

**UKOPA EMERGENCY PLANNING WORK GROUP**

**NOTES OF MEETING HELD ON 6<sup>TH</sup> DECEMBER 2000**

**1. Attendance:**

J V Haswell, Chairman  
K Thomas, Huntsman ICI  
R Ellis, Shell  
K Raeburn, bp  
N Jackson, Transco  
W P Jones, UKOPA Secretary

**2. PSR 96 – Emergency Planning Issues**

**2.1 Responses to UKOPA and Transco from LA Emergency Planning Departments regarding the approach to testing of emergency plans**

JVH tabled copies of collated LA responses to both the UKOPA and Transco correspondence, together with a note summarizing the background and results prepared on behalf of the WG by JVH and WPJ. This documentation clearly demonstrates the variation in responses from LA's. The documentation was reviewed and discussed in detail. The note to be issued by the EP Work Group was reviewed and revised. It was agreed that, subject to revision of the note, the complete documentation package would be issued by the EP Work Group to HSE requesting a further meeting of the PEPF.

Action: EP Work Group

**2.2 UKOPA Response to HSE (N Briscoe) Questionnaire**

Responses to the numbered questions in the questionnaire sent by N Briscoe of HSE (Ref. UKOPA/00/0084) were prepared (included in Attachment)

Following completion of the above responses to the questionnaire, it was agreed that the UKOPA emergency plan database should be updated for the purpose of assessing costs for preparation and costs for testing. WPJ to resend database format to all EP Work Group Members for input.

Action: WPJ

It was agreed JVH and WPJ would draft the formal response from UKOPA to N Briscoe based on the prepared responses.

Action: JVH / WPJ

### 2.3 Costs

JVH to circulate a copy of the Transco cost model and cost estimates for testing of emergency plans to the EP Work Group. Members to review and comment. The cost model and cost estimates to be revised to accommodate members' comments and issued to PEPF as the UKOPA position statement.

Action: JVH

KR to forward costs of bp exercises to EP WG Members.

Action: KR

RE to forward a copy of the Cheshire costs for EP preparation to EP WG Members.

Action: RE

### 3. PSR 96 – Operator Guidance

The draft Operator Guidance circulated by HSE was reviewed. Issues relating to the responsibilities of owner, asset manager and service provider were considered. It was agreed the proposals included in the Guidance should be reviewed in detail with respect to specific situations. WPJ to contact A Thayne to request an overview at the next UKOPA meeting. JVH to write to P Siddals noting issues relating to PGTs included in the Guidance.

Action: WPJ / JVH

In general, the Work Group considered the Guidance to be a step forward but the issues are complex.

### 4. UKOPA Statement on Public Awareness

Issues relevant to a UKOPA position on public awareness and actions required to justify / qualify the position were identified as follows:

#### 4.1 **Issues Relevant to UKOPA position:**

- Pipeline safety, no injuries or deaths.
- No justified need for public awareness initiatives.
- Regular contact is made with LA's and landowners / tenants.
- Public response to pipeline leaks / noise in relation to reports of damage to pipelines.
- UKOPA would require consultation at an early stage of any legislative development.
- Consistency with Europe would need to be demonstrated.
- Consider LUP issues, impact on existing land values.

**4.2 Actions required to justify / quality UKOPA position:**

- Interpret SEVESO II requirements.
- Define UK requirements for fixed installations (COMAH).
- Review current UK nuclear transport and European pipeline practice.
- Investigate impact on operator – resources for records and public interface (i.e. maintenance of databases etc).
- Review information already supplied to LA's, landowners etc.
- Review potential for strengthening PSR Regulation 15 – Prevention of Damaged Pipelines.
- Consider statutory requirement to demonstrate use of information (one-call system).

Following discussion and agreement on the above lists of issues and actions, it was agreed that JVH/WPJ would draft a short statement indicating that:

- i) pipelines are a safe form of transport,
- ii) information is already publicly provided to stakeholder groups, particularly those groups likely to cause damage to pipelines,
- iii) therefore there is no need for a public awareness initiative.

The statement, together with the issues identified by the Work Group and actions needed for further development, will be tabled at the next UKOPA meeting with the recommendation that no action is required at this time.

Action: JVH / WPJ

WPJ will contact Lancaster University to request a copy of the report prepared for HSE on public awareness.

Action: WPJ

## **5. Any Other Business**

### **5.1 PERO Courses**

KT presented a status update on the attendance at PERO courses. There have been 50 attendees so far – 17 from Transco, 10 from Shell, 7 from bp, and 6 from Huntsman. KT noted poor response from the last two courses. WPJ to circulate the above summary for discussion at the next UKOPA meeting.

Action: WPJ

WPJ to maintain register of PERO attendees on behalf of UKOPA.

Action: WPJ

The EP Work Group considered that the course should be built into the competency requirement. This is already the case for Shell. It was agreed this recommendation should be made to the Competency and Training Work Group with a view to establishing a national standard. KT to draft a note for consideration at the next UKOPA meeting.

Action: KT

GINTO to be requested to consider inclusion in the occupational standard for pipeline engineering.

Action: JVH

### **5.2 Incident Definition**

As previously agreed by UKOPA, 4 levels of incident are defined and used in the PERO course. KT noted that the order of priority in the defined levels varies from a standard practice on some fixed sites which is leading to internal company difficulties. KT agreed to check site practice at Wilton and Runcorn, KR to check

site practice at Grangemouth, and JVH to check Transco practice. WPJ to check and circulate the original agreement to the Working Group. Based on the above, it will be recommended that UKOPA review and revised the incident definitions.

Action: KT / KR / JVH / WPJ

6. **Date of Next Meeting**

The next meeting will be held on 13<sup>th</sup> March 2001 at Tebay.

**UKOPA Response to HSE Questionnaire –  
Some Key Questions for Operators and Local Authorities**

**Questions to Operators**

- Q1. To what extent have LA costs for preparing pipeline emergency plans, in the case of a single operator, varied along its route? Are operators able to give examples of charges made by the different LA's?

*Submit Transco costs supplemented by the costs provided by other UKOPA Members.*

- Q2. In what ways have LA's sought to justify cost variation? To what extent have operators been satisfied with the justification presented, including the consistency?

*In UKOPA's view, LA's have not justified any variations in cost. Transco is progressing challenges in a number of cases.*

- Q3. To what extent are operators already involved in any of the decision making relating to emergency planning? How has this varied from LA to LA? How "successful" have operators been in influencing change?

*In terms of emergency plans, operators have had very little input or influence in modifying or challenging proposals prepared by LA's.*

- Q4. Are charging arrangements clear and consistent? To what extent do LA's document this?

*No – documentation is variable.*

- Q5. What are "typical" LA numbers operators have to deal with along the length of a pipeline?

*Number of LA's/length of pipeline:-*

*Transco LDZ Maximum = 28*

*Transco LDZ Minimum = 3*

*Trans-Pennine ethylene pipeline = 8 LA's over 240 kms*

*Wilton - Grangemouth ethylene pipeline = 6 LA's over 250 kms*

*Mosmoron – Grangemouth = 3 LA's over 40 kms*

*Teesside – Saltend = 4 La's over 150 kms*

*Stanlow – Grangemouth = 10 LA's over 412 kms*

- Q6. Have operators gained any feel from LA's of what they each propose under testing? Do operators have any feel for the extent to which live testing might be sought?

*Refer to responses received from LA's. Majority made no specific proposals.*

- Q7. Have LA's provided operators with projections on likely costs for tests? Examples would be helpful here.

*No - dependent on approach which requires clarification.*

- Q8. What has been the cost charged to pipeline operators for preparing the pipeline emergency plans? Does UKOPA have details of total figures?

*UKOPA does not have sufficient information to provide a total cost estimate at this time.*

- Q9. To what extent have operators been charged for changes and revisions to pipeline emergency plans?

*The process of revision of emergency plans is just commencing. Little information is available at this time.*

- Q10. What lessons have operators learned from their dealings with local authorities when plans were being prepared – was it a co-operative experience – did operators feel that they had any influence or a meaningful part to play in the discussions – or was it fait accompli? In the light of experience, how has this changed?

*Main lesson learnt is the significant variation to both approach and cost leading to difficulties between LA's and pipeline operators. UKOPA feels this is due to the lack of common model.*

- Q11. To what extent have emergency procedures been tested since the regulations came into force? In what ways have LA's and ES's been involved?

*Regularly – majority of cases are without the involvement of LA's. The exception is Scotland where, generally, testing is co-ordinated with the emergency plan testing.*

**Additional Observations and Comments**

Additional observations and comments relating to the questions posed in the questionnaire to LA's were also drafted:

- Q1. Which LA's etc. have pipeline emergency plans? What proportion are generic pipeline emergency plans?

*All LA's have not yet published emergency plans, however the majority are pipeline specific.*

- Q2. What has been the total charge presented to the industry for the preparation of pipeline emergency plans? Has the LGA been able to draw total costs together?

*With the exception of Scotland, there is little evidence of co-operation between LA's. There is no evidence of strategies for generic testing other than proposals by UKOPA.*

- Q4. What has been the extent of "adjacent" LA's working together – are arrangements formal (eg Memorandum of Understanding, protocols etc) or ad-hoc? Are there any notable examples?

*Pipeline operators are not aware of the activation of any emergency plan for MAHPs since the enactment of PSR 96.*

## Attachment 2

**UKOPA Response to HSE Paper  
PEPF – Strategic Aspects**

- Q10. Initial draft PSR proposed test requirements for emergency procedures and emergency plans – test requirement for emergency plans withdrawn by HSC in 95/96 – Commission recognized that more work needed to be undertaken to develop an appropriate test regime – they were anxious not to delay PSR implementation (PSR timetable linked with that for new gas legislation) – they saw the actual requirement to test provision under COMAH and PSR as effectively being the same –with more time being available under COMAH, rather than the argument being visited twice, that the requirement would be developed under COMAH and “translated” to PSR.

*The testing regime proposed for pipelines does not reflect the difference between pipelines as distributed assets and fixed installations as noted in SEVESO II. The UK regime is driving equivalents between fixed installations (COMAH) and pipelines (PSR).*

- Q11. PSR had to come into force in April 1996 to coincide with opening up the gas market to competition – delays would have produced a lacuna in health and safety legislation.

*PSR in fact include absolute duties (e.g. Regulations 8, 11, 13). UKOPA has already requested modification of the wording to remove absolute duties. A response from HSE on these issues is outstanding.*

Taking the above into account, the UKOPA EP WG supports the comments made in this paper.