



## Procedure for Hot Work Naked Flame

### AZSPU-HSSE-DOC-00053-2

This number supersedes UNIF-HSE-POL-101-C1

<b>Authority:</b>	AzSPU S&C Systems Manager	<b>Custodian:</b>	HSE Systems – Control of Work Advisor
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## 1. INTRODUCTION

### 1.1. Purpose

This document sets out the precautions and conditions considered necessary for the safety of all Hot Works Naked Flame carried out on BP owned or managed sites in Azerbaijan and Georgia. It has been produced so that all involved parties can make a uniform approach hot work activities.

### 1.2. Scope

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 procedure.

This document does not replace the procedures prepared and adopted by specialist contractors. Neither does it supersede any national and local regulatory requirements. However contractors will not be permitted to perform works on BP AzSPU sites without proper work control certification.

- Operating Management System OMS Essentials 3.2(3.2.1) and 4.5(4.5.1)
- BP Group Defined Practice for Control of Work GDP 4.5-0001

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

The scope covers defined activities of BP and Contractors at all BP AzSPU sites and installations.

### 1.3. 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.

### 1.4. 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 level 2 Risk Assessment will be undertaken to identify any additional controls and demonstrate that risks remain as low as reasonably practicable.

### 1.5. 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 Hot Work make it very clear that all personnel are obliged and have the authority to “**STOP**” the work that they consider to be unsafe.

### 1.6. 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, Deviations from Regulations and Procedures (Doc. No: AZSPU-HSSE-DOC-00011-2).

### 1.7. Document Review

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

### 1.8. SSOW Cross References

In carrying out any such Hot Work Naked Flame activity, compliance to AZSPU SSOW management system shall apply. As a minimum, reference shall be made to the following:

SSOW	
Document Number	Title of Procedure
AZSPU-HSSE-DOC-00060-2	Permit to Work
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-00002-2	BP Control of Work Standards

### 1.9. Language Facilitation

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

## 2. DEFINITIONS

Hazardous Area	Plant areas processing highly flammable materials, e.g. gas and condensate
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ALARP	As Low As is Reasonably Practical
Hot Work	Covers the use of any device, tool or equipment that produces flame, sparks, arcs, heat or hot particles having enough energy to ignite flammable or combustible materials
A combustible material	Any material that will burn, while a flammable material is a gas or liquid that is easily ignited by most low-energy heat sources.
HWNF	Hot Work Naked Flame
SSOW	Safe System of Work
SM	Site Manager
SC	Site Controller
OIM	Offshore Installation Manager
AA	Area Authority
PA	Performing authority
PTW	Permit to Work
TRA	Task Risk Assessment

### 3. ROLES & RESPONSIBILITIES

#### 3.1. Operations Manager & Engineering Authority

Provide approval for Hot Work Naked Flame in hazardous area.

#### 3.2. Site Manager (SM) / Site Controller (SC) / Offshore Installation Manager (OIM)

The Site Manager / Site Controller / Offshore Installation Manager shall be responsible and accountable for the application of this procedure in his area of responsibility, He shall ensure:

- That adequate numbers of Competent responsible persons are appointed to manage and maintain the requirements of this procedure
- That this procedure is strictly adhered to for all occasions when it is identified that hot work is to take place.
- That formal records of all SimOps risk assessments are maintained in accordance with this procedure
- To ensure the correct approvals from Operations Manager are in place for HWNF in Hazardous Area

#### 3.3. Area Authority (AA)

The Area Authority shall be responsible for ensuring that the requirements of this procedure are adhered to within his area of responsibility. He shall be responsible for ensuring:

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- That hot work activities have been risk assessed and planned
- That all persons involved in hot work activities are instructed on the requirements of risk assessment, permit to work conditions, and any risks or hazards associated with the work activity
- That regular inspection is performed on all hot work activities to confirm that conditions are suitable and sufficient and, that all personnel are in compliance with this procedure, and that good housekeeping practices are being implemented to limit or eliminate the potential for fire.
- That the Performing Authority performs Risk Assessments, and conducts Toolbox Talks associated with hot work activities.

### **3.4. Performing Authority (PA)**

The Performing authority shall ensure;

- The compliance of all personnel under their supervision with this procedure when involved in hot work activities
- That a risk assessment has been performed and a toolbox talk conducted
- That all personnel are informed of, and understand, the risks associated with the task they are performing, and any associated works that may affect their work activity
- That the activity is executed in accordance with this procedure
- That hot work activities are halted if an unsafe situation occurs.
- That good housekeeping practices are implemented at all work areas
- That work activities have been reviewed and pertinent information exchanged with all other affected parties.

### **3.5. Employees**

All employees shall be responsible for:

- Compliance with this procedure when involved in hot work activities
- Implementing good housekeeping practices
- Informing their immediate Supervisor should any unsafe situation occurs
- Awareness of other personnel and ongoing works in their area
- “STOP”ing the work that they consider to be unsafe

## **4. POLICY & CLARITY**

### **4.1. Policy**

The Azerbaijan Strategic Performance Unit (AZSPU) policy relating to Hot Work Naked Flame activities in hazardous areas is that:

- Engineering shall minimize the need for hot work and provide cost effective alternatives by careful consideration during the design phase.
- It is not permitted unless all other alternatives have been totally exhausted.
- Appropriate level of authorization has been obtained – Operations Manager & Engineering Authority (ref. 5.1)

When such work is unavoidable it is necessary to ensure that the activity is planned and activities recorded and approved demonstrating that ALARP requirements have been met. In meeting ALARP the following shall be considered:

- Record Management justification for considering naked flame work, including consideration of alternatives.
- Identify and classify the potential sources of release.
- Determine the extent of the probable risk areas.
- Carry out a formal risk assessment.

Only when these steps have been completed and with the approval of the Operations Manager may the Area Authority consider the issue of a Hot Work (Naked Flame) Permit.

If Naked Flame work is considered to be justifiable under these requirements, the guidance in this document provides a logical and safe application methodology.

#### 4.2. Clarity

Permit for Hot Work Naked Flame could involve any of the following activities but not limited to:

- Naked flames (welding, flame cutting)
- Electrical welding
- Electrical induction pre-heating, stress relieving or use of high temperature thermal calibrators (above 200°C), except in authorised workshops
- Use of portable grinders (air or electrically powered)
- Abrasive wheels
- Use of flare guns
- Use of heat shrink blowers in hazardous zones
- Use of equipment or work on pipe work or vessels contaminated or potentially contaminated with pyrophoric scale

**Note 1:** A Hot Work Naked Flame Permit is not required for operations and/or maintenance activities involving ignited gas flares or permanently mounted plant using an enclosed flame (boilers, inert gas generators, etc).

## 5. RISK ASSESSMENT

### 5.1. Key Risk Issues

It is BP policy that Hot Work Naked Flame should not be carried out in hazardous areas (Zones 0, 1 and 2) whilst the plant is online and/or under the pressure. Alternative engineering solutions should always be sought for activities that require hot work.

Normally work of this nature should be carried out during planned turnarounds when the plant can be depressurized, drained and made hydrocarbon free.

In circumstances where the OIM/Site Controller/Asset Manager considers that Hot Work Naked Flame could be safely carried out in a hazardous area and where there is no other practicable alternative, the following precautions are required:

- A level 2 Risk Assessment outlining rigorous control measures must be conducted
- Before the work commences approval must be obtained from the Operations Manager (for Georgia Exports – General Manager & HOC) and Engineering Authority

The Key Risk Issues associated with Hot Work in hazardous areas are the ignition potential to any local hydrocarbon residues or a leak, which could lead to a localised fire impact on personnel and potential escalation. Hot work may also require that local fire detection systems would need to be inhibited.

Any hot work within a zone which is not designated hazardous shall be carried out under PTW system following appropriate RA and approval process.

### 5.2. Background

These requirements are based on hazardous area classification for selection of electrical equipment. They are not identical and care should be taken not to confuse the results, which may differ significantly (The electrical techniques examines plant in normal operation while these guidelines are concerned with abnormal operation)

The requirements are based on the:

- Identification of any item from which flammable material may be released and then,
- The assessment of the extent of the risk area likely to be affected if flammable material is released

Hot work sites must be prepared in such a manner that fires or explosions cannot result from the work. To do this, it is essential to take all of the steps necessary to keep flammable and combustible materials away from hot work ignition sources. However, a combustible liquid that is confined at a temperature near its flash point becomes highly flammable when it escapes from confinement.



Preparing for safe hot work requires knowing sources of flammable and combustible materials and operating conditions, which could adversely affect conditions at the work site. The people who prepare the hot work sites also have an obligation to help protect the people who do the work against other hazards. Such hazards include hot, corrosive or toxic materials, hot atmospheres, harmful chemicals and unsafe access.

For extent of Designated Zones and their detailed use in different kind of plants (on-shore / off-shore) refer to API RP 505 and ETP 44-60.



PI 505.pdf (9 MB)

## 6. WORKPLACE PRECAUTIONS

Additional measures may be taken to reduce risks where this is considered to be reasonably practicable. Such measures may include the provision of barriers, (such as fire-blankets or tarpaulins), a habitat around the workplace, or forced ventilation. These precautions may reduce the extent of the risk area.

### 6.1. Insulated Flanges

Where flanges are covered by insulation consideration shall be given to removing the insulation to enable a satisfactory gas test.

### 6.2. Open Drains

Where it is possible for flammable materials to drain in to open drains, the drains shall be considered to be high risk unless the drain lines are isolated and the drains flushed though to remove flammable materials. After a satisfactory gas test such flushed drains may then be considered to be low risk.

## Appendix A: Checklists

These checklists are to assist the Area Authority of the precautions, which may be required in completing a Hot Work permit for naked flame work in a hazardous area. A completed copy of the appropriate checklist is to be attached to the top (performing authority) copy of the permit and filed with the permit on completion. A new checklist is required for each permit; it is not permitted to use the same checklist for continuation permits when the work lasts more than one day.

In view of the importance of monitoring flammable materials when performing naked flame hot works in hazardous areas the Area Authority may require to specify the location of any portable gas detectors. It may even be necessary to mark the required position of the detectors on site to prevent inadvertent misplacement.

### Title: Checklist prior to and During Hot Work

#### Prior to work starting (by area authority)

✓ When Noted on Permit ✗ If not required	Required (Delete as necessary)		Precaution
	Yes	No	Consult HSE Advisor over Emergency Response Plan
	Yes	No	Habitat for Hot Work (complete additional checklist)
	Mandatory		Habitat for Hot Work if a task is carried out within hazardous area
	Yes	No	Provide Forced Ventilation
	Yes	No	Provide fire blankets / Protective Screens
	Mandatory		Barrier off area
	Mandatory		Warning notices around worksite
	Mandatory		Appropriate portable fire extinguishers available at worksite
	Yes	No	Check calibration of fixed gas heads / detectors
	Yes	No	Work squad familiarisation with fire equipment
	Yes	No	Test deluge prior to start
	Yes	No	Inform CCR
	Mandatory		Carry out worksite inspections before, during and after the work
	Mandatory		Approve isolation design if required and control it
	Mandatory		Level II Risk Assessment
	Mandatory		PA prior to start of work

#### During Work (by performing authority)

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✓ When Noted on Permit ✗ If not required	Required (Delete as necessary)		Precaution
	Yes	No	Specified location for portable gas monitors
	Mandatory		Permanent Firewatcher
	Yes	No	Radio contact with control room
	Yes	No	Production operator to monitor plant pressure
	Yes	No	Ground monitor linked to fire hydrant
	Yes	No	All fire doors to/from area to be kept shut

## Appendix B: Habitats

A temporary habitat is a temporary construction used to protect personnel and/or a work site from weather and interference from surrounding processes. Temporary habitats are made from scaffold and tarpaulins, purpose made rigid boarding or similar materials and shall be of the following types:

**Type 1 Personnel/Equipment Habitat**

This type of habitat is solely for the use of protecting personnel or equipment from the weather. These can be further defined as equipment storage areas or weather shelters where no work activities are being performed.

**Type 2 Work Habitat**

This type of habitat is sheeted out to protect a worksite from surrounding plant conditions in a hazardous area. Hot Work Naked Flame may be carried out in these habitats during full area shutdowns (turnarounds) providing that the area has been proved to be hydrocarbon free and deemed unclassified under the hazardous area zone classification.

**Type 3 Positive Pressure Habitat**

This type of habitat allows Hot Work Naked Flame to be carried out in, or within 15 m of hazardous area.

**Habitats shall:**

- Be built so that an Entry Attendant can be posted outside and ensure communication with personnel inside the habitat
- Have the exit clearly marked, both inside and out. The exit shall be capable of being opened from either side. If the habitat obstructs a walkway, then suitable barriers shall be erected together with warning signs
- Have radio communication made available to the Entry Attendant whilst the habitat is in use to raise the alarm in the event of a gas detector activating or emergency situations
- The minimum number of personnel allowed in the habitat is two with one of the inhabitants acting as Firewatcher
- Have all gas cylinders located outside the habitat, and any hoses and torches used removed from the habitat at work breaks and at completion of the task
- Have a foam fire extinguisher available inside the habitat and a dry powder extinguisher externally
- Have a pressure set firewater hose with spraying nozzle laid out to the habitat from the nearest hydrant or drum and placed so that it can easily be operated by the Firewatcher from outside the habitat
- Only fire retardant material shall be used in the construction

**Positive Pressure Habitats used for Hot Work Naked Flame shall:**

- Have an entrance that maintains positive pressure
- Have the exit clearly marked, both inside and out. The exit shall be capable of being opened from either side. If the habitat obstructs a walkway, then suitable barriers shall be erected together with warning signs
- Have radio communication made available to the Entry Attendant whilst the

habitat is in use to raise the alarm in the event of a gas detector activating or emergency situations

- Have an overpressure of 5 to 20mm water gauge (can be monitored by the aid of slanting pipe fluid manometer)
- Have an exterior manometer for read-off of overpressure in the habitat
- Be built so as to minimise possible hydrocarbon leakage points in the habitat
- Pressurisation shall be by air circulation drawn from a safe zone well away from any noxious fumes taking account of wind direction and release sources. The source of air for the inlet duct shall be at least 2m inside a designated safe zone that has been declared gas free. The exhaust vent shall be ducted, from a point opposite to the inlet, to a safe, open air zone. Inlet and outlet ducts shall be protected and either marked with signs or guarded so that obstruction is prevented. The ducts and air supply hoses shall be clearly marked at both ends 'For Habitat Use – Do Not Remove'. A gas detector shall be placed at the habitat inlet for the duration of the task to ensure no ingress of toxic or flammable/explosive gases.
- Radio communication shall be made available to the Entry Attendant whilst the habitat is in use to raise the alarm in the event of a gas detector activating or emergency situations

## Precautions

Habitats that are constructed for hot work require special precautions to be considered to mitigate against risk of fire to the habitat itself. Habitats in this case will be constructed from fire retardant sheeting and additional protection will be required in the form of fire blankets in the direct vicinity of the hot work area to include floor, and in some cases walls and ceilings.

**Note:** It must be remembered that although fire retardant material should be used throughout, this material in certain circumstances can still support a fire.

It is difficult to specify exactly what specific precaution should be taken as each job will be different. The following checksheet must be used to identify what precautions have been put in place; this must be completed for each habitat.

## Checklist Prior To Habitat for Hot Work

**FACILITY:**

### APPROVAL TO PROCEED WITH THE WORKSCOPE

Area Authorities Signature:		Date:	
To be completed /signed/approved prior to the commencement of Naked Flame Work		Yes	No
1	Is the housing secure, safe, made of fire retardant material and sturdy enough to hold men and equipment?		
2	Are the entrance and exit satisfactory and are they identified?		
3	Is the inside of habitat and any combustible fabric lined with fire blankets and is the fire blanket secured to ensure that it stays in place within the habitat.		

4	Will any welding debris etc. be contained within the habitat and neither come into contact with the habitat structure nor fall out of the habitat into the external environment?		
5	Is the habitat of sufficient size for at least 2 men to carry out the job within minimum restriction?		
6	Is the inside of the habitat free from combustible material?		
7	Is the pressurising air supplied from at least 2 meters within a safe area and is the ducting properly secured?		
8.	Is the duct marked 'FOR HABITAT USE - DO NOT REMOVE'?		
9	Is the air supply to air movers marked 'FOR HABITAT USE – DO NOT REMOVE'?		
10	Is the exhaust ducting vented out of the module		
11	Can the pressure within the habitat be maintained at a pressure above atmospheric pressure? State test pressure achieved: <input type="text"/>		
12	Is the exit from the habitat of sufficient size to allow easy escape in an emergency and is there a suitable viewing port?		
13	Is the area at the pressurising duct inlet, gas free?		
14	Have all open ended pipes, not subject to work scope been blanked? (Not applicable means yes)		

#### APPROVAL OF THE HABITAT

Habitat Build Responsible Person

Signature:..... Date: .....

**Area Authority**

**Signature:** ..... **Date:** .....

**2<sup>nd</sup> Auditor**

**Signature:** ..... **Date:** .....

#### APPROVAL TO PROCEED WITH THE WORKSCOPE

SC Signature: ..... Date: .....

#### Review / Revision Log

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Revision Date	Authority	Custodian	Revision Details
09 September 2004	Alan McNulty	Esmira Akhundova	Initial Issue
15 March 2008	Alan McNulty AzSPU CH&S Manager	Abbas Islamov Central Safety TL	<p><b>Table of Contents changed as follows:</b> Section 3 is now Responsibilities; Section 4 is now Policy and Clarity.</p> <p><b>General.</b> <b>Section 1. Introduction.</b> The Section now consists of 10 new paragraphs substituting 2 replaced ones – Policy and Clarity, they are: 1.1 – Purpose; 1.2 – Scope; 1.3 – Legislation; 1.4 – Company Requirements; 1.5 – Stopping Unsafe Work; 1.6 – Deviations; 1.7 – Document Review; 1.8 – SSOW Cross References; 1.9 – Language Facilitation; 1.10 – Procedure Summary.</p> <p><b>Section 2. Definitions.</b> The previous title 'Definitions and Abbreviations' was altered to 'Definitions'. 10 new definitions were added.</p> <p><b>Section 3. Responsibilities.</b> New section consisting of 4 paragraphs defining the roles and responsibilities of key personnel.</p> <p><b>Section 7. Non-Process Flammable Materials.</b> It is deleted as making the Procedure inconsistent with its toughening as to permissibilities and deviations.</p> <p><b>Appendix B</b> Describes now the use of Habitats.</p>
04 Dec 2008	Alan McNulty AzSPU CH&S Manager	Adalat Mamedov Central Safety TL	<b>Paragraph 5.1</b> – For Georgia Exports approval must be obtained from General Manager & HOC and Engineering Authority.
16 March 2009	Yuliy Zaytsev, Safety&Compliance Systems Manager	Adalat Mamedov, Central Safety TL	Next revision date extended to 30.04.2009 due to rescheduling
23 April 2009	Yuliy Zaytsev,	Niyaz Mamedov	<b>Paragraph 3.4</b> – additional bullet is added

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18 May 2009	Safety&Compliance Systems Manager  Yuliy Zaytsev, Safety&Compliance Systems Manager	HSE Systems – Control of Work Advisor  Niyaz Mamedov HSE Systems – Control of Work Advisor	<p><b>Paragraph 4.2</b> – four additional bullets are added</p> <p><b>Appendix A</b> – additions made to the checklist</p> <p><b>The title of the Procedure:</b> is changed from previous one 'Procedure for Hot Work' to 'Procedure for Hot Work Naked Flame'</p> <p><b>Paragraph 3.1</b> – new paragraph is added 'PUL &amp; EA' which content is referred to this Procedure only.</p> <p><b>Paragraph 3.2</b> – additional bullet is added (the last one)</p> <p><b>Paragraph 4.2</b> – four bullets related to HW Spark Potential are taken out</p> <p><b>Appendix A</b> – four mandatory requirements are added to the Checklist</p> <p><b>Appendix B</b> – wording changes made to penultimate bullet in 'Positive Pressure Habitats used for HWNF requirements.</p>
02 February, 2010	Yuliy Zaytsev, Safety&Compliance Manager	Kamran Aliyev HSE Systems – Control of Work Advisor	PUL was replaced with Operations Manager for the approval of HWNF activity within hazardous area
10 December 2010	Yuliy Zaytsev, Safety&Compliance Manager	Kamran Aliyev HSE Systems – Control of Work Advisor	<p><b>Section 1 Purpose and Scope</b></p> <p>Removed reference to Getting HSE right, Golden Rules and replaced with OMS, Group requirements</p>