

HSE information sheet

Verification during decommissioning and dismantling

Offshore Information Sheet No. 2/2008

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Introduction

1 This information sheet provides guidance on revising the written scheme of verification where the boundaries, scope or requirements for safety critical elements (SCEs) or specified plant (SP) change as a result of decommissioning and/or dismantling projects to ensure these measures are (or will be) suitable at all times.

Background

2 A number of oil and gas fields on the UKCS have reached the end of their economic life. Operators are required to remove the infrastructure. This will require the decommissioning and then dismantling of equipment, plant and structures. During this period the major accident scenarios are likely to change continually, requiring further reviews and revisions of major hazard risk control measures. Thus the performance required from these major hazard risk control measures will change.

3 These risk control measures will include safety critical elements and specified plant. The situation is dynamic with major changes to the scope and boundaries for SCEs and SP or even their removal. In addition new SCEs or SP may be introduced. Therefore, to retain adequate health and safety risk control measures performance standards for SCEs and SP must be reassessed and appropriately revised as required. This sheet considers only one aspect of this process, what, in HSE's opinion, must be undertaken to comply with the verification requirements of the Offshore Installations (Safety Case) Regulations 2005 (SCR05).

Revision of the verification scheme

4 Regulation 20 of SCR05 calls for the verification scheme to be reviewed as often as may be appropriate and, where necessary, revised or replaced in consultation with the independent competent person (ICP). Revision of the scheme should be considered when dismantling affects or includes SCEs and that such a decision should be made in conjunction with the ICP.

When is revision required?

5 The purposes of the verification scheme are for the ICP to verify that the SCEs are (or will be) suitable and remain in good condition and repair (SCR05, regulation 2(5)). Associated guidance in paragraphs 97-98 of the guidance to SCR051 further explains the purpose of the verification which is to ensure continuing suitability and to discover errors in modification and operation. Given these requirements and expectations then any revision of the scheme must be made prior to a change to a SCE or SP for the scheme to be effective.

How could this be achieved?

6 Decommissioning and subsequent dismantling projects are normally divided into phases. Prior to the commencement of a phase the duty holder is expected to carry out a risk assessment. This risk assessment should identify changes to risk control measures for major accidents. This in turn requires a review of the record of SCEs (e.g. removal or changes in scope or boundaries) and any changes should be recorded. The ICP must comment on this amended record prior to implementation of any changes. Given the nature of the dismantling work and changes to the SCEs the duty holder and ICP should then consider what verification activities (if any) are required, or may be removed, prior to or during the next project phase in order for the ICP to be satisfied that the SCEs are (or will be) suitable and likely to remain so. This process is then repeated for each substantive project phase.

Verification record keeping

7 SCR05 regulation 18(3) requires that records must be kept for at least 6 months after the expiration of the scheme. Regulation 19(2)(b), schedule 7 defines what records must be kept. These include what verification activities have been undertaken, any resulting remedial actions, and what remedial actions are performed.

What else requires attention?

8 The dynamic situation during decommissioning and dismantling gives rise to the possibility that SCEs or SP are impaired or their performance degraded. If this is the case the effectiveness of risk control measures (or barriers to harmful events) has been reduced. Thus in such circumstances the duty holder must consider enhancing other risk control measures to ensure the risk is as low as reasonably practical.

When does an offshore oil and gas installation cease being an installation?

9 The Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995 (MAR) define the meaning of an "offshore installation" in regulation 3. This regulation states that once an offshore structure has been designated as an installation it will remain so until it is removed or used for another purpose. This regulation also states that any apparatus or works that are situated on, or affixed to, the main structure or wholly or partially within 500m and associated with a pipe or system of pipes and connected to any part of that installation shall be deemed as part of the installation.

Action

10 Given that during a decommissioning and/or dismantling project the boundaries, scope or requirements for SCEs or SP are likely to change then revision(s) of the verification scheme must be made. Such revisions must be made in consultation with

the ICP and prior to the changes being made for a scheme to be effective. It may be advantageous to align revision of the scheme with the project phases and treat them as project milestones.

References

11 Further information can be found in the following publication:

1. A Guide to the Offshore Installations (Safety Case) Regulations 2005 L30
Third edition HSE Books 2006 ISBN 0 7176 6184 9

Further information

12 Any queries relating to this information sheet should be addressed to:

Health and Safety Executive
Hazardous Installations Directorate
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Lord Cullen House
Fraser Place
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<p>This information sheet contains notes on good practice which are not compulsory but which you may find helpful in considering what you need to do</p>
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