



Bureau of Safety and Environmental Enforcement

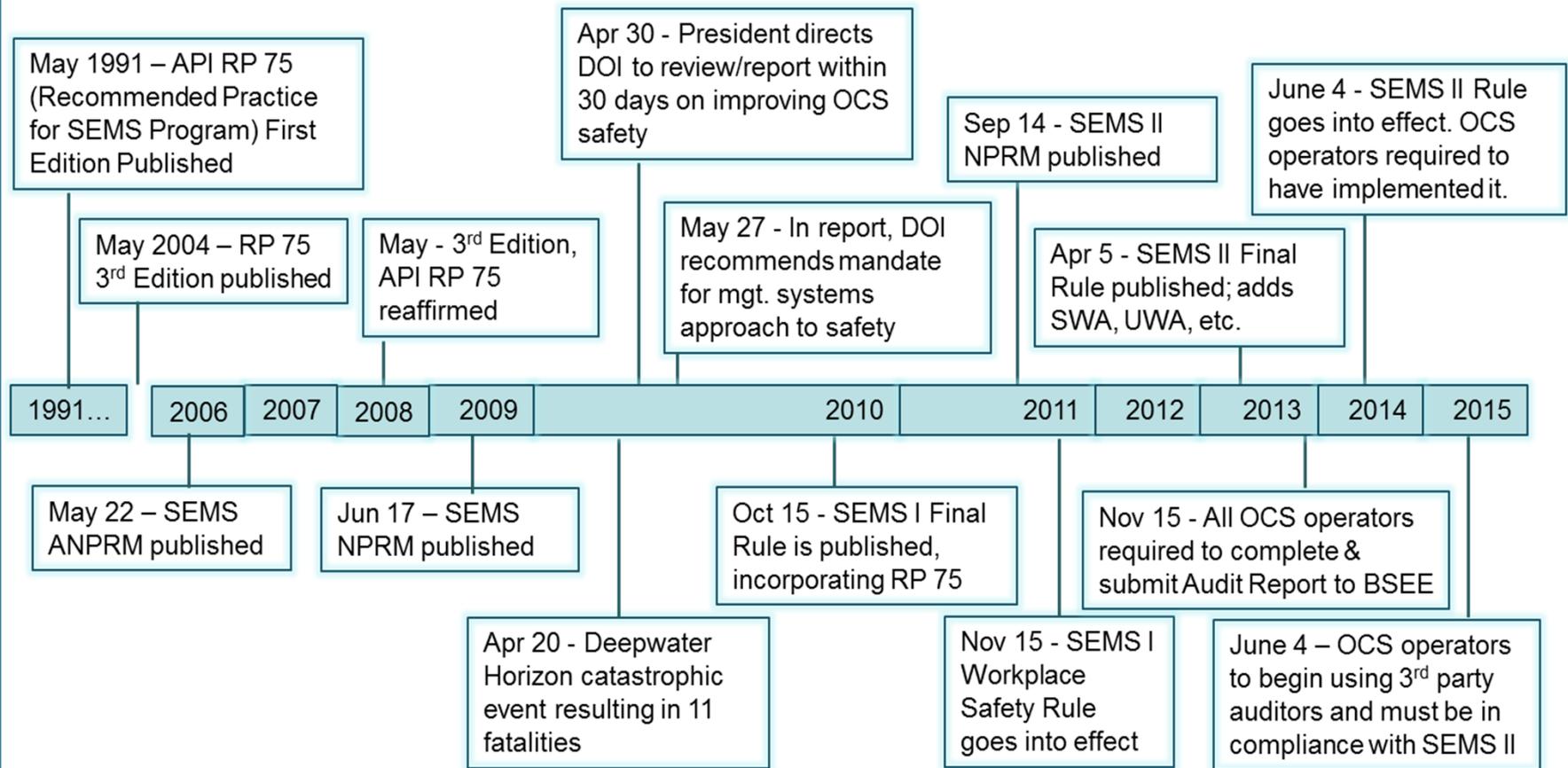
The Status of SEMS in the Pacific Region

Brian Little, Office of Field Operations

Prevention First 2016

“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”

Development of SEMS



Audit Change From Previous Rounds

- SEMS II Rule
 - COS-2-01 Audit Team of Three Auditors Must Meet Qualification Requirements
 - COS-2-03 Specifies Use of Accredited Audit Service Provider

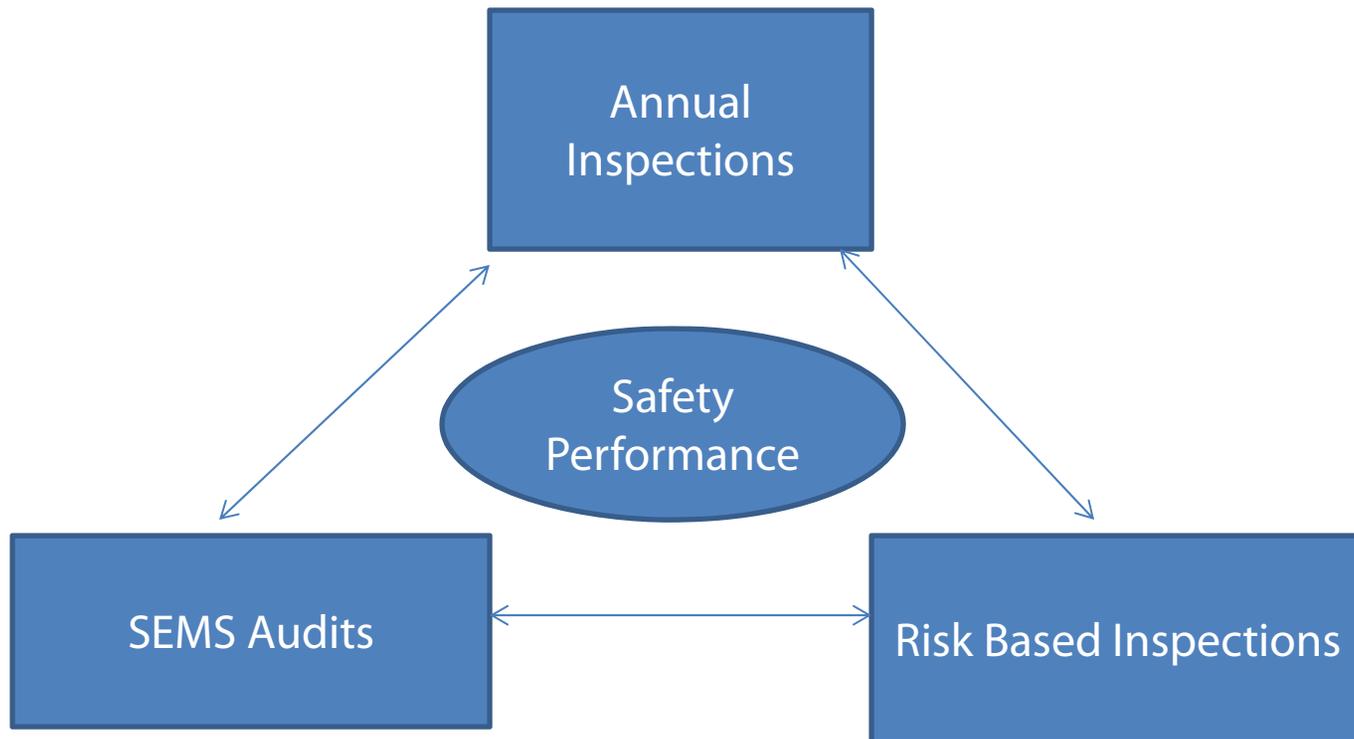
While initial audits have been focused at establishing a SEMS program from a compliance perspective, audits now are more directly evaluating how operators are incorporating elements into their operations.

Principle SEMS Objectives

1. **focus attention** on the influences that human error and poor organization have on accidents;
2. **continuous improvement** in the offshore industry's safety and environmental records;
3. **encourage** the use of performance-based operating practices; and
4. **collaborate** with industry in efforts that promote the public interests of offshore worker safety and environmental protection.

National Inspection Program

SEMS is one of the tools in BSEE's toolbox through which we provide "vigorous regulatory oversight"...



SEMS

- **Focused on risk management:** requires an understanding of hazards, risks, risk-barriers, and the steps needed to mitigate, control and maintain each
- **Integrated:** output from one part of the National Inspection Program can change focus of another part
- **Proactive:** goal is management of risk, wherever it exists, by the operator, and before it devolves
- **Performance Based:** success will be based on:
 - ... Quality and substance of “engagement and collaboration” between BSEE and operator (near term)
 - ... Reduction in number and severity of incidents (long-term)

Previous Two Rounds of Audits

- Elements With The Most Corrective Actions
 - **Safety-Environmental**
 - **Management of Change**
 - **Operating Procedures**
 - **Mechanical Integrity**
- Elements With The Least Corrective Actions
 - **Emergency Response**
 - **Auditing**
 - **Pre-startup Review**

An Analysis of Corrective Actions

Look at Which Elements had the:

- Largest increase/decrease in share of corrective actions.
- Largest increase/decrease in total number of corrective actions.
- Most operators with corrective actions.
- Greatest increase/decrease in operators with corrective actions.
- Most operators that repeatedly had corrective actions for the same element.

The Evolving Role of BSEE in SEMS Oversight

Our focus is **Continual Improvement**

- **Internal:** Training regional staff to assess implementation and effectiveness of CAPs
- **External:** Continue to improve the work products generated during ASP audits of the SEMS programs
- **Internal/External:** Reinforce emphasis on:
 - the design, oversight and enforcement of bridging documents and agreements between operators and contractors, and
 - the adoption / use of performance Indicators to foresee challenges before they become major problems

Where is the Industry heading for SEMS?

- Update for API RP 75 can define the future:
 - “expectations” for effective implementation should help guide what “good” looks like
 - less prescriptive language opens up possible dialog around effectiveness and ultimately, compliance
 - Will modifications to the Subpart S regulatory text be required to effectively incorporate an updated RP 75 into the BSEE regulations?

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