

# COS SAFETY SHARE

## WHAT WILL WE DO TO PREVENT THIS FROM HAPPENING HERE?

### OFFSHORE WORKER STOPS WORK AND PREVENTS POTENTIAL PROCESS SAFETY INCIDENT

#### What happened?

On a floating production facility, a process safety concern was raised through a safety observation stating that a high-pressure gas system had been operated without Pressure Safety Valve (PSV) protection. To address an area of corrosion identified from an integrity management (IM) inspection finding, the high-pressure gas system was initially inspected and evaluated in late 2017. In early 2018, it was concluded that repair of the IM finding could be deferred until January 2019. This deferral decision was based upon a reduction in a Process Safety High (PSH) trip setpoint without verification of process safety time (PST) calculation. Although the PSH trip setpoints were reduced, the PSV setpoints for this section of the HP Gas Line were not reduced, as required by industry code. Due to increased pipeline pressure in late 2018, the offshore team wanted to raise the PSH setpoint, but an operator remembered that the PSH had been previously lowered due to an integrity finding. The PSV setpoints were not reduced until March 2019.

#### What went wrong?

Company procedures and processes for IM anomaly reporting and control of work were not followed. Instead, an alternate inspection and evaluation process was utilized which did not conform to company requirements. The extended operation of the HP Gas Line without adequate overpressure protection was caused by a lack of knowledge and competency in application of industry code. The IM finding should have become a Priority 1 finding in early 2018, but no notification was made.

#### Why did it happen?

The risk ranking processes used for deferral decisions were found to be inadequate. Contributing to this incident was failure to adequately or timely respond to concerns that were raised.

#### What areas were identified for improvement?

A documented review of all Priority 1 and 2 IM findings and mitigations at GoM sites will be completed to ensure conformance and compliance with applicable industry and Company requirements. Verification will continue at defined intervals and frequency. Improvements to the risk assessment process will include evaluation of: use of a system and process to track actions, closures, requirement that actions are complete before credits are taken, and defined expectations on the required timing to elevate and approve risks at the required organizational level.

GoM will systematically improve understanding and competency in the application of industry codes for engineering staff. This will also include a sustainable process safety and risk training program. Expectations will be communicated to Company leaders on how process safety concerns should be documented, addressed, and communicated when closed.

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