

# SAFETY ALERT



**Safety Alert No. 377**  
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## **Improperly Bypassed Safety Device Poses Work and Environmental Hazards**



*A level safety high deactivated with a zip tie.*

On December 30, 2019, BSEE Inspectors working offshore discovered that a level safety high had been improperly deactivated with a zip tie, resulting in the issuance of a P-103 incident of noncompliance (INC). There have been multiple instances across the Gulf of Mexico in which operators have failed to bypass or block out-of-service devices in accordance with the Code of Federal Regulations (CFR), specifically 30 CFR 250.869(a).

Per 30 CFR 250.841, all platforms must have a surface safety system in accordance with American Petroleum Institute (API) Recommend Practice (RP) 14C. The safety analysis outline in the RP states that the safety system should provide two levels of protection. It further explains that when bypassing a safety device improperly, the safety system is compromised and presents hazards to personnel and the environment.

In the past three years, over 40 P-103 INCs have been issued. Reflective of the severity of the safety hazard related to this incident, an operator who receives a P-103 violation can face a civil penalty fine of up to \$44,675 per day. In addition, BSEE has the option to escalate willful violations into criminal investigations at the individual or company level.

**Therefore, BSEE recommends that operators and contractors consider the following:**

- Review and fully understand conditions for bypassing safety devices as prescribed in [30 CFR 250.869\(a\)](#) and ensure personnel follow proper procedures;

- Emphasize with personnel that they should not bypass or block devices unless (1) the device is being monitored and (2) the equipment is undergoing start-up, testing, or maintenance;
- Ensure only the minimum number of safety devices are bypassed;
- Highlight the importance of Stop Work Authority (SWA) and encourage personnel to feel empowered to initiate SWA procedures without fear of reprisal;
- Monitor work orders and ensure that requested repairs or replacements are being made in a timely manner to ensure proper function of equipment;
- Confirm that appropriate bypass flags are available and legible;
- Conduct and document bypassed safety device hunts and/or audit the lockout/tagout system on an established reoccurring frequency;
- Ensure your SEMS program has established procedures for investigating all incidents with the potential for serious safety and/or environmental consequences and that it properly addresses contributing factors of the incident and its escalation or control; and,
- Assess your evaluation programs to determine if employees feel pressured to bypass safety devices;
- Encourage personnel to review [Safety Alert 357](#) and report hazardous or unsafe working conditions, which can be made anonymously, to the BSEE Toll-free Safety Hotline at 1-877-440-0173.

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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.