

## **Fixed Platform Self Inspection Program Biannual Status Report October 1, 2002 through March 31, 2003**

### **Background**

On June 7, 2002, the Minerals Management Service (MMS) was authorized to conduct safety inspections on fixed Outer Continental Shelf (OCS) facilities on behalf of the U.S. Coast Guard. Implementation of the program by MMS followed a phased approach in order to allow classroom and field training of MMS inspectors, complete development and distribution of newly-developed Potential Incidents of Non-Compliance (PINCs), create and launch a dedicated website for dissemination of program information, and provide operators with adequate time to bring their facilities into compliance with applicable Coast Guard regulations. This is the first report on the status of the Fixed Platform Self Inspection Program, covering the period from October 1, 2002 through March 31, 2003.

### **Inspection Issues**

During early phases of program implementation, MMS inspectors found that a large number of manned and unmanned facilities did not comply with Coast Guard requirements for primary and secondary means of escape. It was also discovered that most davits for life boats did not evidence proper Coast Guard certification. At this time, MMS is following policy clarifications provided by the 9 June 2003 correspondence from Captain Dan Ryan to Mr. Don Howard. Additionally, needed policy clarification on emergency and fire drill requirements was also provided in an e-mail dated 25 June 2003 from Mr. David M. Moore to MMS and Coast Guard Headquarters and District staff. With the exception of the noted items, preliminary review of inspection statistics did not reveal any significant safety problems or trends. MMS has, during program implementation, continued open dialogue with operators and trade organizations regarding the MMS application and enforcement of Coast Guard regulations and has not been advised of any issues.

### **Inspection Distribution**

During the six-month reporting period, which began on October 1, 2002, MMS conducted 1,108 fixed facility inspections in the Gulf of Mexico and Pacific regions, of which 415 were on manned facilities and 693, unmanned facilities. Of the total inspections, 180 were full spot inspections in which the Coast Guard Self Inspection Form 5432 was critically reviewed and visual observation of safety components was performed, while the remaining 928 inspections consisted of a limited review of pre-selected priority safety items.

### **Compliance Findings**

Of all platform inspections that occurred, 1,032 (93.1%) were found to be in compliance with Coast Guard regulations and 76 (6.9%) were found to be out of compliance. Facilities that were subjected to a limited inspection resulted in a compliance rate of 95.9%, whereas facilities that underwent a full spot inspection had a compliance rate of 78.9%. Compliance rates for manned versus unmanned facilities were 88.4% and 96%, respectively.

### **Incidents of Non-Compliance**

For all facilities inspected, the discovery of deficiencies led to the issuance of 140 Incidents of Noncompliance (INC) for the 76 facilities found to be out of compliance with Coast Guard regulations. Thus, for each platform that was found to be out of compliance, an average of 1.8 INCs were issued. The INC ratio for manned facilities was 2.1 and for unmanned, 1.5. Full spot inspections yielded an INC ratio of 2.1, and for limited inspections, 1.6 INCs per facility visited. Manned facilities that underwent a full spot inspection had an INC ratio of 2.2, while unmanned facilities that underwent limited inspections had an INC ratio of 1.3 INCs issued per deficient facility.

### **Trend Analysis and Findings**

As each MMS District's schedule for phasing in Coast Guard related inspections differed, a full analysis for the reporting period is not feasible. Still, general observations can be made even at this stage that can help focus the future direction of the program. General trends that are evident thus far and which will be evaluated further include:

- Manned facilities that had full spot inspections had the highest rate of facilities that were found to be out of compliance and also had the highest INC ratio.
- Unmanned facilities that had limited inspections had the highest rate of facilities that were found to be in compliance and also had the lowest INC ratio.
- When comparing full spot inspection to limited inspections, the later evidenced the highest rate of facilities in compliance with regulations.
- When comparing inspection of manned versus unmanned facilities, the later evidenced the highest rate of facilities in compliance with regulations.
- On average, for each facility that was inspected and found to be out of compliance, MMS inspectors issued 1.8 INCs.

While a total of 140 INCs were issued during the reporting period, none were of sufficient severity to warrant referral for potential civil penalty review.

### **Future Program Direction**

- MMS will continue to place emphasis on the inspection of manned fixed facilities in the OCS and the identification and remedy of existing safety infractions.
- MMS will closely monitor consistency in the interpretation and application of Coast Guard regulations among all MMS districts through evaluation of types of INCs being issued and the type of enforcement actions being pursued.
- MMS will continue to work with the Coast Guard when questions of regulation policy arise that affect facility inspections and will develop policy codification protocol.

