



DOI Priority Goal Action Plan

Conduct Facility-Based Risk Inspections and Performance-Based Risk Inspections

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Overview

Goal Statements

- By September 30, 2021, the Bureau of Safety and Environmental Enforcement will conduct 12 facility-based risk inspections and 6 performance-based risk inspections.

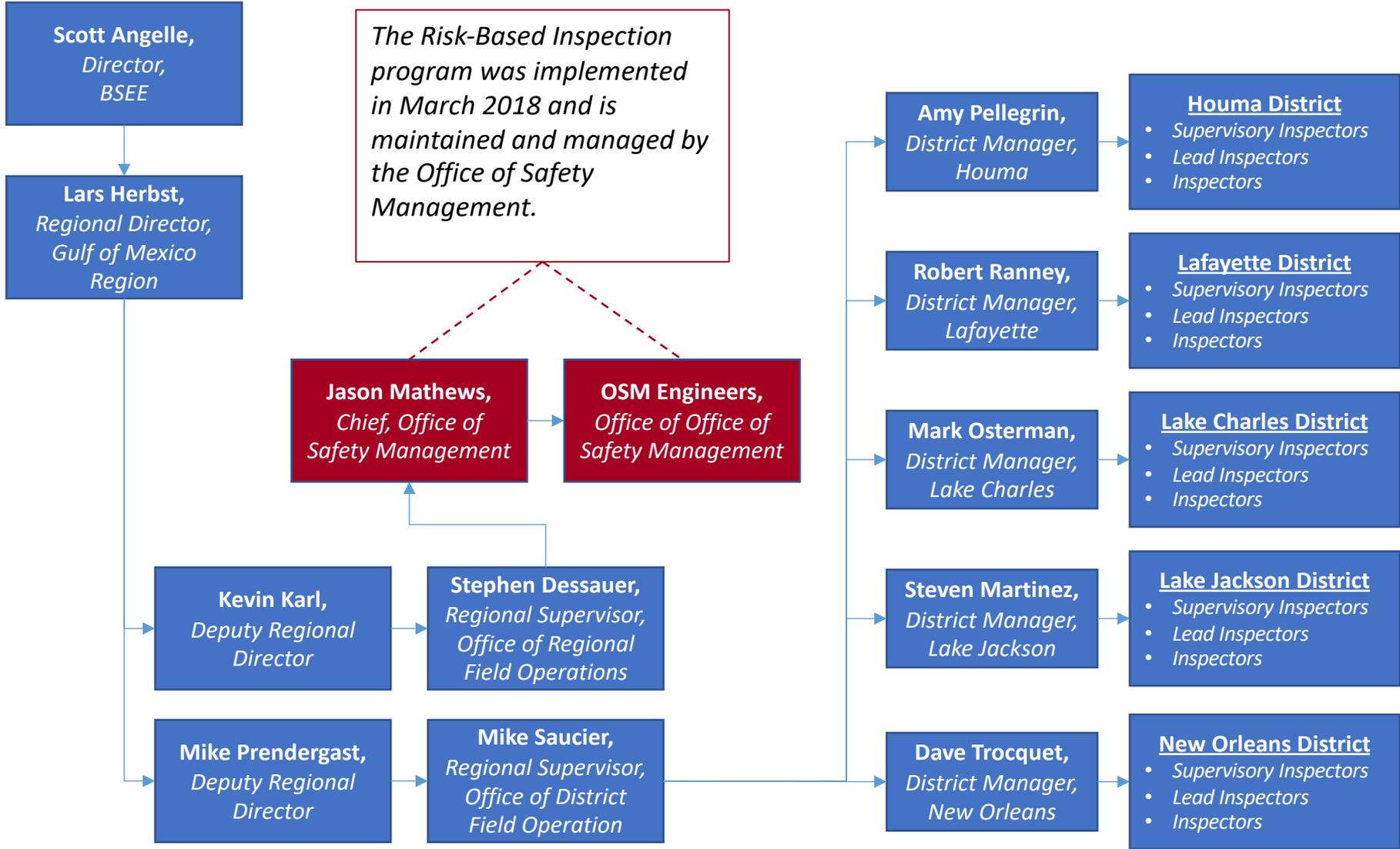
Challenge

- Risk-based inspections present additional workload to BSEE's inspection staff, who already face numerous inspection targets to meet.
- Performance-based risk inspections are especially resource-intensive, including inspectors and engineers visiting numerous facilities typically across all 5 districts in the Gulf of Mexico.

Opportunity

- Risk-based inspections allow BSEE inspectors to target (1) areas that need special attention given trends in safety and environmental performance and (2) facilities that warrant additional inspection time given risks inherent to a given facility. The analysis of raw inspection and incident data allows BSEE to create insightful and actionable inspections to continually improve operator performance.

Leadership & Implementation Team



Goal Structure & Strategies

- The Risk-Based Inspection Agency Priority Goal will be achieved using:
 - Analysis of inspection & incident (e.g., Incident of Non-Compliance (INC)) data
 - Routine review of offshore assets on Increased Oversight List
 - Soliciting feedback from inspectors



- Challenges to meeting the agency priority goal include:
 - Weather, which can be mitigated against with proper planning.
 - Competing inspection priorities, which is mitigated against with the inclusion of Risk-Based Inspections in the Gulf of Mexico's annual inspection strategy.

Summary of Progress – FY 2020 Q2

- **Level of Results Achieved**

- Since October 1, 2019, BSEE has completed:
 - 2 of the proposed 6 facility-based risk inspections for FY 2020;
 - 2 of the proposed 3 performance-based risk inspections for FY 2020.

- **Likelihood of Success**

- High

- **Basis for the Assessment**

- BSEE is currently on target to meet the Risk-Based Inspections agency priority goal for FY 2020. As of June 12, 2020:
 - The Office of Safety Management (OSM) has identified all of the 6 facilities that will receive a facility-based risk inspection in FY 2020;
 - Similarly, OSM has completed 2 performance-based risk inspections for FY 2020, and, for the third, all inspections were complete and analysis and report development are underway.

- **Actions planned to ensure achievement of the goal**

- No additional actions required at this time.

Key Milestones – Performance-Based Risk Inspections (PBRIs)

Milestone Summary				
Key Milestone	Milestone Due Date	Owner	Milestone Status	Comments
PBRI 1 (Compliance with Real-time Monitoring Reqs.)				
<i>Complete planning and train inspectors</i>	Q2 FY20	OSM	Complete	
<i>Conduct inspections</i>	Q2 FY20	OSM, Districts	Complete	
<i>Analyze results, develop reports, and share results</i>	Q3 FY20	OSM	Complete	
PBRI 2 (Pandemic Management Planning)				
<i>Complete planning and train inspectors</i>	Q3 FY20	OSM	Complete	
<i>Conduct inspections</i>	Q3 FY20	OSM, Districts	Complete	
<i>Analyze results, develop reports, and share results</i>	Q4 FY20	OSM	Complete	
PBRI 3 (Hurricane Preparedness)				
<i>Complete planning and train inspectors</i>	Q4 FY20	OSM	Complete	
<i>Conduct inspections</i>	Q4 FY20	OSM, Districts	Complete	
<i>Analyze results, develop reports, and share results</i>	Q1 FY21	OSM	On-Track	

Key Milestones – Facility-Based Risk Inspection (FBRI)

Milestone Summary				
Key Milestone	Milestone Due Date	Owner	Milestone Status	Comments
FBRI 1 & 2 (Murphy/Front Runner and EnVen/Brutus)				
<i>Complete planning and train inspectors</i>	Q1 FY20	OSM	Complete	
<i>Conduct inspections</i>	Q1 FY20	OSM, Districts	Complete	
<i>Analyze results, develop reports, and share results</i>	Q2 FY20	OSM	Complete	
FBRI 3				
<i>Complete planning and train inspectors</i>	Q3 FY20	OSM	Ongoing	
<i>Conduct inspection</i>	Q3 FY20	OSM, Districts	On-Track	
<i>Analyze results, develop reports, and share results</i>	Q4 FY20	OSM	On-Track	
FBRI 4 & 5				
<i>Complete planning and train inspectors</i>	Q4 FY20	OSM	Ongoing	
<i>Conduct inspections</i>	Q4 FY20	OSM, Districts	On-Track	
<i>Analyze results, develop reports, and share results</i>	Q1 FY21	OSM	On-Track	
FBRI 6				
<i>Complete planning and train inspectors</i>	Q3 FY20	OSM	Ongoing	
<i>Conduct inspection</i>	Q3 FY20	OSM, Districts	On-Track	
<i>Analyze results, develop reports, and share results</i>	Q1 FY21	OSM	On-Track	

Overview of Completed PBRI 1

(Compliance with Real-time Monitoring Reqs.)

- Decision to conduct a PBRI related to real-time monitoring (RTM) resulted from BSEE's January 2020 data analysis on related well control equipment failures and kick events.
- The RTM PBRI included 6 rounds of inspections conducted between March 10 and March 20, 2020.
 - Over 300 BSEE work hours prior to the PBRI were spent in developing correspondence, protocol, training material, and company-specific RTM plan reviews.
 - The PBRI included 15 of the 33 rigs operating in the Gulf of Mexico and that use subsea blowout preventers (BOPs), surface BOPs on floating platforms, or operate in high-pressure and high-temperature environments.
 - These 15 rigs included 6 unique operators: Beacon, Chevron, EnVen, Hess, Cosmos, and Shell.
 - For the PBRI, BSEE reviewed 194 files submitted in advance of audits and committed over 200 audit hours.
- No Incidents of Non-Compliance or civil penalties were issued, and no investigations were initiated; however, numerous findings were identified, and OSM made 8 recommendations to operators and other BSEE staff.

Overview of Completed PBRI 2: (Pandemic Management Planning)

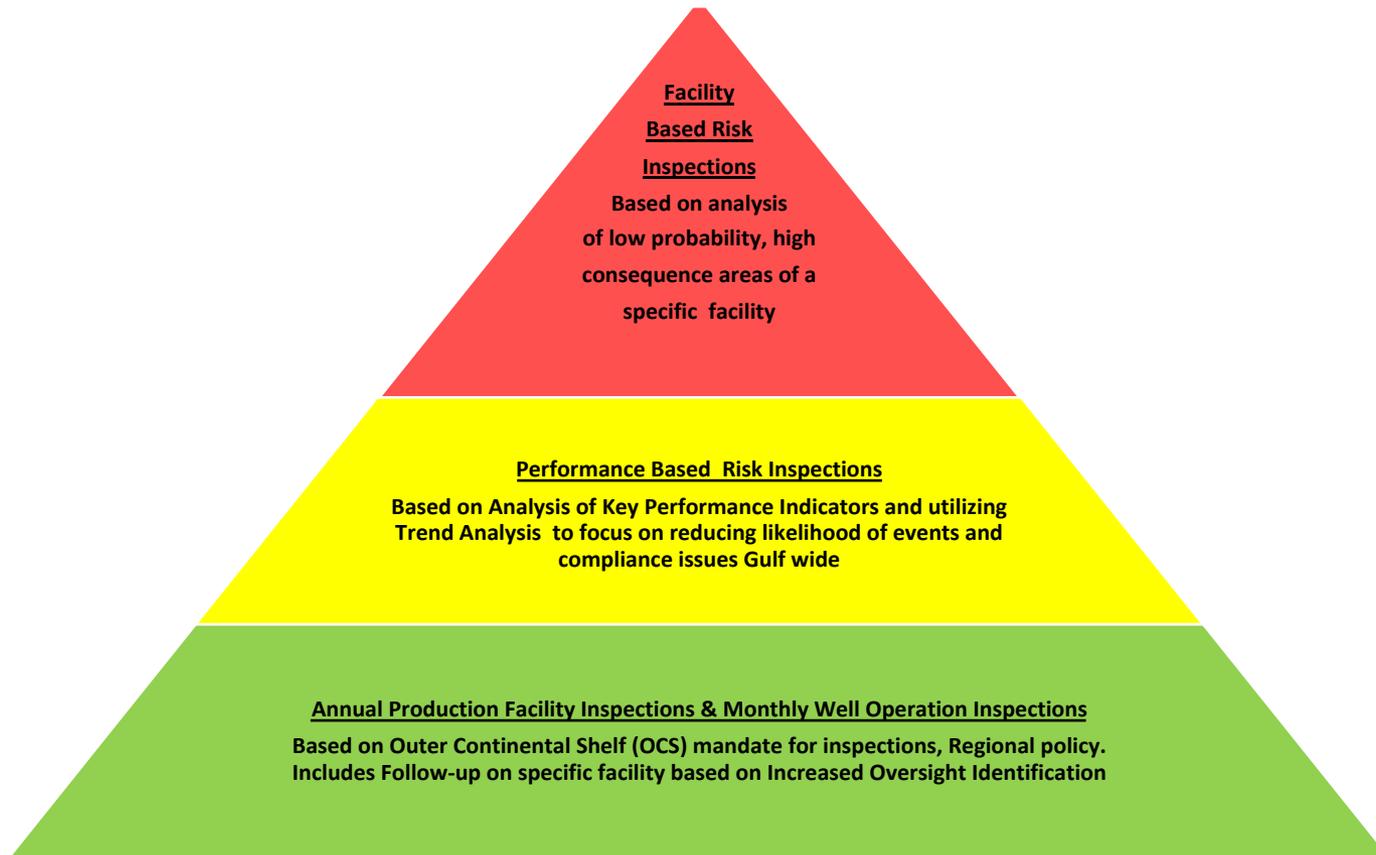
- BSEE conducted a PBRI related to pandemic management planning in response to the COVID-19 pandemic.
- Inspection-related activities occurred between May 18 and May 27, 2020.
 - The PBRI included 8 unique operators.
 - BSEE committed over 275 work hours in developing correspondence and protocols, as well as conducting operator reviews. Operator reviews were conducted virtually.
- No Incidents of Non-Compliance or civil penalties were issued, and no investigations were initiated; however, BSEE identified 13 findings, including numerous recommendations to operators and one recommendation to BSEE and the American Petroleum Institute.

Overview of Completed FBRI 1 and 2

- FBRI 1 occurred from December 2, 2019, through December 9, 2019, with inspection of a production platform (Front Runner) and associated platform rig (Nabors MOD 201) operated by Murphy.
 - The FBRI included physical inspection of the platform and rig, as well as an office review with EnVen staff.
 - No Incidents of Non-Compliance or civil penalties were issued, and no investigations were initiated.
 - BSEE identified 12 areas for improvement with Murphy's management systems on the inspected facility.
- FBRI 2 occurred from December 9, 2019, through December 19, 2019, with inspection of a production platform (Brutus) and associated platform rig (DD 202) operated by EnVen.
 - The FBRI included physical inspection of the platform and rig, as well as an office review with EnVen staff.
 - No Incidents of Non-Compliance or civil penalties were issued, and no investigations were initiated.
 - BSEE identified 4 good practices and 10 areas for improvement with EnVen's management systems on the inspected facility.

Key Indicators

Risk-Based Inspections allows BSEE the opportunity to perform enhanced and targeted inspections using customized protocols to address those facilities and offshore activities that pose significantly higher risk.



Data Accuracy and Reliability

All of the data used to support Risk-Based Inspections is contained within BSEE's corporate database, which contain controls related to inputting and managing that data. Much of the information (e.g., inspection data, facility data, INCs) is directly inputted into BSEE's database by bureau employees and is used regularly by bureau employees.

Data related to incidents is contained within BSEE's corporate database, but given that incidents are reported directly to the bureau by operators per regulatory requirements, BSEE acknowledges that some minor incidents may go unreported. Historically, incidents are typically reported to BSEE and there is sufficient data to utilize in trend analyses.

Additional Information

Contributing Programs

Program Activities:

- BSEE's inspections program
- BSEE's program to issue civil penalties
- BSEE's Safety and Environmental Management Systems (SEMS) program

President's Management Agenda:

- The Risk-Based Inspection (RBI) program is supported by two performance measures:
 1. Percentage of high risk well operations (e.g., drilling) inspected
 2. Percentage of high risk production facilities and operations inspected

Regulations:

- 30 Code of Federal Regulations (CFR) 250: Oil and Gas and Sulphur Operations in the Outer Continental Shelf

Policies:

- The RBI program was formally established in March 2018 through Bureau Interim Directive 2018-033G

Stakeholder / Congressional Consultations

BSEE provides continuous updates on the results of RBI activities to the Offshore Operators Committee and other industry members.