

Ref: UKOPA/04/0109

3<sup>rd</sup> December 2004

Ruth Franklin  
Health and Safety Executive  
HID Headquarters Unit 1E  
St Annes House  
Bootle, L20 3RA

Dear Ms Franklin,

## Consultation on Draft Guidance: Safe Isolation of Plant and Equipment

With regard to the above mentioned draft guidance, I am pleased to submit the following comments on behalf of the United Kingdom Onshore Pipeline Operators' Association:

1. There is a typing error in the last line of clause 2 of section 3.1.
2. Clause 3.1. This document is different to the previous publication in that it now encompasses all pressure ranges. Is there any particular reason to expand the pressure range into very low pressure and risk situations?
3. The spirit and intention of clause 6 of section 3.1 is supported, but it is suggested that the wording of the last sentence should be amended to start with "You should then consider a programme of ...". Alternatively, the sentence could be reworded to include the term "as far as reasonably practicable".
4. Clauses 42 and 130 regarding the requirement to physically label all points connected with any isolation process. It is reasonable to label points where they are not readily identifiable (e.g. buried) but not where they are visible.
5. Clause 80 - The document requires: "Eliminate or minimise hot work wherever reasonably practicable". This would be a change to current practice with associated significant costs.
6. Clause 89 - The document requires the use of a more secure isolation if it is "reasonably practicable to use it". There are usually different alternatives which would prove increasingly difficult, costly and complex but which still may fall within the limits of "reasonably practicable".
7. Clause 93 – It is noted and agreed that the published selection tool does not apply to pipelines, but for clarification it should be clarified that it does apply to pipeline installations.
8. Clause 95 – Figure X - Category 1 isolations include the use of single ball valve with body vent and downstream spade. We would agree that this is good practice and should be followed where ever possible. It is common practice however in the gas industry new to design and install single DBB valves with a downstream bleed and bagging off point which becomes the baseline isolation method. This has proved to provide a reliable method of isolation over many years, and it is recommended that this be included in the guidance as category 1 isolation.

Internet Address: [www.ukopa.co.uk](http://www.ukopa.co.uk) Email Address: [info@ukopa.co.uk](mailto:info@ukopa.co.uk)

9. Clause 97 - This clause directs towards the principle of adopting the highest standard of isolation available - there are always higher standards available with increasing difficulty, costs and complexity, and the guidance should recognise the balance that has to be struck.
10. Clause 159/161. This clause acknowledges that valves may not be leak-tight and allows 'passing' criteria, but Clause 161 does not allow use of 'passing' single or double valves.
11. The flow chart on page 25 needs further work as it does not allow for any category III and the "Figure Z" flow chart should be combined with the chart on page 25.
12. The draft requirements in Appendix 5 are more onerous requirements relating to isolations than have been or are the cases in the gas transportation industry. Complexity and cost would increase with no obvious benefit based on many years of operational experience.
13. Appendix 5 Paragraph 8. The selection tool has no time dimension and with flammable gases almost always results in the requirement for a positive isolation rather than industry long standing practice of proved isolation methods to complete intrusive maintenance lasting less than 1 shift (e.g. filter element changes/ regulator strip down etc.). The tool should be flexible enough to allow this distinction.

The above comments have been prepared by personnel with extensive experience of pipelines and plant isolations, and we respectfully request that they are given full and detailed consideration as part of the consultation process.

If you have any queries, or require clarification regarding any of the comments, then please do not hesitate to call me on 07832 450 233.

Yours sincerely,



W.P. Jones  
Secretary to UKOPA.