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Pipelines Safety Regulations
ACoP and Guidance to support amended Regulations 25 and 26 covering Pipeline Emergency Plan Testing and Charging

Draft Outline

1 Introduction

1.1 Purpose

The purpose of a local authority emergency plan is to ensure that the response of all key partners to an accident protects the public and is co-ordinated in the most effective way. It is important that the interpretation and approach between local authorities, pipeline operators, emergency services and other key partners, such that the interface between parties is clear and allocation of responsibilities in the event of an accident is transparent, and therefore involvement in and charges for tests are clearly understood.

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As major accident hazard assets, pipelines have particular characteristics (see section 1.3) which are likely to affect the planning and resourcing of tests, and should be taken into account in testing. The Regulations require that plans are fully tested over a three year interval. The scope and scheduling of tests covering specific aspects may need to accommodate specific local requirements. Planning and co-ordinating of tests must be efficient and effective to maximise the value obtained. An auditable process for documentation of programmes, decisions and actions raised in testing of pipeline emergency plans which demonstrates compliance with the Regulations is therefore recommended.

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Properly planned and executed tests will result in costs for which justifiable charges should be made by the local authority on the pipeline operator. A transparent approach to costing and charging which is sufficiently flexible to allow for local differences in organisation, infrastructure and resources is required.

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1.2 Application

The recommendations and guidance applies to the testing of and charging for emergency plans for major accident hazard pipelines (MAHPs) as defined in PSR.

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1.3 Characteristics Particular to Pipelines

As major accident hazard assets, pipelines have particular characteristics which require consideration when planning and co-ordinating emergency plan tests. These characteristics are summarised as follows:

- Pipelines are long, linear distributed assets which are laid on 3rd party land and cross boundaries of several LAs.

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- Pipelines are generally remotely located in rural areas, are unmanned and remotely operated.
- Pipelines are buried, so the general public may not be aware of pipeline presence/ location.
- In the event of an incident, the Emergency Services are likely to be the first to be notified, and could be the first to arrive at the scene of the incident.
- Rendezvous points may not be known in advance.

The above characteristics can affect the scope, scale and scheduling of reasonable emergency plan tests, and any decisions or accommodations made should be clearly documented and reflected in the LA's 3 year schedule of tests.

1.4 Testing of Characteristics Particular to Pipelines

Based on the characteristics described above, the following aspects are of particular importance in testing of pipeline emergency plans:

- The diagnostic period – including initial reporting and mobilisation
- Communication between all agencies.
- Interface with the media and provision of information to the public.

2 Testing

2.1 Objectives

- To validate the pipeline emergency plan.
- Test characteristics particular to pipelines (ref flowchart, Appendix 1).
- Define what, how and when to test.
- Ensure the response of pipeline operators, emergency services and other key partners dovetails under the LA plan.
- Ensure that programmes, decisions and actions raised in testing pipeline emergency plans are auditable

2.2 Scope

The scope of the test should cover the characteristics particular to pipelines, and should be sufficient to validate the plan and ensure it is adequate.

The scope of a pipeline emergency plan test would normally include:

Incident identification
Process for establishing communications
Strategy for mobilisation of resources
Emergency response by all agencies

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It would not normally include physical deployment of resources, off-site support and welfare facilities, stand down and recovery and restoration, all of which are general to all emergency response requirements.

2.3 Methods

Various methods can be applied to the testing of pipeline emergency plans:

2.3.1 Communication Exercises

Communication exercises test the essential direct links, contact numbers and contact details which are required in the event of an emergency.

Communication exercises in which the direct communications links and contacts between key stakeholders are tested to confirm accuracy and\reliability are an essential.

2.3.2 Control post testing

This is the recommended method for testing communications, which is an essential component of the emergency plan and must be included in every test programme.

A control post communication exercise examines the adequacy of communications between all key players in an emergency. Testing in this way involves resources based at the posts and locations that they would take up in the event of an accident. This means that without deploying any resources, personnel work through the communications involved in the roles, decisions and actions that arise in response to an accident. The exercise may include simulating some of the potential problems that can be experienced during real incidents.

2.3.3 Table Top Exercises

Table top exercises bring together the appropriate personnel and resources in one place to work through their roles in the event of an emergency in a realistic way. Table top exercises are flexible, and can test the response to more than one of the identified hazards with very little additional effort and expense.

Control post testing is the recommended method for testing communications, which is an essential component of the emergency plan and must be included in every test programme.

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involved in the roles, decisions and actions that arise in response to an accident. The exercise may include simulating some of the potential problems that can be experienced during real incidents.

Other methods of testing are:

Internet-based Communications Software, Information Technology or Virtual Reality Systems

These systems being developed allow realistic simulations of accidents and the response to them. Such systems have the potential to enable effective and practical testing, and to enhance the scope of the exercise.

Table top testing is considered to be a relevant and effective means of testing emergency plans, and is the recommended method for testing of pipeline emergency plans.

Seminar, Workshop or Discussion Based Tests

These test exercises are aimed at informing participants about the organisation and procedures which would be invoked in response to an accident. This approach can be used to provide information on current developments, and generally focus on particular aspects of response to an accident.

Live Exercises

Live exercises involve the deployment of appropriate resources in a simulation of their actual response to an accident scenario selected from the identified hazards. This type of testing is time consuming and resource intensive, and requires careful planning to ensure maximum benefit is gained.

2.4 Planning and Co-ordinating

The test scenario and the scope and scale of the test of the pipeline emergency plan should be agreed between local authorities, pipeline operators and emergency services at an exercise planning meeting, held before the test is carried out, and developed any subsequent planning meetings required.

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The exercise planning meeting should be fully documented, as an auditable stage in the LAs management of the programme of testing duties. The aims and objectives, scope and scale of the test, including how the value of the test is maximised and how learning will be shared, should be clearly documented. The elements of the plan to be tested should be clearly defined together with the programme for testing of other aspects of the plan to demonstrate that all relevant aspects are tested over the three year interval specified in the regulations. Documentation of the exercise should be initiated, and this documentation should include the aims and objectives of each party involved, together with what they

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wish to achieve. The benefit of the test to all partners involved should considered, to ensure that the value of the test is maximised at the earliest opportunity. The LA(s) should present a reasonably accurate estimate of the cost of the proposed schedule for agreement with the operator(s).

Meetings should confirm and record agreement between the LA(s) and pipeline operator(s) regarding all aspects of the operator's involvement and charges to be allocated for the test.

Pipelines cover large distances and are likely to cross the boundaries of several LA and emergency service organisations, so tests should be planned to cover a practical geographic area which enables the interfaces between key partners to be examined.

In selecting the geographic area for and therefore participants in the test, consideration of the use of Police Authority Areas is recommended, but other locally determined areas or groups may be determined. However, the selected geographic area should take account of local requirements and enable maximum benefit to be gained.

Where possible the test should involve more than one pipeline operator. As pipelines are remotely located and their operation is unmanned, the diagnostic period may involve interfaces between the emergency services and all pipeline operators present. In addition, the most effective response to an accident may involve input from more than one pipeline operator.

Test programmes should be co-ordinated with adjacent areas to ensure reasonable involvement of the operational resources. In many cases, pipeline operators have responsibilities for pipelines which cross the boundaries of several LA and emergency service organisations. Test programmes should therefore be co-ordinated to minimise the disruption to operational resources caused by involvement in a number of different tests, and programmed with them to ensure all participating agencies to ensure there are no unrealistic burdens on any one of them in the same year, whilst nevertheless ensuring that plans are adequately tested.

2.5 Evaluation

The key stages test should be identified and reviewed in accordance with HS(G)65 principles, and each stage should be evaluated in a structured way to identify shortcomings, successes, learning points and actions. Once actions have been identified, a programme, responsibilities and timescales to address these should be established.

Debriefings following an emergency plan test should be carried out in an open and blame free atmosphere. This should allow any problems in implementing the emergency plan to be identified, the reasons for the problems to be discussed and appropriate solutions to be considered.

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Debriefings should be organised to ensure involvement by all relevant parties, and scheduled appropriately, ie

a) On the day multiagency debriefing, involving all key partners involved in the test,
b) Follow up meeting to obtain direct single agency feedback if required
c) Test report – including a summary of learning points and actions with responsibilities and timescales for completion.
d) Communication of lessons learned to other LAs and operators.

3 Charging

Before any test of a pipeline emergency plan is carried out, the local authority should reach agreement with the operator on the scale and scope of the test (see 2.4) and charges for cost recovery which will be made.

The charges that local authorities make for testing should only cover the costs of testing to make sure that plans are accurate, complete and practical. If the scope of the test is increased for other reasons, such as to provide peripheral training opportunities, then charges should not be extended to cover additional costs.

3.1 Approach

A cost model and a reasonably accurate estimate of the costs of the proposed testing should be presented to the operator(s) for agreement at the exercise planning meeting, or otherwise at the earliest opportunity and before significant costs are incurred. The cost model should include the system for recording work done by the local authority to enable costs to be recovered. Principles for handling additional essential but unplanned costs should be agreed.

3.2 Definition of Reasonable Costs:

LAs should present charges to operators as itemised, detailed statements of work done, resources used and costs incurred, in accordance with the cost model agreed at the exercise planning meeting.

Reasonable costs are considered to include arranging and attending planning meetings, preparation of exercise documentation, setting up the accommodation for the table top exercise (including room hire, catering etc), attendance at and taking part in the exercise and preparation of the exercise report.

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3.3 Charging Mechanism

In presenting a charge to an operator, the local authority should provide an itemised, detailed statement of the work done and costs incurred in accordance with the methodology agreed at the exercise planning meetings.

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A detailed invoice should be submitted to the pipeline operators which includes:

- a detailed statement of work done
- full details of personnel included in charges, including times and rates
- details of specific overheads included in rates (eg equipment, facilities,)
- Travel and expenses
- Identification of other costs submitted (eg room hire, catering, materials)

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