



Title: PROCEDURE FOR DEALING WITH DESIGN OR RELOCATION NOTIFICATIONS SUBMITTED UNDER REGULATION 6 OF THE OFFSHORE SAFETY CASE REGULATIONS 2005

PROCEDURE FOR DEALING WITH:

DESIGN OR RELOCATION NOTIFICATIONS FOR A PRODUCTION INSTALLATION

SUBMITTED UNDER REGULATION 6 OF THE OFFSHORE INSTALLATIONS (SAFETY CASE) REGULATIONS 2005

PROCEDURE ALSO TO BE USED FOR DESIGN NOTIFICATION FOR A NON-PRODUCTION INSTALLATION TO BE CONVERTED, SUBMITTED UNDER REGULATION 9

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1 INTRODUCTION

- 1.1 The purpose of this procedure is to ensure that design or relocation notifications (DNs) submitted under regulation 6 of the Offshore Installations (Safety Case) Regulations 2005 (SCR05) are adequately recorded and dealt with by HSE.
- 1.2 The procedure will also apply to design notifications for non-production installations to be converted, submitted under regulation 9. These are expected to be rare and the procedure does not make further specific reference to them.
- 1.3 HSE's objectives whilst dealing with the notification are to:
 - (i) Identify whether there are any significant matters that might prevent HSE from accepting a safety case subsequently submitted under SCR05 regulation 7,
 - (ii) Identify whether there are any other health and safety matters that need to be pursued with the operator,
 - (iii) To formulate an initial intervention plan for the prospective installation.
- 1.4 The time interval between submission of the design notification and the end of HSE's consideration of it will occupy only a proportion of the time between the operator's original decision to proceed and the commencement of operation. HSE may well be involved at other stages in the design and construction process and has published guidance stating its intentions in that regard¹. This procedure is intended to support that process.

2 RELEVANT REQUIREMENTS OF THE REGULATIONS

- 2.1 SCR05 regulation 6 requires prospective operators of production installations, and operators of production installations that are to be moved to new locations, to prepare and submit a notification to HSE, containing the particulars specified in Schedule 1 of SCR05.
- 2.2 Design and relocation notifications do not need to be accepted by HSE. However the aim of the notification is to provide HSE with an early opportunity to raise health and safety matters and to start a dialogue between the operator and HSE. This notification is intended to allow HSE to comment on the health and safety aspects of a design at a time when detailed design work has yet to be carried out.
- 2.3 Within 3 months of the receipt of a DN, HSE has to indicate to the operator any matters that, if not taken into account, could create



difficulties in the subsequent acceptance of the operational safety case. It may diminish HSE's ability to object subsequently to aspects of a safety case, if HSE does not raise matters at the DN stage that have been fairly presented to HSE.

- 2.4 Should the operator make a material change to any of the particulars notified, between submission of the notification and submission of the operational safety case, a notification of that change is required (see regulation 6(4)). HSE may comment on these changes.
- 2.5 In the operational safety case, the operator has to indicate the extent to which matters raised by HSE have been taken into account (see Schedule 2 paragraph 2).
- 2.6 SCR05 regulation 15(4) gives Inspectors power to obtain documents relevant to the operator's preparation of the subsequent safety case.

3 ADMINISTRATIVE REQUIREMENTS AND DUTIES

3.1 An IMT Inspector will be identified who will manage HSE's part of the notification. Their responsibilities will include:

- Screening the notification to ensure it is sufficient;
- Identification of appropriate specialists to consider the notification;
- Calling any necessary meetings;
- Ensuring adequate consultation with relevant teams in HSE;
- Facilitating dialogue with the operator;
- Ensuring the operator is advised of HSE's views within 3 months in an appropriate manner and in conjunction with an OSD operations manager;
- Developing an initial intervention plan that covers the period up to likely submission of the operational safety case;
- Ensuring information is adequately recorded in HSE's systems.

3.2 The DN provides an opportunity to consider wider health and safety issues and not just those relating to major accident hazards. It will be appropriate to have a dialogue with the operators on these matters too, and to include such matters in communications with the operator. However inspectors should differentiate clearly between major hazard matters, which could affect eventual acceptance, and those which would not.

3.3 Inspectors should refer to technical guidance i.e. APOSC/GASCET as appropriate. APOSC² contains assessment principles, primarily for safety case assessment, that are also of relevance to design or relocation notifications. GASCET³ contains more detailed technical guidance for



inspectors. HSE has also published guidance on risk reduction opportunities in the design phase¹.

4 PROCEDURES

4.1 Upon receipt of a Design or Relocation notification, the safety case receipt officer (SCRO) should identify the relevant IMT inspector and safety case coordinator (SCC) and send them the notification. If an IMT inspector cannot be identified e.g. because the operator is a new one, the SCRO should consult an Operations Manager, who should appoint one. The SCRO should create a COIN case and service order.

4.2 The SCC should send an acknowledgement letter to the operator on behalf of the IMT inspector (template DN_1). The SCC should identify the appropriate specialist inspectors to consider the notification, allocate the relevant service order lines and send the notification to them. The inspectors involved will normally be the inspectors who would assess a safety case from that operator. However OSD5.3 will consider 'Management of Design' as a separate issue from that of 'Materials'.

4.3 The IMT inspector should screen the notification to ensure potential sufficiency against the requirements of SCR05 Schedule 1 i.e. that there is adequate information present, bearing in mind the provisions of SCR05 regulation 6(3). If it appears that the information is deficient, they should confirm the proposed action with their team leader, then advise the operator accordingly. However HSE should proceed with detailed consideration of the notification according to this procedure, unless the operator withdraws the notification.

4.4 The IMT inspector should advise the topic specialists of the DN using template DN_2 and provide the following information:

- (i) details of the notification,
- (ii) names of the team members,
- (iii) any relevant information about the notification, project or operator,
- (iv) identified timescales for consideration of the notification.

4.5 Once the team members have had an opportunity to consider the DN, the IMT inspector should hold a meeting with the identified specialists (the initial coordination meeting). If appropriate, the operator can be invited to make a presentation at this meeting. The meeting is intended to allow the IMT inspector to obtain an early identification of any significant matters that might subsequently prevent HSE accepting the anticipated safety case.

4.6 Interactions with the operator are to be expected during the consideration of the DN. There is no limit to the extent of these, but this procedure is



written on the assumption that there is a single set of interactions, in which the IMT inspector coordinates a set of questions to be put to the operator by the specialist teams. The operator then replies to HSE and the specialist teams consider the responses, before advising the IMT inspector of the implications for the forthcoming safety case.

- 4.7 Specialist inspectors can advise the IMT inspector at the meeting or by virtue of a note (template DN_3) of any questions or requests for information that need to be put to the operator.
- 4.8 The IMT inspector will normally gather such requests together into a written set of questions to the operator (template DN_4). However the IMT inspector may delegate the pursuance of some issues to a particular specialist who may need to hold meetings etc.
- 4.9 The operator will then be given an opportunity to prepare replies etc.
- 4.10 Following receipt of replies, inspectors should consider them and prepare a concluding report (template DN_5) identifying:
 - (i) any remaining issues that might prevent acceptance of a safety case subsequently submitted;
 - (ii) any proposed inspection activities associated with the remainder of the pre-operation phase, or relevant to the initial periods of operation.
- 4.11 If appropriate, the IMT inspector may call a close-out meeting of the inspectors who have considered the notification, in order to formulate any specific responses or interventions deemed necessary.
- 4.12 The IMT inspector should prepare a concluding report, containing HSE's views of the design notification and statements of whether there are any matters which are unresolved and which could prevent acceptance of the subsequent safety case (template DN_6). The report should also summarise the recommendations for future inspection activities.
- 4.13 The IMT inspector should then prepare a letter to advise the operator of HSE's views, (using template DN_7). This letter should be sent by the Operations Manager, who will approve the course of action at that point. It may be appropriate to meet with the operator to explain HSE's views.
- 4.14 The conclusion of HSE's work on the DN occurs with the sending of the above letter. Further activities should be recorded against an intervention plan case, which should be created at this point, if it does not already exist.

5 KEY DATES AND RESPONSIBILITIES



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Note: Refer to section 4 above for details of procedures

Procedure reference	Brief description	Person responsible	Date action is required by after receipt of notification
4.1	Identification of responsible IMT inspector, Create Case/SO.	SCRO/SCC	24 hours
4.2	Acknowledge receipt, identify HSE team, distribute DN, populate SO.	SCC	48 hours
4.3	Screen DN	IMT Inspector	15 days
4.4	Provide Brief	IMT Inspector	15 days
4.5	Hold initial coordination meeting, identify potential matters arising	IMT Inspector and Specialist Inspectors	40 days
4.7	Specialists advise IMT of any matters arising/requests for information	Specialist Inspectors	40 days
4.8	Send questions/initial views to Operator	IMT Inspector	40 days
4.9	Receive replies, ensure distributed	SCC/IMT Inspector	59 days
4.10	Prepare concluding reports	Specialist Inspectors (IMT for SMS)	83 days
4.11	If appropriate, hold closeout meeting	IMT/Specialist Inspectors	83 days
4.12	IMT's close out report	IMT Inspector	90 days
4.13	Prepare and send letter to Operator. OM's approval.	IMT Inspector /Operations Manager	90 days



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6 ABBREVIATIONS

DN Design or Relocation Notification submitted under Regulation 6
IMT Inspection Management Team
SCC Safety Case Coordinator
SCRO Safety Case Receipt Officer
SCR05 Offshore Installations (Safety Case) Regulations 2005

7 REFERENCES

- 1 Offshore Installations (Safety Case) Regulations 2005 HSE's involvement in the design and construction process (including processing of design notifications) <http://www.hse.gov.uk/offshore/infosheets/is11-2007.pdf>
- 2 Assessment Principles for Offshore Safety Cases (APOSC) <http://www.hse.gov.uk/offshore/aposc190306.pdf>
- 3 Guidance for the topic assessment of the major accident hazard aspects of safety cases <http://www.hse.gov.uk/offshore/gascet/>



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ANNEXES

ANNEX 1 DRAFT LETTERS TO OPERATORS



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ANNEX 1

DRAFT LETTERS FOR USE WITH DESIGN OR RELOCATION NOTIFICATIONS

The following are intended to be templates for use with standard HSE letterhead.

Anything in carat marks e.g.<name>, should be replaced by specific details in an actual letter.



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Template DN_1

RECEIPT OF NOTIFICATION AND CONTACT DETAILS LETTER

From: <Inspector name>
To: <Operator>
FAO: <title and name of Operator's contact for SC>
Date: <date>

Dear <name>

Offshore Installations (Safety Case) Regulations 2005 (SCR05)

Operator: <Operator>
Installation: <Installation>
SCR05 Reg. 6
Notification received: <Date> (Day 0)
Notification Number: <COIN Case number>

Your Notification was received on the date given above. It will now be dealt with according to HSE procedures. These can be found online at <http://www.hse.gov.uk/offshore/scham/index.htm>

You will be informed by <insert agreed date - maximum is day 0 +3 months>. Any matters identified at this stage, that are not adequately addressed, might mean that HSE is unable to accept a subsequent safety case.

I am the Inspector dealing with this Notification. I will ensure all formal communications are tracked and recorded. It will assist me greatly if you ensure that all relevant written or email communications quote the Notification Number given above and are addressed (or copied) to me. I will distribute the communications within HSE.

Contact details:
Inspector <name>, tel. <telephone>, email <email>
My address is: <office address of Inspector>

Yours sincerely,

Inspector



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Template DN_2

ADVICE OF RECEIPT OF A DESIGN NOTIFICATION

COIN CASE NUMBER: abcdefg

DN title:

Author of this letter:

Date:

Addressees: *[IMT Inspector's TL]*
[Topic Specialists]
[Topic Specialist's Managers]
[DIS]
[Safety Case Coordinators]

1 Purpose

This is to advise you of the receipt of a Design Notification for the [name] installation. Please consider the DN and advise me:

- (i) whether there are any significant matters that might prevent HSE from accepting a safety case subsequently submitted under SCR05 regulation 7;
- (ii) whether there are any other health and safety matters that need to be pursued with the operator.

Please provide me with any initial questions or views relating to the above matters within 4 weeks. During this time I will be hosting a meeting on [date] at which we can discuss your views.

I will then write to the operator with our initial views and requesting any further information we need. You will be sent their replies and have a further opportunity to consider them.

You will then need to provide me with any revised views, having considered any further information we have obtained from the operator. You will also need to provide me with any proposals for subsequent interventions.

2 Background information

Enter any relevant information about the installation or operator

3 The following table summarises the proposed involvement by inspectors

Topic		Name	
Issue No:1	Issue Date: April 25 2008	Issue Authority: I Whewell	Page 11 of 20



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Safety Management Systems	
Well Operations	
Process Integrity	
Fire, Explosion and Risk Assessment	
Evacuation, Escape and Rescue	
Mechanical Systems	
Control and Electrical Systems	
Human Factors	
Diving	
Materials	
Structural Integrity	
Management of Design	
Naval Architecture and Marine Engineering	
Marine and Aviation Operations	
Pipelines	
Occupational Health	

4 Key Dates

Please attempt to keep to the timescales below

	Days after start	
Receipt of Design Notification	0	Enter dates here and below
Acknowledgement of receipt sent, this brief issued	15	
Matters raised	40	
Operator's reply due date	59	



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Topic final report's	83	
Letter to Operator	90	

5 Arrangements for communicating with the operator are as follows:

[Include contact name(s), phone number(s) and e-mail address(es) and operator's address.]



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Template DN_3

DESIGN NOTIFICATION MATTERS RAISED CASE NOTE

COIN CASE NUMBER: abcdefg

Design Notification Title:
Note Title:
Author:
Date:

I have considered the Design Notification in accordance with the request from the IMT inspector and relevant guidance.

Matters to be raised with the operator

Identify:

- (i) Whether there are any significant matters that might prevent HSE from accepting a safety case subsequently submitted under SCR05 regulation 7;*
- (ii) Whether there are any other health and safety matters that need to be pursued with the operator.*

State any further information that is needed from the operator or questions that need to be asked.

If any significant matters are being raised i.e. (i) above, indicate if possible what the operator would need to do to satisfy the concern. If possible, refer to SCR05 guidance, APOSC and GASCET.

Prepared by Inspector	Enter name	Date:	
Approved by Team Leader	Enter name	Date:	



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Template DN_4

LETTER TO OPERATOR WITH INITIAL VIEWS AND REQUESTS FOR INFORMATION

From: Inspector <name>
To: <Operator>
FAO: <title and name of Operator's contact for SC>
Date: <date>

Dear <name>

Offshore Installations (Safety Case) Regulations 2005 (SCR05)

Operator: <Operator>
Installation: <Installation>
SCR05 Reg. 6
Notification received: <Date> (Day 0)
Notification Number: <COIN Case number>

Further to our acknowledgement of receipt of your Design/Relocation Notification submitted under SCR05 regulation 6, we have now performed an initial analysis of this submission. We will present our final views within 90 days of submission, but it will assist us to do so if you would reply to the following interim views and requests for information.

The following matters have been identified at this time that if not addressed adequately, could prevent HSE subsequently accepting a safety case submitted under SCR05 regulation 7.

Enter matters here (including any proposals). If there are none, remove the paragraph above

The following matters relevant to health and safety have been identified at this time. However they are of a significance that means they are unlikely to affect acceptance of the safety case submitted under SCR05 regulation 7.

Enter matters here. If there are none, remove the above paragraph

Please reply to the following questions/provide further information as requested

Enter questions/requests here (numbered)

Yours sincerely,

Inspector



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Template DN_5

TOPIC ASSESSOR'S COMPLETION REPORT FOR A DESIGN NOTIFICATION

COIN CASE NUMBER: abcdefg

Design Notification Title:
Report Title:
Author:
Date:

I have considered the Design Notification in accordance with the request from the IMT inspector and relevant guidance.

1 Summary of Matters Raised

Identify matters raised with the operator and any further information received

2 Conclusions of Consideration

Identify:

- (i) Whether there are any significant matters that might prevent HSE from accepting a safety case subsequently submitted under SCR05 regulation 7;*
- (ii) Whether there are any other health and safety matters that need to be pursued with the operator.*

State any further information that is needed from the operator or questions that need to be asked.

If any significant matters are being raised i.e. (i) above, indicate if possible what the operator would need to do to satisfy the concern. If possible, refer to SCR05 guidance, APOSC and GASSET.

3 Suggested future inspection topics

The following matters, which are specific to the Installation or to its Case, are recommended for inclusion in the Annual Inspection Plan:

[If there are no such items insert "NONE"]

The following matters, which have implications beyond this installation or its Case but are specific to this operator, are recommended for consideration during future inspection of this operator:



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[If there are no such items insert "NONE"]

4 Status of COIN records

All COIN records generated have been raised to the appropriate status and the service order line will be marked as completed.

Topic Team:			
Prepared by Inspector	Enter name	Date:	
Approved by Team Leader	Enter name	Date:	



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Template DN_6

IMT INSPECTOR'S CLOSE OUT REPORT

COIN CASE NUMBER: abcdefg

Design Notification Title:
Report Title:
Author:
Date:

Based on my consideration of this Design Notification, any other communications with the operator and advice from topic specialists, I consider that:

Delete the inapplicable: i.e. either:

There remain matters which may prevent HSE accepting the safety case anticipated to be submitted under SCR05 regulation 6.

Explain

The following action is proposed and initially I am writing to the operator accordingly:
 [List proposed actions]

OR

There are no matters, which we have identified at this time, which would prevent HSE accepting the safety case submitted under SCR05 regulation 6.

The following matters were raised and resolved or remain extant, but are of a significance that is unlikely to affect the acceptability of the safety case.

Explain

Future Inspection activities

In addition to any items identified above. The following topics and issues are also proposed for inspection and will be included in the intervention plan.

[List topics proposed]

IMT:			
Prepared by Inspector:	Enter name	Date:	



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Approved by IMT Team Leader	Enter name	Date:	
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Template DN_7

DESIGN NOTIFICATION – OPERATIONS MANAGER’S LETTER TO OPERATOR

From: <Operations Manager>
 To: <Operator>
 FAO: < title and name of senior Operator contact>
 Date: <date>

Dear Sirs

Offshore Installations (Safety Case) Regulations 2005 (SCR05)

Operator: <Operator>
 Installation: <Installation>
 SCR05 Reg. 6
 Notification received: <Date> (Day 0)
 Notification Number: <COIN Case>

The Health and Safety Executive has considered the Design Notification referred to above, including any revisions made.

The following matters have been identified at this time, that if not addressed adequately, could prevent HSE subsequently accepting a safety case submitted under SCR05 regulation 7. We invite you to address these concerns.

Enter matters here. If there are none, remove the paragraph above

The following matters relevant to health and safety have been identified at this time. However they are of a significance that means they are unlikely to affect acceptance of the safety case submitted under SCR05 regulation 7.

Enter matters here. If there are none, remove the above paragraph

HSE expects to interact with you during the remaining design and construction phases of your project. We have produced a draft intervention plan and trust that you will be able to discuss the relevant details with our inspectors as necessary.

Attach Intervention plan

HSE Inspectors will monitor your compliance with SCR05 and other relevant statutory provisions but you are reminded that you, as the operator, are responsible in law for the management of health and safety and the continuing control of hazards and risks on the installation.

Yours faithfully,
 Operations Manager