CANADA-NEWFOUNDLAND and LABRADOR OFFSHORE PETROLEUM BOARD

Chief Safety Officer Decision (Regulatory Equivalence)

Date:	January 16, 2014
C-NLOPB Reference:	2013-RQ-0040
Applicant:	Husky Oil Operations Limited
Applicant Reference:	RQF GSF 32
Installation Name:	GSF Grand Banks
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:	*Subsection 8(2) of the Newfoundland Offshore Petroleum Installation Regulations* *Section 1.1 of the Draft Petroleum OSH Regulations* *Section 11.6 of the Draft Petroleum OSH Regulations* *Section 17.4 of the Draft Petroleum OSH Regulations*

Decision:

The Chief Safety Officer concurs with the following in respect of the Applicant's proposal to conduct hot work operations onboard the GSF Grand Banks:

1. In all circumstances, hot work should be deferred to periods when the Installation is not connected to the well. Where this is not practical or is not the lowest risk approach, hot work may only proceed subject to a risk assessment process with appropriate mitigations/precautions in place.

2. Hot work, while not connected to the well, is permitted if:
   - the work can be conducted in accordance with the Installation's permit to work system
   - is not conducted in the vicinity of other sources of ignitable vapor
   - fire suppression systems and fire and gas detection systems are fully functional; and
   - measures outlined in the Application are followed.

3. Hot work, in interior non-hazardous locations as outlined in the Application, is only permitted if work can be 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:
    - Sealed HVAC providing a gas tight environment
    - Sealed fire/blast protected doors
    - Fire suppression systems
    - Fire and gas detection systems

No other hot work activities are approved.

Chief Safety Officer