

OSDR SCR2015 Safety Case Assessment Trial Feedback:

DECC and HSE recently tested the internal processes that the OSDR partnership will use to assess safety cases. The trial used early drafts of a duty holder transitional safety case and SCR2015. The results enable OSDR to further develop the process and identify points duty holders can consider when preparing safety cases for submission as follows:

Lessons for Duty Holders :

1. **Safety and Environmental Critical Elements (SECEs)** is a term introduced by the new regulations to describe safety and/or environmental critical elements. SCEs (and ECEs) are no longer terms that are used.

ADVICE Duty holders should use the term SECE in Safety Cases. The use of SCEs or ECEs should be avoided to prevent confusion unless adequate justification is provided and it is clear they are equivalent to SECEs.

2. **Adequacy of Demonstration:** The details required by some aspects of the new regulations are prescriptive in nature and comprehensive, for example in relation to CMAPPs, management systems and verification.

ADVICE Duty holders' safety cases should adequately demonstrate that the extent of each regulatory requirement is understood and met. Reading and understanding the regulations is important. Using OSDR safety case assessment templates will assist in determining the level of detail to be included in the submission. Duty holder are not required to complete individual topic assessment templates but, if wishing to do so, they may consider submitting them with the safety case as an aid to regulatory assessors.

3. **Environmental Aspects** are new to the safety case regime, but duty holders probably already have most of the information needed, which may be in use for other regulatory purposes. Contributions by different individuals or department can also introduce overall inconsistencies in a case. If various individuals or department contribute sections of the safety case this also introduces further potential for inconsistencies

ADVICE: Duty holders should ensure they are using current information in safety cases and avoid inconsistencies between existing material submitted to regulators and the information submitted in a safety case, which may summarise it. It may be prudent to include an overall editing check to eliminate conflicts and inconsistency between sections in cases.

4. **Locating information:** Inspectors will annotate OSDR Assessment Templates to show where they find particular information in a Safety Case and whether it meets the criteria the template indicates are required for regulatory acceptance. Locating specific information takes significant time, particularly when issues are covered to varying degrees in multiple sections of a case.

ADVICE Duty holders should include a comprehensive contents page and adopt a clear numbering and cross-referencing strategy throughout Safety Cases so that information is easy to locate. This will assist assessing inspectors and the workforce to use the document.

Duty holders should also partially complete the Initial Assessment Template (contained on www.hse.gov.uk/osdr) to identify where relevant information is located in a safety case and send this with the case when it is submitted

- 5. Submission of a safety case to OSDR:** The regulations require the Safety Case to be submitted. OSDR request that two hard copies and an electronic copy are provided. Whilst not strictly a submission of an electronic document, using a web file server download link may be a convenient, practical way to provide access to an electronic copy of the case. Experience shows this can work well, depending on the system used, and if successful OSDR will accept this method of electronic submission.

ADVICE Duty holders considering web download access to a safety case should contact OSDR in advance to ensure compatibility of systems and to test the link.

- 6. Maintenance of Control Systems Following Evacuation :** Schedule 6 – 20 requires arrangements for the maintenance of control systems when all personnel are evacuated. Electrical, Control and Instrumentation specialists will therefore be included in the assessment of transitional production installation safety cases. A topic assessment template has been developed and will be available on the website.

The above lessons and advice should not detract from the guidance material that has been, and is being, produced to support the implementation of these regulations and are simply a few 'headliners' that were identified during the trial.