

Sent: 13 October 2007 07:40
To: phill.jones@pieuk.co.uk
Cc: Jim.Stancliffe@hse.gsi.gov.uk; Steve_Chatfield%HSE@hse.gsi.gov.uk
Subject: PSR amendments mentioned at the recent UKOPA meeting

UKOPA/07/0060

Phill

These are the two issues which I mentioned at the UKOPA meeting and which I am not convinced need to be taken forward into the consultation document. At present I don't feel that there is any justifiable need for a change in PSR and I would be interested in UKOPA's view. The issues are:

4.	Operators have a duty to ensure that the pipelines are designed, constructed and installed so as to be safety operated. There are no explicit duties place on the designers and constructors, which may cause problems following the introduction of competition in the gas supply market where the operator may be remote from the designer and constructor.	i) To ensure that designers and constructors provide the necessary information to the operator. ii) To enable new/inexperienced operators to meet their legal duties.	Excluded from the 1996 regulations following the public consultation exercise. Proposal to place a new duty on designers and others to supply information, if and when requested by the operator, was supported in principle by industry associations and was included in the 2003 draft consultation document. Key challenge: Establishing, from our experience of working with the new gas supply market, whether the	No case for change made yet. SI3 is unaware of any problems in this area and will make a preliminary approach to UKOPA on this issue.
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			<p>evidence shows that there is a problem with co-operation and information sharing between operators and designers etc. Determining whether any issues could be addressed in other ways without amending the regulations.</p>
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6.	<p>Currently there is no duty of co-operation, for the purpose of safe pipeline operation, between the pipeline operator and:</p> <ul style="list-style-type: none"> The operator of a site (either onshore or offshore) to which the pipeline connects. The person in control of a site through which a pipeline passes. 	<p>To ensure that sites where pipelines pass through or connect allow access to the pipeline operator to ensure safe operation of the pipeline (e.g. for inspection, monitoring, maintenance, inspection and during emergencies).</p>	<p>Currently pipeline operators rely on contractual agreements to gain access to connected sites and land through which their pipelines pass.</p> <p>PSR Regulation 19 requires cooperation between the pipeline operator and the offshore installation operator in regard to the ESDV.</p> <p>Key challenge: To establish whether this currently presents a problem or not to pipeline operators and whether or not they would be</p>	<p>Possible legislative change.</p> <p>SI3 is unaware of any problems in this area and will make a preliminary approach to UKOPA on this issue.</p>
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| | | | supportive of a | |
| | | | legal duty. | |
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Regards

Steve Wing
Head of Gas and Pipelines Unit
HID - SI3
0114 291 2367
VPN: 514 2367
Mobile: 07801 839848

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