

Bureau of Safety and Environmental Enforcement
Interim Policy Document

Effective Date: January 4, 2013

IPD No.: 2013-01

Series: 640 - Operations

Title: Safety and Environmental Management Systems Implementation

Originating Office: Office of Offshore Regulatory Programs

1. **Purpose.** This Interim Policy Document (IPD) establishes Bureau of Safety and Environmental Enforcement (BSEE) policy and responsibilities for Safety and Environmental Management Systems (SEMS) program management and implementation.
2. **Objective.** To provide national guidance specific to the responsibilities and activities of the SEMS oversight program. To ensure consistent implementation practices by BSEE personnel involved in conducting SEMS compliance evaluations, audits, and enforcement activities on the Outer Continental Shelf (OCS).
3. **Authorities.** The following statute provides BSEE with the legal authority to administer the SEMS oversight program:

The OCS Lands Act (43 USC 1331 et seq.) as amended.

4. **References.**

A. Safety and Environmental Management Systems (SEMS) (30 CFR 250, Subpart S).

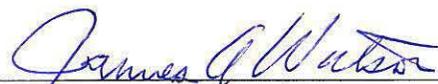
5. **Policy.** The October 15, 2010, regulations that BSEE issued require operators to use a SEMS to identify, address, and manage safety, environmental hazards, and impacts during the design, construction, start-up, operation, inspection, and maintenance of all new and existing OCS facilities. Operators are required to submit the results of the first completed audit under their SEMS program to BSEE by November 15, 2013. To ensure smooth implementation of the SEMS program and to ensure that the Bureau and industry have sufficient time to adjust to the requirements of a new performance-based system (30 CFR 250, Subpart S), BSEE is issuing the following guidelines:

- A. The BSEE will focus efforts on ensuring that all operators perform and submit the results of a completed SEMS audit by the November 15, 2013 deadline provided for in §30 CFR 250.1920 (a). The BSEE staff must not grant extensions of this deadline.
- B. In public forums and in discussions with industry personnel, BSEE staff will highlight the importance of submitting results of the audits by the specified deadline and the consequences of failure by the deadline.
- C. The BSEE SEMS staff resources will be focused on witnessing operator-conducted audits rather than performing BSEE audits. The BSEE may continue to use directed audits to

address concerns arising from accidents and other safety performance information known to BSEE. The BSEE will continue to coordinate activities and policy issues related to the program through the National SEMS Coordinator.

- D. Based on the initial round of audits in 2013, BSEE will analyze relevant SEMS data and ensure that corrective action plans are implemented for those audits that identify areas for improvement.
- E. The focus of the SEMS program will be on promoting a system that continuously improves the safety culture and pollution prevention practices within the industry. The BSEE will work with industry groups and other interested parties to develop appropriate performance measures to evaluate progress.
- F. BSEE staff will focus enforcement efforts on egregious errors involving clearly deficient programs or a failure by an operator to comply with a regulatory deadline.
- G. To encourage the early completion of audits, BSEE will waive the advance notification requirement found in §30 CFR 250.1920(b) if we receive an operator's completed SEMS audit package by March 29, 2013. A completed audit package includes the original plan, final report, and list of corrective actions. BSEE staff will not accept early audit packages if they find there were egregious errors in the conduct of the audit (e.g. unqualified auditors, insufficient number of facilities audited, or lack of corrective action plan).

6. **Expiration:** This IPD will remain in effect until November 15, 2013.



James A. Watson – Director

1-3-2013
Date: