

**ALARP/Safety Case Guidelines/Designated Petroleum Activities Consultation Papers
Respondent Meeting
Shell E&P Ireland Limited (SEPIL)
Wednesday Jan 9th 2013**

Location: CER Offices
Time: 10.00

Attended by:

Gerry Costello	SEPIL
Niall Lawlor	SEPIL
John Conroy	SEPIL
Andrea Ahern	SEPIL
Eamonn Murtagh	CER
Liam Murphy	CER
Alice Hanly	CER
John Morgan	CER Consultant, GL Noble Denton
Martin Maple	CER Consultant, GL Noble Denton

Minutes:

1. Introduction

- The meeting was opened by CER and attendees were introduced.

2. Discussion on SEPIL Response to ALARP Consultation paper:

A number of points relating to the SEPIL submission were discussed, including:

- 3.1 Overview of ALARP principle
SEPIL stated that a qualitative approach should be acceptable in addition to a quantitative approach to demonstrate that risks are managed to ALARP levels. SEPIL voiced concerns that all risks would have to be quantitatively analyzed and that some flexibility is needed in the approach.

SEPIL presented a number of slides, which outlined why SEPIL think a bowtie methodology should be acceptable for ALARP demonstration in relation to major accident hazards. The slides also outlined SEPIL's view on the disadvantages of using a purely quantitative approach to demonstrate ALARP and in relation to cost benefit analysis (as it is not possible to quantify the benefit of many risk reduction measures).

4.3.2 Applying good practice as part of ALARP assessment

SEPIL stated that it would be very onerous on the undertaking to check for modifications in updated codes/standards and then carry out an assessment on existing infrastructure on whether it is reasonably practicable to meet the new code. SEPIL stated that Shell has an internal process of notification for updates made to safety related aspects of standards.

5.3 Societal Risks

SEPIL queried why the societal risk limits proposed by the CER did not align with the HSA's limits. SEPIL highlighted the need for a consistent approach, in particular, where there is regulatory overlap.

Appendix C

SEPIL is of the view that the Gross Disproportion Factor should be aligned with the UK HSE, i.e. the Gross Disproportion Factor should be related to the risk level and a differentiation should be made between workers and the public. SEPIL stated that the CER should justify why a factor of greater than 10 is proposed and why no maximum value is set. They stated that this is not necessary and makes the cost of doing business higher.

CER clarifications

CER queried the use of qualitative research in a Cost Benefit Analysis (CBA) in section 4.5.5.2. SEPIL stated that a CBA should look at the specifics of each case with regard to using quantitative or qualitative assessment, e.g. there are many examples where it is not possible to quantify the benefit of the risk reduction measure and therefore a qualitative approach to CBA would need to be used.

3. Discussion on SEPIL Response to Safety Case Guidelines Consultation paper:

2.5 Changes to activities the subject of approved safety cases.

SEPIL requested that the CER clarify how they will manage and support 24 hour Well Work Activities. SEPIL stated that a real-time system should be used, where evidence of change is provided, to avoid unnecessary delays in the event that Well Work Activities require material changes. SEPIL suggested a different material change process could be used for Well Work and Production activities.

SEPIL suggested that only one safety case should be live at any one time. SEPIL queried the need to resubmit a Design Safety Case because of a material change to a Production Safety Case. CER stated that the need to resubmit the Design Safety Case would depend on the scale of the material change proposed.

3.2 Control and Detection

SEPIL stated that the bullet points were very prescriptive and that the points should be more general. SEPIL requested that CER remove "annulus" from bullet point six as annuli do not normally contain fail-safe isolation valves.

4.1 Purpose and Scope of Production Safety Case

SEPIL suggested that if a Safety Report is required under COMAH regulations, one Safety Case should satisfy both regulators.

5.0 Requirements for Well Notifications

SEPIL questioned the need for a Well Notification, as this would be repetition of what will be in the Well Safety Case. SEPIL stated that there should only be a single submission of a Well Safety Case. SEPIL stated that sufficient information relevant to proposed Well Work Activities would not be available more than 6 months before well spud date and submitting such a document would have little value.

CER clarifications

CER queried SEPIL's concern in section 4.2.3. SEPIL stated that it was very onerous to expect the undertaking to update a safety case every time a third party organisation changed. SEPIL stated that there would be numerous third party organisations, which would change frequently.

4. Discussion on SEPIL Response to Designated Petroleum Activities Consultation paper:

4(2)(A)

SEPIL suggested that "any hydrocarbon" be replaced with "petroleum" as the term 'hydrocarbon' is very broad.

4(3)

SEPIL suggested that "until permanently petroleum free" should be added to the end of this sentence.

3. Closing

The CER noted that the Decision Papers are due for publication February 2013.