

Chief Safety Officer Decision (Regulatory Equivalence)

Date: 16 September 2016

C-NLOPB Reference: 2015-RQ-0187

Applicant: Hibernia Management and Development Company

Applicant Reference: RQF 465

Installation Name: Hibernia

Authority: *Canada-Newfoundland Atlantic Accord Implementation Act, subsection 151(1)*
Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1)

Regulation: *Newfoundland Offshore Petroleum Installations Regulations Sub-section 8(2)*

Decision:

The Chief Safety Officer accepts the Applicant's, the operator of the Hibernia Installation, proposal for conducting hot work during normal operations with the following conditions:

1. In all circumstances, hot work should be deferred to periods of shutdown. Where this is not practical or is not the lowest risk approach, hot work may only proceed as defined below and subject to a risk assessment process with appropriate mitigations/precautions in place.
2. Interior Spaces: Hot work in interior non-hazardous locations as outlined in the Application and inclusive of the Welding Shop, is only permitted if work is conducted in accordance with the Installation's Permit to Work System, is not conducted in the vicinity of other sources of ignitable vapor and the following systems are fully functional:
 - I. Sealed HVAC providing a gas tight environment
 - II. Positive overpressure protection relative to the external process/utility areas from which hazardous vapors may originate.
 - III. Sealed fire/blast protected doors, bulkheads, decks and fire dampers.
 - IV. Fire Suppression system.

- V. Fire and gas detection system.
3. Exterior Spaces: Exterior hot work is permitted provided:
- I. Work is conducted in accordance with HMDC's Work Management System.
 - II. The work is not conducted in the vicinity of other sources of ignitable vapor.
 - III. The fire suppression system and gas detection systems are fully functional.
 - IV. When conducting hotwork within 50 m of a source of ignitable vapour, a pressurized habitat is used in accordance with the manufacturer's recommendations.
 - V. All hazards and risks associated with repair work are to be identified, risk assessed and mitigated to ALARP. This shall include all high and medium risk work activities on the platform and must consider ongoing well operations.
4. The status of drilling and intervention operations including hole section of wells shall be considered in the hot work risk assessment process such that the risk is as low as reasonably practicable.
5. All expectations addressed in the associated C-NLOPB Hot Work Interpretation Note 14-01 apply to this RQF decision and where required, HMDC's Permit to Work System shall reflect these expectations.



Chief Safety Officer