"An investigation is triggered by a review of the notification information provided to NOPSEMA. Where the notification represents a notifiable event under the relevant legislation, a lead investigator is allocated, and because of their inquiries, a recommendation to escalate to a more detailed investigation may be made."

Mr Bell explains that the lead investigator (generally the focal point inspector for the facility or activity) will contact duty holders and request additional information, where required, to examine the issue and form a view on the significance of any associated risk gap. If the lead investigator identifies that the incident may expose members of the workforce to health or safety risks or pose a risk to the environment or well integrity, it will be escalated with an investigation team appointed to establish what has occurred and to determine any immediate risks. The investigation will also consider whether appropriate actions are being taken by the duty holder to return to compliance, where appropriate, and prevent reoccurrence.

The investigation team's role is to collect first-hand information to quickly understand the potential consequences of the incident and any immediate risks. The inspector will prepare a short report with the findings, conclusions, and any recommendations, and provide this to their manager. The duration of this investigation is generally relatively short, typically in the order of less than two weeks.

At any stage, recommendations can be made by the lead inspector to their manager to escalate the investigation, to take a deeper dive into the details of what has occurred. This escalation could be due to a range of circumstances including where a range of failings are identified as contributing factors to the incident. Some investigations may take up to 60 days during which the investigation team will aim to establish whether a breach of the relevant legislation has occurred. If, during such an investigation, information is gathered to support a suspicion that an offence may have occurred which warrants significant enforcement action, a recommendation may be made to escalate the issue, which typically involves using powers under the Regulatory Powers (Standard Provisions) Act 2014 and may involve the execution of a warrant to gather evidence.

Where investigations involve significant and detailed evidence gathering, this investigation

is undertaken by a lead investigator who is generally independent of the regulatory teams and has a target period of less than 180 days to determine the detailed facts of an incident, including the impact on all parties and associated organisations and individuals. Given incidents may contain elements relevant to safety, environment and well integrity, inspectors from different divisions may be utilised to allow all relevant scope items to be effectively and efficiently addressed. Additional independent external expertise may also be contracted as part of these investigations. A range of evidential material including photographs, interviews, statements, additional documentation, and other physical evidence may be taken by the investigation team.

Once the suite of evidence is analysed and evaluated, only at this point is there a potential pathway to prosecution under NOPSEMA's Enforcement Policy. NOPSEMA's CEO and Compliance Committee carefully consider the evidence gathered by the investigators and any recommendations made to pursue prosecution action considering public interest and the seriousness of the alleged offence.

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Where such recommendations are agreed by the CEO, a brief of evidence is compiled and submitted to the Commonwealth Director for Public Prosecutions to determine whether there is a prima facie case.

In the six months from July 2020 to December 2020 NOPSEMA carried out 295 investigations.

"While we have had 295 investigations during the latter half of 2020, 90 per cent of those have been related to notifications that have not required escalation, which is encouraging news," Mr Bell said.

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Gather sufficient evidence to support & prove the breach (prosecution)

e.g. environmental damage, serious injury, fatality or failure to meet the safety case, EP or WOMP commitments.

Understand in detail what has occurred & whether a breach of legislation has occurred

e.g. significant damage to safety-critical equipment or incident that could have caused serious injury or death.

Establish what has occurred & immediate risks e.g. hydraulic leak found on crane.

Review of notification e.g. fault of smoke detector notification.

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COLLEGIATE ENGAGEMENT

NOPSEMA maintains and nurtures relationships through stakeholder engagement programs including direct interaction with industry operators and contractors, unions, environmental groups, fishing interests, community groups and all levels of government.

While 2020 presented some challenges with stakeholder participation in meetings across Australia, NOPSEMA actively promoted the use of virtual technologies to remain engaged with stakeholders on important safety and environmental management issues. NOPSEMA participated via teleconference, in several important discussions with members of the Australian Council of Trade Unions (ACTU) to address any workforce issues during this challenging period impacting workforce health on offshore facilities.

In recent years NOPSEMA has taken strides in addressing community expectations on decision-making processes and environmental consultation associated with environment plans. Through stakeholder engagement, NOPSEMA identified and defined 18 administrative proposals on how to improve consultation and transparency.

One of the 18 initiatives was the establishment of the Transparency Taskforce. The Taskforce shaped NOPSEMA by improving community confidence in NOPSEMA's processes which in turn benefitted the industry. Although the Taskforce concluded in 2020, NOPSEMA remains committed to collegiate engagement on multiple levels, including continuous efforts to explore opportunities of establishing further initiatives and consultation groups. NOPSEMA's establishment of a Community and Environment Reference Group (CERG) has helped guide our approach for considering community perspectives on NOPSEMA's performance in regulating offshore petroleum environmental management. Chaired by NOPSEMA's CEO, stakeholders participate as individuals, not on behalf of their employer, to ensure their contributions are representative of their own experience and perspectives in a range of areas.

The CERG has successfully operated for two years providing a variety of recommendations and views that have helped shape NOPSEMA actions.

Recently, competing interests between commercial fisheries and seismic survey proponents have brought conflict to the industry due to the overlap in space and time. NOPSEMA, along with other government departments and agencies have recognised the need for a standard process to manage these conflicts.

NOPSEMA is working collaboratively with departments responsible for resources, the environment, and fisheries, to engage with seismic and fisheries stakeholders to progress the development of a policy framework aimed at reducing negative interactions and mitigating impacts where they cannot be avoided.

For more information on NOPSEMA's engagement and transparency visit *nopsema.gov.au*.

VIRTUAL GATHERING OF GLOBAL OFFSHORE WIND REGULATORS

In January 2021, representatives from NOPSEMA and the Department of Industry, Science, Energy and Resources joined members of the Global Offshore Wind Regulators Forum (GOWRF) for a virtual meeting, facilitated by the United States (US) Bureau of Ocean Energy Management.

In addition to Australia and the US, participating jurisdictions from experienced and emerging offshore wind markets included Canada, Denmark, France, Germany, Ireland, India, Japan, Netherlands, Norway, Poland, Scotland, Turkey, and the United Kingdom.

The GOWRF provide an opportunity for participants to share regulatory insights and experiences in relation to offshore wind within their respective jurisdictions.

During the meeting each jurisdiction provided an update on policy and regulatory developments, and industry activity. In European jurisdictions where the offshore wind sector is well established in Germany, the Netherlands, Denmark and the UK, participants noted that targets have been set for increased installed capacity by 2030. This is reflective of the European Commission's ambition of becoming a climate-neutral economy by 2050, with net-zero greenhouse gas emissions. Specifically, Germany reported the country is expecting to double its offshore wind energy generation capacity with targets set for 20 gigawatts (GW) by 2030 and 40 GW by 2040 respectively. The Netherlands reported their intention of meeting the 2030 targets to include a total of 11.5 GW of offshore wind generation capacity. Denmark noted its plans to create artificial energy islands in the North and Baltic seas which will serve as energy hubs for offshore wind. The islands intend to connect multiple countries' electricity networks, and when fully operational will transmit up to 10 GW of energy generated from offshore wind. The UK reported its increased ambition to achieve a total of 40 GW of offshore wind capacity, including 1 GW of floating wind generation.



In recognition of advances in technology, Norway noted its first floating offshore wind farm project is under construction comprising 11 turbines and a total capacity of 88 megawatts (MW), with water depth at the site ranging between 260-300 metres. The Hywind Tampen floating development is expected to be generating power in late 2022.

In terms of emerging offshore wind markets, India noted they are currently undertaking preparatory work and looking at prospective offshore areas for future release and licencing. Similarly, Turkey advised that their Government has been developing a roadmap for offshore wind energy. The roadmap provides a strategy for economic and financial assessment, supply chain and capacity building for the sector. Turkey is expecting to see its first offshore windfarm by 2027.

As the transition to a diversified energy future continues, the offshore wind industry is expected to grow rapidly.

> With 11 years of offshore wind experience under their belt, the US noted that they are considering enhancements to their legislative framework for offshore energy developments to ensure it continues to be fit-for-purpose as technology and the industry continue to evolve. The US is also engaging closely with

various local governments across the country and other key stakeholders through formalised arrangements to identify prospective areas for future development. Offshore wind developments in the US are expected to grow rapidly over the coming years with plans for a total installed capacity of 28.78 GW by 2030.

As the transition to a diversified energy future continues, the offshore wind industry is expected to grow rapidly. A common perspective shared by jurisdictions that already have a well-established industry, was the importance of marine spatial planning for offshore wind developments, particularly in terms of cumulative impacts and co-existence of other industries operating in the marine environment such as oil and gas, fishing, and shipping.

As Australia's representative on the forum. NOPSEMA noted that the Australian Government is continuing to develop a legislative and regulatory framework for offshore renewable energy activities, including offshore fixed and floating wind farms, wave and tidal power and emerging technologies such as ocean thermal energy. NOPSEMA also noted Australia's unique position with respect to supply chain potential, and synergies with potential hydrogen and other renewables export industries as well as proximity to markets throughout the Asia Pacific.

Further information about the proposed policy framework for offshore renewable energy infrastructure in Australia is available on the Department of Industry, Science, Energy and Resources website at <u>industry.gov.au</u>.

OVERVIEW OF THE PUBLIC COMMENT PROCESS FOR ENVIRONMENT PLANS

The public comment process provides the community an opportunity to have their say via NOPSEMA's online platform, and comment on proposed environmental management of exploration activities prior to NOPSEMA commencing its formal assessment.

Public comment on Environment Plans (EPs) commenced 25 April 2019 following amendments made to the Offshore Petroleum and Greenhouse Gas Storage Environment Regulations 2009, to introduce a 30-day public comment period for seismic and exploratory drilling proposals.

The NOPSEMA website includes guidance to assist stakeholders with making public comment on submissions and guidance is available on how titleholders should take public comments into account.

The public comment process provides an opportunity for the community to raise any environmental management issues for consideration by NOPSEMA and the titleholder in planning for the proposed activity.

The titleholder can change the EP after considering information received by the public, and is required to prepare a report responding, in general terms, to the comments received. This is an opportunity for titleholders to explain to the public how their environmental management will be effective in addressing the matters raised. The titleholder and NOPSEMA are not obliged to respond to each individual comment. The titleholder report, along with a new version of the EP, will be published on NOPSEMA's website when the EP is submitted for assessment.

Comments are particularly useful if they identify:

- Environmental impacts and risks that have been overlooked/not adequately addressed.
- Baseline information on the environment, including particularly sensitive fauna, locations, or times.
- The nature and timing of other marine use activities that require consideration in the EP.

Those who submit a comment via the platform and provide their contact information contribute to the transparency and accountability of the public comment process. This also provides a direct avenue for NOPSEMA and/or the titleholder to follow-up with individuals who raise issues that require further discussion or clarification.



If a relevant consideration is raised through the public comment process, the issue must then be addressed within the EP. Where many individuals supply similar or identical comments, they will be regarded as one matter for consideration, and does not gain priority through repetition. Information that is irrelevant to EP decision making criteria cannot be considered, this includes statements only raising opposition to oil and gas activity, no matter how many indirect submissions are made.

After NOPSEMA has completed its assessment of the EP, a report is published online describing how key matters, raised during public comment, were considered. The public can also review and provide comment on development projects which are submitted to NOPSEMA in the form of an Offshore Project Proposal (OPP), once NOPSEMA has determined the OPP is suitable for publication. See the *public comment page* on NOPSEMA's website.

Each year acreage areas proposed to be released for new offshore oil and gas exploration are published by the Department of Industry, Science, Energy and Resources. The Department manages this public comment process. Visit <u>industry.gov.au</u> for more.

STRATEGIC COMPLIANCE FOCUS AREAS FOR 2021

NOPSEMA's strategic compliance focus areas (SCFAs) guide the agency's activities to mitigate the highest perceived risk factors that currently affect industry.

NOPSEMA's current SCFAs are about preventing major accident events (MAE) and loss of well control, effective oil pollution emergency preparedness and responsible asset stewardship.

Preventing major accident events

COVID-19 coupled with lower oil prices and ageing assets in Australia has heralded the need for rapid change in the industry. NOPSEMA plans to drive the required change by addressing the following issues under this SCFA:

- Managing human factors, such as mental health and fatigue, that may contribute to MAEs
- Key safety management systems, including the use of management of change, operational risk assessment, performance standards and other tools
- The management of maintenance with a particular focus on corrosion of ageing assets, ensuring that facilities are maintained appropriately until the point at which they are decommissioned.

Preventing loss of well control

A major well control incident can result in catastrophic consequences for life and the environment. NOPSEMA has identified several key areas of improvement:

• Titleholder and drilling contractor interfaces, including management system interfaces and management of change

- Consistent standards for well-barrier diagrams, well failure models and terminology in the industry to promote a common language for communicating well integrity risks and controls
- Standardisation of methods for calculating pore pressure and fracture gradients to improve industry's ability to predict possible failure pathways and conditions.

Effective oil pollution emergency preparedness

NOPSEMA plans to drive improvements in the industry's ability to effectively respond to a major oil pollution by:

- Maintaining a compliance focus on operational matters including incident management team capability, source control capability, selection and use of dispersants, availability and capability of oil spill response providers and international response arrangements
- Promoting cooperative solutions with titleholders through collaboration with industry representative bodies, the Oil Spill Risk Forum and major oil spill response organisations
- Participate in the National Plan Review and collaborate with the Department of Industry, Science, Energy and Resources to review the strengths and limitations of the offshore petroleum spill response framework, aiming to clarify and simplify arrangements and inform potential policy and legislative change.



Responsible asset stewardship

The obligation to maintain structures, property and equipment brought onto title in accordance with legislative requirements is paramount. Also, the decommissioning of offshore petroleum wells, structures, and equipment in a timely, safe, and environmentally responsible way continues to be a key focus for NOPSEMA. Key initiatives to support industry to meet their decommissioning obligations include:

- Ensuring duty holders have appropriate plans for decommissioning and are executing those plans in a timely manner
- Providing certainty to industry regarding decommissioning obligations, including developing policies in relation to relevant legislative provisions and supporting regulations
- Supporting capacity building for decommissioning in industry, including supporting research, supporting collaboration, and sharing of resources and establishing a property register.

NOPSEMA will communicate further information about the suite of SCFAs during NOPSEMA inspection and promotion activities.

STRENGTHENING DIVING SAFETY

Under the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 (the Regulations), a diving project requires the diving contractor to prepare a diving safety management system (DSMS) that must be accepted by NOPSEMA.



The DSMS must meet the minimum standards set out in Diving Guidelines prepared by NOPSEMA. Diving contractors must also prepare a diving project plan (DPP). Requirements on the content of the DPP is set out in the Regulations. DPPs must be approved by the operator, where there is no operator, they must be accepted by NOPSEMA. The DSMS and DPP are complementary documents that must also align on the identification of risks and controls for all hazards associated with the diving project. Diving activities must not commence without accepted documents.

The Diving Guidelines were originally developed in 2003. In October 2018, these guidelines were revised by NOPSEMA, noting regulatory changes that evolved over the years.

The Diving Guidelines explain how the DSMS must provide for the identification of any hazards that could cause harm under normal and emergency situations and explain the requirements to address the elimination or reduction of risk.

A further review of the Diving Guidelines is currently underway to address any industry advancements and stakeholder comments on areas for improvement. External stakeholder input was received throughout 2020. A further opportunity to review and comment on the Guidelines will be announced within the coming weeks and will continue throughout 2021.

Latest improvements to the Guidelines provide further details including:

- chamber availability and coastal waters diving
- diving work being carried out from light diving craft
- closed bell umbilical lengths
- saturation diving fatigue management
- surface decompression using oxygen (Sur D O2)
- dive support vessel modular diving systems
- stabilisation periods prior to saturation decompression
- diver breathing rates (emergency)
- impacts of pandemics (e.g., COVID-19)
- cumulative changes to DSMS.

With the review in progress, diving contractors must continue to consider the existing published Diving Guidelines when developing their DSMS. NOPSEMA publishes a register of current and expired DSMS and DPPs, for further information visit *nopsema.gov.au*.

REGULATORY PRACTICE INITIATIVES AND SHARED LEARNINGS

NOPSEMA's reputation as a competent and professional regulator has seen NOPSEMA ramp up its efforts to improve its regulatory practice by learning from and contributing to broader regulatory professions.

Next year marks 10 years since NOPSEMA was formed from the National Offshore Petroleum Safety Authority through the addition of regulatory responsibility for environmental management and well integrity.

In 2020, NOPSEMA became a foundation corporate member of the National Regulator's Community of Practice (NRCoP) – a community of regulators across Australia and New Zealand – under the auspices of the Australian and New Zealand School of Government. Through NRCoP, NOPSEMA accesses the collective wisdom of the community of practice and provides staff with opportunities for professional development targeted at regulators.

NOPSEMA also taps into its regulatory networks, particularly via the International Regulators' Forum and the forum of International Offshore Petroleum Environmental Regulators, to learn about and build on the experiences of other regulators who face similar challenges.

However, it is not enough to merely consume information, NOPSEMA is also actively improving its own regulatory practice and is currently undertaking a review of its inspection and compliance monitoring processes.



"Compliance monitoring, including inspections, is arguably our most important function as a regulator" said Derrick O'Keeffe. Head of Division - Safety and Integrity and project sponsor. "Being risk-based is second nature for NOPSEMA but we can get better. As the world changes and threats emerge faster and more profoundly, we need to keep pace with the dynamic nature of the industry within a global context, to be assured that we are protecting lives and the environment and continue to ensure that duty holders are managing their own health, safety, environmental and integrity risks appropriately."

As well as learning, NOPSEMA actively contributes to the regulator profession through its involvement in the NRCoP, and the Australasian Environmental Law Enforcement and Regulators Network (AELERT) and other forums. For example, NOPSEMA's Strategic Compliance Manager recently presented, along with other regulators from Canada and New Zealand, on NOPSEMA's regulatory framework at an ANZSOG webinar that attracted over 480 live viewers from across the globe.

> Compliance monitoring, including inspections, is arguably our most important function as a regulator

NOPSEMA has also contributed to the Society of Petroleum Engineers as part of the Distinguished Lecturer series and leading a collaborative, original research project for the AELERT regulatory Intelligence community of practice, on leadership in regulatory intelligence.

OVER RELIANCE ON ADMINISTRATIVE CONTROLS CAN BUILD RISK

In 2020, NOPSEMA was notified of a process safety incident concerning a high flow rate on a production train that exceeded the technical integrity limits for potential vibration. The potential consequence of this incident could have resulted in fatigue failure of the pressure containing envelope.

In this scenario, a high priority alarm for high flow rate had been configured in the process control system with the expectation that the administrative control of a control room operator would respond to this alarm and intervene to reduce the production flow rate. In addition, a second administrative control with the onshore engineering team



would also monitor the production flow rates and intervene if potential exceedance of technical integrity limits were observed. Related to this incident there was also no 'high-high' flow rate process trip configured in the process control system to automatically protect the technical integrity limit of the pressure containing envelope.

66 The high flow rates were finally observed and the process was brought under control

> What occurred was that the production flow rates were exceeded and neither the control room operators nor the onshore engineering team intervened in a timely manner. The high flow rates were finally observed, and the process was brought under control to reduce the flowrate before a pressure containment failure occurred.

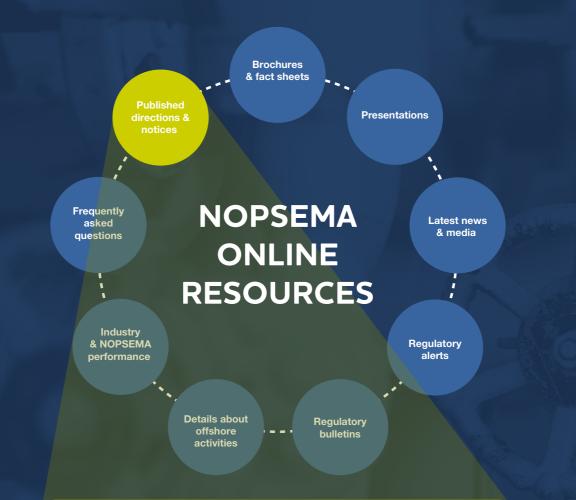
Functional Safety engineering guidelines that reflect International Electrotechnical Commission (IEC) standards, IEC 61508, and IEC 61511, indicate that a Layer of Protection Analysis (LOPA) should only take one risk management protection layer credit for 'alarm and operator response.' In this situation the facility operator was relying on two layers of administrative control such as the control room operators and the engineering teams to respond to the high flow alarm with no automatic trip back-up.

LOPA studies on the implementation of protection layers to prevent possibilities of failures, consider process design, basic process control system and alarm and response. Further independent mitigation layers such as automatic trip functions, pressure safety valves and restricted access to area, should also be evaluated to mitigate the event likelihood.

Facility operators should ensure LOPA and other risk assessment processes are designed and applied to ensure that engineering controls are preferred over administrative and other lower order controls, unless engineering controls are not feasible or (after appropriate analysis) are found to be disproportionate to the risk being addressed.

In addition, facility operators should consider undertaking a review of previous LOPA exercises related to loss of containment events that have a continuing impact on safety at the facility to ensure that implemented control measures reduce risks to as low as reasonably practicable and are not overly reliant on the administrative controls, such as alarm response.





Published Notices and Directions

As part of its regulatory functions under the OPGGS Act and to increase transparency, NOPSEMA publishes directions, prohibition notices and improvement notices to petroleum or greenhouse gas titleholders.

NOPSEMA can issue three types of directions: general directions, significant incident directions and remedial directions. The directions powers are used by NOPSEMA for enforcing compliance with the OPGGS Act and associated regulations.

These regulatory enforcement actions are published within 7 days and no later than 21 days of issuance and the provisions for publication do not apply to any other types of notices, letters or enforcement actions issued by NOPSEMA or NOPSEMA inspectors.

All published notices and directions are available at nopsema.gov.au.

66 Report an incident

To notify NOPSEMA of an accident, dangerous occurrence, environmental or well integrity incident call: 1300 674 472



nopsema.gov.au

National Offshore Petroleum Safety and **Environmental Management Authority (NOPSEMA)**

ABN 22 385 178 289