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**Re: Consultation Papers on Detailed Design of Petroleum Safety Framework**

Dear Eamonn

Thank you for inviting the RPII to provide comments on the consultation papers recently published by the CER as part of the Design Phase of the Petroleum Safety Framework. The RPII has now reviewed Document CER/12/182 (Safety Case Guidelines) and, as the competent authority responsible for all work involving Class 7 (radioactive) materials, it would appear that it will have minimum involvement in the Safety Case Guidelines.

Our review of the Guidelines would suggest that their scope is targeted at petroleum undertakings that carry on designated petroleum activities. In contrast, the RPII's regulatory activities are targeted at service companies who supply services to petroleum undertakings, rather than the petroleum undertakings themselves.

Accordingly, the RPII's involvement, if any, could come under Sections 3.2, 4.2.3 and 4.3.3 of the proposed Guidelines. In particular:

- Section 3.2 of the Safety Case requires the petroleum infrastructure to have suitable means in place to detect hazards and then achieve a safe condition. As it is likely that Class 7 radioactive materials could be brought on to a rig by external service companies, for example for the purposes of well logging, then these materials would probably come under this requirement.
- Section 4.2.3 the Safety Case requires the roles and identities of Third Party Organisations to be summarised. The RPII would suggest that both drilling and well service companies are covered under this Section which would include companies that are licensed by the RPII.

Also included in this Section, are Third Party Companies whose co-operation may be required in an emergency situation. If an incident occurs on a petroleum infrastructure involving a Class 7 material then the RPII, as the Regulatory Authority, may itself have a role under this Section.

I hope you find these comments useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Fennell', with a stylized flourish at the end.

Dr Stephen Fennell  
Manager  
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