



Tilsynsrapport

Rapport	
Rapporttittel Audit report - AoC application Safe Scandinavia	Aktivitetsnummer 60E20

Gradering		
<input checked="" type="radio"/> Offentlig	<input type="radio"/> Begrenset	<input type="radio"/> Strengt fortrolig
<input type="radio"/> Unntatt offentlighet	<input type="radio"/> Fortrolig	

Involverte	
Hovedgruppe Flyttbare (mobile units)	Oppgaveleder (task leader) Øystein Bruncell Larsen
Deltakere i revisjonslaget ØBL/IHF/SRJ	Dato

1 Introduction

The Petroleum Safety Authorities (PSA) undertook an audit of Prosafe Offshore in Aberdeen February 30th -31st 2007. Subject areas for the audit were company quality management and regulatory compliance.

2 Background

Safe Scandinavia was delivered in May 1984, based on an Aker H3.2E design. The vessel is registered in Singapore. Prosafe Offshore has a contract with Statoil to deliver accommodation services starting *medio* April 2007. The audit was undertaken in relation to Prosafe Offshore's application for Acknowledgement of Compliance (AoC) for the vessel. The AoC regime has been extended to include accommodation support units, thus the need for a valid AoC document prior to 2007 operations.

3 Audit aims

Audit aims where company management and compliance with - and understanding of - PSA rules and regulations. The company where asked to demonstrate how Prosafe procedures where applied on board the accommodation support unit Safe Scandinavia, and which mechanisms where in place to secure operation in accordance with Norwegian regulations.

4 Result

It is our understanding that Prosafe are addressing all aspects of HSE management issues in their management system. However the system appears somewhat fragmentary. An overall system to tie all the elements together in a traceable way is not in place. Such a system is also needed in order to demonstrate compliance with requirements in PSA regulations, including the underlying standards and guidelines referred to in the regulations.

Chapter 5 details the identified findings.

5 Observations

PSA observations are generally communicated in two categories:

- Non-conformities: Observations with obvious infringement of regulatory requirements.
- Amelioration areas: Observations of subject areas with obvious shortcomings, yet not an established infringement of relevant regulation.

5.1 Non-conformities

5.1.1 Insufficient system for following-up of HSE issues

Non-conformity:

Prosafe can not demonstrate that all elements of the company HSE management system are established in such a way that it enables the organization onshore and offshore to follow up on all technical, operational or organisational issues, nor are they able to identify weaknesses and deficiencies in the aforementioned systems. No overall status can be presented.

Basis:

- A consultant (Scanpower) has previously performed a gap analysis with regards to Norwegian Regulations. The status of the recommended actions in this gap analysis could not be shown. A consultant has been engaged to update the gap analysis.
- It was discovered by Statoil during verification in 2006 that the maintenance back log was severe, Prosafe was not aware of this situation at the time.
- The status of action points after the Statoil verification was not easily available during the audit
- A total overview of working environment mappings in different areas was not available
- “Stop cards” were used on board, but information on the content or follow-up of each card or incident was only available offshore.

Prosafe are planning to use an additional module in their maintenance system, Star, to achieve a total overview of all outstanding items.

Requirement:

The Management Regulation; Section 21 on follow-up

5.1.2 Practice and exercises

Non-conformity:

Prosafe does not distinguish between the terms *practice* and *exercises* as required in the regulations. No documentation could be presented to give an account for an execution plan as required in PSA regulations. There were no log data for the two types of activities.

Basis:

Emerged through interviews and document control

Requirement:

The Activities Regulation; Section 21 on practice and exercises

5.1.3 Managing non-conformities

Non-conformity:

Prosafe system for handling of non-conformities is insufficient. There is no system for gathering conclusions from various audits, investigations, or inspections. The company can not demonstrate how non-conformities are identified and handled in a systematic approach.

Basis:

See Section 5.1.1, above. Also, the applicable procedure (“event handling”) did not address the process of identifying non-conformities, nor the possible need for the application for exemption in case of a non-conformity with regards to regulations.

Requirement:

The Management Regulation; Section 20 on handling of non-conformities

5.1.4 Working Environment

Non-conformity:

Insufficient follow-up of working environment issues. A total overview of working environment issues in different areas was not available

Basis:

- Prosafe's specific requirements have been established for noise and lighting, but no such internal requirements could be shown for other working environment factors, such as ergonomics or chemical exposure.
- Though a number of working environment analyses have been performed, the outcome of these are not compiled in a systematic way. As an example, outstanding working environment issues in the crane cabin could not be presented.
- The Statoil "HAM inspection report" points out (for some areas) "mapping completed, but no overview of which actions have been taken or done offshore the last 2 years" (e.g. Obs. No 2 and 18). In some areas, mappings are not complete (e.g. Obs. No 17, ergonomic mappings)
- Good check lists have been established for addressing working environment issues during "HSE inspections" on the vessel. However, the use of professional competence to assess the working environment is not part of this system. Abermed in Aberdeen is used as the company health service, whereas Fabipartner supplies Norwegian nurses. Working environment is not part of their scope of work.

Requirement:

The Management Regulation; Section 17 on analysis of the working environment

The Management Regulation; Section 21 on follow-up

6 Comments

The compliance analysis is one of the core elements in the AoC regime. The Petroleum Safety Authorities trust all AoC holders to maintain and develop the terms of the diploma. This requires a set of procedures within a management system that reflects all requirements in the underlying standards and guidelines from all relevant regulations. It is Prosafe`s responsibility to identify and successfully implement these requirements into the company`s system. This will be an unalterable condition for the award of the AoC diploma.

7 PSA participants

Øystein Bruncell Larsen – Task leader (AoC coordinator)

Ingvill Hagesæther Foss - Supervision coordinator + Working Environment Engineer

Sigurd Robert Jacobsen – Emergency Preparedness Engineer

8 Prosafe Offshore participants

Name	Position	Kick-off meeting	Interviewed	Summarize meeting
Ian Young	Director of HSEQ Prosafe Offshore	x	x	x
Debbie Cooper	HR consultant Prosafe Offshore	x		
Martin Brown	Vessel Manager Prosafe Offshore	x	x	x
Clive Adshead	Technical Manager Prosafe Offshore	x	x	x
Mark Arlow	Marine Super Intendant Prosafe Offshore	x		
Fiona Grubb	Base Manager Prosafe Offshore	x	x	x
Steve Travis	Account Manager Prosafe Offshore	x		
Cameron Mew	HSE Manager Prosafe Offshore		x	x

9 Documentation

The following documentation where used during planning and completion of the AoC audit:

- Application for Acknowledgement of Compliance - dated 08.12.06
- Safe Scandinavia Safety Case – document no. 647
- Safety Committee Meeting 02.12.2006 Rev. no. 18
- DNV Class Status Report – report date 2006-12-07
- Safe Scandinavia Training Matrix – Doc. No. 47-O-TA-001 Rev. 4
- Prosafe Offshore – Strategy and Goals 2007 Procedure No. 01-Q-KA-001
- Emergency Plan Safe Scandinavia – Doc no. 8472A Rev. – 010
- Event Management Routine – process ref. 101-02 Rev. 1
- Maintenance Management Strategy Procedure no. 63-O-KA-005
- Risk Management and Assessment Procedure no. 62-S-KA-012
- Permit to work Procedure no. 62-S-KA-013
- Safety Induction DVD – Safe Scandinavia