



Procedure for Deviations

AZSPU-HSSE-DOC-00011-2

This number supersedes **UNIF-HSE-PRO-101-C2**

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1 PURPOSE / SCOPE

1.1 SCOPE OF DOCUMENT

The contents of this procedure are applicable to all AzSPU owned and managed sites / installations in Azerbaijan and Georgia. Contractors working on AzSPU owned or managed sites / installations are also responsible for alignment with this procedure.

This document does not replace the procedures prepared and adopted by specialist contractors. Neither does it supersede any national and local regulatory requirements.

This procedure contributes to compliance with Group Control of Work (CoW) standard that the Hazards associated with BP activities are identified and that the risks are assessed and managed.

All guidelines contained shall be regarded as the minimum requirements for BP owned or managed sites / installations in Azerbaijan and Georgia.

This dispensation process should be used whenever it is deemed necessary to deviate from current practice, standards and procedures on a specific work site.

This procedure defines:

- Who needs to authorise deviations
- The conditions which must be met before authorisation is given
- The vehicle for documenting the process

1.2 REASON FOR CHANGES

Operations within BP Azerbaijan / Georgia are supported and controlled by:

- BP Group and subsidiary policy
- Local Legislation & International Conventions / Standards
- BP Azerbaijan / Georgia procedures
- BP Group Requirements
- Business Unit management system and other manuals, procedures, standing instructions, etc

However, occasions may occur where the best solution to an operational need involves deviating from one or more of the above requirements excluding legislation due to specific circumstances at the time.

2 DEFINITIONS

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

SM	Site Manager
SC	Site Controller
OIM	Offshore Installation Manager

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MA	Marine Authority
DMA	Delivery MA
SSOW	Safe System of Work
ALARP	As Low as Reasonably Practicable
PTW	Permit to Work

3 GENERAL REQUIREMENTS

3.1 AZSPU REQUIREMENTS

It is a company requirement that all deviations are subjected to an assessment of risk to demonstrate that risks have been reduced to as low a level as reasonably practicable (ALARP). This can be achieved by complying with the Company's existing standards. Where compliance with Company standards cannot reasonably be achieved, a formal level 2 Risk Assessment will be undertaken to identify any additional controls and demonstrate that risks remain as low as reasonably practicable, whether by compliance with Company Standards or through level 2 Risk Assessment.

- Operating Management System OMS Essentials 3.2.1 and 4.5.1

3.2 LEGISLATION AND STANDARDS

This procedure complies with applicable national law. 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.

In the absence of national legislation, or where national legislation is inconsistent with the requirements of project specific agreements, BP Group Standards or applicable requirements from UK or US legislation will be complied with.

Where requirements conflict, legal advice has been obtained and a defensible compliance position adopted.

The standards and practices contained in this procedure are consistent with those internationally recognized within the petroleum industry.

3.3 STOPPING UNSAFE WORK

To stop the continuation of potentially unsafe work at the earliest possible stage, the Control of Work (CoW) Policy and this procedure for Deviations make it very clear that all personnel are obliged and have the authority to “**STOP**” the work that they consider to be unsafe.

3.4 LANGUAGE FACILITATION

Due to the various languages spoken at sites / installations, there is a necessity to assist all with “an ease of understanding”.

4 RESPONSIBILITIES

4.1 SITE MANAGER (SM) / SITE CONTROLLER (SC) / OFFSHORE INSTALLATION MANAGER (OIM)

The Site Manager / Site Coordinator / Offshore Installation Manager have final responsibility for authorising a deviation and ensuring the relevant requirements of the deviation are met from:

- BP Standards
- Practices and procedures

With reference to the Group Marine Standard this responsibility extends only as far as is required to allow the above to discharge their accountabilities with regard to statutory duties and authorities

4.2 AREA AUTHORITY (AA) / DELIVERY MARINE AUTHORITY

The Area Authority / Delivery Marine Authority are responsible for:

- Informing the Site Manager / Site Coordinator / Offshore Installation Manager / Marine Authority at the earliest opportunity of the need to apply for deviation from standards, practices and procedures
- Identifying and specifying the standards, practices and procedures from which deviation is sought, along with the reason
- Seeking specialist technical advice where required to carry out the associated risk assessment
- Carrying out a risk assessment and identifying mitigating measures
- Distributing the original, and copies of, the completed request with approvals
- Ensuring that all mitigating measures are in place

4.3 TECHNICAL AUTHORITY (TA) / MARINE AUTHORITY

The relevant technical authority is accountable for:

- Assessing the incremental risk to the operation with respect to the required dispensation
- Assessment of the identified mitigation requirements from the asset requesting the deviation
- Identification of additional technical mitigation requirements should they be required.
- Reviewing current practices and updating as required following assessment
- Supporting the asset in obtaining dispensation from the company self regulated standards, e.g. Group Standards and ETP's

Technical Authority / Marine Authority should also provide an approval in case of deviation request for non- or Site compliance with ETP Technical Practice / Group Marine Standard and the process is to record it as MoC.

Limitations for the Group Marine Standard deviations are defined in section 5.1

The Register of Engineering and Technical Authorities, and Marine Authority, and Delivery Marine Authorities, and Discipline Responsible Engineers retains in dk:

\\Bp1bakis003\baku_office\Operations\engineering\EngWebPage\EngineeringFunctions\EA-TA-DRE.xls

5 DEVIATION APPROVAL PROCESS

5.1 APPLICATION FOR DEVIATION APPROVAL

Applications for site specific dispensation are submitted to the Site Manager / Site Coordinator / Offshore Installation Manager at the place of operation using pro forma illustrated in Appendix A.

For such applications, the attached form should be used to document the:

- Procedure, practice recommendation, etc., from which a deviation is required
- Required duration of the dispensation
- Requested deviation
- Justification for the deviation
- Risk assessments carried out
- Mitigating measures to be implemented
- Signatures of those in charge of processing the request
- All deviations from the Group Marine Standard must be approved by the CEO BP Shipping as appropriate via the Segment Marine Authority. Variations are a temporary authority not to meet the standard and Exceptions are a permitted authority. The standard has a mandated exception and variation process that is out with this procedure. The AzSPU Marine Authority shall be contacted in the first instance for all Marine Standard variations and exceptions. See Appendix D

5.2 REQUIREMENTS FOR APPROVAL

The Site Manager / Site Coordinator / Offshore Installation Manager at the place of operation have the authority for final approval for deviations from BP standards, practices and procedures.

In order to authorise dispensation for a deviation, the Site Manager / Site Coordinator / Offshore Installation Manager is responsible for ensuring that:

- A risk assessment has been properly carried out in accordance with AZSPU-HSSE-DOC-00063-2 Task Risk Assessment
- Appropriate technical endorsement from the specific practice or standard has been obtained
- Mitigating measures have been identified and appropriate actions implemented
- Interim procedures have been produced and distributed to all relevant personnel

Limitations for the Group Marine Standard are defined in Section 5.1

5.3 PROLONGED OR FREQUENT DEVIATIONS

If it proves necessary to deviate from a practice, standard, or procedure for a prolonged period of time, or if the same deviation is requested on a frequent basis, the person handling the request is responsible for implementing measures to either:

- Change the practice, standard, or procedure in order to bring it into line with what needs to be done
- or,
- Change the method of work to bring it into line with the practice, standard, or procedure.

Limitations for the Group Marine Standard are defined in Section 5.1

5.4 WORK CONTROL (PERMIT TO WORK REQUIREMENTS)

All work requiring an authorised deviation from BP standards, practices and procedures shall be carried out under a permit to work. This provides the vehicle for the Site Manager / Site Coordinator / Offshore Installation Manager to ensure that all agreed precautions are in place before the work proceeds.

Note: The pro-forma illustrated in Appendix A is to be used for recording the deviation authorisation. This form must be attached to the permit and must be brought to the attention of the Performing Authority before he signs the permit.

6 KEY DOCUMENTS REFERENCES

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

Document Number	Title of Procedure
AZSPU-HSSE-DOC-00060-2	Procedure for Permit to Work
AZSPU-HSSE-DOC-00063-2	Procedure for Task Risk Assessment
AZSPU-HSSE-DOC-00012-2	Procedure for Authorization
AzSPU-HSSE-DOC-00021-2	HSSE Definitions
AZSPU-HSSE-DOC-00002-2	Procedure for Control of Work
AZSPU-HSSE-DOC-00072-2	Review/Revision Process for HSE Tier 2 Procedures – Terms of Reference

APPENDIX A: AUTHORIZATION FOR LOCAL DEVIATION

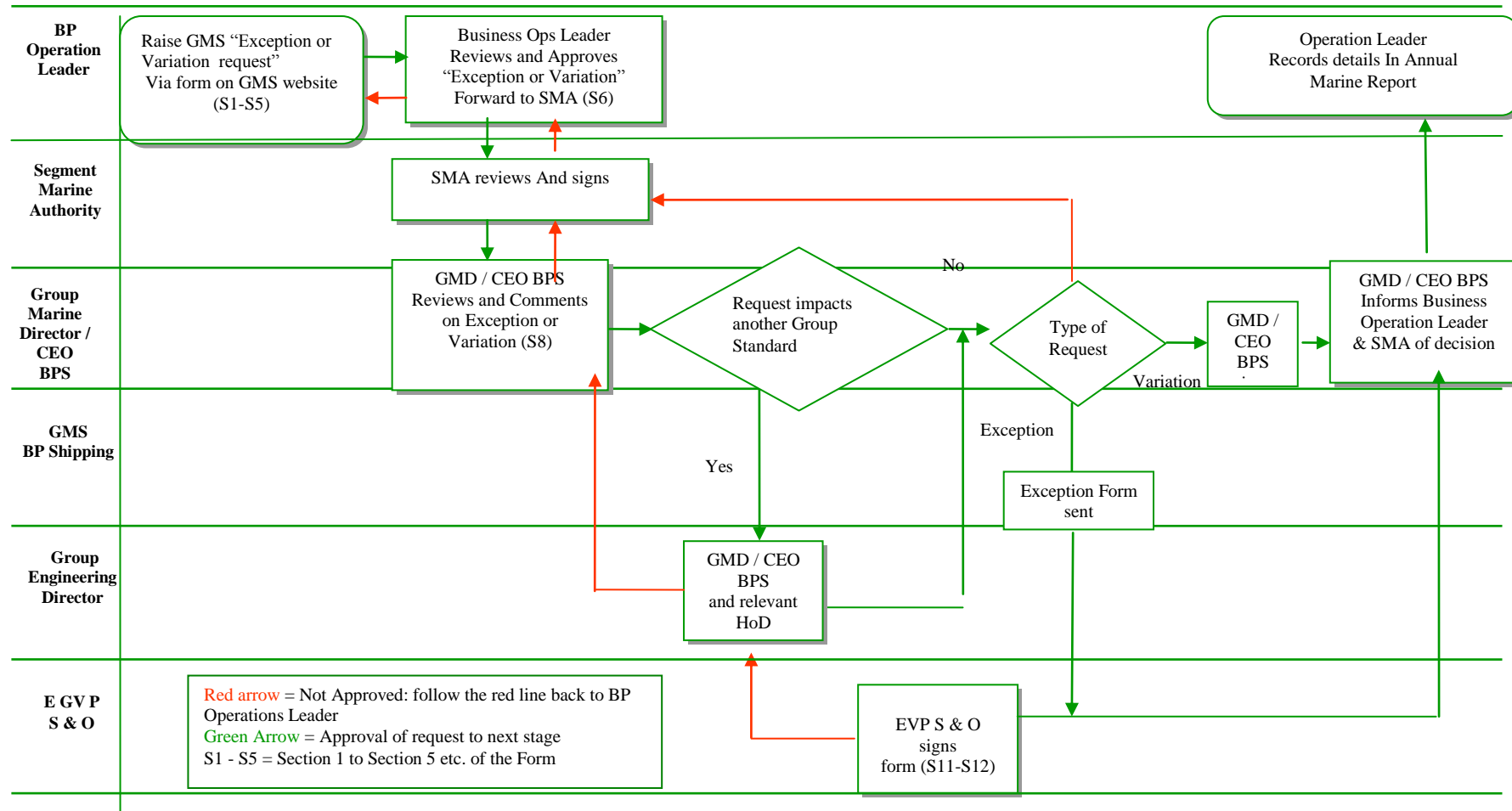
<http://docs.bpweb.bp.com/dkAzSPU:/published/hse/azspu/records/AZSPU-HSSE-REC-00203-2>

APPENDIX B – GROUP MARINE STANDARD EXCEPTION OR VARIATION PROCESS

GROUP MARINE STANDARD EXCEPTION OR VARIATION PROCESS

Exception: Permanent authority not to meet the GMS

Variation: Temporary authority not to meet the GMS



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REVISION/REVIEW LOG

Revision Date	Authority	Custodian	Revision Details
11 October 2004	Alan McNulty	Esmira Akhundova	Initial Issue as controlled document
25 January 2008	Alan McNulty (CH&S Manager)	Abbas Islamov (Safety Team Leader)	<p>General: Throughout the procedure the document numbering for referred procedures has been changed from UNIF to AzSPU.</p> <p>Section 1. Introduction: 1.2 <u>Scope</u>; Wording changes. The following are inclusion to Section 1. They are: 1.2 <u>Scope</u>; 4 additional paragraphs added. 1.3 <u>Legislation & Standards</u>, 1.4 <u>Company Requirements</u>, 1.5 <u>Stopping Unsafe Work</u>, 1.6 <u>Document Review</u>, 1.7 <u>SSOW Specific Cross References</u> (new doc control numbers), 1.8 <u>Language Facilitation</u>, 1.9 <u>Procedure Summary</u></p> <p>Section 2. Definitions: New section</p> <p>Section 3. Roles & Responsibilities: 3.1 <u>Site Manager</u>; Site Controller and Offshore Installation Manager added. Foot Note added. Added new paragraph – 3.3 Technical Authority.</p> <p>Section 4. Deviation Approval Process: Figure 1; Authorization for Local Deviation Pro-Forma. Additional line added for approval of Technical authority. This pro-forma has been moved to Appendix A.</p> <p>Appendices. In addition to Appendix A, 2 new appendices have been included to the document as follows:</p> <p>Appendix A: Procedure Summary Appendix B: Feedback & Improvement Suggestions</p>
05 December 2008	Yuliy Zaytsev Safety&Compliance Systems Manager	Adalat Mamedov Safety Team Leader	Authority position/name and custodian name have changed to reflect org changes in HSE&TD as of December 1st 2008
05 February 2009	Yuliy Zaytsev Safety&Compliance Systems Manager	Adalat Mamedov Safety Team Leader	The next review/revision date is extended to 01.05.2009 due to rescheduling

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14 August 2009	Yuliy Zaytsev Safety&Compliance Systems Manager	Niyaz Mamedov HSE Systems – CoW Adviser	<p>The wording to deviations from legislation is taken out as it is mandatory to comply with all them.</p> <p>The procedure's numbering is structurally changed in accordance with Standardized Document Control Procedure Template requirements.</p>
25 November 2009	Yuliy Zaytsev Safety&Compliance Systems Manager	Niyaz Mamedov HSE Systems – CoW Adviser	<p>Slight inclusions regarding Marine Ops made to Paragraphs 4.1, 4.2, 4.3, 5.1.</p> <p>Appendix B, Group Marine Standard Exception or Variation Process, is included in the Procedure.</p>
25 January 2011	Yuliy Zaytsev Safety&Compliance Systems Manager	Elman Shikhkerimov Safety Systems/CoW Lead	<p>Section 3 General Requirements</p> <p>Removed reference to Getting HSE right, Golden Rules and replaced with OMS, Group requirements</p>