



**AZERBAIJAN BUSINESS UNIT
(AzBU)**

**Procedure for:
Control Of Over-rides And Inhibits**

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1 Introduction

1.1 Purpose

The purpose of this document is to describe the roles and responsibilities for all personnel involved in the Risk Assessment, Application, and Sanction of trip over-rides/inhibits during operation and maintenance activities. To ensure the audit trail for the application, sanction, approval, removal of trip over-rides or inhibits. To ensure that the application of plant overrides is managed and assessed to reduce risks to a level that is as low as reasonably practicable.

There are numerous examples of accidents and incidents in oil, gas and condensate processing and transportation activities due to the uncontrolled use of trip over-rides/inhibits on running plant. It is equally true that in some instances, it is necessary to use over-rides/inhibits as a temporary means of maintaining operation and conducting essential maintenance intervention activity. This is acceptable only with the appropriate controls in place to reduce any risks generated to

1.2 Deviations

The procedures are written in sufficient detail that they should be able to be applied consistently at all sites. There may still be the requirement for some local rules covering site-specific logistical/administrative arrangements and local variations in responsibilities to reflect differences in organisational arrangements. These local rules should not deviate from the core processes within this document. Any form of deviation from this procedure, including but not limited to local rules, shall be requested and authorised in accordance with the SSOW Deviations from Regulations and Procedures procedure (Doc. No. UNIF-HSE-PRO-101)

1.3 Scope

This applies to ESD, Fire and Gas, Software and all hard-wired over-rides/inhibits, on all Caspian Projects and existing facilities.

1.4 Document Review

This document will be reviewed on an annual basis when users from the sites will have an opportunity to propose changes to the existing processes and procedures. The document Technical Authority will be responsible for coordinating this review.

1.5 SSOW Specific Cross references

This Control Of Over-rides Procedure shall, where appropriate, be used in conjunction with this suite of BP AzBU SSOW Procedures referenced below.

Document Number	Title of Procedure
UNIF - HSE- PRO - 101	Deviations from Regulations and Procedures
UNIF - HSE- PRO - 103	PTW Procedure
UNIF - HSE- PRO - 105	Task Risk Assessment
UNIF - HSE- PRO - 106	Energy Isolations-Electrical

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2 Roles and Responsibilities

The key roles and responsibilities within the control of over-rides and inhibits are described below.

2.1 Responsible Person (RP)

This shall be the person designated by OIM/Site Controller as accountable for the management of overrides..

2.2 Performing Authority (PA)

This will be any person who is defined as a Competent Person by systems in use on his particular work site for application of the override

2.3 Site Managers (SM) / Site Controllers (SC) / Offshore Installation Managers (OIM)

Offshore Installation Managers/ Site Managers and Site Controllers are responsible for:

- Overall operation of the Control of inhibits on their site and ensuring that the procedures described in this document are consistently followed.
- Ensuring that the Control of inhibits process is subject to regular monitoring and auditing, acting upon the results of these audits to maintain the integrity of the system and proposing any recommendations for system improvement.
- Authorising the Responsible Person (RP) and Performing Authority as competent to carry out their duties, as described in this document, and ensuring that a controlled log of all authorised personnel is maintained.

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3 Over-Ride / Inhibit Definition

Over-rides and Inhibits are all hard wire links, software over-rides/inhibits, software force, DCS override and all forms of disabling protective devices.

4 Procedure

The application of any overrides, inhibits, links etc may be applied after due consideration and consultation to assess the risks. This may take the form of a permit, a formal level 2 risk assessment or an ORA (Operational Risk Assessment) but the RP must ensure that there are valid reasons to effect any disablement. The results and outcome of any assessment must be documented and retained for future reference. The RP must also record and document any subsequent amendments to the assessment that were not originally considered.

No override or inhibits will be put into place without an appropriate level of risk assessment, to ensure that appropriate control remains and that safety is not compromised. The assessment must take account of the possible cumulative effect of existing overrides or inhibits.

The assessment should detail any particular control or mitigation measures that need to be in place, in addition reference should be made to the future resolution of the problem that has caused the over-ride to be applied, (ie P10 submitted, MOC (Management of Change Procedure), etc). It must also consider the duration that the disablement shall be in place for. This RA must be conducted by suitably qualified and experienced operations and maintenance staff, HSE and or specialist input shall be sought where relevant.

After seven days the override, inhibit is deemed to be long term and will be subject to the audit process. After 28 days the RP must be able to demonstrate that a process to remove the disablement is underway.

All personnel involved in the use of the PTW shall be both trained and proven to be competent to the appropriate level.

5 Categorisation Of Over-rides / Inhibits

There are three primary categories of over-ride

5.1 Category A

(To prevent production loss/process upset)

These are classified as over-rides inhibits which are applied:

To maintain production / drilling / pumping / transportation activities.

To ensure that online maintenance operations do not trip any running plant/equipment.

To allow the plant start up from a shutdown condition.

To carry out any commissioning function checks that may be required.

To apply a Category A over-ride the following steps must be adhered to:

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The PA must seek authorisation from the RP. The RP may only give permission after he has conducted the appropriate level of Risk Assessment.

Note:

Drilling areas which are not the responsibility of the Senior Tool pusher for the purposes of override tracking, will be captured by the RP, and all overrides will be recorded in the Inhibit register similar to all other over-rides/inhibits. Drilling areas, which are the responsibility of the Senior Toolpusher, must have a robust system in place for the control of overrides. Regular communication between the RP and Senior Toolpusher must take place to ensure all possible conflicts are addressed

5.2 Category B

(Safety systems where no mitigation is available)

These are classified as over-rides / inhibits which are applied:

To safety critical items and covers, but is not limited to: riser valves; sub-sea valves; down hole safety valves; ESDV's and ESD systems.

To apply a Category B over-ride the following steps must be adhered to:

Any overrides to this system will require a risk assessment approved by the OIM/Site Controller.

In the case of routine maintenance activities the risk assessment will be by a specific work permit or work control certificate for that activity. This ensures any override is applied and removed in accordance with that specific work activity.

In all other cases a specific level 2 risk assessment approved by the OIM/Site Controller is to be recorded on each occasion the override is put in place and logged.

Note:

Drilling areas which are not the responsibility of the Senior Tool pusher for the purposes of override tracking, will be captured by the RP, and all overrides will be recorded in the Inhibit register similar to all other over-rides/inhibits. Drilling areas, which are the responsibility of the Senior Toolpusher, must have a robust system in place for the control of overrides. Regular communication between the RP and Senior Toolpusher must take place to ensure all possible conflicts are addressed.

5.3 Category C

(Safety systems where mitigations are possible)

These are classified as over-rides / inhibits which are applied:

To the Fire and Gas System.

To apply a Category C over-ride the following steps must be adhered to:

The PA must seek authorisation from the RP. The RP may only give permission after he has conducted the appropriate level of Risk Assessment.

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However, in instances where excessive loss of coverage may occur, particular consideration must be given to additional mitigation measures to provide alternative means of detection.

If any areas are to be inhibited for particular tests, sampling or work routines then an assessment for that task must be carried out. This may take the form of a procedure, a permit or a formal risk assessment and the overrides must be recorded on the Over-ride/Inhibit Register.

Note:

Drilling areas which are not the responsibility of the Senior Tool pusher for the purposes of override tracking, will be captured by the RP, and all overrides will be recorded in the Inhibit register similar to all other over-rides/inhibits. Drilling areas, which are the responsibility of the Senior Toolpusher, must have a robust system in place for the control of overrides. Regular communication between the RP and Senior Toolpusher must take place to ensure all possible conflicts are addressed.

6 Application Of Over-Rides / Inhibits

Application of over-rides/inhibits will be the responsibility of the PA. He will also be responsible for updating of the comments section of the Over-ride/Inhibit Register, and shall make reference to the specific Risk Assessment that applies. This will be generated from Report IT and will form part of shift handover report. The RP shall review the register at the end of every shift.

7 Removal Of Over-Rides / Inhibits

Over-rides/inhibits should be removed from the systems as quickly as possible, when the reason for its application has been resolved

8 Audit Of Over-Rides / Inhibits

A process shall be conducted on a weekly basis to perform an audit of the over-ride register, with a view to understanding the number of over-rides/inhibits and the reasons for the over-rides/inhibits being in place. A suitably qualified and competent person, designated by the OIM/Site Controller, shall conduct this audit.

The RP's responsibility is to ensure that there is a process in place to ensure that all long term requirements for over-rides/inhibits are engineered out as rapidly and effectively as possible.

9 Application Of Over-Rides / Inhibits

Temporary hardwired over-rides/inhibits will be controlled by the normal Work Control Certificate or permit and risk assessment procedure, sanctioned by the RP and recorded on an Isolation Certificate. An ICC label must be displayed on the outside of a cabinet along with any labels attached to the cable.

Audit of these is carried out with the same frequency as above.

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10 Registers

A register of over-rides and Inhibits must be held at each site location. The Register is mandatory and shall be used at all times.

The Register will contain the following details for each Over-ride or Inhibit applied.

- Tag Number
- Functional System, i.e. ESD, F&G, Vendor trip etc
- Reason For Override
- Date Applied
- Time Applied
- Applied By
- Risk Assessment Ref
- Isolation Confirmation Certificate no If applicable
- Permit NO
- Date Removed
- Time Removed
- Removed By
- Action Required, for any reference to Maximo Job or MOC etc where remedial action is being worked towards removal of long term overrides.

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Appendix A - Abbreviations and Definitions

ESD	Emergency Shutdown
ICC	Isolation Control Certificate
SSOW	Safe System Of Work
PA	Performing Authority
RP	Responsible Person
TA	Technical Authority
PTW	Permit to Work
OIM	Offshore Installation Manager

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Appendix B - Applicable to

This document applies to the following job functions:

OIM / Site Manager / Site Controller
Operations Engineer
Control Room Technicians
Area Authority
Maintenance Supervisors
Instrument Technicians
Electrical Technicians
Performing Authority
Responsible Person
Business Unit Leader
Document Controller
Technical Authority

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Appendix C - Over-Rides and Inhibits Register