

Fixed Platform Self Inspection Program
Biannual Status Report
April 1, 2003 through September 30, 2003

Background

On June 7, 2002, the Minerals Management Service (MMS) was authorized to conduct safety inspections on fixed Outer Continental Shelf (OCS) facilities on behalf of the U.S. Coast Guard. Implementation of the program by MMS followed a phased approach in order to allow completion of classroom and field training of MMS inspectors, development and distribution of newly-developed Potential Incidents of Non-Compliance (PINCs), creation and launching of a dedicated website for dissemination of program information, and adequate time for OCS operators to bring their facilities into compliance with applicable Coast Guard regulations. As a result, MMS did not begin inspection of Coast Guard regulated items until August 30, 2002, with full implementation not in effect until year-end 2002.

This is the second report on the status of the Fixed Platform Self Inspection Program, covering the period from April 1 through September 30, 2003. It should be noted that this is the first report in which all MMS Districts were fully engaged in inspections of Coast Guard regulated items throughout the entire reporting period, providing the first complete set of data to allow analysis of trends in inspection consistency and operator compliance.

Inspection Issues

Full implementation of the Fixed Platform Self Inspection Program has continued to reveal regulations that are unclear, do not address requirements for newly-developed safety equipment, or fail to provide adequate guidance on older safety systems. In most cases, issues are being resolved through a new Policy Clarification Protocol in which an analysis and recommended policy is jointly documented, reviewed, and approved by the Coast Guard and MMS. During the reporting period, the protocol was used to establish policies associated with: a) Emergency drills and the need for participation by all crew members, and b) Fully-enclosed life boats and life capsules and the approved omission of oars when vessels are motorized. In cases where minor policy clarification is required, such as in the case of platform egress and the questionable need for a ladder to extend to the water's surface, MMS staff contact Coast Guard inspection and regulatory experts directly, and then disseminate the findings to MMS staff in the regions and districts.

One issue was identified during the reporting period that will require an official finding by the Coast Guard. As noted in the MMS letter to the Coast Guard dated 18 November 2003, regulations require that fog horns be equipped with tags and that the devices have Coast Guard approval. In many cases, fog horns do not have appropriate tags nor can they be readily obtained. As a result, MMS is recommending a method to follow the intent of the law, an action that will require issuance of operator-specific departures.

Inspection Distribution

During the six-month reporting period, which began on April 1, 2003, MMS conducted 2,181 fixed facility inspections in the Gulf of Mexico and Pacific regions, of which 787 were on manned facilities and 1,394, unmanned facilities. Of the total inspections, 232 were full inspections in which the Coast Guard Self Inspection Form 5432 was critically reviewed and visual observation of safety components was performed, while the remaining 1,949 inspections consisted of a limited review of pre-selected priority safety items.

Compliance Themes

Of all platform inspections that occurred, 2,054 (94.2%) of the platforms were found to be in compliance with Coast Guard regulations and 127 (5.8%) were found to be out of compliance. Facilities that were subjected to a limited inspection resulted in an in-compliance rate of 95.9%, whereas facilities that underwent a full inspection had an in-compliance rate of 79.3%. In-compliance rates for manned versus unmanned facilities were 92.6% and 95.1%, respectively.

Incidents of Non-Compliance

For all facilities inspected, the discovery of deficiencies led to the issuance of 207 Incidents of Noncompliance (INCs) for the 127 facilities found to be out of compliance with Coast Guard regulations. Thus, for each platform that was found to be out of compliance, an average of 1.6 INCs were issued. The INC ratio for manned facilities was 1.8 and for unmanned, 1.5. Full inspections yielded an INC ratio of 2.2, and for limited inspections, 1.3 INCs per facility visited. Manned facilities that underwent a full inspection had an INC ratio of 2.3, while unmanned facilities that underwent limited inspections had an INC ratio of 1.3 INCs issued per deficient facility.

Twenty of the 27 Coast Guard safety items that were inspected by MMS received INCs during the reporting period. While distribution of INCs is fairly normal, eight of the items received ten or more INCs (Z-114 – Deck Openings; Z-120 – Lights and Fog Horns; Z-125 – Means of Escape; Z-135 – Guards, Rails, and Fences; Z-140 – Helicopter Deck Perimeter; Z-145 – Life Floats, Boats, Life Rafts; Z-185 – Fire Extinguishers; and Z-205 – Emergency Drills), highlighting areas that should be more closely monitored in the future. More significantly, two of the items (Z-120 – Lights and Foghorns; and Z-140 – Helicopter Deck Perimeter) received twenty or more INCs, with Z-140 receiving the highest number of INCs (24).

Areas that evidenced no problems and thus did not receive any INCs included: Z-100 – Inspection Form; Z-104 – Respiratory Inspection; Z-108 – Personal Flotation Device; Z-170 – Communications Equipment; Z-180 – Additional Equipment Compliance; Z-195 – General Alarm; and Z-200 – Personnel Assignments. Notably, results indicate that, without exception self inspection forms are being maintained on facilities in keeping with current regulations.

Trend Analysis and Observations

As this is the first report that contains data for the full reporting period, temporal trends can not be accurately assessed. Still, attempts have been made to compare data to the previously submitted inspection summary report for the potential identification and correction of clear implementation problems. Bullets on the subject comparative assessment as well as observations on the results of the reporting period are noted below.

- ☑ When comparing inspection of manned versus unmanned facilities, the later evidenced the highest compliance rate. This is consistent with the previous summary.
- ☑ When comparing full versus limited inspections, the later evidenced the highest compliance rate (79% vs. 96%). This is consistent with the previous summary.
- ☑ On average, for each facility that was inspected and found to be out of compliance, MMS inspectors issued 1.6 INCs, a decrease from the previously reported value of 1.8.
- ☑ Houma District had the highest numbers of facilities reported to be out of compliance (44), the highest INC ratio (2.0), and was responsible for issuance of 42.5 percent of all INCs issued by MMS during the reporting period, although they only accounted for 20.6 % of all inspections conducted throughout the OCS.
- ☑ Houma and Lake Charles Districts each had the highest number of facilities out of compliance with Coast Guard regulations (9.8%).

One key observation of the data is that physical inspection of safety components on a fixed facility yields a higher level of non-compliance than the limited review of the self-inspection form and select safety components. One possible explanation for differences in compliance rates is that operators and/or third-party contractors performing safety reviews still do not fully understand the Coast Guard regulations and thus fail to identify out of compliance items. Whatever the cause, the goal of the Fixed Platform Self Inspection Program should be to have high, comparable in-compliance rates regardless of inspection type.

None of the INCs issued were of sufficient severity to warrant referral for civil penalty review.

Future Program Direction

- ☑ MMS will continue to place emphasis on the inspection of manned fixed facilities in the OCS and the identification and remedy of existing safety infractions.
- ☑ MMS will analyze differences between full and limited inspections to determine which safety systems contribute most to inconsistencies in compliance rates.
- ☑ MMS will continue to work with the Coast Guard when questions of regulation policy arise that affect facility inspections and will seek real-time guidance as required.

