

# Incident Investigation Summary

Responsible Manager: David Wright - Maintenance Delivery Gas    Neil Pullen - Gas Operations Manager  
 Incident Reference No: 2179/08/NG  
 Person Responsible for National Implementation: Russell Wilcock & Andy Malins

## Title: NRO Preparation & Approval Processes

### What happened?

In August 2008 a Non-Routine Operation (NRO) procedure to commission pipework at Wormington Compressor Station following modifications was submitted to the Gas National Control Centre (GNCC) for approval to start work. The NRO, signed by an Authorising Engineer (AE), contained errors due to recent valve movements at the site under a different NRO. These were subsequently found by the Network Controller who declined permission for the NRO to proceed. Due to slippages in the construction programme, holiday and resource conflicts arose with staff responsible for preparing the NRO. This time pressure may have contributed to a lapse in which there was a failure to positively check valve positions.

*The NRO had passed a number of stages in the checking processes which should have identified the errors in the NRO. Fortunately, the NRO errors did not result in a significant incident, however on another occasion this could have resulted in a significant incident.*

### Why Did This Happen? - Root causes:

Planning - Construction delays were a contributory factor which caused resourcing problems and placed under undue pressure to meet tight timescales.

Roles and Responsibilities The responsibility for producing an accurate NRO sits with the Authorising Engineer. In this case, the NRO author believed that the role of GNCC was to carry out an initial review of the draft document.

Organisation - There were communication issues during the holiday period and poor awareness between other parties undertaking work on site. In order to continue work on site, MDG requested that GNCC provide assistance with the re-write of the NRO. Although this enabled the work to go ahead, it was inappropriate for the MDG to request this and GNCC should refuse any similar requests in the future.

Competence - Inappropriate understanding of the importance of the responsibilities owned by SCO duty holders.

### Learning Points and Actions

**MDG & GNCC Implementation Managers to remind SCO Duty Holders of the following, as per their responsibilities under T/PMSCO/91 & 94. Action by 30 September 2009.**

1. Remind staff that a formal hand-over process shall take place when responsibility for an NRO is to be transferred to different persons acting as Authorising Engineer or Competent Person as defined by SCO.
2. To reinforce the duties imposed under SCO, i.e. that they remain paramount under all circumstances.
3. To highlight that even when there are time and commercial pressures, safety should remain paramount.
4. To request additional resourcing under capital works where the project produces significant resourcing issues for site staff.
5. Authorising Engineers shall conduct a thorough and detailed examination of the work proposal detailed in the NRO and confirm it is safe and acceptable. This duty can not be delegated. As a reminder:
  - a. This duty should be performed prior to issue to GNCC and others for review, i.e. the AE should be satisfied that the document is appropriate for the operation.
  - b. The NRO should be in an appropriate format, include referenced drawings, method statements etc., with clear contingency plans.
  - c. It should also highlight any impact on telemetry systems or on the gas supply network.

**Circulation: MDG & GNCC**

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For further information regarding this bulletin please contact Kelvin McIntosh or the Responsible Manager detailed above.