Global standards, safety are key offshore issues

OFFSHORE ISSUES on which IADC members and staff have worked during the past year show the complexity of offshore drilling operations and regulations.

In the North Sea, IADC’s role in forging an agreement on the terms under which the Working Time Directive in the European Union will be extended to “Other Work At Sea” and the other “excluded sectors” represented a substantial victory for the Association’s Work Time Work Group.

Also, IADC, with help from the North Sea Chapter, launched an initiative to develop a unified North West European Safety Case.

MODU INITIATIVES

The need continues for safety management systems to respond to changes in regulations, codes, standards and guidelines.

“Management must be committed to ... managing,” said Alan Spackman, IADC Director-Offshore and Technical Affairs, in regard to safety management systems.

“Almost universally, safety, health and environmental management system guidelines conclude that management should identify and respond to change in mandatory rules and regulations and in other codes, guidelines and standards.

“Rig owners—both offshore and onshore—must satisfy their shareholders expectations while meeting the increasingly stringent demands of both clients and regulators,” said Mr. Spackman.

IADC was actively engaged in key initiatives involving mobile offshore drilling units during the past year, representing members’ interests in the development of a variety of standards.

As a certified Observer at the United Nation’s International Maritime Organization, IADC continuously monitors and participates in critical discussions regarding international regulation of MODUs. This year several key amendments were addressed.

Amendments to the 1974 SOLAS Convention, including revision of Chapter V on Navigation Equipment, reflect successful IADC efforts to obtain language allowing MODUs to be exempt from installing major items of navigation equipment.

The exemption means a saving of several hundred thousand dollars per rig.

The amendments address emergency towing arrangements for tankers, prohibition of asbestos and the incorporation of the Fire Systems Safety Code and rewrite of the fire safety regulations.

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The amendments also include a revised chapter on navigation safety that is applicable to all ships, including MODUs, clarifications to the safety management system regulations, and adoption of the High Speed Craft Code. Absent objections, the amendments will be accepted on 1 Jan, 2002 and become effective 1 July, 2002.

Amendments to the International Safety Management Code memorialized an earlier decision by the IMO that the ISM Code requiring an audited safety management system would apply only to self-propelled MODUs.

Cost to develop such a system at the corporate level can run as high as $2-3 million and can cost an estimated $100,000 per vessel. Absent objection, these amendments will be deemed accepted on 1 Jan, 2002 and enter into force on 1 July, 2002.

IADC also worked to avoid a requirement to carry voyage data recorders on existing ships. The value of this new technology is questionable, and its cost is uncertain. Cost estimates have ranged from $10,000 to $200,000.

Technical Regulations of the 1966 Load Line Convention were revised to assure that items whose weight is well known or can be calculated can be added or removed from a vessel without the need to perform a new stability test. Eliminating the need for a stability test can save several hundred thousand dollars.

Focus of IADC efforts in regard to regulations on Harmful Aquatic Organisms in Ballast Water and ballast water management was to assure that the need to maintain the safety of a vessel during operations takes priority over ballast discharge programs.

In regard to the Fire Systems Safety Code, IADC helped shape the code’s language to clarify its application to specialized vessels.

IADC also continues to be involved in activities related to:

- Mandatory Application of the International Maritime Organization Dangerous Goods Code (IMDG) under SOLAS and MARPOL conventions;
- Subdivision and Damaged Stability;
- Banning of Organotin Anti-Fouling Paints.

The IMO’s Maritime Safety Committee decided in principle to make the IMDG Code mandatory, aiming at an entry into force date of 1 Jan, 2004. Under current plans it will apply to all ships including MODUs. IMO is continuing its efforts on the harmonization (across vessel types) of the subdivision and damaged stability provisions of SOLAS based on probabilistic damage estimates. The effort is scheduled for completion in 2003.

Also, a draft legal instrument developed
by the IMO’s Marine Environment Protection Committee would ban application of organotin coating systems effective 1 Jan, 2003. Ships would be required to comply by 1 Jan, 2008.

Industry is also beginning the process of reviewing a suite of standards it has developed using the International Standardization Organization (ISO). Included are standards involving metocean design and operation conditions; seismic design procedures and criteria; weight control during engineering and construction; and floating systems.

IADC’s recognition as a liaison member of ISO’s TC67 on Standardization of Materials, Equipment and Offshore Structures for the Petroleum & Natural Gas Industries will assure drilling contractors have a voice in standardization at the international level.

In the longer term, offshore vessel owners face issues of controlling greenhouse gas emissions from ships and environmental best practices for offshore operations, said Mr Spackman.

**NWE SAFETY CASE**

IADC, with help from the North Sea Chapter, recently launched an initiative to develop a unified North West European Safety Case. Members believe the new guidelines will assist drilling contractors in preparing a single safety case that will satisfy each coastal state’s statutory requirements, reducing the cost of revising documentation every time a MODU moves to a new sector.

Phase 1 of the project began in March with discussions with the North Sea Chapter safety professionals who will benefit from the project. Work then began on drafting guidelines, which along with “legislative road maps,” were to be assembled in third quarter 2001.

Formal consultation with stakeholders will take place beginning in September.

The schedule calls for the guidelines to be formally accepted by the North Sea Chapter and issued in early 2002.

Objectives of the safety case project are:

- Develop a living process—the guidelines will help drilling contractors prepare and review their safety cases and serve as a benchmark for regulators in assessing the adequacy of the case;
- Provide a robust process—the guidelines mean industry can work with North Sea Offshore Authorities Forum (NSOAF) regulators to achieve common safety standards across North West Europe on a cost benefit basis;
- Achieve best safety performance—the guidelines will be a compendium of best practice demonstrating a sector committed to high standards of safety in a challenging environment where members can be shown to be proactive to regulators while lowering the cost of maintaining safety cases.

Key members of the project team are Gert-Jan Windhorst, Noble Drilling; Jay Richardson, Transocean Sedco Forex; Ian McLean, IM Risk Management; and Dennis Krahn, IADC Director-European Offshore Affairs.