BOEMRE Compliance and Beyond: Focusing on Real vs. Paper Safety

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ABSTRACT

The Workplace Safety Rule (30 CFR 250.1902) finalized in October 2010 by the Bureau of Ocean Energy Management, Regulatory and Enforcement (BOEMRE) specifically requires drilling and production operators of offshore facilities in the Gulf of Mexico to have a Safety and Environmental Management System (SEMS) in effect on or before November 15, 2011. The Rule is performance-based rather than prescriptive and, as such, focuses on desired characteristics of the final product, rather than specific requirements. The principle behind the Rule is that it is the operators’ job to assess their processes, procedures and systems to identify and evaluate risks and implement appropriate controls to manage safety and environmental risk. The operator is required to conduct a hazard analysis for major hazards, job safety analyses for workplace hazards and adopt a complete safety management system per the American Petroleum Institute’s Recommended Practice 75 (API RP 75). For many in the offshore industry, these requirements are synonymous with the term “Safety Case”. A safety case is a document produced by the operator of a facility which identifies the hazards and risks, describes how the risks are controlled, and demonstrates how the safety management system ensures the controls are effectively and consistently applied. The requirement to develop a formal safety case for oil and gas facilities has been in place for many years in certain parts of the world (e.g. Europe and Australia). Additionally, companies and industry associations (e.g. IADC) have encouraged the development of safety cases in other areas of the world where specific legislation does not currently exist. As the Workplace Safety Rule is performance-based, it is reasonable to assume that a safety case is the standard to which industry will be compared. This paper will discuss what it takes to comply with BOEMRE’s Workplace Safety Rule and how that relates to an effective safety case, how to embed the safety case within operations and what lies beyond compliance. The paper presents real examples from around the world with an emphasis on how to avoid common shortcomings and ensure that the process is not just a paper exercise, but results in a real step change in safety performance and culture.