

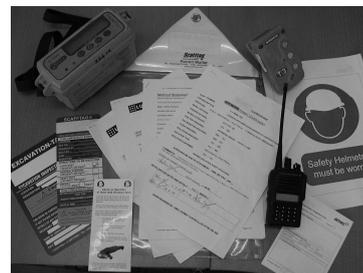
Engineering Bulletin 072

Issuing Manager/Department: - SCO Responsible Engineer J Sandford / MD Gas Manager David Wright
Approved: - Date 23/11/09

NTS Safe Control of Operations - Learning from Incidents and Near Misses

A review of NTS gas asset and permit related Compass investigations logged during 2009, has revealed that there have been a number of occasions where errors relating to both permit and non routine operations (NRO's) could have had the potential to cause an incident on the NTS. The safe control of operations procedures T/PM/SCO/91 and SCO/94 are the management system put in place to provide safe systems of work activities associated with receiving, transporting or storing of natural gas.

Whilst the vast majority of operations are carried out safely according to procedures there are some key lessons from actual incidents where our Safety Management System was not followed which could have led to serious process safety incidents. This bulletin has been developed to remind everyone of their responsibilities in an attempt to raise standards further.



Planning of Operations

1. Ensure correct paperwork is used to cover the operational activities being carried out. If in doubt ask your supervisor.
There have been instances where:
 - a. Blanket permits have been used for dissimilar activities where specific ones would have been more appropriate.
 - b. Local procedures have been used for operational sites where a non routine operational procedure (NRO) would have been more appropriate.
2. NRO's have been written and approved by the same person (see section 2.1 SCO/94 for more details).
3. Draft documents have been circulated with incorrect drawings and incorrect valve positioning – draft should not be circulated until the AE is happy with the accuracy of the document otherwise time is wasted by staff reviewing documents which are incomplete.
4. Ensure versions of the same document are controlled. There have been instances where incorrect versions in use have meant:
 - a. Valves being in a different starting position than expected
 - b. Different versions of the same procedure being held by the site/Gas Network Control Centre.
 - c. Various versions of the 'final' being in existence
5. NROs have been given final status before all signatories have approved the draft
6. AEs have not briefed the CP on the final version

During Operations

1. The Competent Person (CP) has:
 - a. Left site during the activities (see section 3.12.3 SCO/91 & section 8.1 SCO/94)
 - b. Attempted to book onto job when not physically on site (see section 3.12.3 SCO/91 & section 8.1 SCO/94)
 - c. Been identified to be the CP at two concurrent jobs many miles apart (see section 8.1 SCO/94)
 - d. Not formally handed over the Competent Person role to all relevant parties (see section 4.5.3 SCO/94 & section 3.12.7 SCO/91)
2. There has been incorrect management of start permissions and end of day reports for permit control and NRO's.

Completion of the Operations

1. Incomplete NRO's have been signed off as complete
2. There has been a failure to communicate to all relevant parties when an NRO has been completed

**For further information please contact your Line Manager Joanne Harris or Steve Reveley –
To be reviewed – 31st of July 2010**