## Rules Comments

**From:** TGrove@eagle.org
**Sent:** Monday, May 27, 2002 3:36 PM
**To:** rules.comments@mms.gov
**Subject:** RIN 1010-AC-85

ABS Comments on RIN 1010-AC-85...

Attached please find supplemental comments by American Bureau of Shipping on NPR regarding amendment of regulations for floating offshore platforms.

Regards,
Todd Grove
Director, Offshore Project Development
American Bureau of Shipping
ABS Plaza
16855 Northchase Drive
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RIN 1010-AC-85

COMMENTS BY AMERICAN BUREAU OF SHIPPING (ABS) ON PROPOSED RULEMAKING REGARDING FLOATING OFFSHORE PLATFORMS.

The following are comments on 30 CFR 250 by ABS. These comments are supplemental to those by ABS dated 27 March 2002.

1. Ref: 250.803; We note the proposed incorporation of API RP 14J into the revised rules. In this regard, we note that much of 14J was written from the standpoint of use with fixed platforms. With respect to floating structures (such as spars and FPSO's) it is unclear whether the risk assessment methodologies and checklists accompanying the 14J document will adequately cover the integration of vital process and marine systems (such as ballast control, stability, marine system integration, cargo transfer, etc.), where simultaneous operations and cross-overs are prevalent. The hazards assessment methodology proposed by MMS should therefore consider ways to ensure that strict adherence to 14J in carrying out a hazards analysis on a floating installation will address this vital marine/process system relationship.

2. Ref: 250.803(b)(2)(iii), 250.1002(b)(4), 250.1007(a)(4); The Independent Verification Agent (IVA) per API SPEC 17J is noted in the introductory supplementary information of the notice of proposed rulemaking as being equivalent to the Certified Verification Agent (CVA) per MMS rules. However, this equivalency is not specifically addressed within the above cited proposed rule sections. Such a clarification is suggested for clarity.

3. Ref: 250.901; It is noted in the proposed rulemaking commentary that API RP 2FPS is an umbrella document imposing no new requirements directly. Structural and production facility requirements are specifically referenced throughout §250. Prior to this rulemaking

MMS had no specific rules for marine and other non-production related systems for floating production units, as are found in API RP 2FPS. A specific statement as to MMS intentions relative to these non-production systems would be appropriate.

4. Ref: 250.911, 250.912; These sections refer to the applicable provisions of the documents in 250.901(a). As API RP 2RD and Spec 17J are specifically design oriented, clarification is required regarding MMS intentions relative to Fabrication and Installation CVA activities.

5. MMS is encouraged in the recognition of industry design, fabrication and installation requirements more specific than, but fulfilling compliance with the new proposed rules. This is to ensure harmonization of requirements for joint responsibility areas between MMS and USCG as well as with relevant third parties, such as classification societies, and reducing the risk of differing requirements for the same item by different parties.

Dated:
27 May 2002

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## Rules Comments

**From:** TGrove@eagle.org
**Sent:** Wednesday, March 27, 2002 11:52 AM
**To:** rules.comments@mms.gov
**Subject:** RIN 1010-AC-85

ABS Comments on RIN 1010-AC-85...

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Regards,
Todd Grove
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RIN 1010-AC-85

COMMENTS BY AMERICAN BUREAU OF SHIPPING (ABS) ON PROPOSED RULEMAKING REGARDING FLOATING OFFSHORE PLATFORMS.

ABS commends Minerals Management Service (MMS) on its effort to better define the requirements for floating offshore platforms. Much experience has been gained in recent years with the application of various floating installations in the Gulf of Mexico (GOM). With 28 such installations currently working or presently being actively developed the MMS and industry can move forward with the associated practical experience contributing to this effort.

ABS offers the following specific comments to 30 CFR Part 250 based on its first-hand experience with all of the (GOM) floating offshore platforms to-date.

1. Ref: 250.901; The document adopts the API- RP2A- WSD. Is the API - RP2A - LRFD not acceptable at this time for any application? Some of the requirements in API - RP2A - LRFD, such as hydrostatic collapse of tubular members for deepwater applications, may be more reasonable than those in WSD. If acceptable, guidance in the regulations should specify load and resistance factors.

2. Ref: 250.913; The current practice on fatigue safety factors are based on API RP 2T considering repairability, inspectability and criticality (redundancy) of the members and joints. The API RP 2T fatigue requirements are widely used in the site specific floating structures (TLPs, column-stabilized units, spars, etc.). The recommended fatigue safety factors (2 and 3) consider only one (redundancy) of these three factors. For the deck structure, which is above the water line, these safety factors are appropriate because it is accessible for inspections and repairs. However, for the hull structure, which is always below the water line, the recommended

fatigue safety factors may not be appropriate because good quality inspections and repairs will be difficult to carry out in some areas of the hull. The Rules should also indicate that the other two factors need to be considered if applicable. The following are the safety factors normally used for the hull structure of a site-specific floating structure in current practice.

| CRITICALITY | INSPECTION | REPAIR | FACTOR OF SAFETY |
|---|---|---|---|
| Critical | Easily inspectable | Field Repair | 5 |
| Critical | Difficult or Non-inspectable | Difficult or Non-repairable | 10 |
| Non-Critical | Easily inspectable | Field Repair | 3 |
| Non-Critical | Difficult or or Non-inspectable | Difficult or Non-repairable | 5 |

3. Ref: 250.915; It will be very helpful to the offshore industry to clarify requirements as to the maximum distance of the soil boring from the foundation piles and number of borings. It would also be helpful to clarify if the borings can be replaced by other means of taking soil samples such as CPT or by a combination of geotechnical investigation and geophysical survey.

4. It would be helpful for the MMS to provide guidance as to the acceptance criteria for faults such as the minimum distance from the faults to the foundation and what type of fault studies are recommended. This issue has not been addressed in any of the referenced documents listed in 250.901. Faults have been encountered in deepwater applications.

5. It will be useful for the offshore industry if MMS's policy on the

required pile capacity at first oil is specified in the CFRs.

Dated:
27 March 2002

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