

# HSSE Toolbox Talk

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## REVISION TO HSSE POLICY PR-3 Permit Approval Table

The permit approval table associated with HSSE Policy PR-3, Control of Work, has been revised for format and content.

### **Format Revisions:**

1. Consolidated all risk levels for an activity into one spreadsheet on one row. This clearly shows the escalation of approval level, risk assessment facilitation, and field release for an activity as conditions change and risk increases.
2. Eliminated low, medium, and high risk levels and replaced with residual risk ranking from the risk assessment.

### **Content Changes:**

1. Breaking containment: added requirement for ELT or LT approval (based on residual risk) for hydrogen or light ends with LEL >10%.
2. Confined space entry:
  - a. Removed the general requirement for work execution to sign the WCC for residual risk 1-8, except where designated.
  - b. Excavations: added to table.
  - c. Cooling towers: added to table.
  - d. Underground sewers, below ground separators, and underground electrical vaults: added below ground separators. Lowered approval from LT to ELT level.
  - e. Boilers and furnaces: added to table. Added ELT level approval for entry with tubes under hydrotest pressure or slight nitrogen purge.
3. DCS Work:
  - a. Based approval level on residual risk. Clarified that no permit is required if the work is not impacting control or alarm devices.
  - b. Specified a process control PA (process control engineer or specialist) as the risk assessment facilitator.
4. Field Instrument Work:
  - a. Clarified the need for complying with the Abnormal Situation Management (ASM) policy.
5. Engineered temporary repairs: added to table. Consolidated clamps, sleeves, re-pumping of clamps, hot taps, stopples, and line freezes into one row.
6. Hot work:
  - a. Allows FLS supervisor approval of HWOFF for designated TAR or brown field construction areas (ISBL or OSBL). TAR or brown field construction areas are designated per PR-3 by the TAR SPA/Project Manager and Operations Leader.
  - b. Clarifies superintendent level approval for HWOFF OSBL does not include the use of a plug or balloon as a vapor barrier.
  - c. Clarifies the meaning of ISBL HWOFF, added Power 2 ISBL and any OSBL area with significant light ends inventory. Adds the requirement to notify the Operations Manager for ISBL HWOFF.

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7. Mechanical devices used for isolation:
  - a. Removed LT technical approval for use of a mechanical device as sole isolation for hot work, or the use of an Atkinson blind. Still requires approval from LT level in operations and work execution.
  - b. Added ELT approval for use of a mechanical device as a vapor barrier for welding, positive isolation in place.
  - c. Added use of a relief valve as an isolation device for installation of an inlet blind. Requires superintendent approval, unless an answer to one of the questions in PR-14 attachment R is "no".
8. Protective devices or systems, including trip systems and related instrumentation, automated shut down systems and associated instrumentation, and relief valves.
  - a. Clarified this includes related instrumentation for trip and shutdown systems.
  - b. Clarified a SORA per PSM 9.1 is required.
  - c. The SORA becomes the basis for the risk assessment and should be attached to the WCC.
  - d. Points out that isolation or deactivation of protective devices or systems where level of protection is reduced may be a higher risk activity, and may require higher level approval, depending on residual risk.
9. Respiratory protection usage: added to table.
10. Vacuum truck operations: added to table.
11. Working at heights: clarified to working at heights outside of a guard railed system.

### **Examples:**

1. Abrasive blasting will be done on a system that is positively isolated, cleared, and de-pressured. The work will be done during a TAR.
  - a. The initial risk is 8, so a qualified individual can facilitate the risk assessment.
  - b. The residual risk is 5. Per the permit approval table, the operations FLS can approve the WCC.
  - c. The permit can be released from the operator to the work crew rep.
2. Abrasive blasting will be done on a system that is positively isolated, cleared, and de-pressured. The work will be done pre-TAR in the middle of a unit that is running.
  - a. The initial risk is 13, so a risk assessment specialist is required to facilitate the risk assessment.
  - b. The residual risk is 8. Per the permit approval table, even though the equipment is positively isolated, cleared, and de-pressured, the operations FLS can no longer approve the WCC. The requirement for approval is now the superintendent level in operations and work execution. Because the blasting is on equipment that is out of service, inspection approval is not required.
  - c. The permit is released from the operator to the work crew.
3. Abrasive blasting will be done on hydrocarbon piping that is in service.
  - a. The initial risk is 14, so a risk assessment specialist is required to facilitate the risk assessment.
  - b. The residual risk is 9. ELT in operations, work execution, and inspection are required to approve the WCC.
  - c. The permit is released from the operator to the work crew.

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4. A pneumatic test will be done on a piping system.
  - a. A risk assessment specialist is required to facilitate the risk assessment.
  - b. The risk assessment team does a great job of putting controls in place to reduce residual risk as low as reasonably practical to a level of 5. Even though the residual risk is low, per the table, LT level in operations, work execution, and technical are required to approve the WCC. The Operations manager must notify the BUL prior to the work being done.
  - c. The permit is released from the shift supervisor and operator to the work crew.
5. A scaffold will be built on an operating unit. There are no overhead power lines.
  - a. A qualified person can perform the risk assessment.
  - b. The residual risk is 2. An Operations FLS can approve the WCC. The permit is released from the operator to the work crew rep.
  - c. The residual risk is 9. ELT level in operations and work execution must now approve the WCC. The permit is released from the operator to the work crew.

### **Restatement of Non-Permitted Work:**

1. Per PR-3 section 5.2, the list of non-permitted work includes:
  - a. Non-invasive inspection.
  - b. Engineering surveys, walk around, audits, and planning walkthroughs at grade.
  - c. Routine housekeeping.
  - d. Use of intrinsically safe devices.
  - e. DCS work if not impacting control or alarm devices.
  - f. Sampling from standard sample points using an approved procedure.
  - g. Lab Work.
  - h. Work in permanent workshops outside the process area.
  - i. Routine operator tasks covered by risk assessed procedure carried out by trained, competent operators.
  - j. Work inside office buildings except for craft activities normally requiring permits.

### **Restatement of Approval Levels:**

- Operations FLS: Shift supervisor, asset coordinator, project coordinator, TAR coordinator, or other supervisory personnel designated by the Operating Superintendent.
- Superintendent level: Applicable superintendent level in operations, inspection, work execution, technical, or process control. Work execution includes routine maintenance, program maintenance, TAR, or projects. This level reports directly to an extended leadership team member.
- Extended leadership team (ELT): Applicable extended leadership team level in operations, inspection, work execution, or process control. Work execution includes routine maintenance, program maintenance, TAR, or projects. This level reports directly to a leadership team member (LT members report directly to the BUL).
- Leadership team (LT): Applicable leadership team member in operations, technical, and work execution. Work execution includes maintenance or projects. LT members reports directly to the BUL.

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.