



Procedure for Control of Work

AZSPU-HSSE-DOC-00002-2

Authority:	AzSPU Vice President Operations-Mark Thomas	Custodian:	OMS/CI Manager & Ops Authority-Godjat Nuriyev
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1. PURPOSE & SCOPE

1.1. Purpose

The purpose of this Procedure for Control of Work is to set out a required approach to managing work risk for BP AzSPU activity, its employees and contractors.

This procedure defines the Requirements for Control of Work processes. Conformance to the requirements detailed in this procedure is necessary to deliver the intent of the Operating Management System Group Essential 4.5.1 – “Implement and maintain a process to plan work, identify hazards, assess risk and put in place risk reduction measures to allow work tasks to be completed safely and without unplanned loss of containment causing environmental damage.”

1.2. Scope

This procedure covers the means of safely controlling construction, maintenance, demolition, remediation, operating tasks and similar work activities carried out by the BP workforce at BP premises.

Subject to this procedure's intent and subject to existing contractual constraints (to the extent that they can not be renegotiated), where contractors and their associated subcontractors perform work at BP premises, this procedure shall be applied to them in relation to that work.

2. DEFINITIONS

(See Appendix 3)

Refer to document [AzSPU-HSSE-DOC-00021-2](#) HSE Definitions for definitions common to this Procedure. Definitions specific to the Procedure are included below.

3. GENERAL REQUIREMENTS

3.1 Legislation & Standards

- Operating Management System OMS Essentials 2.3(2.3.1) and 4.5(4.5.1)
- BP Group Defined Practice for Control of Work GDP 4.5-0001([Link](#))

AzSPU Control of Work (CoW) Policy

AzSPU implements the Group Defined Practice for Control of Work (GDP 4.5-0001). This practice covers the means of safely controlling construction, maintenance, demolition, remediation, operating tasks and similar work activities of BP employees and contractors on BP facilities.

Following this Policy is everyone's responsibility.

- This policy and the associated *AzSPU Procedure for CoW* ([AzSPU-HSSE-DOC-00002-2](#)) detail how the Group CoW requirements are delivered in AzSPU. More detail on all of the following points can be found in the AzSPU CoW procedure. Reference is also made to additional related AzSPU documentation.
- A Single Point of Accountability (AzSPU HSSE & TD VP) will manage and deliver the CoW process. All identified roles will have defined accountabilities. Each accountable and responsible person shall understand and accept their role.
- Persons will be trained and competent in their CoW roles. Defined CoW competency and training shall be identified and checked at defined frequencies. CoW training and competency records will be maintained and updated. More information on training and competency can also be found in the *AzSPU CoW Training Policy* ([AzSPU-HSSE-DOC-00088-2](#)).
- Work planning and scheduling shall identify individual tasks and interactions; consider time and resources needed for hazard identification, risk assessment, preparation and planning; identify simultaneous operations' compatibility; and coordinate with priorities of other activities.
- All tasks shall be risk assessed. At least one member of the workforce performing the task shall participate in the risk assessment. To reduce risk, measures shall be considered in the following order: Elimination, Substitution, Control and Mitigation. Approval for work will be commensurate with the level of risk as determined by the risk assessment. Prior to work start-up equipment shall be inspected; emergency plans shall be in place; and all involved personnel must sign-off the risk assessment. The risk assessment process is defined in the *AzSPU Procedure for Task Risk Assessment* ([AzSPU-HSSE-DOC-00063-2](#)).
- A Work Permit shall be obtained for high-risk work (confined space entry, work on energy systems, ground disturbance, hot work, or other hazardous activities). Only work covered by the Work Permit can be conducted. Information can also be found in the *AzSPU Permit to Work Procedure* ([AzSPU-HSSE-DOC-00060-2](#)).
- The work site shall be inspected prior to issuing the Work Permit. A competent person shall identify the scope, hazards, controls and mitigations. The person issuing the permit must confirm that the person(s) accepting the permit fully understand its contents. All involved in the work must understand and sign-off the Work Permit. Operations and other personnel shall be informed of and understand the impact and status of all work which may affect them prior to commencement.
- A responsible person shall monitor and manage all tasks performed under a Work Permit. Those issuing the permit shall maintain regular communication with those performing the work. If work is interrupted (e.g. due to a shift change or stopped work), site conditions and appropriate control measures must be reassessed. The status of Permits (including a register of associated inhibits / overrides / isolations) shall be accurate, up-to-date, and available at a designated location.
- The work site shall be left in a safe condition on completion or interruption of work. The CoW process shall include de-isolation, reinstatement and testing of the system's integrity. Upon completion of work, the permit shall be closed by signature from the appropriate authority.
- The CoW process shall be subject to a program of documented, regular auditing. The audits shall include CoW documentation, as well as its correct use and application.

- Internal and external lessons learned that impact the CoW process shall be captured, incorporated, and shared. The process for this is defined in the *AzSPU Lessons Learned Communication Process* ([AzSPU-HSSE-DOC-00137-2](#)).
- Everyone has the obligation and authority to stop unsafe work.

In the event of a conflict between this procedure and applicable legal and regulatory requirements, the applicable legal and regulatory requirements shall be followed. If this procedure creates a higher obligation, it shall be followed as long as full compliance with applicable legal and regulatory requirements is achieved.

Applicable national law is national law as amended by project specific agreements, e.g. the ACG Production Sharing Agreement (PSA), and relevant International Conventions, if any, in force in Azerbaijan or Georgia, as applicable.

3.3 Deviations

Under exceptional circumstances, a decision to deviate from any of the specific requirement detailed in this procedure shall be based on a risk assessment (including defining and documenting the risk reduction measures that are to be applied). Such deviations must be fully justified and approved using the deviation process described in the current version of the Procedure for Deviations (Doc. No: [AZSPU-HSSE-DOC-00011-2](#)).

Any deviation, changes or amendments should be communicated to the Custodian of this procedure along with the reasons.

4. KEY RESPONSIBILITIES

4.1 General

All identified roles within the Control-of-Work procedure must have defined accountabilities. The intent is to ensure that all roles and responsibilities, required to operate the Control-of-Work policy and associated procedures are identified and articulated to the designated persons, that those persons are competent and authorized, and that auditable evidence to support this requirement is available.

There must be auditable evidence that the following Control-of-Work roles and responsibilities have been assigned to suitably competent personnel. See Appendix 3 for a listing of assignments.

4.2 Single Point Accountability

- A person who will be ultimately responsible for the overall performance of the written Control of Work policy and associated procedures.

4.3 Technical Authority

- A person responsible for confirming the accuracy and integrity of technical content and changes

Augmenting these specific roles, there are additional roles contained within the following documents, which support the Control of Work:

- AZSPU-HSSE-DOC-00060-2: Procedure for Permit to Work
- AZSPU-HSSE-DOC-00063-2: Procedure for Task Risk Assessment

4.4 Levels of Authority

The levels of authority for approval to proceed with work shall be commensurate with the level of risk involved.

Those who give final authorization for any work must be sufficiently trained and suitably aware to competently assess all of the hazards and risks in accordance with the Authorization Procedure (Doc. No: AZSPU-HSSE-DOC-00012-2), this requires full knowledge of the work in progress within the area concerned.

In order to comply with this requirement, the following information must exist:

- A clear definition / description for each authority level including the required training and knowledge for each level.
- A formal process must be in place (e.g. risk matrix) that clearly defines and allows determination of individual risk levels.
- An Authority-Risk matrix (or similar tool) defining the appropriate authority level for the determined level of risk.

4.5 Acceptance of Accountabilities

All roles and responsibilities required to operate the Control of Work process must be identified and persons with identified roles shall demonstrate that they understand and accept their accountabilities.

These responsibilities and accountabilities must also be documented, personnel must be made aware of their role(s) and responsibilities, and must have ready and easy access to them in documented form.

5. CONTROL OF WORK REQUIREMENTS

5.1 Provision of Written Control of Work Process

Written Control of Work policy and associated SSOW procedures shall be in place and describe how control of work is delivered at a site level.

They must be issued in accordance with a document control management system and any changes must be subjected to a strict document control procedure before authorization and adoption. All proposed changes must be reviewed by competent persons in order to examine the proposed changes.

5.2 Accountabilities

5.2.1 Definition of Accountabilities

All identified roles within the CoW policy and associated procedures shall have defined accountabilities.

5.2.2 Levels of Authority

The levels of authority for approval to proceed with work shall be commensurate with the level of risk.

- Those who give final authorisation for any work shall be sufficiently trained and suitably aware to assess the hazards and risks. They shall have full knowledge of the work in progress within the area concerned.

b) The CoW policy and procedures shall include:

- A clear definition / description for each authority level including the required competence for each level.
- A formal process (e.g. risk matrix) that clearly defines and allows determination of individual risk levels.
- An Authority-Risk matrix (or similar tool) defining the appropriate authority level for the determined level of risk.

5.2.3 Roles Acceptance

Each person assigned a CoW role shall, upon request, be able to demonstrate that he or she understands and accepts the assigned role, accountabilities and responsibilities.

- A list of the required roles, including their accountabilities and responsibilities, shall be clearly documented as part of the CoW policy and procedures.
- Personnel assigned a CoW role shall be informed of their role(s) and responsibilities, and shall have ready and easy access to them in documented form.

5.2.4 Single Point of Accountability

There shall be a Single Point of Accountability (SPA) for management of the CoW process and its continuing successful delivery:

- SPA authorities, accountabilities, and responsibilities shall be clearly documented as part of the CoW policy and procedures
- The identity and contact details for the SPA shall be readily and easily accessible to personnel.

5.3 Training and Competency

All persons involved in the Control of Work process must be appropriately trained and have reached the level of competence required to ensure correct application of the process.

5.3.1 Competency Definitions

To define the competency for any given role, that role must be assessed for the knowledge, skills and reasoning required to carry it out safely. The resulting defined competency must be documented and used to establish the competency and training requirements of personnel expected to carry out that role.

In order to comply with this requirement:

- The knowledge, skills and reasoning requirements for each identified role must be documented.
- All persons involved in the Control of Work process must be appropriately trained and competent to carry out their roles
- All roles must have a defined level of required competency
- Training must be established that links to the defined competency
- Training, including refresher training, must be made available for all roles within the Control of Work process
- Competence levels will need to be checked regularly
- Training and competency records must be kept and kept updated
- A documented program of audit and review for defined competencies must be in place to capture lessons learned and new best practices.

5.3.2 Training and Refresher Training

Training, including refresher training, shall be available for all roles within the Control-of-Work process and linked to the defined competency set.

Personnel must be provided with the training necessary to equip them with the understanding, knowledge and skills to fulfill their responsibilities safely. A training program must be in place that accounts for initial users, those requiring refresher training, and those who require remedial training because they have been recognized as operating below acceptable standards.

A documented training program must exist and identify:

- All personnel designated a Control-of-Work role
- The training required by designated personnel in order to fulfill their roles (including dates for refresher training and re-certification).

The AzSPU utilizes Virtual Training Assistant (VTA) to manage training requirements and track training records.

Training for contractor employees is primarily the responsibility of the contractor. The contractor must ensure, and BP will verify, that the appropriate training has been identified and received, and that contractor employees are competent to undertake the tasks expected of them.

5.3.3 Competence Assessment

A competence assessment program, including regular audits and reviews for each designated Control-of-Work role, will be used to ensure that the required level of knowledge and skills for execution of the assigned responsibilities are in place. All results of the assessments will be documented and used to identify future training requirements.

5.3.4 Training and Competency Records

Training and competency records will be maintained for all personnel and will include training received (including dates) as well as qualifications and certifications held. The records also include the due dates for refresher training and re-certification.

For the matrix demonstrating training requirements for AzSPU Safe Systems of Work refer to AzSPU Control of Work Training Policy [AZSPU-HSSE-DOC-00088-2](#)

5.4 Planning and Scheduling

Planning and scheduling of work shall identify individual tasks and their interaction.

The intent is to ensure that Planning and Scheduling of work delivers an integrated planning function, which accurately reflects the work to be carried out, use of resources and time period required for the safe completion of work. This should reflect:

- Does the planning and scheduling of work identify individual tasks and their interaction?
- Does the planning and scheduling function allow enough time and resources for performance of risk assessments, permitting and job preparation?
- Are simultaneous operations identified and consideration given to their compatibility?
- Whenever work is dependent on, or affects, another activity, is the planning, scheduling and implementation coordinated and any priorities of execution defined?

5.4.1 Time and Resource Requirements

Planning and scheduling shall consider time and resource requirements for hazards identification, risk assessment, preparation and planning.

A documented work planning process, taking into account the time required for Control of Work, must be in place. For any activity, Hazard Identification, Risk Assessment, planning, scheduling and preparation shall be integral to the work planning process. This includes the identification of competent personnel and suitable equipment required for execution of the task.

Where necessary, the appropriate subject matter experts must be included in the planning stages.

5.4.2 Simultaneous Operations

Simultaneous operations shall be identified and consideration given to their compatibility. Simultaneous Operations are defined as:

Activities undertaken and performed by two or more independently supervised work groups or managed organisations, where the physical proximity or activities on one work location have the potential to impact another work location.

Examples of Simultaneous Operations are:

- Working at height and working at ground level in the same area
- Lifting operations in congested works areas
- Other combined activities; generally fabrication, welding, rigging, painting and cleaning activities
- When Operations (Production and Maintenance), Well Operations, Construction or a Sub-Contractor need to undertake or take control of an activity simultaneously.

- When newly installed equipment at any location is formally handed over to Operations and Construction or Sub-Contractor continues work at the same location.
- When an area that is formally handed over to Construction contains currently operating process plant and equipment
- When Work-over / Drilling rig or rig-less activities are in close proximity to a fixed facility (operational or under construction). Examples are activities such as well clean up, testing and flaring. This SIMOPS situation has the potential to significantly increase the risk due to activities occurring in close proximity.

5.4.3 Work Coordination

When work is dependent on or affects another activity, their planning, scheduling and implementation shall be coordinated and priorities of execution defined.

The planning process must identify all linked activities, including those associated with planned maintenance. Where necessary, all activities must be coordinated and prioritized so that they can be completed in a safe, efficient and timely manner.

5.5 Risk Assessment Process

Prior to commencement of a task, it must be ensured that a risk assessment in accordance with the Task Risk Assessment procedure (Doc. No: [AZSPU-HSSE-DOC-00063-2](#)) is conducted and is capable of coping with various levels of complexity, dependant upon the hazards, likelihood of those hazards being realized, and the extent of the controls and mitigation needed to ensure that the work can be completed safely.

5.5.1 Participation and Communication

At least one member of the workforce performing the task shall participate in the risk assessment, which shall be communicated in writing and signed off by all involved in task. Where more than one team is assigned to carry out the work, a representative from each shall be included.

Results of the risk assessment must be recorded and communicated in writing to all personnel involved in the assessed task.

All personnel involved in carrying out the task must sign off on the completed risk assessment findings to show that they have agreed with and understood them.

5.5.2 Site Inspection

The work site shall be inspected by a competent person as a prerequisite for conducting the risk assessment to highlight the hazards arising from the location features. These hazards are usually common to all work carried out at the location and must be accounted for in the risk assessment.

Findings from the site inspections, carried out by a competent person, shall be reported to the risk assessment team before the risk assessment can be approved and signed off.

5.5.3 Routine Tasks

Routine tasks may be covered by a procedural approach providing a documented risk assessment has been conducted. Templates for routine tasks are available in ISSOW Sentinel PRO Database. Those tasks are also subject to regular audits and periodic content review process. Link to electronic ISSOW system: http://bp1bakap054/sentinel_pro/

All tasks classified as routine must be easily identifiable and must have a documented risk assessment.

Documented risk assessments, and the routine procedures to which they apply, must be formally recorded and controlled utilizing a document control management system.

All documented Risk Assessment, and the procedures to which they apply, must be subject to a program of regular review.

Persons carrying out activities controlled by procedures must be trained, competent and authorized to do so.

5.5.4 Fitness of Equipment

All equipment used in performing work must be assessed fit for purpose by a competent person through inspection and review of certification.

A system must be in place to ensure that all equipment identified as necessary for safe completion of the task is checked by a competent person to ensure it is of an adequate specification for the task, within the date for testing and re-certification, and free from obvious defects or excessive wear.

5.5.5 Risk Reduction

To reduce risk, Risk Assessments shall consider these measures in the following order:

- Elimination(when hazard is removed)
- Substitution(substitute with lower hazard)
- Control(engineering design and administrative controls)
- Mitigation (planned maintenance and etc.)

In order to comply with this requirement, hazards shall be eliminated from the task wherever possible. If a hazard cannot be eliminated, consideration shall then be given to its substitution.

If the hazard cannot be eliminated or substituted, control measures must be put in place.

Personal Protective Equipment:

Personal Protective Equipment (PPE) shall only be considered as the last protective barrier before a person is exposed to a hazard. Reliance on PPE shall only occur after all other efforts have been made to eliminate or reduce the hazard. A system shall be in place to ensure that Personal Protective Equipment identified as necessary for safe completion of the task (including contractor supplied equipment) is checked by an authorised person at defined intervals to confirm it meets the defined specification for the task and is within date for testing and re-certification.

Mitigation measures (measures to reduce the affects of an accident or condition) must be in place even when controls are in place because residual risks will still remain.

Barriers and Safety Signs:

The effective use of physical barriers and safety signs shall be in place, such that hazards and risks associated with all work activities are clearly identified and delineated to ensure safe operations, safety of personnel, safety of plant and equipment and protection of the environment. Where risk assessment has identified non-eliminated hazards other methods will be put into place to minimize the risk of exposure to personnel. Examples of such will be:

- work place where high levels of noise have been identified
- areas of ongoing controlled operations, e.g. lifting operations, breaking of containment, excavation activity, etc.
- areas where vehicle entry is either not permitted or only permitted with Permit
- areas of chemical storage and handling

Above examples must be clearly signed and barriered to control the hazards to personnel.

BP Azerbaijan Strategic Performance Unit (AzSPU) has reviewed and adopted the following regulations and standards in relation to physical barriers and hazard warning signs:

- The Health and Safety (safety Signs and Signals) Regulations 1996 – L64
- Fire and Life Safety Signs – NFPA 101

5.5.6 Emergency Response

Proven emergency response plans, based on potential emergencies, shall be in place before commencing work.

The risk assessment shall identify the credible potential emergencies that could occur during the work. Based on the risk assessment findings, emergency response plans must be in place before work commences.

All personnel involved in the work must be made fully aware of the control measures and emergency response plans that are in place and the actions required of them in an emergency.

5.5.7 Requirements for High Risk Activities

Requirements detailed in the Golden Rules of Safety (Appendix 4 of this document) shall be applied when defining the controls for work activities involving energy isolation, ground disturbance, confined space entry, working at heights, lifting operations, hot work.

5.6 Permitting Process

A formal process of “permitting” must be utilized for specific high risk work to allow such work to be safely carried out using the appropriate level of control.

Before conducting work that involves confined space entry, work on energy systems, ground disturbance, hot work or other hazardous activities, a permit shall be obtained.

The intent is to ensure that a formal process of permitting is utilized for the specific high risk work mentioned above and to allow such work to be safely carried out using the appropriate level of control.

A work permit must comply with the following mandatory requirements:

- Define the scope of work, location and its duration.
- Identify hazards and reference risk assessments.

- Identify isolation of energy sources required to carry out the job.
- Establish control measures to eliminate or mitigate risks.
- Link the work to other associated work permits or simultaneous operations.
- Ensure that where there are isolations common to more than one permit, the isolations are not removed before all permits have been signed off.
- Specify those carrying out the work and verify that the risks and control measures have been communicated to them.
- Be authorized, monitored and re-validated by the responsible person.
- Ensure adequate control over the return to normal operations.

A work permit itself is not a control for an individual work task. It is a means of recording the controls required and the reasons behind their inclusion.

Only work covered under the task description of the permit can be performed.

5.6.1 Work-Site Inspection

The work-site shall be inspected by a competent person before a permit is issued to ensure that conditions have not materially changed.

A visual inspection of the work site must be conducted by a competent person in order to:

- Confirm all permit requirements have been fulfilled.
- Identify any problems that may have previously been overlooked.
- Identify any material changes to the site that will affect the findings of the original risk assessment.

Material changes to the site, or the existence of hazards overlooked by the risk assessment, will require the review of the existing assessment, or a new Risk Assessment.

5.7 Communication of Scope, Hazards, and Controls

In order to reduce the possibility of an incident or accident, the scope of the work, hazard controls, and the mitigations used shall be communicated in writing and signed off by all involved in the task.

It is vital for the safe execution of work that everyone involved is acquainted with the identified hazards, likelihood of those hazards being realized and the controls and mitigation actions which have been applied in order to reduce the possibility of an incident or accident.

5.7.1 Understanding of Permit Contents

The person responsible for issuing the permit must confirm that the person(s) accepting the permit fully understands its contents, and that they:

- Understand the scope and requirements of the work permit, adjacent activities and hazards and initial emergency actions.
- Are shown the correct equipment addressed by the permit, which shall be clearly identified.
- Are able to identify when changes in the work environment invalidate the original permit, and shall cease all activity until a re-assessment has been completed

5.7.2 Permit Acceptance

The person accepting the permit shall ensure that all involved in the task sign to confirm understanding of the scope, hazards, controls and mitigation.

There must be effective communication to ensure full understanding of the information being conveyed and there must be a recorded and auditable indication that this has taken place.

Workforce members must be made aware of the permit contents, especially the:

- Scope of work.
- Hazards that may be encountered.
- The controls and mitigating actions in place to reduce these hazards and their affects.

Workforce members must sign the permit to formally acknowledge that they fully understand its contents.

A copy of the permit must be retained on site for the duration of the work for the benefit of the work force.

Operations and other relevant personnel shall be informed of and understand the impact and status of all work, which may affect them prior to commencement of the work.

5.7.3 Remote Locations

Personnel operating in remote locations may have limited access to facilities and other competent personnel. Therefore it is particularly important that the persons performing work at remote locations off-site shall:

- Have the skills and competency to identify the required work scope, hazards, controls and mitigation measures.
- Establish and maintain regular communication.
- Validate the permit requirements with another competent person.

Personnel operating in remote locations shall be able to demonstrate their understanding of the Control of Work process to which they must adhere, and that they have the skills and knowledge necessary to carry out the work, including the ability to safely carry out electrical and mechanical isolations where required.

Personnel operating in remote locations shall also be provided with a reliable system of communication and be competent in the use of that system. They have to have access to a competent person with whom they can confirm their understanding of the permit, and validate the permit.

5.8 Monitoring of the Permit Process

All ongoing work requiring a permit shall be regularly monitored and managed by a responsible person regularly visiting and inspecting the work site to ensure that the conditions detailed on the permit have not been compromised, that only the work as described on the permit is carried out, and the work is continuing in a safe manner.

The frequency and type of monitoring required must be defined as part of the risk assessment process.

5.8.1 Regular Communication

Those issuing the permit shall provide monitoring of the work, and maintain regular communication with those performing the work.

It must be ensured that the conditions detailed on the permit have not been compromised and that work continues in a safe manner. It is also important to ensure that only the work described on the permit is carried out.

Work must only be carried out within the conditions of the permit.

A competent person must be assigned to regularly visit the worksite in order to ensure that the permit conditions are being complied with by the workforce and to continually assess whether the original permit still covers the work in progress.

5.8.2 Work Re-commencement

If work is interrupted, the site conditions and appropriate control measures must be re-assessed before work is allowed to re-commence. Interruptions may include meal breaks, smoke breaks, alarms, emergency situations and shift changes.

After any break in activity, the conditions and control measures must be reassessed as compliant with the current permit by a competent person before any work can restart.

Where conditions or control measures are seen to have changed, work must not restart until the situation has been assessed by a competent person and conditions returned to those required by the permit. If this cannot be achieved, a new permit shall be required.

5.8.3 Shift Change

At shift change, before work re-commences, hand-over arrangements between all involved in the work shall include the status of continuing work, a re-appraisal of site conditions and the appropriate control measures.

5.8.4 Site Conditions Monitoring

The responsible person charged with monitoring the ongoing work shall:

- Identify when the site conditions have changed.
- Assess when the original permit no longer accurately covers the task, stop the job if necessary and request a re-assessment.

A copy of the current permit must be retained on site for reference.

The person assigned to monitor the work must have the required competence to recognize when site conditions no longer comply with the permit requirements.

The person assigned to monitor the work must investigate any indication from the workforce that the work may be unsafe.

5.8.4 Status of Permits

The status of permits, including a register of associated inhibits, overrides and isolations, shall be accurate, up to date, and available at a designated location.

A copy of all permits and associated certificates currently in force must be held at a suitable location (e.g. the control room, the site office, or electronically).

A competent person must be assigned to monitor the status of all permits and to ensure that associated registers for isolations, overrides and inhibits are maintained in an up-to-date condition.

5.9 Work Completion

The work site shall be inspected and confirmed as being in a safe condition on completion or interruption of work (except where the interruption is an emergency in which case it should be undertaken after the emergency has been cleared).

On completion or interruption of any work activity, it is essential that prior to the permit being closed, the work site is visited by a competent person to ensure that no potential sources of accidents remain and that the equipment can be safely brought back into service without incident.

When work is interrupted or completed a competent person must inspect the work site to ensure that:

- The area has been cleared of any tools, rags, debris, etc.
- Fittings and equipment removed or dismantled during the work have been left in a safe condition.
- The area has been cleaned as required and any spills and contaminants removed and disposed of safely.

If work is interrupted due to an emergency, the site inspection may be delayed until the emergency has passed.

5.9.1 Permit Closure

Upon completion of the work, the permit shall be closed by signature from the appropriate authority.

A documented procedure must be in place to ensure that on completion of the work:

- A competent person has assessed the work site as clean, tidy and in a safe condition.
- A competent and suitably authorized person must provide a sign-off to indicate that the work is complete and the permit closed-out.

5.9.2 Reinstatement

The Control of Work process shall include de-isolation, reinstatement and testing of the system's integrity.

5.10 Auditing and Compliance

The Control of Work processes are subject to a program of regular auditing to maintain a consistently high standard of Control of Work processes application. The audits should review and make recommendations for improvements on the correct application of the Control of Work process, including all documentation, controls, training and competency. Any discrepancies noted should be communicated to the site and business management with a requirement that corrective action plans are developed and actions are closed out in a timely manner.

Monitoring compliance to this procedure, reporting on implementation and progress on meeting targets, shall be locally owned and included as part of the annual HSSE self-verification process.

5.10.1 Audit Records

In order to maintain a consistent high standard of CoW process application, it is essential that a program of regular auditing be established. The audits should review and make

recommendations for improvements on the correct application of the CoW process, including all documentation, controls, training and competency. Any discrepancies noted should be communicated to the site / installation management with a requirement that corrective action plans are developed and actions are closed out in a timely manner.

Audit results shall be recorded, analyzed and used to improve the management and quality of the Control of Work process.

To comply with this requirement of the Control of Work Procedure:

- A regular program of auditing for the Control of Work process must be in place
- Individual PTW and associated ICC's, including risk assessments, must be regularly audited
- Audits must account for the Control of Work documentation processes and procedures as well as their correct use and application
- Audit results must be communicated to the Site Management
- A mechanism must be in place to incorporate improvements identified by the audit process

Note: A monthly review of audits PTW's (Permit to Work) and ICC's (Isolation Confirmation Certificates) shall be conducted to identify any trends and root causes. The review shall record agreed actions in ISSOW Sentinel PRO Database /Traction and/or the Sangachal Terminal Action Tracking System (STATS)

5.11 Lessons Learned

Internal and external lessons learned that impact the Control of Work process shall be captured, incorporated, and shared.

All Major Incident lessons learned are being reviewed for relevance. This include a formal mechanism for capturing, recording and incorporating lessons learned and a regular review process for lessons learned from other sites including their relevance and applicability.

At AzSPU level this is ensured via existence of relevant work groups which are in close two way communications with onshore and offshore facilities, where main aim to verify review progress status from incidents and their lessons learned flow processes. The detailed process for this is defined in the AzSPU Lessons Learned Communication Process ([AZSPU-HSSE-DOC-00137-2](#)).

The intent is to ensure that any learning's on how to improve the CoW process and the safe means of carrying out work are made available to and used by all facilities across the AzSPU Group. This shall include:

- Are internal and external lessons learned that impact the CoW process captured, incorporated, and shared?
- Are all Major Incident lessons learned reviewed for relevance?
- Is an implementation plan for the identified lessons learned documented?

5.12 Stopping Unsafe Work

Everyone has an obligation and the authority to stop unsafe work.

5.12.1 Personnel Obligation

All personnel must be made aware of their obligation to stop work that they consider to be unsafe.

All personnel must be made aware of the actions they must take, including reporting, when stopping unsafe work.

5.12.2 Investigation of Unsafe Work

All instances of work being stopped for reasons of safety must be recorded.

All reports of unsafe work, from any member of the work force, must be properly investigated and the results recorded.

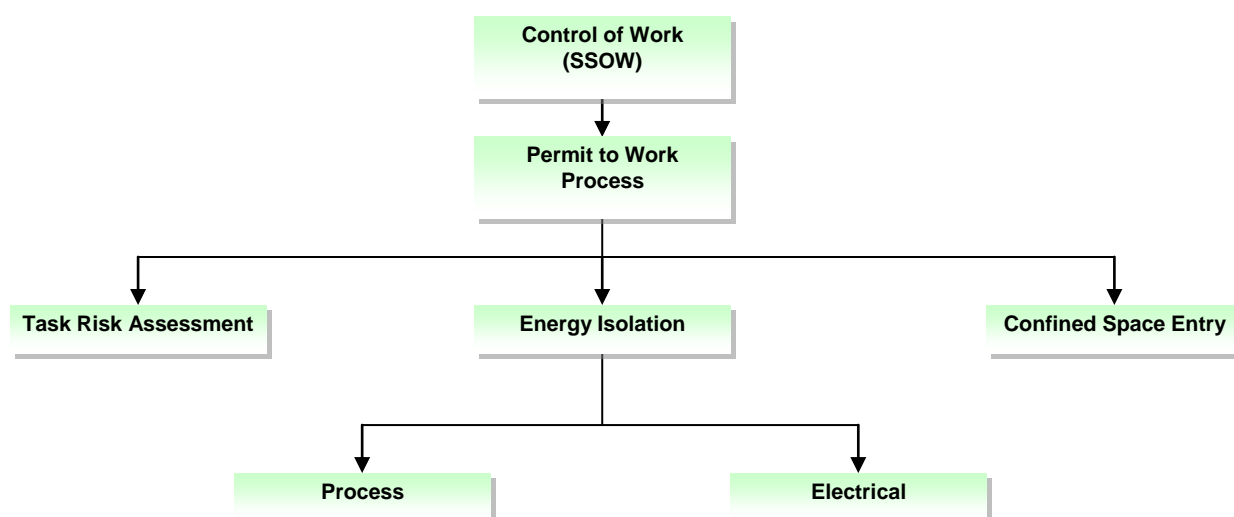
6. KEY DOCUMENTS / TOOLS / REFERENCES

SSOW Specific Cross References

This Control of Work procedure shall, where appropriate be used in conjunction with this suite of AzSPU SSOW Procedures referenced below.

Document Number	Title of Procedure
AZSPU-HSSE-DOC-00011-2	Deviations from Regulations and Procedures
AZSPU-HSSE-DOC-00060-2	Permit To Work
AZSPU-HSSE-DOC-00012-2	Authorization
AZSPU-HSSE-DOC-00063-2	Task Risk Assessment
AZSPU-HSSE-DOC-00048-2	Energy Isolations-Electrical
AZSPU-HSSE-DOC-00049-2	Energy Isolations-Process
AZSPU-HSSE-DOC-00013-2	Confined Space Entry
AZSPU-HSSE-DOC-00050-2	Excavations
AZSPU-HSSE-DOC-00053-2	Procedure for Hot Work
AZSPU-HSSE-DOC-00065-2	Procedure for Working at Heights
AZSPU-HSSE-DOC-00055-2	Procedure for Leak Testing
AZSPU-HSSE-DOC-00062-2	Procedure for Scaffolding
AZSPU-HSSE-DOC-00056-2	Procedure for Lifting Operations

APPENDIX 1: Control of Work Process Flowchart



APPENDIX 2: Glossary of Terms

Accountable Person	The person in the organization who has ultimate responsibility.
Activities	Specific actions or pursuits.
Assess	To consider and make a judgment upon.
Assurance	A guarantee, giving certainty.
Auditing	A formal or official examination and verification. The audit process should include monitoring, review, and reporting of the outcome of the audit to those people who can implement any changes needed.
Authority	<ul style="list-style-type: none"> a) Official permission. b) A position that has the power to make a judgement; an individual cited or appealed to as an expert. c) The power to influence or command.
BP Company	A company in the BP Group, or a company or other legal entity where BP has operational control, is responsible for HSSE and has the right to impose this Standard.
BP Employee	A person employed by a BP Company.
BP Premises	Any site, location, vehicle or vessel that is owned or operated by or for a BP Company.
CoW	Control of Work
Competency	The ability to perform a task in the correct manner with the correct understanding and reasoning behind the task.
Competent Person	A person who has demonstrated that they have the knowledge, training and experience required to perform the defined role to the standard required.
Confined Space	A confined space is one that is large enough for personnel to enter, has limited or restricted means of entry, and is not designed for normal or continuous occupancy. It can be any enclosed or partially enclosed space where there is a risk of death or serious injury from hazardous substances or dangerous conditions (e.g. lack of oxygen).
Contractors	Members of the work force who are not directly employed by BP.
Control	<ul style="list-style-type: none"> a) A mechanism used to regulate a physical process or activity. b) An action to mitigate risk. c) The power to direct (usually through authority).
Document Control Management System	An established means of controlling the issue, use and updating of documents used in the management of a site. A full document control management system (DCMS) will include reference numbers on documents, means of tracking changes and updates and regular audits of the system to ensure compliance.
Eliminate	To remove or get rid of.
Energy Systems	Systems, which by their nature contain energy e.g. hydraulic, mechanical, electrical, potential and pneumatic.
Formal	A formal process or agreement is one that is written, recorded and audited. It may also include tracking to ensure that work is following the process or agreement.
Ground Disturbance	Work that involves a man-made cut, cavity, trench or depression formed by earth removal, or driving piles into the earth surface.

Hand-over	The detailed review of an operating unit's status, condition and ongoing work.
Hazards	Equipment, materials, activities, or conditions that have a significant potential to cause injury.
Hot Work	Work which involves either the use or the possible creation of a flame, spark or high energy discharge that could act as the ignition source for a fire or explosion.
Interaction	Act upon each other.
Interruption	The actual definition of work interruption may be different at each site, but could include coffee, smoke breaks and lunch breaks, fire alarms, suspension of work overnight, emergency situations and shift changes.
Live Equipment	Equipment that is in operation and is therefore the source of energy in the form of electricity, process fluids, radioactive sources, hydraulic or pneumatic pressure that could be released or discharged in an uncontrolled manner in the event of an incident.
Lock	A mechanical device, either key or combination type, to hold an energy isolating device in the safe position, usually to prevent the energizing of a machine or equipment.
Management of Change	An established means of managing and controlling changes within an organization.
Mandatory	Obligatory or compulsory. All instructions, requirements, procedures etc., described as mandatory must be complied with.
Mitigation	An action or event which prevents or minimises the effects of an incident or condition.
Monitoring	The routine function of regular inspection carried out by a responsible and competent person.
Non-BP Company	A company outside the BP Group, or a company or other legal entity where BP does not have operational control.
Permit	A formal and detailed document containing location, time, equipment to be worked on, Hazard identification, mitigation/precaution measure used, naming those authorizing the work and those performing the work.
Permit to Work	An approved management system used to control work in a safe manner.
Plan	The function of task (work) identification, interaction and sequencing including, preparation and completion requirements, to achieve an outcome.
Plant	Land, building and equipment.
Policy	Plan of action pursued by the Company (BP) with which all personnel must comply.
Positively isolated	Isolation by mechanical means such as physical disconnection or the insertion of a blank or slide plate.
Pre-job	An activity which is required prior to a task or work being undertaken.
Procedure	A detailed document either in paper or electronic form which sets out sequential or parallel actions which shall be followed by those engaged in carrying out an activity.
Process	A detailed description of a management system or a production operation.

Regular	An activity that is required to take place regularly will be defined by the site and should cover the normal, typical, activities and explain the frequency of that work. Regularly is used to indicate activities that must occur frequently enough to ensure the on-going safety of the work force. For some activities this might be annually, for others it could be every few minutes.
Responsible Person	A suitably trained and experienced individual who has been formally assessed as competent and has been given specific actions or areas of responsibility by an accountable person.
Risk	Possibility of loss, injury, damage, or exposure to hazard or danger.
Risk Assessment	The process of hazard identification and the assessment of the potential for identified hazards to be realised in any given activity.
Roles	The documented description of personnel functions within a management structure.
Root Cause Analysis	A formal process designed to determine the key causation factors in an incident or accident.
Routine	A procedure that does not vary in its execution.
Scheduling	The systematic identification of activities into a time based work flow process.
Shift change	A period of time during which one work shift stops working and another commences.
Simultaneous Operations	Separate activities or works, taking place at the same time with the potential to impact on each other.
Single Point Accountable	The person in the organization (site/Business Unit) who has been appointed as being accountable for the delivery and performance of an activity.
Subject Matter Expert	An acknowledged expert in a particular field.
Substitution	Replace; serving or causing to serve a function in place of another person or thing.
Suspension	Temporary removal, withholding or postponement.
Task Risk Assessment	A means of identifying work related hazards, assessing the possibility of those hazards being realised and defining the mitigating actions and controls required to reduce the risk.
Training	The bringing of a person to a desired degree of proficiency in some activity or skill. Training should only be carried out by people who have been assessed as being competent to train.
Task	An activity in support of a piece of work.
Verified fit for use	Equipment that has been inspected by a competent person, who has confirmed that it is fit for use for a specified period and completed a written record of the inspection.
Work	An activity made up of a number of different tasks.
Workforce	BP employees and every employee of any other company or other legal entity that has been engaged to perform work on BP Premises.
Work Control	An established means of controlling the completion of work.
Work Planning	A systematic process of identifying and listing work and determining when such work will be carried out.
Worksite	The location of the activity, work or tasks.

APPENDIX 3: Assignment of Roles

The following Control-of-Work roles and responsibilities have been assigned:

Location	Role	Person / Position	Method of Selection	Approved by	Date
AzSPU	Single Point of Accountability	Mark Thomas AzSPU VP Operations	Based on responsibility assigned to the position and familiarity with the Control of Work standard	Rashid Javanshir SPU Leader	01 June 2010
AzSPU	Technical Authority	Appropriate person as listed on the Engineering Technical Authorities Team list	Based on establishment of accepted technical authority	Chris Houghton SPU Engineering Authority	01 June 2010

AzSPU Safe System of Work (SSOW) process is mainly forms collection of procedures aligned with relevant Group defined practices. Current CoW process clearly defines critical roles and responsibilities required to maintain safe and smooth operations at BP Operated facilities:

Area Operations Managers (AOM)

The Area Operations Manager is responsible for:

- Ensuring that the PTW Process applied at their sites are authorised by them prior to implementation.
- Periodic self-regulatory reviews.

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

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

- Overall operation of the PTW on their site and ensuring that the procedures described in this document are consistently followed.
- Ensuring that the PTW 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.
- Ensuring that the training and competency standards, as defined in this document, are followed and to satisfy him / herself that the AA is competent
- Authorization of all categories of WCC's (Work Control Certificate's)
- Approval of all Level 2 Risk Assessments (Normal, ORA, IRA & SARA).
- Approval of audits.
- Signature for approval of Deviations from this procedure.
- Approval of all Routine Templates

Department Head (DH)

The Department Head (where applicable) roles and responsibilities are:

- Operation of the PTW process within their areas of responsibility.
- Countersignature of all categories of permit within their area of responsibility and ensuring that the appropriate hazards and controls have been identified and mitigations are in place for the planned task.

Area Authority (AA)

The AA is responsible for the day-to-day management of the PTW process within their area of responsibility. The AA is normally the Shift/Operations Team Leader or equivalent, although any individual can be dedicated to the role providing the individual is trained and competent. There may be more than one AA at any particular site. The duties of the AA are:

- To report to the SM/SC/OIM and have overall responsibility for the safe control of work activities in accordance with these procedures and within their designated area. This includes the issue of all Work Permits.
- Liaising closely with the PA's when planning permits, to ensure that the appropriate hazards and controls have been identified for that task.
- Ensuring that the appropriate level of risk assessment has been carried out for the task (Level 1 or 2) and acting as the Task Risk Assessment Team Leader
- Ensuring that all Prerequisite control measures have been put in place prior to a permit being issued, confirming that the PA fully understands the scope of the task.
- Providing the culture to "STOP the Job" if anyone feels unsafe
- Approval of isolation design, control of isolation implementation and ensuring that the ICC is attached or cross-referenced to the correct WCC prior to issuing. Also ensuring that the isolation is properly removed after completion of all the works associated/referenced to the ICC and cancellation of those permits.
- To ensure that the worksite inspections are carried out before, during and after the performance of each task (some of this task activity may be delegated to a competent nominated person).
- To ensure that there is a walk through of every work site activity before and after completion of work as a minimum, ensuring good housekeeping, isolations and tags removed as appropriate.
- Ensuring that adequate handovers take place at shift change, crew change or other change out/over of AA's, PA's and IA's
- Validate lessons learned and audits.
- To ensure that any cancelled permit to work documents are replaced with new ones, if required.
- To ensure that a WCC is closed and archived once the task is finished and the WCC has been Job Completed or Incompleted by the PA
- Be familiar with all AzSPU Caspian SSOW documents.
- Issue and Revalidation of Permits

Performing Authority (PA)

The PA is the responsible person for the activity being carried out under the Permit. The PA must be competent to perform the task and be fully conversant with the equipment and tools being used. The PA may be the person carrying out the task or may be supervising a group of people carrying out the job. The PA can be responsible for more than one task at any one time providing he/she can safely manage the tasks concurrently. The PA's main duties are to:

- Reports and interacts regularly with the AA and AAA on any Management of Change (MOC) issues to ensure the risks from all hazards are mitigated by controls to ALARP.
- Create the Permit and identify the hazards and control measures (Level 1 Risk Assessment) for the task being planned.
- Participate in any Level 2 Risk Assessment where required.
- Ensure that where other persons are involved in the task, they fully understand the scope of the work and the hazards and controls for the job by holding a toolbox talk meeting. This includes ensuring that all of those involved in the specific work activity sign off the worksite hard copy of the Permit.
- Provide the culture to "STOP the Job" if anyone feels unsafe
- Ensure that only personnel authorised by the Permit participate in the work and no unauthorised interference takes place.
- Ensure that all controls are applied prior to commencing task.
- Ensure that only work covered within the scope of the Permit takes place.
- Ensure that lessons learned from the job are captured.
- Ensure that where there are any deviations from the initial Permit conditions the work will be stopped and reassessed.
- Ensure that the worksite is kept in a clean and safe condition both during and upon completion of the job.
- Advance the permit Job Complete or Job Incomplete once the job has been finished and the worksite made safe
- Ensure adequate handovers take place at shift and crew change periods with the oncoming PA and AA.

APPENDIX 4: Requirements for High Risk Activities

Introduced across the BP Group in 2002, the Golden Rules of Safety define the controls to be put in place met when working in certain higher-risk situations. The controls associated with the Golden Rules of Safety directly associated with Control of Work are listed below and shall be applied whenever the work activity is carried.

Work Activity	Requirements
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Work Activity	Requirements
Energy Isolation	<p>Any isolation of energy systems; mechanical, electrical, process, hydraulic and others, shall not proceed unless:</p> <ul style="list-style-type: none"> the method of isolation and discharge of stored energy are agreed and executed by a competent person(s) any stored energy is discharged a system of locks and tags is utilized at isolation points a test is conducted to ensure the isolation is effective isolation effectiveness is periodically monitored
Ground Disturbance	<p>Work that involves a man-made cut, cavity, trench or depression in the earth's surface formed by earth removal shall not proceed unless:</p> <ul style="list-style-type: none"> a hazard assessment of the work site is completed by the competent person(s) all underground hazards, i.e. pipelines, electric cables, etc., have been identified, located and if necessary, isolated <p>Where persons are to enter an excavation:</p> <ul style="list-style-type: none"> a confined space entry permit shall be issued if the entry meets the confined space definition ground movement shall be controlled and collapse prevented by systematically shoring, sloping, benching, etc., as appropriate ground and environmental conditions shall be continuously monitored for change
Confined Space Entry	<p>Entry in any confined space shall not proceed unless:</p> <ul style="list-style-type: none"> all other options have been ruled out permit is issued with authorization by a responsible person(s) permit is communicated to all affected personnel and posted, as required all persons involved are competent to do the work all sources of energy affecting the space have been isolated testing of atmospheres is conducted, verified and repeated as often as defined by the risk assessment stand-by person is stationed unauthorized entry is prevented

Work Activity	Requirements
Working at Heights	<p>Working at heights of 2 metres (6 feet) or higher above the ground shall not proceed unless:</p> <ul style="list-style-type: none"> • a fixed platform is used with guard or hand rails, verified by a competent person, or... • fall arrest equipment is used that has <ul style="list-style-type: none"> ○ a proper anchor, mounted preferably overhead ○ full body harness using double latch self locking snap hooks at each connection ○ synthetic fibre lanyards ○ shock absorber • fall arrest equipment will limit free fall to 2 metres (6 feet) or less • a visual inspection of the fall arrest equipment and system is completed and any equipment that is damaged or has been activated is taken out of service • person(s) are competent to perform the work
Lifting Operations	<p>Lifts utilizing cranes, hoists, or other mechanical lifting devices shall not commence unless:</p> <ul style="list-style-type: none"> • an assessment of the lift has been completed and the lift method and equipment has been determined by a competent person(s) • operators of powered lifting devices are trained and certified for that equipment • rigging of the load is carried out by a competent person(s) • lifting devices and equipment have been certified for use within the last 12 months (at a minimum) • load does not exceed dynamic and/or static capacities of the lifting equipment • any safety devices installed on lifting equipment are operational • all lifting devices and equipment have been visually examined before each lift by a competent person(s)
Hot Work	<p>Mandatory requirement for Level 2 Risk Assessment for the tasks causing spark potential and naked flame risks with hazards controls in place</p>

Revision/Review Log

Revision Date	Authority	Custodian	Revision Details
18 June 2007	Gunther Newcombe (CHSSE Director)	Alan McNulty (CHSSE Manager)	Initial issue as controlled document
30 October 2007	Greg Mattson (VP Technical Directorate (HSSE)	Alan McNulty (CHSSE Manager)	<p>3.2 Roles and Responsibilities 3.2.3 Maintainer Additional responsibilities added to include: - Monthly and other periodic reviews and audits. - The review shall record agreed actions in Traction and/or the Sangachal Terminal Action Tracking System (STATS)</p> <p>3.10 Auditing & Compliance 3.10.1 Audit Records Addition to bullet point 2 to include ICC's. Note added to section regarding monthly reviews of audits conducted.</p> <p>Appendix 4 Assignment of Roles Single Point of Accountability name change</p>
07 December 2007	Greg Mattson (VP Technical Directorate (HSSE)	Alan McNulty (CHSSE Manager)	<p>3.5.5 Risk Reduction Section added to cover physical barriers and safety signs.</p>
18 December 2008	Greg Mattson, VP HS and Technical Directorate	Yuliy Zaytsev, Safety & Compliance Systems Manager	3.3.4 Training and Competency Records
16 June 2010	Michael Barnes, AzSPU HSE & Engineering Vice- President	Yuliy Zaytsev, AzSPU Offshore Health & Safety Manager	<p>The document has been re-formatted to be compliant with the requirements of Standardized HSE Document Control Template (AZSPU-HSSE-DOC-00026-2)</p> <p>Section 3 General Requirements Updated against relevant group defined practice, link attached</p> <p>Section 5 Control of Work Requirements has been updated with relevant Group Defined Practice requirements</p> <p>Sub-paragraph 5.10.1 Audit Records Reference to Electronic Permit to Work System added</p> <p>Sub-paragraph 5.5.3 Routine Tasks added statement</p>

			<p>Sub-paragraph 5.5.5 Risk Reduction has been updated with information on mandatory requirement to have a system in place ensuring that PPE is regularly being checked by an authorized person, also hierarchy of control stages made more specific.</p> <p>Sub-paragraph 5.5.7 Requirements for High Risk Activities This is a new sub-paragraph.</p> <p>Appendix 3 Assignment of Roles has been updated with new changes made in AzSPU organization</p> <p>Appendix 4 Requirements for High Risk Activities This appendix is referenced in 5.5.7 and added to the procedure; additional line for hot work is embedded.</p> <p>Paragraph 5.11 Lessons Learned has been updated with information on lessons learned review processes applicable for AzSPU</p>
28 October 2010	Mark Thomas AzSPU Vice President Operations	Godjat Nuriyev OMS/CI Manager & Ops Authority	<p>In order to bring alignment with relevant GDP requirements some of “should “ words have been substituted with more stringent “shall”(observation made by S&OI auditor)</p> <p>Appendix 3 Single Point of Accountability role for CoW has been re-assigned to Mark Thomas</p>