

OFFSHORE MAJOR ACCIDENT REGULATOR



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for Environment & Decommissioning



Guidance Notes on 2022/23 Intervention Planning

A revised Framework Diagram has been produced for intervention planning for the 2022/23 work year. These notes are to supplement the framework.

The key document used for intervention planning is the Duty Holder Overview and Strategy document. It is intended that this document should be a live document that is produced and updated throughout the year to capture the intervention strategy for a duty holder. This year we are also piloting the use of a NEW Planning Spreadsheet to capture Topic Specialist opinions and priorities.

Additional notes on the stages in the framework are given below:

Step	Stage	Notes
1	Identify installations planning to work in UK in UKCS.	<p>IMTs should attempt to identify, as much as possible, any installations that have a likelihood of working in the UK in 2022/23. It is recognised that this might still be difficult for NPIs, particularly as the impact of COVID-19 and the oil price has led to a number of DHs contracting and installations being 'stacked'.</p> <p>IMTs should also identify dates for shutdowns for installations, as far as possible. HSE normally tries to avoid shutdowns for inspections, as bedspace is often limited during these intense periods of work, but it may well be appropriate to schedule an inspection during such work (e.g. in response to previous incidents that have occurred during shutdowns).</p> <p>It is also useful to identify potential combined operations that may take place, as it could be more efficient to schedule a joint visit of the combined operation.</p>
2	<p>Review and revise Specialist Topic Strategies.</p> <p>Populate TS Sheets in the 'Planning Spreadsheet' with opinions on DH performance, requests for inspections and prioritisations.</p>	<p>Topic Specialist Team Leaders should review the topic specialist strategies that have been produced for previous years located in CM9 folder 4.6.1711, and revise as necessary.</p> <p>The use of the TS Sheets in the planning spreadsheet is a new step in the process for 2022/23. The aim is for TSs to articulate their priorities in a transparent way that can be seen by all other TS disciplines as well as IMTs. Further guidance is contained in the 'Notes' boxes in the spreadsheet.</p>
3	Produce duty holder strategy	Last year's (2021/22) Duty Holder Strategy

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	<p>documents.</p>	<p>and Overview documents are easily accessible via the OMAR SharePoint Site, or from last year's Intervention Planning CM9 folder 1.1.2.652. DHOSs should be revised for 2022/23 and forwarded to Admin for uploading into CM9 and onto the OMAR Sharepoint site.</p> <p>The existing strategies already include some plans for the 2022/23 and 2023/24, and specialists in particular should review those strategies to see what has already been proposed for 2022/23 for their disciplines.</p> <p>The DHOS template has been revised to reflect dates for 2022/23, the only other changes are to the '3 Year Strategy Plan' Table - change the notes under the heading 'Comment/Future Priorities for DH' and REMOVING the superfluous line 'k) Operational Integrity' from the SMS Strategy section. This was added in error and created an 11th SMS Topic which was NOT reflected in the IMT Strategy. Operational Integrity issues are sufficiently covered under the 10 existing 10 sub-topics. IMTs should review and update the strategy documents produced for 2021/22 utilising data contained in the new TS Sheets in the Planning Spreadsheet. Where required, IMTs should initiate discussions to fully understand TS priorities before finalising the DH Strategies.</p> <p>IMT and OPRED inspectors should discuss the duty holder strategy as there are some HSE disciplines which align more closely with OPRED intervention activities than others, this may affect the intervention strategy for joint visits. OPRED may also have populated the Planning Spreadsheet with their proposed joint visits.</p> <p>The strategy should explicitly identify what significant onshore intervention activities may be required, which needs to be included in the intervention plan. Significant intervention activities would be activities that are longer than 1 day total inspection time.</p>
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		<p>The strategy document is also looking for an indication of when the inspection might be conducted (please specify a week). This will enable specialist team leaders to identify potential resource constraints at an earlier stage.</p> <p>All the strategy documents for 2022/23 will be filed in CM9 folder 1.1.2.659.</p>
4	Collate outputs from Duty Holder strategies into planning spreadsheet.	Admin will collate all the data from the duty holder strategy documents into a planning spreadsheet which will also be located in CM9 folder 1.1.2.659.
5	Identify potential resource constraints, amend DH strategy documents where required, and amend planning spreadsheet.	The spreadsheet will be reviewed by all team leaders to identify any potential resource constraints. If constraints are identified, then discussions will take place between IMT and specialists, and the strategy amended as appropriate. If the strategy is amended, both the strategy document and planning spreadsheet in CM9 should be updated.
6	Identify potential joint visits required (e.g. OPRED, ODM, Management Visits, CPD visits, to include in intervention plans).	Inspection teams should be limited to 3 active HSE inspectors. This is to facilitate space for OPRED joint visits, and also other joint visits (e.g. CPD visits, line manager visits, STP joint visits etc.). It is recognised that there may be exceptions to this rule (e.g. for a brand new installation), but this should be a rare event.
7	Produce 2022/23 DH Intervention Plans, approved by team leaders.	The template remains largely unchanged since 2021/22 and is located on the OPRED SharePoint Site. The holding statement for the Principles of Process Safety project has been removed but the standard lines for Diving (reference to onshore Diving Review and interventions if they have diving operations) and onshore Annual Pipeline Reviews remain. Intervention Plans will continue to be shared between HSE and OPRED using the OPRED SharePoint site.
8	Issue Intervention Plans to Duty Holder (ED Admin)	Intervention plans will be emailed to the dutyholder, as well as hard copies (which will be copied to safety reps). The contact details for where to send plans (including email addresses) should be clearly identified on the duty holder intervention plan.
9	Names of inspectors for inspections identified and added to planning spreadsheet.	All team leaders should add specific names of inspectors for each inspection to the planning spreadsheet. This will enable Admin to create the COIN IPSO lines, and also enable the

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		Lead Inspector to send calendar invites to inspection team members.
10	COIN Service Orders and Activity lines created, where required.	<p>Admin will create the COIN IPSO lines using the data from the planning spreadsheet, and assign the lines to inspectors as appropriate. It is therefore important that the correct names of inspectors are added to the planning spreadsheet (and in particular the Lead Inspector) to enable Admin to do this efficiently. Inspectors should check any service orders they have been assigned, to ensure that the data is accurate.</p> <p>Inspectors are reminded to inform Admin when inspection activities have been completed, in order to set the timescales for production of letters and reports.</p>
11	Send calendar invites to all inspection team members.	The Lead Inspector for the inspection should send calendar invites to all inspection team members, including dates for onshore pre and post inspection meetings. The 'ED Offshore Site Visit' email account should be added as an addressee for all offshore calendar invites, to ensure that Admin can track the movements of HSE personnel in the event of an emergency.



Appendix A: Suggested Norms for Inspection Frequency

HSE has a principle of focussing intervention activities on the installations which has the highest inherent hazards. In developing the intervention strategy for a duty holder's installations, the frequency of inspection should be determined by the IMT focal point inspector. Table A1 below gives some suggested norms that can be used to determine frequency of inspection.

Installation Type	Inspection Frequency
Manned production installations	1 inspection / year
Not permanently attended production installations (NPAI): <ul style="list-style-type: none"> • Planned overnight stays for significant periods in a year • Some overnight stays, or very frequently visited • Infrequently visited 	Between 2-5 years, depending upon type of NPAI: <ul style="list-style-type: none"> • Every 2 years • Every 3 years • Every 5 years
Mobile Offshore Drilling Units	1 inspection / year for operational units
Light well intervention vessels	Every 3 years for operational units
Larger flotels	1 inspection / year for operational units
Other accommodation units	Every 2 years for operational units. Note: Additional inspections may also be warranted due to intelligence received via Combined Operations Notifications.

Table A1: Suggested norms for inspection frequency depending upon type of installation

The inspection frequency may also be modified in the duty holder strategy due to other factors and operational intelligence.

Factors which may warrant increases or reductions to inspection frequency

- New installations.
- New or changed duty holder.
- Poor inspection scores from previous interventions.
- Previous enforcement.
- Increased history of incidents.
- Planned projects (e.g. large flotel campaigns or significant additions to an installation).
- Very large installation with large POB.
- Increased hazards (e.g. high H₂S, HPHT installations).
- Intelligence from combined operations or well notifications.
- Very low POBs or process plant (e.g. FSUs).
- Large number of similar NPI units.

The frequency of inspection should be reviewed every year by the IMT during the intervention planning process.