

**Consultation on High Level Design of Petroleum Safety Framework  
Respondent Meeting  
MCS Kenny  
Wednesday, October 5<sup>th</sup> 2011**

**Location:** CER Offices  
**Time:** 14:00  
**Attended by:** Kieran Kavanagh MCS Kenny  
Eamonn Murtagh CER  
Kieran Walsh CER  
Theresa Reddy CER Consultant, GL Noble Denton

**Minutes:**

*1. Introduction & Presentation*

- The meeting was opened by CER and all attendees were introduced.
- A brief presentation on the company background of MCS Kenny and the wider *Wood Group Kenny* was provided by MCS Kenny by way of context.

*2. Discussion on MCS Kenny Response to Consultation Paper:*

A number of key specific points relating to the MCS Kenny submission were highlighted by MCS Kenny:

1. There is substantial benefit for the safety case to consider both safety and environmental risks
2. The interface between the various regulators should be clear and efficient to ensure that there is no regulatory overlap or dual approvals required which would increase the bureaucracy of the regulatory system.
3. There would be some benefit for the CER to engage with industry bodies to ensure the sharing and development of expertise. The BOEMRE, the US regulatory body for petroleum activities, was cited as a good model as they support many joint industry projects to clarify best practice with respect to major accident hazards.
4. Queried whether transportation safety should be addressed as part of safety case to cover platform to shore transport of hydrocarbons either by pipeline or ship.
5. On verification, one option is the US BOEMRE/CVA model where the independent competent body was chosen and financed by the undertaking and approved by the regulator in accordance with Code of Federal Regulations (CFR 250, Part I and J). CVA require specific verification of riser/pipeline construction/installation and design to ensure that appropriate processes are followed to ensure that good practice was

followed and verified from design through construction and installation. In such cases, a CVA organization would have to meet criteria laid out by US regulators to demonstrate their competence and experience.

6. The area of drilling pertaining to Exploration drilling and Development drilling was queried, specifically is Development Drilling covered in the safety case and how would it be dealt with?
7. The number of Safety Cases to be submitted prior to Construction commencing was deemed to be excessive.
8. Considered ALARP demonstration should focus on Major Accident Hazards but only consider plausible events. On this issue, it is considered of primary importance to fully address and mitigate risks associated with High Consequence events (i.e. those that could lead to significant loss of life or major environmental damage). In our experience, these events are often treated differently and with more priority than the lower consequence events (even with higher probability).
9. There may be some benefit in being prescriptive on certain standards for certain activities/infrastructure design. To make a safety case, one must still demonstrate the design has been performed in compliance with industry-recognized (e.g. ISO or API) codes of practice.

The CER requested further clarification from MCS Kenny on its response to question 19 i.e. expand on particular aspects of Norwegian approach that would be beneficial to consider for Ireland.