

COVID-19 Challenges to Integrity Management – Offshore

Daniel Shuter CEng MIMechE

Principal Specialist Inspector - Mechanical Engineering

Energy Division

Health and Safety Executive

COVID-19 – Impact on HSE

- Impact of COVID on HSE and the way we work
 - End March '20 – End July '20: Predominantly Virtual HQ inspections with the relevant DH personnel – onshore and offshore during this 4 month period.
 - Relatively few mandatory investigations during this period (where an offshore trip was required).
 - These virtual inspections worked very well for Maintenance & inspection systems. Not so good when looking at lifting practices, etc – where an offshore trip is essential
 - Going forward it is possible that more virtual HQ work will take place e.g. onshore HQ inspection work/incident follow up/etc
 - From end of July '20 – ED moved back to the original offshore intervention plans for 2020/21

****Note:** The information included in the following slides is based on a small sample of “Virtual” HQ/and recent offshore Mechanical inspections**

Inspection findings during the COVID-19 period

- How COVID has affected Integrity management (inspection and routine maintenance)
 - Focus on SECEs, no significant increase in SECE backlog to date
 - Although PSV recertification – a widespread issue
 - FM & other non-critical work not being completed, increasing deferrals/ non-critical backlog
 - In some cases, no OIE presence offshore – but contactable onshore; in other cases, in terms of inspection it has been BAU
 - Very few cases of vessel entries being deferred until next major TAR
- Impact on planning/preparation for turnarounds/ campaign maintenance
 - TARs postponed – shortened
 - Forties Pipeline System shutdown postponed – an issue for some DHs
 - No major resource/materials issues reported
 - FUP campaigns post COVID likely in some cases

Inspection findings during the COVID-19 period

- Impact of supply chain pressures (availability of specialist personnel/materials/equipment)
 - No specific issues with NDT techs/ Lifting Competent persons/etc
 - Some minor issues with sourcing equipment from Italy/etc at the beginning of the Pandemic Lockdown period.
- Impact on availability of technical support within own organisation, contractors or verifiers?
 - TAs – no issues; Indeed some companies outlined that TAs have been more visible during this period!
 - Some upskilling of personnel to carry out SECE maintenance
 - Provision of Contractors Offshore – no apparent major issues
 - Some issues with mobilising verifiers

Longer term effects of COVID-19

- Potential long-term consequences of the Pandemic –
 - Increasing backlogs/deferrals – Potential bow wave of FM, inspection and maintenance work
 - Resourcing issues/ Loss of experienced staff – ability to liquidate backlogs may be affected due to high demand for resources across UKCS (assuming everyone is playing catch up)
 - Potential moves toward NII? Requires robust justification in order to assess the suitability of this methodology – probably on a case-by-case basis.
 - Remote verification? Possibility?

COVID-19 Challenges to Integrity Management Onshore Major Hazards

David Glass CEng FIMechE

Principal Specialist Inspector - Mechanical Engineering

CEMHD

Health and Safety Executive

The same...and different

- Similar issues to ED colleagues, March – July 2020:
 - HSE ceased proactive inspections for the period;
 - Undertook some virtual/remote inspections after;
 - Now back to site visits, with COVID precautions.
- A lot of business as usual, but...
- Some significant deferments (number and scale)
 - Some small, others with entire shutdowns moved;
 - Remember Pressure Systems Safety Regulations apply onshore...

COVID Concerns part 1 - PSSR

- Only one postponement is allowed & notification to HSE;
Regulation 9(7)
- Written Scheme can be reviewed but can't be used to extend the next examination date;
paragraph 118, Guidance to Reg. 8
- Some companies already running 'postponement hot' prior to COVID outbreak...
- Nonetheless in Spring 2020 HSE recognised the difficulties COVID potentially posed:
 - Competent Person and user/operator reviews, and
 - Logistic difficulties were transparent, and
 - It is safe to use, then HSE would not enforce...
 - probably

COVID Concerns part 2 – PSSR &...

- Non-PSSR equipment is not notified to HSE;
- But a similar management expectation applies.
- The dreaded ORA...
- Maintenance & repair backlog;
- Suspicion of economic reasons for deferral, not logistics
- Effect is snowballing...COVID isn't finished, e.g.,:
 - HSE warned of second wave and need to take opportunities – inspect while you can.
 - Shortage of skilled labour, foreign labour, coincident demand;
 - Danger of compromise (e.g., unskilled labour);
 - Added complexity on site (segregation, one way etc.);
 - Accommodation and transport availability;
 - Equipment availability (stock log jam).

Finally, remember:

- Any regulatory flexibility is temporary, and only as long as it is safe.
- Plan to revert back to normal...
- ...whenever that is.

Many thanks for your attention

Daniel.shuter@hse.gov.uk

David.glass@hse.gov.uk