

HSSE Toolbox Talk

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REVISION TO HSSE POLICY PR-3 CONTROL OF WORK

HSSE Policy PR-3, Control of Work, has been revised to reflect the following key changes. The revision becomes effective July 28, 2008.

1. **Permit Approval Table** – Clarifies that table details minimum approvals and facilitation of risk assessment and that residual risk determines approval as defined by the risk matrix or permit approval table. ([Section 2.0](#))
2. **Performing Authority Competencies and Coverage for Multiple Jobs** – Clarifies the following ([Section 2.1.3](#)):
 - a. The PA must be knowledgeable in the work being performed.
 - b. Where a PA's work crew is spread across multiple permitted tasks, once permits have been released and work begun, the PA can pass his ongoing accountabilities to a member of the work crew. The PA must communicate with the Issuing Authority who this Work Crew Representative (WCR) will be and ensures the WCR:
 - i. can communicate with both the IA and work crew members,
 - ii. is knowledgeable of the craft line activity, and
 - iii. understands his accountability to review the permit with any new work crew member
3. **JSA Embedded in Shift Permit** – Clarifies that risk assessment requires completion of JSA embedded in Shift Permit. ([Section 5.0](#))
4. **Risk Assessment Facilitation and Approval of Activities Not Listed in Permit Approval Table** – Corrected that approval of activities not listed on Permit Approval Table is based on residual risk and facilitation of risk assessment is based on initial risk. ([Section 5.1](#))
5. **Standard Maintenance Instruction Permit** – Adds SMIP provision and guidance for routine tasks. ([Section 5.15 & 5.16](#))
 - a. Routine tasks may be covered by a "Standard Maintenance Instruction Permit", SMIP in lieu of a permit independent of who performs the task.
 - b. The procedures must include or reference a standard set of task steps which have been risk assessed involving craft person(s) competent in the activity and facilitated by a Control of Work Specialist. For non-craft performing work, persons knowledgeable of the activity will be involved.
 - c. The SMIPs will be formally approved by approval levels equivalent to WCC approvals for the work activity and in addition, require approval for utilization of the SMIP format in lieu of normal WCC and Shift Permit. The SMIPs will be maintained in the sites document management system.
 - d. Approval level will be determined by the CoW Technical Authority for use of SMIP in lieu of WCC and Shift Permit.
 - e. Any work activity performed by an SMIP requires:
 - i. The work is scheduled, or appropriate approvals are obtained for break in.
 - ii. The IA and PA complete appropriate sections of the SMIP for job specific details.
 - iii. The AA releases the SMIP unless deemed lower risk by the Technical Authority which will be noted in the SMIP.
 - iv. Work handover follows the procedures for permitted work.
 - f. All risk assessments relating to routine procedures are documented and retained via the SMIP process. This will be subject to an annual formalized review and audit program. For procedures written to only cover task related hazards, a review of process hazards via the SMIP issue will be required for each use of the procedure.

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6. **Annual Review of SMIPs** – Revises annual review of routine task procedure to reflect SMIPs specifically, and simply states that SMIPs must be reviewed and re-approved annually. ([Section 5.17](#))
7. **Competency Standards for Routine Tasks** – Clarifies that SMIPs must be carried out by personnel competent in the task activity. ([Section 5.18](#))
8. **Work by Different Companies** – Clarifies craft line permit requirements when work is executed by different companies. If company executing the work changes during execution, the WCC can be updated to reflect the revised company if scope of work, hazards, etc are unchanged. If work scope and hazards affect contents of the WCC, a new WCC is required. ([Section 6.2](#))
9. **Permitting for Pressure Testing** – Pressure testing as defined per S-25 (hydrotesting or pneumatic) is permitted work per the permit approval table and requires a WCC. In addition to the hazards inherent to the pressure and extra weight involved with pressure testing, the hazards of SIMOPS, breaking containment, and the potential for disturbing an existing LOTO must be considered. Blinds installed for the purpose of pressure testing must be tracked and accounted for. ([Section 6.2.2](#))
10. **Representation on Isolation Review Team** – Clarifies that representation on Isolation Review Team is the responsibility of the LOTO Custodian, not the Permit Coordinator. ([Attachment C](#))
11. **Work Location Tags** – Allows work location tags to remain hung until completion of work or when the Shift Permit expires. Modified work location tag to reflect this change. ([Section 7.1 and Attachment D](#))
 - a. The work crew representative will return all tags to the IA (operator) upon completion of the work or when the work permit expires.

Revisions for CoW TAR Process

The following provisions have been added to address the CoW TAR Process:

1. **TAR Planning/Simultaneous Operations (SIMOPS)** – Provides requirements for TAR Planning/SIMOPS. ([Section 4.2](#))
 - a. Work defined as TAR in regards to this policy relate to where the process hazards have been eliminated by the de-pressuring and de-inventory of process, and installation of isolation blinds. The TAR SPA and Operations Leader will jointly agree when a unit or unit area is in TAR mode as defined in this policy. For project work, the Project Manager and Operations Leader will determine when a brown field project qualifies for this policy definition. A TAR or project specific HSSE execution plan will be developed and approved by the TAR SPA/Project Manager and Operations Leader. The HSSE execution plan will have USW input and participation.
 - b. To manage SIMOPS at the work scheduling stage, the Operations Supt and TAR Supt will recommend to the TAR SPA unit segregation for managing SIMOPS.
 - c. Once agreed, the Operations Supt will assign an accountable Operations Representative (typically experienced Operations representative), and the TAR Supt will designate a TAR Representative (typically lead Job Rep) for each area. For around the clock TAR efforts, both nights and days will have this accountability assigned, but the day roles will have scheduling accountability.
 - d. Key examples of SIMOPS issues during TAR would be opening or draining equipment near ongoing hot work activity, work overhead and below in a single area, adjacent jobs where either of the jobs might impact personnel from the other.

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- e. Management of SIMOPS has two components. One occurs during the daily scheduling of the next days activities. It is essential that the schedule plan considers SIMOPS and work schedules set accordingly.
 - f. SIMOPS plan will be decided on a 24 hour basis, with a meeting held each day to review the next day schedule. The look-ahead schedule will be reviewed by the Operations and TAR SIMOPS representative. They are accountable for establishing the 24 hour schedule for work activity in that area after considering SIMOPS (adjacent work activity), critical path, etc. Only permits for work defined on the schedule will be released for work over the following 24 hours without scheduling approval from the Operations and TAR SIMOPS representatives.
 - g. Where SIMOPS issues are identified in the field which create risk, the area Operations and Maintenance SIMOPS representatives will resolve conflicts that cannot be managed by the work crews.
2. **Hot Work Spark Potential Permits for TAR/Brown Field Work** – Adds requirements for hot work spark potential permits for TAR/brown field. ([Section 6.1](#))
- a. In areas deemed to be under the TAR / brown field CoW process, area Hot Work Spark Potential permits may be issued which allow a single permit to cover incidental mobile equipment and spark potential tools and equipment.
 - b. The intent is to eliminate multiple gas tests for a single area. It is not the intent to eliminate the permitting of individual job task activities which still require permitting to define the hazards of the tasks.
3. **Communication Requirements at Permit Issue for TAR** – Added requirements for communication at permit issue for TAR as follows ([Section 6.3](#)):
- a. Initial issue of any WCC requires face to face handover by Operations IA to the Work Crew Representative (PA) per the Permit Approval Table.
 - b. Operators involvement in permit release are as follows:
 - i. Initial issue of all WCC permits.
 - ii. Perform gas testing per PR-1 Confined Space Entry and PR-2 Hot Work.
 - iii. Subsequent release of lower process hazard risk jobs will only require review of the craft Shift Permit some time within the first 4 hours of the maintenance work shift.
 - iv. Higher process hazard risk work will be defined as any job requiring initial Confined Space entry, containment break of process piping until proven and agreed the process is completely cleared, or any job involving initial welding activity on equipment or piping.
 - v. Where systems are still under live process within the TAR area, Operations release at the start of shift is required for all the above activities each shift.
 - vi. Operations may designate other activities deemed as higher process hazard risk for release by an Operator.
 - c. The PA accountability for permit release is:
 - i. Ensure the work activity is on the daily SIMOPS schedule.
 - ii. Verify if Operator release is required.
 - iii. Lead the work crew in the daily Shift Permit JSA creation and review.
 - iv. Ensure all crew understand, agree, and sign the Shift Permit.
 - v. Interface with Operations on high risk work prior to work start.

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- vi. For all other work, start once permit agreed by work crew.
- vii. At end of day, ensure work site is left in a safe condition prior to close of permit.
- viii. For back to back continuous work, hand over to the oncoming PA prior to permit close out.
- d. The Operations SIMOPS rep is accountable in the permitting process for:
 - i. Assuring Shift Permits requiring Operations release are managed.
- 4. **WCC Creation for TAR** – Added requirements for WCC creation for TAR work as follows ([Section 6.5](#)):
 - a. WCCs are created for each craft and activity and by systems (of common LOTO). Pulling multiple exchangers, valves, etc of similar configuration in a common system may utilize a single WCC if the hazards are common. Doing weld repairs on those exchangers would require a separate WCC from the WCC for pulling the bundles. Pulling valves in varying service require permitting by systems of common hazards and / or areas as determined by Operations.
 - b. WCC creation is done for all known scope activities during the planning stage of the TAR. People knowledgeable of the craft activity and Operations reps will be assigned to complete WCCs for these activities in advance of the TAR start. For discovery work, this will be an ongoing activity for the TAR execution team.
- 5. **WCC and Shift Permit Validity for TAR** – Added requirements for WCC and Shift Permit Validity for TAR work as follows ([Section 6.8](#)):
 - a. Brownfield capital and TAR work may utilize a modified process as agreed via a safe work plan. WCC will have a daily (24 hr) release good for duration of job activity with re-validation every 28 days.
 - b. Other than for back to back continuous jobs, WCCs / Shift Permits will be returned to a central permitting location in each unit area (same as defined for SIMOPS). Permits will be re-issued from this location each day to the PA only after confirming the work is on the SIMOPS schedule agreed by the Operations and TAR SIMOPS representatives the prior day.
 - c. The PA and work crew will be accountable to generate the JSA section of the shift permit for the work activity. The Shift Permit may be valid for a 24 hour period. The second shift must review and understand the content of the permit pack, review and update the JSA for the tasks to be performed on their shift, and indicate their acceptance and understanding by signing the Shift Permit.
 - d. Two options available for JSA's / Shift Permit creation;
 - i. A JSA can be created using the Shift Permit Supplemental Job Safety Analysis form, valid for the duration of the job. The work crew would utilize the daily Shift Permit only to identify day of hazards and controls.
 - ii. A daily JSA can be created by the work crew utilizing the Shift Permit.

For more information, the revised HSSE policy will be posted shortly at <https://wss2.bp.com/TexasCity/Safety/default.aspx> or contact your HSSE Department.