

# Hibernia

Management and Development Company Ltd.  
100 New Gower Street  
St. John's, NL  
A1C 6K3



December 6, 2022

Paul Alexander  
Canada-Newfoundland and Labrador Offshore Petroleum Board  
240 Waterford Bridge Road  
The Tower Corporate Campus – West Campus Hall  
Suite 7100  
St. John's, NL  
A1E 1E2

**RE: Lifeboat Launching Drill Alternative Arrangements**  
**File No: 358**

Dear Mr. Alexander:

Hibernia Management and Development Company Ltd. (HMDC) would like to submit the following proposal in regards to the lifeboat launching drills as required in the Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations that came into force on January 1, 2022.

Section 30 (3) of the OSH Regulations states that every employer must ensure that *“If compliance with subparagraph (2)(d)(ii) is not feasible, the employer must ensure that additional inspections and testing of all components that would otherwise be tested by the launching drill are carried out in consultation with the lifeboat manufacturer and with the prior approval of the Chief Safety Officer.”*

## **Proposal**

As is consistent with the current practices of other East Coast Installations, as well as international practice, HMDC proposes the implementation of an on-davit inspection, testing, and maintenance program for all Hibernia lifeboats and ancillary systems in lieu of annual offshore sea deployments and retrievals. The maintenance program, detailed in Rationale, is considered to provide an equivalent level of integrity and reliability assurance for lifeboat and ancillary systems while providing an improved level of safety for maintenance and testing personnel in that they are not exposed to falls from heights or entry to sea during lifeboat launching.

## Rationale

The risks posed to personnel during regular maintenance and testing deployments of lifeboats offshore has been well documented and discussed within the local and international offshore oil and gas industry.

Annual deployment of 8-off Hibernia davit-launched, PrOD assisted lifeboats from a height of over 30-metres to sea on the Grand Banks, with personnel onboard, poses an inherent safety risk that should be avoided except in real emergency evacuation situations. Similarly, the act of re-attaching and re-setting multiple release hooks and winching lifeboats back up to the lifeboat stations poses a significant risk to personnel that should also be avoided.

In lieu of launching, HMDC has a robust internal and external vendor/OEM maintenance program that also meets SOLAS MSC.1/Circ.1206/Rev.1 requirements. Maintenance, inspection, and testing is performed on the lifeboats as per the following schedule:

Weekly (HMDC):	Visual inspection of Prod Boom cabinets, lifeboat, cables, winches; check engine controls, work throttle controls, steering gear, hydraulic hose condition (for MCB34 Lifeboats), stern glans and visually inspect coupling bolts; ensure handle on deluge release system is operational and in correct orientation; check hook release gear and hydrostatic release; check engine oil level, coolant level and fuel level; start engine on spring start and electric start; check battery and battery charger; check seal, hatches and doors; check bilge and pump out any accumulated water.
Monthly (HMDC):	Inspect hook release gear; check condition, pressure and verify expiry of air bottles; visually check Prod Boom foundation bolts; inspect engine; check batteries and charger; inspect bilge pumps; check hatch and door seals for damage.
12M (HMDC):	Annual inspection of deluge system - Remove deluge pump drive belt and manually rotate to check for premature bearing failure; perform visual inspection of deluge piping system and nozzles.
12M (OEM Vendor):	Annual inspection by OEM includes change hydrostatic diaphragm; inspection of Prod Boom; engine checks, including oil change and fluid samples; emergency air system checks; renewing fuel filter element; visual inspection of davit and winch foundation; greasing of stern gland.
60M (HMDC):	5-yearly replacement of winch fall cables as per SOLAS requirements
60M (OEM Vendor):	5-yearly load/hook release test in accordance with SOLAS; conduct 10% overload release test as per OEM procedure.

Additionally, Hibernia's coxswains are trained, competent and prepared to launch in the event of an emergency. The Hibernia coxswains are primarily tradespeople (e.g. electricians and mechanics) that also perform weekly, monthly and annual maintenance on the lifeboats. Survival Craft Coxswain training is completed annually at the Marine Institute which requires all candidates to launch a lifeboat. Lifeboat drills are completed every six months at a minimum.

## Summary and Conclusion

The design features stated previously and proposed maintenance strategies for Hibernia lifeboats, PrODs, and Ancillaries in lieu of annual deployments to sea and recovery are considered by HMDC to be consistent with similar approaches undertaken onboard other East Coast Offshore Installations. It is also the position of HMDC that these provisions meet the intent of the Installation Regulations, SOLAS, and satisfy Interpretation Note 11-01 with regards to performance standard assurance of lifeboat evacuation systems in lieu of deployment, while at the same time eliminating the risk to personnel associated with such launches. As per the manufacturer's letter, two new maintenance tasks (engine running under load and deluge system out of water demonstrations) will be incorporated into the 2023 program if proven feasible for offshore execution.

This application letter has been reviewed and endorsed by the lifeboat manufacturer (Attachment 1) and the certifying authority (see Attachment 2). The performance standard SCE-42 will be updated as required upon acceptance of this letter. Additionally, this application letter has been reviewed with the platform workplace committee and posted on the platform for public viewing. Workplace committee concurrence has been obtained (see Attachment 3) and the associated CSO approval will also be shared with the committee and posted on the platform.

If there are any questions, or if additional information is required, please contact [REDACTED]

Sincerely,

[REDACTED]

*Attachments*

cc: Central Files w/attachments

[REDACTED]



Palfinger Marine USA Inc. | 912 Highway 90 East | New Iberia | LA 70560 | USA

23 Nov 2022

Hibernia Management & Development Co. (HMDC)  
20 Hebron Way  
St. John's, NL A1A 0LP  
Canada

Attention: [REDACTED]  
Subject: Operational Readiness of LSA Equipment Onboard Hibernia Platform

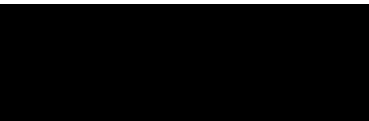
Good day,

I have read the document prepared by the client that details the "Maintenance/Inspection" routine put in place onboard the Hibernia Platform for the lifesaving equipment that is used for personnel evacuation, a copy forms a part of this letter. I agree the document thoroughly illustrates the planned maintenance and checks carried out will sufficiently demonstrate the operational readiness of the LSE with only a few comments.

1. While not mandated by regulation, it is highly recommended the engines be run under load annually. This can be accomplished without lowering to the water by using a bolt on dynamometer arrangement. I can confirm these items are ordered and delivery to Hibernia Platform anticipated in Feb 2023.
2. It is important to demonstrate the lifeboat deluge system works as intended. This can be accomplished without lowering to the water by fixing an external water supply to the sprinkler pump inlet and engaging the pump to demonstrate the pump works and the water nozzles produce the necessary water shield over the lifeboat. Palfinger has developed the system and we will be partnering with HMDC to prove out the procedure to confirm the practicality for offshore execution.
3. Palfinger Marine service personnel should be in attendance for all LSE annual and five yearly inspections which is the current policy employed by HMDC.

If you have any further questions or comments, please don't hesitate to reach out to any of our Palfinger Marine service team.

V/R,  
For Palfinger Marine Canada, Inc.



Technical Support – Americas Region

**From:** [REDACTED]  
**Sent:** Tuesday, April 14, 2020 3:12 PM  
**To:** [REDACTED]  
**Subject:** Request Palfinger Endorsement of Hibernia Lifeboat Maintenance, Inspection and Testing Program

**Importance:** High

On January 1, 2022, newly revised Canada-Newfoundland and Labrador Offshore Occupational Health and Safety Regulations came into force. As per the previous safety regulations, there remains a requirement in the new regulations stating that the platform lifeboats must be launched annually (Section 30 (2)(d)(ii) – "if feasible, a lifeboat launching drill is conducted annually to test the integrity and operation of the lifeboats and launching equipment"). HMDC had an approved deviation to this regulation in the past, but with the release of the new regulations, that previous approval is no longer valid, and another request must be submitted to the Canada-Newfoundland and Labrador Offshore Petroleum Board (CNLOPB), to deviate from this regulation.

Section 30 (3) of the OSH Regulations states that every employer must ensure that "if compliance with subparagraph (2)(d)(ii) is not feasible, the employer must ensure that additional inspections and testing of all components that would otherwise be tested by the launching drill are carried out in consultation with the lifeboat manufacturer and with the prior approval of the Chief Safety Officer." As part of the approval request to the Chief Safety Officer (CSO) of the CNLOPB, the CSO has requested that concurrence with the proposal be obtained from the lifeboat OEM. HMDC is requesting that Palfinger review the maintenance, inspection, and testing details outlined in this email, and respond with their alignment that the HMDC maintenance, inspection and testing program provides an equivalent level of integrity and reliability assurance for lifeboat and ancillary systems that launching would achieve, while providing an improved level of safety for maintenance and testing personnel in that they are not exposed to falls from heights or entry to sea during lifeboat launching.

Highlighted below is a summary of regular lifeboat maintenance, inspection, and testing activities that are carried out on the lifeboats on the Hibernia platform:

- Weekly Lifeboat Inspections
  - Visual inspection of Prod Boom Cabinets
  - Visual inspection of lifeboat, cables, winches
  - Check engine controls, work throttle control, check steering gear
  - For MCB34 lifeboats – check hydraulic hose condition
  - Check stern glands and visually inspect coupling bolts
  - Ensure handle on deluge release system is operational and in correct orientation
  - Check hook release gear and hydrostatic release
  - Check engine oil level, coolant level and fuel level
  - Start engine on spring start and electric start
  - Check battery and battery charger
  - Check seal, hatches and doors
  - Check bilge and pump out any accumulated water
- Monthly Lifeboat Inspections
  - Check condition, pressure and verify expiry of air bottles
  - Visually check Prod Boom foundation bolts
  - Hook Release Gear Inspection
  - Engine Inspection
  - Check Batteries and charger
  - Inspect Bilge Pumps
  - Check hatch and door seals for damage
- Annual Inspection of Lifeboat Deluge System
  - Remove deluge pump drive belt and manually rotate to check for premature bearing failure
  - Perform visual inspection of deluge piping system and nozzles
- Annual Lifeboat Inspections – this maintenance and inspection scope is carried out by the OEM and all OEM recommended maintenance/inspection is completed
  - OEM has listing of all activities carried out in this annual workscope (including, but not limited to, activities noted below) and provides documented report following completion.
    - Change Hydrostatic Diaphragm
    - Prod Boom Inspection
    - Engine checks, including oil change and fluid samples
    - Emergency Air System checks
    - Renewing fuel filter element
    - Visual inspection of davit and winch foundation
    - Grease Stern Gland
- Load / Hook Release Test (3 yearly) – This activity is carried out by the OEM on a 3 yearly basis
  - 3 year load test requirements in accordance with SOLAS
  - Conduct 10% overload release test as per OEM procedure
- Replace the Winch Falls Cables (3 ymly)
  - Replace winch falls cables as per SOLAS requirements

In addition to the outlined maintenance and inspection program above, the lifeboats on the platform are brought onshore for testing, inspection and recertification every 3-8 years. During this onshore recertification the lifeboats undergo a full testing and inspection program, including sea trials and operation of the deluge system, which is witnessed by the Certifying Authority. This ensures that all lifeboat components and system are fully functional and ready for use in an emergency evacuation.

HMDC is requesting concurrence from Palfinger that the outlined Maintenance, Inspection and Testing program for the Hibernia Lifeboats is sufficient to ensure the integrity and reliability of the lifeboats and ancillary systems in lieu of launching to sea annually.

Please reach out to me if further details on any of the items noted above is required. I look forward to receiving your response.

Regards,

[REDACTED]  
Hibernia Risk & Certification Engineer

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, December 6, 2022 2:03 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Request CA endorsement of Hibernia Lifeboat Maintenance & Inspection program in lieu of launching  
**Attachments:** HIB-CNTRLDOC-PMT-036-R001.pdf; HMDC CSO Letter - Lifeboat Launching Alt Arrangements Dec 2022.docx; Request Palfinger Endorsement of Hibernia Lifeboat Maintenance, Inspection and Testing Program; Hibernia Platform Readiness - Palfinger Endorsement.pdf

[REDACTED]  
Please find attached the endorsement letter from the CA for the lifeboat launching deviation.

Regards,

[REDACTED]

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**Sent:** Tuesday, December 6, 2022 1:39 PM  
[REDACTED]

**Subject:** RE: Request CA endorsement of Hibernia Lifeboat Maintenance & Inspection program in lieu of launching

**External Email - Think Before You Click**

Thanks [REDACTED]

Please find attached a CRS regarding the OEM's letter/HMDC's proposal for alternative arrangements to launching the lifeboats.

Condition

*The CA is aligned with the Operator's proposal for alternative arrangements noting we are to be contacted to witness the testing of the "dry" deluge connection once proven onshore. Should this arrangement prove feasible for implementation offshore, the CA expects the Maintenance Plans to be updated to include said testing for the nearest term scheduled annual maintenance.*

Please let me know if you have any questions.

Thank you

Kind Regards,

[REDACTED] **Lloyd's Register**

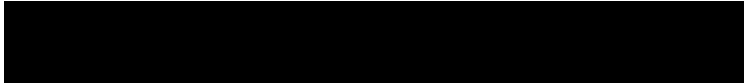
Asset Certification Lead - Hibernia, Americas Marine & Offshore  
[REDACTED]



# Comment Response Sheet

**Client:** Hibernia Management and Development Company Ltd. **CRS number:** HIB-CNTRLDOC-PMT-036  
**Project:** Hibernia - Operator Documents **Revision:** 01  
**Client Contract No:** **Status:** Closed  
**Transmittal No:** Email **CRS Date:** 06 December 2022  
**Client reference:** **Page:** 1 of 3

**Attention:**  
**Copied to:**



**SUBJECT** Lifeboat Launching Drill Alternative Arrangements

## DOCUMENT APPRAISAL STATUS SUMMARY

The document(s) below have been examined in accordance with the Work Instruction(s) referenced and are assigned the status code(s) indicated, subject to the following comment(s):

Document No.	Rev.	Title	Status
File No: 358	05 Dec 2022	HMDC Draft letter to C-NLOPB CSO RE: Lifeboat Launching Drill Alternative Arrangements	I
Palfinger Letter	23 Nov 2022	Palfinger letter to HMDC RE: Lifeboat Launching Drill Alternative Arrangements	AC

**COMMENT STATUS KEY** ● = Closed Comment ◆ = Open Comment

## APPRAISAL STATUS KEY

A = Approved/Accepted  
AC = Approved/Accepted with conditions  
H = Hold  
Q = Queries  
R = Rejected, not acceptable  
RI = Retained as supporting documentation for information only  
S = Superseded  
I = Requested for Information only

## FINAL ACCEPTANCE DEPENDS ON SATISFACTORY SURVEY AND TESTING

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# Comment Response Sheet

**Client:** Hibernia Management and Development Company Ltd.  
**Project:** Hibernia - Operator Documents  
**Client reference:**

**CRS number:** HIB-CNTRLDOC-PMT-036  
**Revision:** 01  
**Page:** 2 of 3

## DOCUMENT APPRAISAL DETAILS

Document No.	Rev.	Title	Status
File No: 358	05 Dec 2022	HMDC Draft letter to C-NLOPB CSO RE: Lifeboat Launching Drill Alternative Arrangements	I

### Work Instruction(s):

Document No.	Rev.	Title	Status
Palfinger Letter	23 Nov 2022	Palfinger letter to HMDC RE: Lifeboat Launching Drill Alternative Arrangements	AC

### Work Instruction(s):

## 1. Project Management Comments

- 1.1 ● The Lifeboat OEM (Palfinger) letter has been reviewed by the CA, along with HMDC's draft letter for information. Per the OEM's comments, the CA would recommend the implementation of these items, especially item 2 as the use of the boat deluge systems has not been frequent using the current boat exchange program, and should be functioned more frequently.

The CA is aligned with the Operator's proposal for alternative arrangements noting we are to be contacted to witness the testing of the "dry" deluge connection once proven onshore. Should this arrangement prove feasible for implementation offshore, the CA expects the Maintenance Plans to be updated to include said testing for the nearest term scheduled annual maintenance.

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## Comment Response Sheet

<b>Client:</b>	Hibernia Management and Development Company Ltd.	<b>CRS number:</b>	HIB-CNTRLDOC-PMT-036
<b>Project:</b>	Hibernia - Operator Documents	<b>Revision:</b>	01
<b>Client Contract No:</b>		<b>Status:</b>	Closed
<b>Transmittal No:</b>	Email	<b>CRS Date:</b>	06 December 2022
<b>Client reference:</b>		<b>Page:</b>	3 of 3

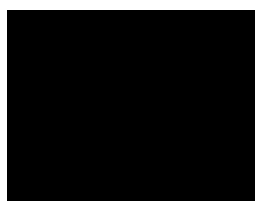
In preparing this report, the undersigned surveyor is acting as an independent person in accordance with the applicable policy on conflict of interest.

Surveyor to Lloyd's Register:

Co-ordinator /  
Project Manager:

Client Response  
Prepared by:

Dated



### FINAL ACCEPTANCE DEPENDS ON SATISFACTORY SURVEY AND TESTING

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The Hibernia Joint Occupational Health and Safety Committee has reviewed the following item during the meetings of February 14<sup>th</sup>, 2022 and March 6, 2022 with no objections or concerns:

Topic: *CSO Letter: Alternate Maintenance in lieu of LB Launching*

Co-Chair #1

Name: [REDACTED] Date: 18-03-2022

Co-Chair #2

Name: [REDACTED] Date: 24-03-2022