

Safety Alert No. 381
May 7, 2020

Contact: Jason Mathews
Phone: (504) 731-1496

Common Operator Deficiencies Discovered by Safety Environmental Management System (SEMS) Audits

In accordance with 30 CFR 250.1920(b)(5), lessees on the Outer Continental Shelf (OCS) are required to have their SEMS programs audited by an accredited Audit Service Provider (ASP) within 2 years of starting operations and every 3 years thereafter. BSEE Gulf of Mexico Region's Office of Safety Management (OSM) has analyzed all SEMS audit results from 41 operators for the period from 11/16/2016 to 11/15/2019. Below is a list of the most common audit findings for each of the 17 SEMS Elements that were observed by accredited ASPs.

1. **General** – There is no formal documented process established for an internal annual review of the SEMS program to determine that it continues to be suitable, adequate, and effective.
2. **Safety and Environmental Information** – The design basis for relief systems and fire protection systems is not available for review.
3. **Hazards Analysis** – Action items resulting from facility-level Hazard Analyses are not formally reviewed, consistently closed-out, nor verified for effective implementation.
4. **Management of Change** – The Management of Change process is not consistently used for both operating procedure revisions and supervisory personnel changes.
5. **Operating Procedures** – Operating Procedures are not consistently reviewed at the conclusion of specified periods (separate from the Management of Change process) to verify that they reflect current operating practices offshore.
6. **Safe Work Practices** – Safety Data Sheets do not accurately reflect all chemicals listed on the facility inventory sheet.
7. **Training** – Safe Work Practices training for contract personnel, such as hot work, lock-out/tag-out, confined space entry, etc., has not been consistently verified as compliant with internal requirements.
8. **Mechanical Integrity** – The preventative maintenance/inspections/tests for critical equipment are not consistently executed in accordance with the established frequencies required by the Mechanical Integrity program.
9. **Pre-Startup Review** – The Pre-Startup Review Policy does not have clear guidance regarding conditions that trigger a review, regardless of whether there is an associated Management of Change initiated.
10. **Emergency Response and Control** – An analysis and critique of each drill is not consistently completed by facility personnel. When critiques are completed for drills,

the critiques do not include actions to take for continuous improvement.

11. **Incident Investigation** – Evidence could not be located to support the proper training qualifications for designated Incident Investigation team members. Additionally, Incident Investigation reports were missing identification of one or more team members associated with the investigation.
12. **Auditing** – The SEMS plan contains obsolete language from the SEMS I Rule or the SEMS plan has not been updated to reflect current SEMS II requirements.
13. **Recordkeeping and Documentation** – SEMS documents, primarily Job Safety Analyses and Operating Procedures, are not kept in an orderly manner nor readily available upon request at the time of the audit.
14. **Stop Work Authority** – Job Safety Analyses are without the required Stop Work Authority procedures and expectations as a standard statement.
15. **Ultimate Work Authority** – The SEMS program does not clearly define the communication expectations for establishing the designated Ultimate Work Authority, including when the responsibility shifts to a different individual.
16. **Employee Participation Plan** – *There were no recorded findings in this element during the 3-year period from 11/16/2016 to 11/15/2019.*
17. **Reporting Unsafe Working Conditions** – The Reporting Unsafe Working Conditions element should be a separate notice from other facility requirements that are posted throughout a facility (e.g. Stop Work Authority, Ultimate Work Authority, etc.). Additionally, the Reporting Unsafe Working Conditions signage should contain the updated BSEE address (refer to [Safety Alert No. 357](#)).

Therefore, BSEE recommends that operators and contractors working on the Gulf of Mexico OCS consider the following:

- Review your SEMS program to determine if any gaps exist in your management system then initiate and implement appropriate corrective actions;
- Share any potential updates to your SEMS program with field personnel (including contractors) for awareness of changes that directly affect their day-to-day duties;
- Revise bridging documents to include SEMS program updates as necessary; and,
- Request feedback from employees and third-party contractors to ensure effective functionality of the SEMS program as it pertains to your scope of operations.

--BSEE--

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