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

May 1991 – API RP 75 (Recommended Practice for SEMS Program) First Edition Published

May 2004 – RP 75 3rd Edition published

May 2004 – RP 75 3rd Edition published

May - 3rd Edition, API RP 75 reaffirmed

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May 27 - In report, DOI recommends mandate for mgt. systems approach to safety

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Apr 30 - President directs DOI to review/report within 30 days on improving OCS safety

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Sep 14 - SEMS II NPRM published

Apr 5 - SEMS II Final Rule published; adds SWA, UWA, etc.

June 4 - SEMS II Rule goes into effect. OCS operators required to have implemented it.

1991...

2006 2007 2008 2009

May 22 – SEMS ANPRM published

Jun 17 – SEMS NPRM published

Oct 15 - SEMS I Final Rule is published, incorporating RP 75

Nov 15 - All OCS operators required to complete & submit Audit Report to BSEE

Apr 20 - Deepwater Horizon catastrophic event resulting in 11 fatalities

Nov 15 - SEMS I Workplace Safety Rule goes into effect

June 4 – OCS operators to begin using 3rd party auditors and must be in compliance with SEMS II
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”…
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.
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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