



Procedure for: Control of Protective System Overrides and Alarm Blocks

AZSPU-HSSE-DOC-00015-2

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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 protective system overrides and alarms during operation and maintenance activities. It ensures there is an audit trail for the application, sanction, approval, removal of trip overrides and ensures 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 overrides/inhibits on running plant. It is equally true that in some instances, it is necessary to use overrides 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 As Low As Reasonably Practicable.

1.2 Scope

This procedure applies to all protective system overrides, PSD, ESD, Fire and Gas, Software and hard-wired inhibits and alarms blocks, on all existing and new Caspian region assets.

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

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

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

Drilling areas which are not the responsibilities of the Senior Toolpusher AA for the purposes of inhibit tracking; will be covered by this procedure. Drilling areas, which are the responsibility of the Senior Toolpusher, must have a robust system in place for the control of inhibits. Regular communication between the Senior toolpusher AA and the Process AA in charge of the main control system must take place to ensure all possible conflicts are addressed.

1.3 Deviations

This procedure is written in sufficient detail that it should be able to be applied consistently at all sites / installations. There may still be the requirement for some local rules covering site / installation 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 SSOW, Procedure for Deviations (Doc. No: AZSPU-HSSE-DOC-00011-2).

2 DEFINITIONS

ALARP	As Low As Reasonably Practicable means risks are reduced to a point where further risk reduction is not justifiable
Block	A means of preventing nuisance alarms from activating and distracting the operator
CRO	Control Room Operator
Defeat	See override definition
ESD	Emergency Shutdown, usually caused by a Yellow Shutdown, a Red Shutdown or Blow-down activation
ICC	Isolation Control Certificate
IL	Integrity level, highest of Safety Integrity Level (SIL), Environmental Integrity Level (EIL) and Commercial Integrity Level (CIL)
Inhibit	See override definition
LTO	Long Term Override, any override in place for more than 7 days
OIM	Offshore Installation Manager
Override	Means a software selection or hardwired link that prevents a trip action
ORA	Operational Risk Assessment
PCS	Process Control System
PSD	Process Shutdown system also known as Protective Systems
PTW	Permit to Work
SIF	Safety Instrumentation Function (any instrumented protective system, sometimes known as Instrumented Protective System or IPS)
SORA	Safety Override Risk Assessment
SSOW	Safe System Of Work
TA	Technical Authority
TRA	Task Risk Assessment

3 GENERAL REQUIREMENTS

3.1 Legislation & Standards

The aim of this Safe System of Work is to achieve "no accidents", "no harm to people" and "no damage to the environment". To achieve this aim, this SSOW complies with National Legislation, the terms of the Production Sharing Agreement (PSA) and mandatory BP Standards.

The best International Oil Industry practice has been adopted to reduce the level of risk to ALARP.

In the absence of local regulations, BP Group Standards will apply. In addition, appropriate UK and US regulations and industry best practice have been considered in setting suitable goals and targets.

3.2 Company Requirements

It is a company requirement that all tasks 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 Risk Assessment will be undertaken to identify any additional controls and demonstrate that risks remain as low as reasonably practicable.

- Operating Management System OMS Essentials 3.2(3.2.1) and 4.5(4.5.1)
- BP Group Engineering Technical Practice GP-30-81

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 Control of Protective System Overrides and Alarm Blocks procedure 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 Document Review

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

3.5 SSOW Specific Cross References

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

Document Number	Title of Procedure
AZSPU-HSSE-DOC-00011-2	Deviations from Regulations and Procedures
AZSPU-HSSE-DOC-00060-2	PTW Procedure
AZSPU-HSSE-DOC-00063-2	Task Risk Assessment
AZSPU-HSSE-DOC-00002-2	BP Control of Work Standards
AZSPU-HSSE-DOC-00048-2	Energy Isolations-Electrical

4 Key RESPONSIBILITIES

The key roles and responsibilities within the control of overrides and alarm blocks are described below.

4.1 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 overrides on their site and ensuring that the procedures described in this document are consistently followed.

- Ensuring that the control of overrides 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 Area Authority and Control Room Operator as competent to carry out their duties, as described in this document, and ensuring that a controlled log of all authorised personnel is maintained.
- Auditing the system to ensure the procedure is being followed.

4.2 Area Authority (AA)

This shall be the person designated by OIM/Site Controller as accountable for the management of overrides and alarm disables. If this role is not designated to the Area Authority then a standing instruction should be issued to define who is accountable for this role.

4.3 Control Room Operator (CRO)

This shall be the person normally responsible for applying the overrides. Overrides or alarm blocks requiring engineer level password access will be applied by a healthcare engineer where required. Overrides requiring hardwired links will be applied by an instrument technical under Permit to Work and Electrical Isolation procedure.

5 PROCEDURE

The application of overrides can only be applied after due consideration and consultation to assess the risks. The Area Authority (AA) must ensure that there are valid reasons to affect any disablement and a risk assessment will be performed, with the AA deciding what level of approval is required. The results of any assessment must be documented and retained for future reference. The AA must also record and document any subsequent amendments to the assessment that were not originally considered.

The risk assessment shall ensure that appropriate control remains and that safety is not compromised. The assessment must take account of the possible cumulative effect of existing overrides. It 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, MOC (Management of Change Procedure), etc. It must also consider the duration that the disablement shall be in place for. This risk assessment must be conducted by suitably qualified and experienced operations and maintenance staff, HSE and or specialist input shall be sought where relevant.

Risk assessments should all be registered and must be retained and be readily accessible, for auditing of the process.

Even for routine tasks such as trip testing or sampling, a PTW and a SORA shall be required, however a generic SORA may be prepared for repetitive tasks.

Irrespective of priority, after seven days the override is deemed to be long term (LTO) and will be subject to a higher level of approval and review.

Reoccurring problems such as pump-change over or pigging problems shall be flagged up for a corrective engineering solution using the EQ or MOC procedure as appropriate and shall be treated the same as LTOs..

At every shift handover the CROs and AA shall discuss the status of protective systems overrides and alarm blocks to ensure it is clearly understood. An entry shall be made in logbook to record the fact that this discussion has taken place.

5.1. RISK ASSESSMENT OF OVERRIDES

All protective system overrides shall have some form of risk assessment. The requirements are described in the flowchart in Figure 1 but are repeated below for clarity.

5.1.1 Equipment not commissioned yet/decommissioned equipment

There is no need for a Safety Override Risk Assessment (SORA) for new equipment not commissioned yet or old equipment that is decommissioned. Also no need to classify equipment as Long Term Overrides (see below).

5.1.2 PM/trip test/sampling/bombing related

A PTW will be issued but the override should be recorded in the register. However a number of tags can be recorded on a single register entry if they are for routine PM work. A generic testing SORA can be developed or the AA can prepare a SORA specific for the test.

If the override continues past end of the shift then an individual register entry shall be made for the override.

5.1.3 Recently discovered faulty trip instrument

A SORA is required. In addition the SORA shall be approved by OIM/Site Controller for any of the following:

- Protective instruments with IL 1 or above. Note IL ratings can be found on cause & effects.
- Riser valves; sub-sea valves; down hole safety valves
- ESDV's
- Yellow or Red Shutdown functions

The relevant Technical Authority shall be informed of any overrides on these critical systems at the earliest opportunity.

Some assets have ability to switch trip logic from the PSD to the PCS transmitter. If this facility is used it shall be treated as a faulty trip instrument override.

All overrides on faulty trip instruments shall be recorded in the register.

5.1.4 Recognised reoccurring problem (e.g. pump switch over or pigging issues).

Occasionally we have reoccurring system issues that require an override for routine activities for example pump switch over or pigging issues. For this case a SORA can be

made on the first application then reused. Use of the override shall be recorded in the register.

5.1.5 Alarm Block

Risk Assessment is discussion between CRO and AA. Record override in register.

5.1.6 Long Term Overrides

If the override is in place for more 7 days it shall be reclassified as a long term override (LTO) and shall be approved by the OOE/Production Superintendent. LTOs shall be reported to asset management as required by OMS. Depending on the risk associated with the loss of protection, the OOE/Production Superintendent will assess if OIM/Site Controller or Technical Authority approval of the SORA is required. There is no need to report overrides associated with equipment not in commission as LTOs.

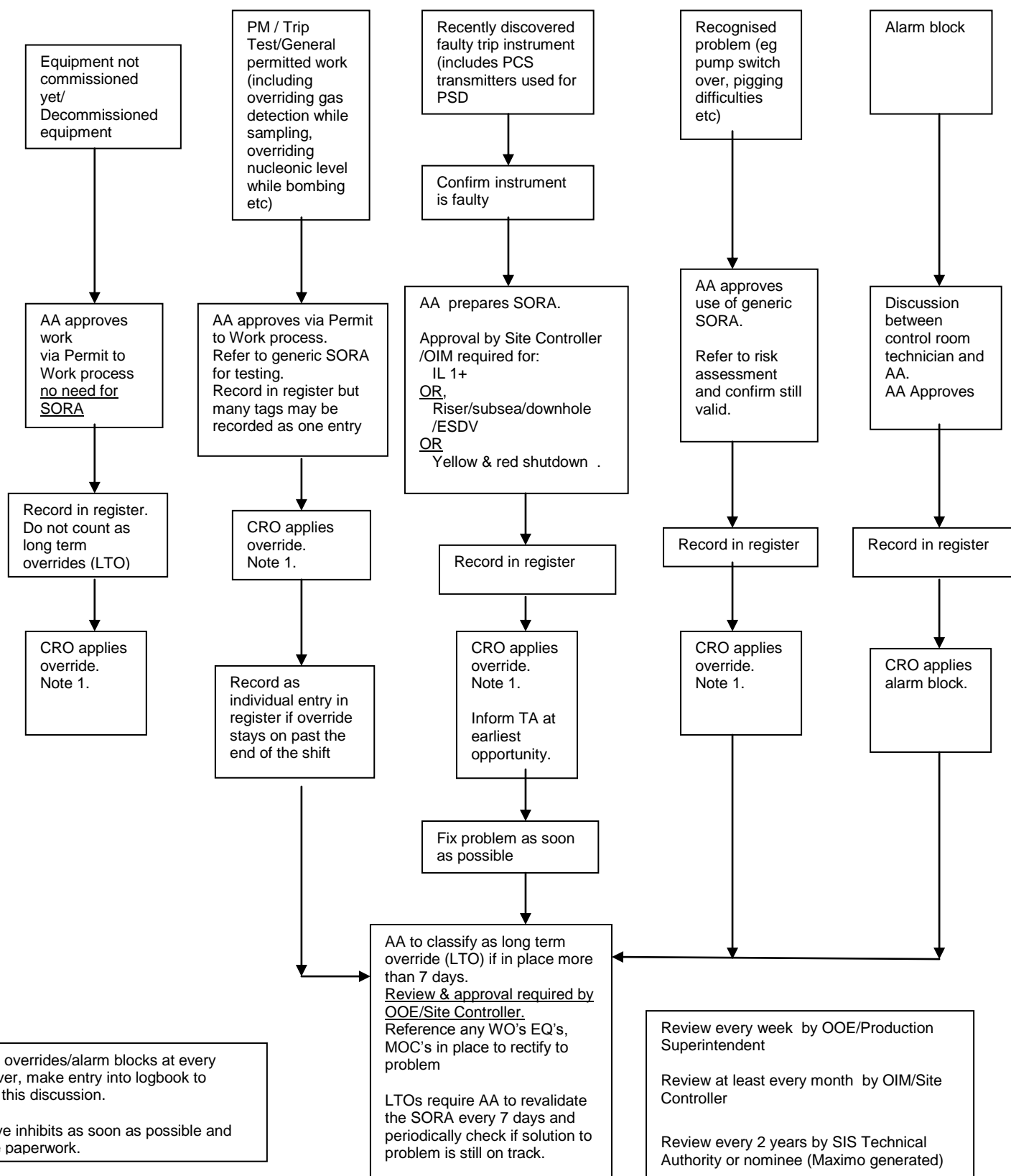
5.1.7 General requirements for all Safety Override Risk Assessments

Risk assessments on overrides need to consider the following factors.

- Identify the consequence and risk associated with the failure of the protective system or alarm to act.
- Identify the cumulative impact and risk of applying the override in addition to any other existing overrides
- Identify any measures or actions that may be taken to reduce the risk to an acceptable level when the override is applied.
- Specify the maximum duration for which an override/bypass may be applied.
- Specify whether any further actions need to be taken.
- Request Technical Authority review where applicable. For example, loss of a whole fire detection zone or loss of a complete voted protective system shall be reviewed by the Technical Authority

Risk assessments shall be recorded on a SORA sheet an example of which is given in Appendix B.

Figure 1 – Override Process Flowchart

**NOTES**

1. If override can only be done in the field, this will be carried out by an Instrument Technician. Overrides requiring hardwired links shall also have an ICC. Some overrides need engineering log on, this will be done by the Control/Protective System Healthcare Engineer. Some field inhibits can be via key-switch on remote panels, controlled by the AA, implemented by his delegate/nominee.

5.2 APPLICATION OF OVERRIDES

Application of Overrides will generally be the responsibility of the CRO. He will also be responsible for recording the Override/Inhibit Register, and shall make reference to the specific Risk Assessment that applies. This will form part of the shift handover report.

Overrides that cannot be applied by the CRO for example password protected systems will be applied by the Control & Protective System Healthcare engineer but will still be recorded by the CRO.

Hardwired Overrides are a particular concern as they can be less visible than other types of overrides. Where a hardwired override is required, an Isolation Certificate will also be put in place. An ICC label must be displayed on the outside of a cabinet along with any labels attached to the cable.

5.2.1 REMOVAL OF OVERRIDES

Overrides should be removed from the systems as soon as possible, when the reason for its application has been resolved.

5.3 FIRE & GAS OVERRIDES

Fire & Gas overrides shall follow the same procedure for trip system overrides and a SORA is required. For F&G overrides pay particular attention to the cumulative effect of multiple overrides.

F&G systems are not IL rated but when a whole fire or gas zone is overridden, the SORA shall be approved by the OIM/Site Controller and Technical Authority informed.

5.4 LONG TERM ISOLATIONS & ICCs

Instrument related long term isolations and ICCs that have trip or alarm functions shall be treated as overrides and recorded in the overrides register.

5.5 ALARM BLOCKING

Alarm blocking is sometimes required to remove the distraction of bouncing alarms. The facilities to allow this are usually built into the control system but in a similar way to protective system overrides, application of alarm blocks needs to be controlled, recorded and subject to continuous improvement.

Application of Alarm Blocks

Application of alarm blocks will generally be by the healthcare engineer responsible for the control system. The CRO will be responsible for updating of the alarm block register, and shall make reference to reasons why the alarm block has been applied. The CRO and AA shall review the register and sign the review log at every shift handover.

Removal of Alarm Disables

Alarm blocks should be removed from the systems as soon as possible, when the reason for application has been resolved

5.6 REGISTERS

Protective system overrides shall be recorded in eLogbook or on paper log during the transition to eLogbook or if eLogbook fails.

5.6.1 eLogbook Register

The protective system overrides register will contain the following details for each override applied. An example is given in Figure 2

- Process system - Primary System
- Tag number - use Title field
- Tag description - use Title field
- Type of override - override method field (ESD/PSD, F&G, Alarm)
- Reason for override - use Details field
- Risk assessment ref - write Yes if SORA attached.
- Permit no - use details field
- Isolation Confirmation Certificate no if applicable (hardwired overrides) - use details field
- Approved by - leave blank, this is just a text field for those assets not using electronic approval. For AzSPU approval is via anyone with Supervisor level access at the New Event page.
- Date applied & time applied
- Action required, for any reference to Maximo Job, EQ, MOC, etc where remedial action is being worked towards removal of long term overrides - use details field.
- Date removed & time removed

The screenshot shows the 'e-Logbook - New SIS Override' form. On the left is a navigation menu with options like 'Day View', 'New Event', 'New SIS Override' (highlighted), 'Week View', 'Month View', 'Search Logbook', and 'TODAY'. The main form area is titled 'New Safety Instrumented System Override'. It contains several input fields and dropdown menus: 'Primary System' (CA-PDQ & CWP Interface), 'Secondary System', 'Title' (with a placeholder 'TEST ONLY' and the text 'FALL-241101 MOL Pump Low Flow'), 'Date/Time From' (24-Sep-2009 13:45), 'Specified Authority' (Mr Area Authority), 'SIS Override Risk Assessment?' (Yes), and 'Override method' (PSD). A 'Details' section is expanded, showing 'Reason : Plant Start-up', 'IL Rating : 1', 'Permit No : N/A', and 'MOC/Maximo/ICC No : N/A'. There is an 'Attach Document' field with a 'Browse...' button. At the bottom are 'Save' and 'Cancel' buttons.

Figure 2 – Example of eLogbook entry

5.6.2 Paper Register

If the eLogbook system is not in use or not available, the paper register in Appendix C can be used.

5.7 REVIEW OF OVERRIDES & ALARM BLOCKS

An audit shall be conducted on a bi-weekly basis by the OOE/Production Superintendent to review the number of overrides and record keeping.

An audit by the OIM/Site Controller shall be conducted on a monthly basis.

An annual audit shall be completed the someone independent from the asset, usually the Safety Instrumented Systems Technical Authority (SIS TA) or nominee.

Just prior to the audits, the CRO shall obtain a list of active inhibits/overrides in the system for reconciliation with the register.

The AA's responsibility is to ensure the requirement for long term overrides (LTOs) and frequent or repeat overrides is subject to continuous improvement. Depending on the situation this might be by raising an EQ or MOC for an engineering solution, or addressing a spare parts issue.

Long term overrides shall be revalidated every 7 days. the AA will check the basis for Long Term Overrides is still valid and mitigations are still in place and effective.

The sheet in Appendix A can be used for all audits.

6.0 KEY DOCUMENTS/TOOLS/REFERENCES

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

Document Number	Title of Procedure
AZSPU-HSSE-DOC-00011-2	Procedure for Deviations
AZSPU-HSSE-DOC-00060-2	Procedure for Permit To Work
AZSPU-HSSE-DOC-00012-2	Procedure for Authorization
AZSPU-HSSE-DOC-00063-2	Procedure for Task Risk Assessment
AZSPU-HSSE-DOC-00002-2	Procedure for Control of Work

Appendix A – AUDIT CHECKLIST

OVERRIDES, INHIBITS, AND ALARM DISABLES REVIEW CHECKLIST		
FACILITY		DATE
Review Purpose To review the management and control of safety systems overrides, and alarm blocks in compliance with Procedure AZSPU-HSSE-DOC-00015-2. This pro-forma can be used for weekly/monthly/annual reviews.		
		COMMENTS
1. Verify users of the override procedure understand the procedure and their responsibilities.		
2. Verify that the record of overrides & alarm blocks is up to date with the overrides applied. Compare with control system reporting facilities.		
3. Verify that appropriate risk assessments have been carried out. Review a sample of SORAs made since the last review.		
4. For Long Term Overrides (LTOs) verify mitigations are still valid and check orders for parts, EQ's, or MOCs are in progress. Record here all current LTOs or attach on a separate sheet. Report LTOs numbers once per week to asset management.		
5. Check all instrument related long term isolations (ICC or LTI) that have trip or alarm functions are recorded on the overrides register and are still valid.		
6. List any PCS transmitters used for PSD and check they are all in overrides register.		
7. If paper system is in use, dispose of paper sheets more than one year old during 2-yearly review by TA		
COMMENTS / ACTIONS		
REVIEW COMPLETED BY	NAME	SIGNATURE

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Appendix B - Safety override risk assessment (SORA)

Tag number of SIS device: (Specify tag no. of input or output field device)	Plant ID:
Descriptor:	
<input type="checkbox"/> Input override/bypass <input type="checkbox"/> Output override/bypass (Input and output devices to be considered separately)	Integrity level: (If applicable)
Integrity basis: <input type="checkbox"/> Safety <input type="checkbox"/> Environment <input type="checkbox"/> Commercial (Identify highest overall requirement)	

Hazard from applying override/bypass: (What are the consequences if this SIS/trip fails to act on demand?)
Possible reasons for applying override/bypass: (Critical maintenance, fault diagnosis, etc. Note: Startup overrides/bypasses normally provided for process operations.)
Mitigation: (What action should be taken to minimise risk whilst SIS/trip is overridden/bypassed?)
Considering the level of risk and the potential for mitigation, the override/bypass of this SIS/trip is classed as: <input type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
Maximum duration of override/bypass: <input type="checkbox"/> Startup only <input type="checkbox"/> 10 min <input type="checkbox"/> 30 min <input type="checkbox"/> 4 hr <input type="checkbox"/> 7 days <input type="checkbox"/> 7 days + (How long can override/bypass remain applied?)
Observations: (Detail any additional monitoring or precautions required?)
Assessment performed by: _____ Date: _____

Authorisation

Area Authority:	Date:
Affected Area Authority (if covered by a 2nd AA):	Date:
OOE/Production Supr:	Date:
Site Controller / OIM:	Date:
Technical Authority	Date:

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OVERRIDES AND INHIBITS REGISTER. FACILITY _____ AREA _____ SHEET NO _____

[illegible]

APPENDIX D – FEEDBACK & IMPROVEMENT SUGGESTIONS**Procedure Feedback & Improvement Suggestions****Project Name:** _____**Date:** _____**Name:** _____**Badge Number:** _____**Procedure Reference:** _____**Procedure Title:** _____

Improvement Suggestions (Write below your improvement suggestions)

Signature: _____ **Forward your Improvement Suggestion to the Offshore H&S Manager at the Offshore H&S Office, Hyatt Tower 2, 6th Floor**

Revision/Review Log

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28 December 2004	Alan McNulty	Esmira Akhundova	Initial Issue
30 June 2008	Alan McNulty (AzSPU CH&S Manager)	Abbas Islamov (Central Safety TL)	<p>General: Throughout the procedure the document numbering for referred procedures has been changed.</p> <p>Section 1. Introduction: 1.2 Scope, 1.3 Deviation, 1.4 Legislation & Standards, 1.5 Company Requirements, 1.6 Stopping Unsafe Work, 1.7 Document Review, 1.8 SSOW Specific Cross References, 1.9 Language Facilitation</p> <p>Changes were made to:</p> <p>Section 2. Abbreviation & Definitions</p> <p>Section 3. Roles & Responsibilities Paragraph 3.2 Area Authority replaces Responsible Person (RP), Paragraph 3.3 Control Room Operator</p> <p>Section 5. Categorisation of Overrides Categories now refer to IL rating, Category A and B swapped, A is now highest, followed by B then C,</p> <p>Section 6. Reason for override New section with chart showing how the reason for the override affects the way it is dealt with. Removed the need for PM driven overrides to be put in the register unless they go on past the end of the shift.</p> <p>Appendices: Appendices renumbered. Some new columns added to blank forms</p>
05 December 2008	Yuliy Zaytsev (AzSPU Safety & Compliance Systems Manager)	Adalat Mamedov (Central Safety TL)	Authority position/name and custodian position/name have changed to reflect org changes in HSE&TD as of December 1st 2008

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19 May 2009	Yuliy Zaytsev (AzSPU Safety & Compliance Systems Manager)	Adalat Mamedov (Central Safety TL)	Next review/revision date is extended to 15.08.2009 due to rescheduling
19 August 2010	Yuliy Zaytsev (Offshore Health and Safety Manager)	Elman Shikhkerimov (CoW/Safety Systems Lead)	<p>The document has been re-formatted to be compliant with the requirements of Standardized HSE Document Control Template (AZSPU-HSSE-DOC-00025-A1)</p> <p>Sub section 1.2 Changed order of paragraphs in this section.</p> <p>Sub section 1.5 Removed references to level 2 risk assessments, using SORA approach instead.</p> <p>Sub section 1.8 Update procedure numbers in line with ISSOW.</p> <p>Sub section 1.9 Language Facilitation removed - didn't mean anything.</p> <p>Section 3 General Requirements Updated against relevant group defined practice, link attached Removed references to level 2 risk assessments, using SORA approach instead.</p> <p>Sub section 3.5 Update procedure numbers in line with ISSOW.</p> <p>Section 5 Procedure</p> <ul style="list-style-type: none"> Remove requirements for Level 2 Risk Assessment - use SORA approach instead. AA decides on level of approval for SORA No Level 2 or SORA risk assessment required for routine tasks unless they go past end of shift. Use IL rating to identify priority. Signing hand over sheet at shift hand over - change to eLogbook entry. <p>Sub section 5.1 Risk Assessment of Overrides</p> <ul style="list-style-type: none"> Section re-titled Old section 6 now included in section 5.1

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<http://docs.bpweb.bp.com/dkazspu/component/hssesms>

			<ul style="list-style-type: none"> Remove category reference and use IL rating to prioritise.
			<p>Sub section 5.1 Risk Assessment of Overrides</p> <ul style="list-style-type: none"> Section re-titled Section titled "Project/Modification related work" changed to "Equipment not commissioned yet/decommissioned equipment" PM related overrides to be recorded in register but multiple overrides on one entry allowed for PMs Old section 6 now included in section 5 Remove category reference and use IL rating to prioritise. Update flow chart with changes from other sections <p>Sub paragraph 5.2.2 Fire & Gas Overrides</p> <ul style="list-style-type: none"> New section <p>Sub paragraph 5.2.3 Long Term Isolations & ICCs</p> <ul style="list-style-type: none"> New section <p>Sub paragraph 5.2.5 Registers</p> <ul style="list-style-type: none"> Section renumbered was 9 Change to using eLogbook to record overrides as well as paper register. <p>Sub paragraph 5.2.6 Review of Overrides</p> <ul style="list-style-type: none"> Section renumbered was 10 Changed reviewing frequency and responsible persons, now includes OOE/Production Superintendent and OIM/Site Controller. Changed TA review to 2-yearly Changed the word 'Audit' for 'Review'. <p>Appendix A</p> <ul style="list-style-type: none"> Add check of roles and responsibilities Overlapping sections from previous audit removed. Include check of ICC and LTI <p>Add check of PCS transmitters used for PSD</p> <p>Appendix D</p> <p>Updated address details inline with</p>

			new reorganizational changes
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