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<b>Custodian2</b>	
<b>Box No</b>	MDL2179VOL000023
<b>DocID</b>	◀ <b>BP-HZN-2179MDL00650169</b> ▶
<b>Beg Doc No</b>	<b>BP-HZN-2179MDL00650169</b>
<b>End Doc No</b>	BP-HZN-2179MDL00650175
<b>Alternate Bates</b>	
<b>ParentID</b>	BP-HZN-2179MDL00650130
<b>Page Count</b>	7
<b>Attachment</b>	
<b>Family</b>	BP-HZN-2179MDL00650130-BP-HZN-2179MDL00650188
<b>Properties</b>	Attachment
<b>Hash</b>	a82520659a0c9b9d297860b9b30f95c1
<b>Folder ID</b>	
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### Attachment Information

<b>Attachment Title</b>	SPU OMS gaps.pptx
<b>Application</b>	Microsoft Office PowerPoint
<b>File Path</b>	\BP-020705\Sprague,Jonathan\Laptop\Sprague_John_Houston_Laptop_BP-020705.E01\Partition 1\BPP_SR3[NTFS]\[root]\Documents and Settings\SpraguJ1\Local Settings\Application Data\KVS\Enterprise Vault\32aa3184e30fd311bb680008c7b1eb02\2011_01_03_048.db:/Personal Folders/2011/01/27/SPU OMS gaps.pptx
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### Objective Coding

<b>From</b>	
<b>To</b>	
<b>CC</b>	
<b>BCC</b>	
<b>Subject</b>	2010 RPU OMS Gaps
<b>Doc Date</b>	
<b>TimeSent</b>	
<b>Date Created</b>	03/05/2011
<b>Date Last Modified</b>	01/27/2011

**TREX-06025G**

# 2010 SPU OMS Gaps – Ranking Matrix

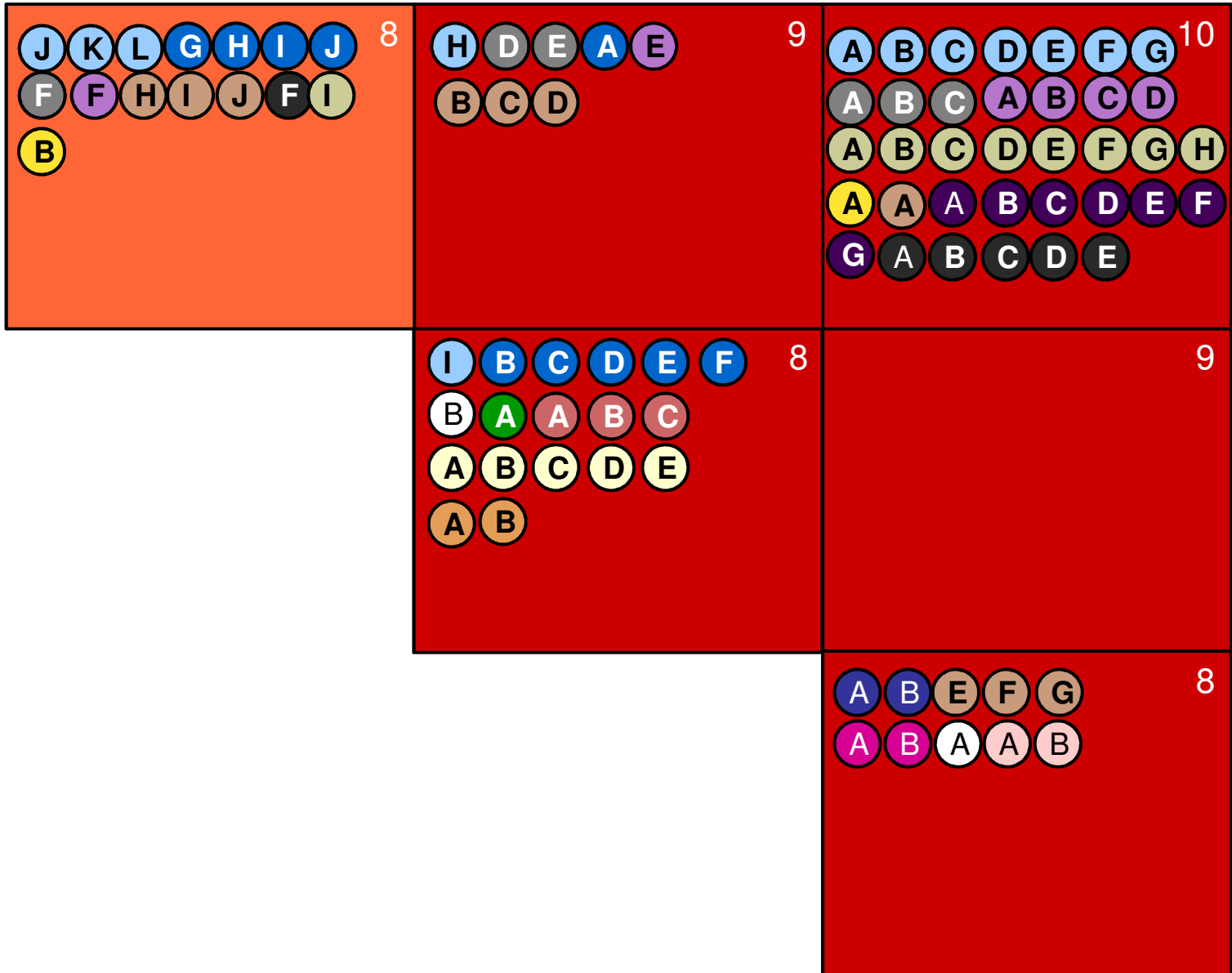


6	7	8	9	10	High (5)
5	6	7	8	9	Moderate to High (4)
4	5	6	7	8	Moderate (3)
3	4	5	6	7	Low to Moderate (2)
2	3	4	5	6	Low (1)
Low Risk + Efficiency Gaps (1)	Low to Moderate (2)	Moderate (3)	Moderate to High (4)	High (5)	<b>IMPORTANCE</b>
<b>GAP RISK TO THE BUSINESS</b>					

# OMS Gap Detail: 8,9,10



- 4.1 Procedures & Practices
- 2.2 People & Competence
- 3.1 Risk Assessment
- 3.3 Process Safety
- 7.1 Regulatory Compliance
- 4.2 MOC
- 5.4 Inspection & Maint.
- 2.5 Working w/Contractors
- 4.5 Control of Work
- 4.6 Crisis & Continuity Man & ER
- 4.4 Incident Management
- 6.6 Procurement
- 4.3 Information Mmgt & Document Control
- 6.8 CI
- 2.3 Operating Discipline
- 1.3 Planning & Control
- 1.5 Accountability



# 2010 SPU OMS Gap assessment



	Item	Description	Rank	Area
4.1 Procedures & Practices	A	Lack of Procedure review and development <ul style="list-style-type: none"> <li>•Inconsistent methodology in creating &amp; reviewing Operating procedures (HSSE/E 5,5)</li> <li>•Procedure creation review process not followed (SPU 4,5)</li> </ul>	5,5	Logistics / SPU/ HSSE
	B	No formal process for verifying the use of procedures in the field Lack of culture to use procedures in GoM	5,5	SPU
	C	Update procedures and practices	5,5	HUB (H)
	D	STP development / ETP review and adoption	5,5	HSSE/Eng
	E	Lack of guidance regarding the creation and review of operating procedures	5,5	HSSE/Eng
	F	Lack of content around IM Element 6 for procedures specifically maintenance, Norm Ops	5,5	HSSE/Eng
	G	Lack of clarity on procedural authority to sign off on (Ops, EA, HSSE)	5,5	HSSE/Eng
	H	Reference drawings and documents attached into procedures are sometimes not updated to "As Built"	4,5	Subsea
	I	Procedure standardization and control	4,4	Subsea
	J	Lack of formal / new employee training	3,5	Subsea
	K	Lack of repository for documentation for procedural admin (& training & communication)	3,5	HSSE/Eng
	L	Monitoring & tracking of procedural reviews	3,5	HSSE/Eng
2.2 People & Competence	A	Need people resourcing strategy <ul style="list-style-type: none"> <li>•Challenges filling open roles for operations positions (Subsea 5,5)</li> <li>•Lack of confidence in plan to ensure competent resources to fill and backfill (Hub MD 4,5)</li> <li>•Attrition in SPU needs to be addressed (Hub MD 4,5)</li> </ul>	5,5	Logistics / Subsea / Hub
	B	Lack of process to assess key operating risk decision makers	5,5	HSSE/Eng
	C	Need to Create / Review succession plans	5,5	Hub (H)
	D	Develop career paths for Operations as incentive for retaining & improving competency	4,5	Hub (MD)
	E	Not enough opportunity for individual growth / personal development	4,5	Hub (MD)
	F	Succession planning onshore	3,5	SPU

# 2010 SPU OMS Gap assessment



	Item	Description	Rank	Area
<b>3.1 Risk Assessment &amp; Mgmt</b>	<b>A</b>	Not all assessed risks addressed by appropriate level of management	4,5	HUB
	<b>B</b>	Lack of entity risk understanding at FLL and below	4,4	HSSE/Eng
	<b>C</b>	Lack of understanding on major hazard risk by offshore personnel	4,4	HSSE/Eng
	<b>D</b>	Inconsistent hazard identification at the asset level (MoC risk) assessment	4,4	SPU
	<b>E</b>	Communicating the risk register	4,4	SPU
	<b>F</b>	Lack of environmental expertise in risk assessment conversation	4,4	HSSE/Eng
	<b>G</b>	Lack of clarity / accountability between SPU / GPO regarding risk policy	3,5	HSSE/Eng
	<b>H</b>	Lack of annual gap assessment / audit of compliance of all GDPs	3,5	SPU
	<b>I</b>	Lack of OMS gap closure process	3,5	HSSE/ Eng
	<b>J</b>	Inconsistent hazard ID methodology at the Area level	3,5	HSSE/Eng
<b>7.1 Regulatory Compliance</b>	<b>A</b>	No comprehensive compliance listing and no process to continuously check regulatory requirement updates for subsea equipment and operations	5,5	Subsea
	<b>B</b>	Houston based HSSE Compliance tasks not documented in compliance matrix	5,5	HSSE/Eng
	<b>C</b>	Limited knowledge of documented process to identify legal and reg requirements outside of HSSE	5,5	HSSE/Eng
	<b>D</b>	Lack of accountability for identifying regulatory and legal requirements	5,5	HSSE/Eng
	<b>E</b>	Lack of documentation of accountability for performing the compliance tasks in other areas	5,5	HSSE/Eng
	<b>F</b>	Lack of clarity on employees' roles in regulatory compliance	5,5	HSSE/Eng
	<b>G</b>	Verification of compliance	5,5	HSSE/Eng
	<b>H</b>	Not using MoC process for regulatory changes or intro of new Ops controls	5,5	HSSE/ Eng
	<b>I</b>	Incorrect application of federal drinking water regs	3,5	HSSE/Eng

# 2010 SPU OMS Gap assessment



	Item	Description	Rank	Area
<b>3.3 Process Safety</b>	<b>A</b>	Lack of information to provide predictive indication of process safety issues. Lack of clear subsea Ops risk Management. Lack of alignment with Asset in risk management	5,5	Subsea
	<b>B</b>	Activities associated with hydrocarbon risks are not totally understood by Offshore Staff and Engineering	5,5	HSSE/Eng
	<b>C</b>	Lack of supportive evidence that HAZOP actions were being tracked to closure	5,5	HSSE/Eng
	<b>D</b>	Lack of implementation of GP 48-02 HAZOP ETP	5,5	HSSE/Eng
	<b>E</b>	No Operating Authority for 3.3.1	4,5	SPU
	<b>F</b>	Lack of understanding of major Hazard Risk Reduction measures and awareness	3,5	SPU
<b>4.2 MoC</b>	<b>A</b>	No robust system for SPOT (Subsea Production Operations Team) specific MOC's; Inconsistent knowledge of bizflow procedures	5,5	Subsea
	<b>B</b>	Inconsistent implementation of GoM SPU Risk policy in D&C MoC procedure	3,5	HSSE/Eng
<b>5.4 Inspection &amp; Maintenance</b>	<b>A</b>	Existing detailed Subsea equipment MTCE requirements are not linked to a strategy statement (Atlantis Audit)	5,5	Subsea
	<b>B</b>	Inspection program gap closure plans not all complete (closed only for marine, mechanical, pressure systems, topside structural).	4, 5	SPU
	<b>C</b>	Lack of closure of GP (32-30) gaps	4,5	SPU
	<b>D</b>	Lack of chemical management strategy	4,5	SPU
	<b>E</b>	No formal QA/QC system for system repairs and mods based on inspection findings	5,3	SPU
	<b>F</b>	Excursions beyond the operating envelope are not formally investigated until a pressure relieving device has operated or the SOL has been exceeded	5,3	SPU
	<b>G</b>	No long term TAR plan to establish TAR budgets Lack of control over MTCE budgets & no transparency /reporting of maintenance budgets	5,3	SPU
	<b>H</b>	QA/QC re- commissioned equipment	3,5	Subsea
	<b>I</b>	No integrated process for documenting Marine Mechanical inspection findings and tracking action closure	3,5	SPU
	<b>J</b>	No inline inspection program in place for GoM owned & operated pipelines	3,5	SPU <sub>5</sub>



# 2010 SPU OMS Gap assessment



	Item	Description	Rank	Area
<b>2.5 Working with Contractors</b>	<b>A</b>	Lack of clarity in accountabilities between HSSE/PSCM in contractor relationship management	5,5	HSSE/Eng
	<b>B</b>	Lack of standardization / documentation of the process for PSCM tendering that incorporates robust HSSE/EA and process safety	5,5	HSSE/Eng
	<b>C</b>	Lack of understanding outside of PSCM of construction management & selection process	5,5	HSSE/Eng
	<b>D</b>	Inconsistent / absent communication of applicable HSSE/EA requirements / specifications of suppliers	5,5	HSSE/Eng
	<b>E</b>	Inconsistent / absent communication of applicable HSSE/EA requirements / specifications to contractor staff	5,5	HSSE/Eng
	<b>F</b>	Lack of systematic process to verify contractor employee competency post initial verification	5,5	HSSE/Eng
	<b>G</b>	Lack of process to confirm contractor embedment of ETPs, SOPs and lessons learned	5,5	HSSE/Eng
<b>4.5 Control of work</b>	<b>A</b>	Lack of rigor in breaking of containment	5,5	HSSE/Eng
	<b>B</b>	Completion of documented risk assessments for routine tasks	5,5	HSSE/Eng
	<b>C</b>	Inconsistent task based approach in JSEA process resulting in process safety hazards / personnel safety individuals	5,5	HSSE/Eng
	<b>D</b>	Insufficient verification of core competency post-training	5,5	HSSE/Eng
	<b>E</b>	Ineffective JSEA process IA/PA competencies	5,5	HSSE/Eng
	<b>F</b>	Personnel involved in ICC's are not always signing in/out or applying personal lock For some isolations locks are applied without the ICC point list or P&ID list in hand	3,5	SPU
<b>4.6 Crisis &amp; Continuity Mgmt &amp; ER</b>	<b>A</b>	Lack of alignment of ERP exercise / drills to major risk scenarios	5,3	SPU
	<b>B</b>	Lack of verification and assurance of competencies for offshore tactical response / IMT ICS positions	5,3	HSSE/Eng
<b>4.4 Incident Mgmt</b>	<b>A</b>	Reviewing Fire protection and prevention - Training, OPRA and Detection	5,3	Hub (HM)
	<b>B</b>	Incident response capability not fully in place	5,3	Subsea

# 2010 SPU OMS Gap assessment



	Item	Description	Rank	Area
6.6 Procurement	A	No PSCM resource to handle contracts, negotiations, warranty claims, verification of terms and conditions of contracts	5,3	Subsea
	B	Contractor compliance need to use preferred suppliers Contract pricing compliance Purchase orders not being initiated	4,4	SPU
4.3 Information management and document control	A	No central repository of GoM documents Lack of awareness, definition and usage of confidential / restricted documents / info	5,3	HSSE/Eng
	B	Inconsistent application / utilization of document control procedures Lack of understanding on roles and responsibilities for reviewing and updating documents Lack of document revision clarification for documents outside controlled management system	5,3	HSSE/Eng
6.8 CI	A	No formal CI culture or organized process - conformance plan delivery requires a culture of CI	4,4	SPU
2.3 Operating Discipline	A	No formal process in place for verifying the use of procedures in the field Need to clarify expectations	4,4	SPU
	B	Need to ensure stop the job culture is fully embedded, track examples and recognize people	4,4	SPU
	C	Training on regulatory requirements / obligations needed for key staff (following gap assessments on understanding of regulations)	4,4	SPU
1.3 Planning and Control	A	No activity based planning	4,4	SPU
	B	No resource loaded SPU integrated plan	4,4	SPU
	C	Inconsistent prioritization methodology across the SPU	4,4	SPU
	D	No long term conformance plan	4,4	SPU
	E	Recast AP to include incorporating OMS gap closure as critical design element	4,4	SPU
1.5 Accountability	A	Employee adhering to financial DOA	4,4	SPU
	B	Accountabilities not clearly written and understood	4,4	SPU