



MARINE MINERALS ADMINISTRATION SAFETY ALERT

Safety Alert No. 524
Date: August 19, 2026

Contact: engagement@bsee.gov
Phone: (800) 200-4853

Improvements Needed in Verify Production Safety System Training Competency

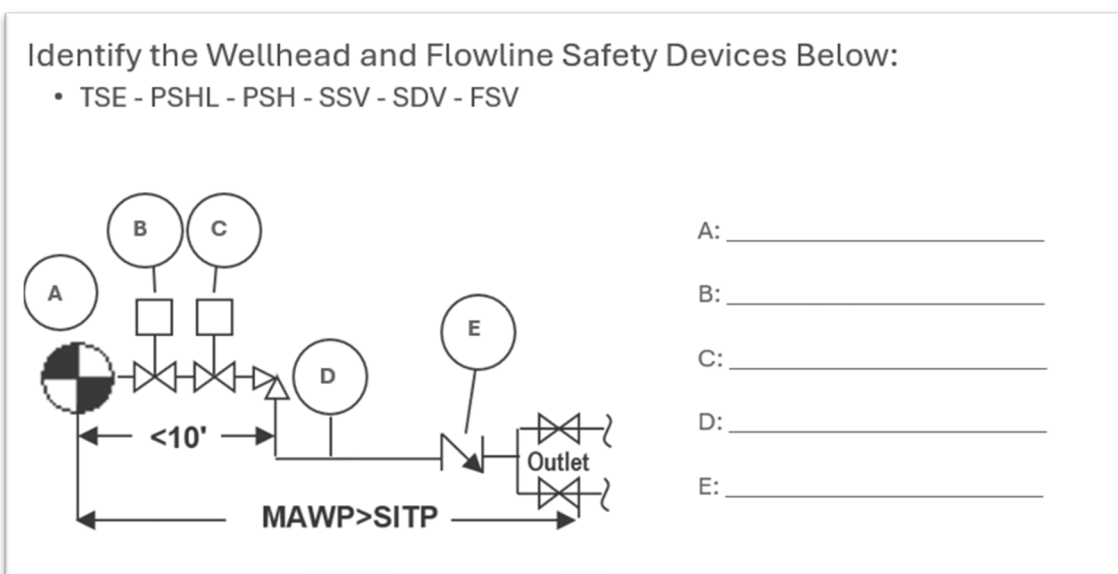


Figure 1: Example of Marine Minerals Administration Production Safety System Training Written Test Question

Background:

During recent Subpart O audits, the Marine Minerals Administration's Gulf of America Region identified potential concerns with Production Safety System Training, or PSST, on the Outer Continental Shelf.

The Marine Minerals Administration found offshore personnel with limited documented knowledge during competency assessments, computer-based training that was not monitored, requests to extend Production Safety System Training frequency timeframes, operators' failures to evaluate contractor training, and limited procedures for verifying employee and contractor training needs.

In response, the Marine Minerals Administration conducted a Performance-Based Risk Inspection covering 16 assets operated by 11 unique operators. During the Performance-Based Risk Inspection, Marine Minerals Administration inspection teams administered 53 written tests; evaluated corrosion associated with production safety systems, skids and containment systems; and conducted a fire drill involving an uncontrollable fire and platform abandonment when operations and time allowed. The 95-question test included nine true or false questions, 14 definition questions with a word bank, 30 device-labeling questions (Fig. 1), five practical questions with minimal calculations, and 37 multiple choice questions.

As a result of the Marine Minerals Administration Performance-Based Risk Inspection, the Marine Minerals Administration identified several key findings:

- Although the Performance-Based Risk Inspection covered a limited sample of Outer Continental Shelf facilities and operators, the Marine Minerals Administration identified qualification deficiencies among personnel who install, inspect, test, and routinely maintain surface and subsurface devices used to ensure safety and prevent pollution during offshore oil and gas production.
 - The average test score was 80.34, with a range of 63.1 to 91.6.
 - Twenty individuals tested, or 38% of those tested, scored below 80%.
 - Five individuals tested, or 9% of those tested, scored below 70%.
- Analysis of the 53 tests highlighted competency gaps in the following topics:
 - Timeframe / requirements of using pressure recording devices to create new operating ranges.
 - Contents and purpose of a Safety Analysis Function Evaluation Chart.
 - Surface-Controlled Subsurface Safety Valve closure times.
 - Required devices on incoming pipelines.
 - Flowline Safety Valve test tolerance.
 - Requirements of a Boarding Shutdown Valve.
 - Secondary protection from gas blowby.
 - Surface-Controlled Subsurface Safety Valve test documentation.
 - Tubing plug leakage test intervals.
 - Flowline requirements when Shut-In Tubing Pressure well exceeds Maximum Allowable Working Pressure.
 - Flowline Pressure Safety High setting requirements.

- Definition of Detectable Abnormal Operating Condition.
 - Definition of Abnormal Operating Condition.
 - Set point of PSH with Pressure Safety Valve value and operating range high point given.
 - Set point of Pressure Safety Low with lowest point of operating range given.
 - With Maximum Allowable Working Pressure and operating pressure range given on separator:
 - Determine maximum allowable pressure the Pressure Safety Valve can be set.
 - Determine highest pressure at which the flowline Pressure Safety High can activate and trip to avoid receiving an incident of noncompliance for being out of tolerance.
 - Determine the lowest pressure at which the Pressure Safety Low can activate and trip to avoid receiving an incident of noncompliance for being out of tolerance.
 - Determine highest acceptable set pressure on Pressure Safety High – if Pressure Safety Valve has been reset to a defined pressure.
 - Gas detection alarm system requirements.
- During the Performance-Based Risk Inspection, Marine Minerals Administration inspection teams observed the following:
 - A production operator with less than three years of experience who had taken only Production Safety System refresher training and had never completed a full course.
 - A production operator with an expired Production Safety System Training certification.
 - Refresher training that consisted of a limited knowledge quiz and observation assessment because in-person training was limited during the COVID 19 pandemic).
 - Industry training providers who offered training test scores showed OCS employees who averaged 95.49 on their tests; however, the same offshore employees averaged 80.8 on the Marine Minerals Administration administered test.

- On those facilities Marine Minerals Administration was able to conduct a fire drill, the inspection teams identified the following:
 - Individuals who were not familiar with deploying the facilities inflatable life raft.
 - Delayed response time at an offshore facility because personnel could not hear the fire alarm.
 - Loudspeakers are not loud enough to be heard over compressors and other machinery noise.
 - Fire drill records that often did not include facility abandonment, realistic uncontrollable fire scenarios; or analysis and critique of each drill.

Therefore, the Marine Minerals Administration recommends that operators and their contractors, where appropriate, consider the following:

- Review their internal procedures to ensure employees and contractors maintain understanding of, and competency in, production safety practices.
- Confirm personnel meet Subpart O plan requirements for Production Safety System Training certification and that training records document adequate retention of the knowledge and skills needed to perform production safety duties.
- Evaluate Production Safety System Training frequency and ensure it aligns with the three-year industry standard. Additionally, all Subpart O plans must specify the type, method(s), length, and content of the training and the method(s) used to verify employee understanding and performance.
- Review recent evaluations, such as course audits or assessments, of their Production Safety System Training providers. Assess instructor qualifications and training practices.
- Ensure contractor training programs include periodic training and verification of production safety knowledge and skills.
- Train personnel on the lifesaving equipment used on the Outer Continental Shelf facility, including inflatable life rafts, to support effective emergency response and control.
- Confirm emergency alarms, including fire, man overboard, and hydrogen sulfide alarms are operational, effective, and can be heard throughout the facility.
- Review recent fire drills on Outer Continental Shelf facilities and ensure they meet 30 CFR 250.1918 (c) and the requirements of the operator's Safety and Environmental Management Systems program.

- MMA -

A Safety Alert is a tool used by the Marine Minerals Administration to inform the offshore oil and gas industry of the circumstances surrounding a potential safety issue. It also contains recommendations that could assist in avoiding potential incidents on the Outer Continental Shelf.

As of July 10, 2026, the Department of Interior has reunified the Bureau of Ocean Energy Management and the Bureau of Safety and Environmental Enforcement into the Marine Minerals Administration, which will oversee the responsible development of the nation's offshore energy and marine mineral resources with an integrated focus on safety, environmental protection and efficient oversight. For more information, visit [Transition to the Marine Minerals Administration | U.S. Department of the Interior](#).