

Chief Safety Officer Decision (Regulatory Equivalence)

Date:

18 November 2019

C-NLOPB Reference:

2019-RQ-0007

Applicant:

Suncor Energy

Applicant Reference:

RQF 215.2

Installation Name:

Terra Nova FPSO

Authority:

*Canada-Newfoundland and Labrador Atlantic Accord
Implementation Act, subsection 151(1) & section 205.069*

*Canada-Newfoundland and Labrador Atlantic Accord
Implementation Newfoundland and Labrador Act, subsection
146(1) and section 201.66*

Regulation:

*Newfoundland Offshore Drilling and Production Regulations
Sub-section 25(b)*

Decision:

The Chief Safety Officer accepts the Applicant's proposal to change the presently scheduled MPG Hot Gas Path (HPG) and major Inspections (MI) of the OEM recommended hours-based intervals of 24,000 and 48,000 hours to 32,000 and 64,000 hours respectively as outlined in the Application. This is in lieu of the requirement to complete a comprehensive inspection on a 5 yearly basis as required by the *Newfoundland Offshore Petroleum Drilling and Production Regulations* provided:

- Recommendations from the manufacturer are not exceeded.
- The Certifying Authority is to be informed whenever major inspections are carried out in order to have opportunity to specify any survey requirements.
- A major inspection (48,000 hour) will be carried out in LET 2020 on the Port MPG.
- A major inspection (48,000 hour) will be carried out in LET 2020 on the Starboard MPG.
- All upgrades to the Combustion and Hot Gas Path components as detailed in GE's "6B Advanced Technology Uprate" are to be installed and proof of completion verified by the CA and C-NLOPB.
- Yearly boroscope inspections are undertaken.
- Gas / distillate fuel quality is unchanged i.e. low sulfur content for any distillate oil in order to prevent 'hot end' corrosion.

This Decision is effective from the date of issuance herein until the earlier of:

- a) the date a Regulation referenced herein is repealed or the date a particular subsection that is the object of a substitution or exemption being granted hereby is amended or replaced, or

- b) the date on which the CSO and /or CCO (as applicable) revokes this Decision as a result of
i) any enforcement action by the Board related to this Decision or ii) new information or analysis coming to light challenging the assessment upon which this Decision was based, including but not limited to any changes to commitments made by the Applicant in its application.

For greater certainty, Chief Safety Officer will no longer have authority under the Accord Acts to grant exemptions for Part III.1 transitional regulations once they are repealed.



Chief Safety Officer