

Bureau of Safety and Environmental Enforcement

Pandemic Management PBRI

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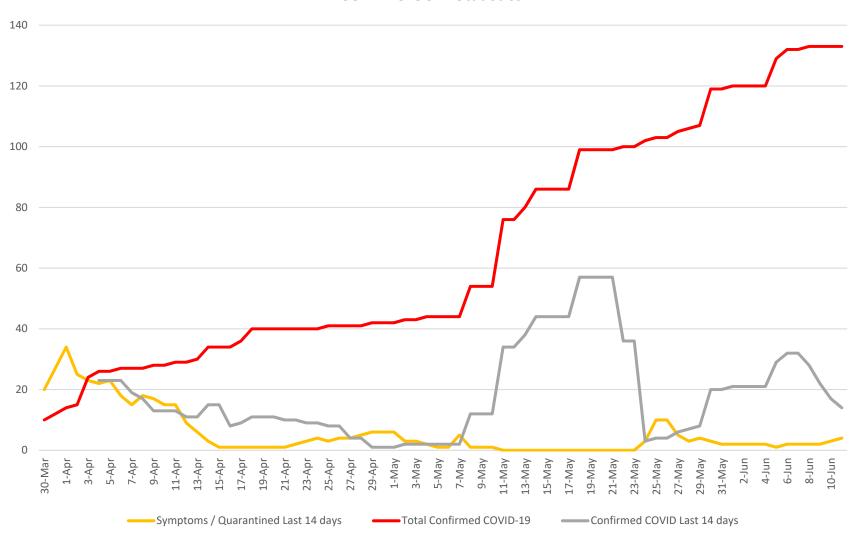
Office of Safety Management

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"To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement."

OCS COVID-19 Trend & PBRI Finding

COVID19 GOM Statistics



OCS COVID-19 Trend & PBRI Finding

One of the most valuable practice has been getting the regulatory and industry work groups sharing through a common source. OOC did a great job facilitating the weekly meetings, and getting the information to Industry in a timely fashion.

Overview of Pandemic Management PBRI

- Pandemic Management PBRI covered eight Operators
- Teams were made up of engineers and SEMS specialists
- Conducted between May 18 and May 27, 2020
- Single protocol used for each PBRI
- Disclaimer: The information submitted by the Operators for this PBRI is tied to a specific date of acquisition by BSEE. Specifically, industry's response to COVID-19 remains very dynamic and is still evolving as far as best practices.

- During the PBRI, most of the Operators involved did not have pandemic mitigation plans implemented prior to the outbreak; however, by the time of the evaluation, they had developed COVID-19 specific plans and are actively revising them to address continuously changing conditions.
- Recommendation: Operators should develop and implement a broad pandemic plan which covers general infection and communicable diseases. Pandemic management plans, at a minimum, should include measures to identify, prevent, and control contagious communicable diseases; periodic training on the plan; and the assignment of authority to appropriate persons for initiating emergency response and control of contagious communicable diseases.

- BSEE concluded by the time of the Pandemic Management PBRI, OCS Operators were highly engaged in providing and implementing effective barriers on their offshore assets to prevent the transmission of COVID-19 between personnel; however, there was some noted lack of awareness on the effectiveness of personnel protective equipment.
- Recommendation: Operators should continue to evaluate the effectiveness of barriers for the spread of communicable diseases on offshore assets. Pandemic management plans should include barriers such as protective personnel equipment and their required medical requirements, cleaning and decontamination, guidance provided by the Center of Disease Control and Prevention, reducing meetings and interactions between crew, meal service and preparation, social distancing, self isolation practices, travel to and from the facility protocol, health monitoring, etc.

- BSEE concluded each Operator evaluated was utilizing a system to aid in containing the spread and the likelihood of COVID-19 reaching offshore personnel. While some of the Operators' screenings were inclusive of temperature checks and questionnaires by medical professionals, other Operators included onshore isolation protocols or COVID-19 test screenings (PCR testing and POS Antibody testing).
- Recommendation: Operators should review the latest edition of the Offshore Operator Committee's "COVID-19 Screening and Status Codes for Offshore Energy Operations" to determine an effective framework to screen personnel traveling to offshore assets to continue and maintain a safe environment throughout any pandemic.

- During the Pandemic Management PBRI, BSEE concluded the response plans in place at the time of the PBRI were inclusive of isolation, contact tracing, medical treatment of symptoms, up to and including evacuation.
- Recommendation: Operators shall review their strategies for managing/mitigating personnel who may have contracted an infectious disease. The strategies should include facility specific isolation planning, isolation protocol to prevent ill personnel from walking throughout the facility, clear communication to offshore personnel through Human Resources and Operations staff, sanitization procedures, case management processes, return to work protocol, etc.

- BSEE concluded the majority of the plans reviewed during the Pandemic Management PBRI did not specifically address the issue on minimum manning to ensure continued safe operations.
- Recommendation: With the potential rate of transfer of communicable diseases, Operators shall review their plans and verify they include procedures that identify the scope of work at specific facilities and make an assessment on the minimum number of personnel / positions to continue to operate the facility safely and respond in an emergency situation.

- During the Pandemic Management PBRI, BSEE concluded most Operators prolonged hitches by seven (7) to fourteen (14) days to reduce the number of personnel going offshore, and Operators also limited non-essential activities in order to reduce additional personnel visiting or working on their facilities.
- Recommendation: Operators should review the personnel on board requirements during a pandemic and evaluate the potential benefit of extending hitches, single asset crew change days, and/or reducing work to essential activity only. For hitches greater than 21 days, Operators should consider the mental health of their employees and retention of focus. Operators shall utilize their management of change processes for any personnel changes.

- BSEE concluded most of the Operators had no specific protocol to provide additional barriers to critical facility roles, and essential employees were treated the same as non-essentials in terms of the at home procedures and guidance.
- Recommendation: Operators should consider identifying critical facility roles and develop processes to verify those personnel have self-isolated in accordance with the latest CDC guidance prior to traveling offshore (outside of medical care and groceries/food), are knowledgeable of social distancing practices outside of the home, are aware of symptoms to monitor, and understand eligibility to travel if they exhibit symptoms or are in close contacts with affected individuals.

- Even though Operators had requested departures and extensions through normal processes, BSEE concluded that no Operators had issues with regulatory testing due to unmanning facilities associated with COVID-19 at the time of the PBRI.
- Recommendation: Although regulatory testing was not identified as an issue in the Pandemic Management PBRI, Operators should shut in their facilities and evacuate personnel in accordance with business continuity to ensure safe operations if they are not able to conduct regulatory testing during a pandemic outbreak.

- BSEE concluded there was uncertainty amongst Operators in the validity in 14-day pre-travel quarantine due to the overall management and confirmation of the process.
- Recommendation: Operators should develop procedures to verify personnel have self-isolated in accordance with the latest CDC guidance prior to traveling offshore (outside of medical care and groceries/food), are knowledgeable of social distancing practices outside of the home, are aware of symptoms to monitor, and understand eligibility to travel if they exhibit symptoms or are in close contacts with affected individuals.

- BSEE concluded half of the Operators evaluated were not familiar with API Guidance Document 1180. BSEE OSM also believes the document is a generic pandemic response and a useful framework for laying out an evergreen pandemic response policy for those Operators that had not developed a plan prior to the COVID-19 outbreak.
- Recommendation: BSEE and API should review this report and the contents of Guidance Document 1180 and consider hosting a workshop and/or outreach with other trade organizations, such as OOC, IADC, etc., to make industry aware of the lessons learned from the COVID-19 pandemic and mitigations to manage future pandemics.

- Due to medical privacy rules, BSEE concluded most of the Operators rely on the employees to self-identify as employees at higher risk for severe illness from the virus.
- Recommendation: Once risk factors for severe illness are identified by the CDC, Operators / Employers should develop clear procedures to ensure personnel in those categories are not sent into a hazardous work environment and potentially exposed to hazardous work conditions.

- During the PBRI, BSEE concluded most Operators do not currently conduct pandemic drills or evacuation procedures based on realistic scenarios to exercise elements contained in their pandemic management plan.
- Recommendation: Operators should incorporate pandemic response and evacuation procedures drills into their Emergency Response and Control drills referenced in 30 CFR 250.1918(c).

- BSEE concluded all Operators had onshore medical professionals available to support offshore personnel to identify and respond to pandemic symptoms.
- Recommendation: No recommendation.

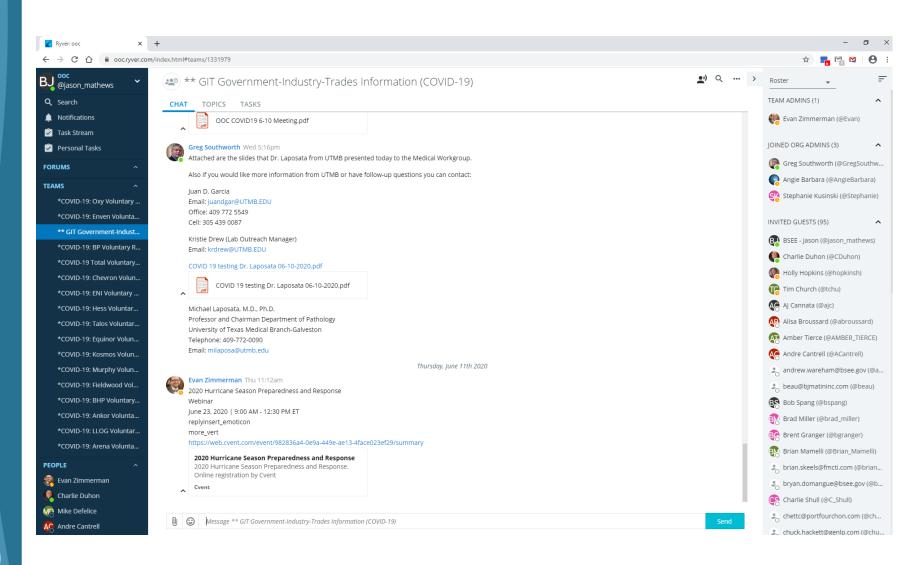
Pandemic Management PBRI - Best Practices

- Operators setting up independent employee support programs made up of operations, Incident Command, and Human Resource staff to answer questions and share information on the virus.
- Operators utilizing air filtration systems on their manned platforms to reduce the spread of viruses.
- Industry, Operators, and Regulators working together on screening codes and mitigation practices and routinely sharing information through a common source – the OOC.
- Townhall meetings with offshore personnel to communicate risks, symptoms, etc., with a medical professional onshore.
- Epidemiologists consulting and reviewing pandemic response plans

Pandemic Management PBRI - Best Practices

- Fire retardant clothing (FRC) is required on Operators' platforms, and they had to locate FRC masks.
- Operators set up Frequently Asked Question sheets on their internal website with directed emails to Incident Management Teams to answer all questions regarding personnel pandemic matters which are not easily discussed in larger settings.
- Procurement of large climate control tent at heliport to help with social distancing / testing.
- Phone application was implemented by a drilling contractor to monitor temperatures and questions during employees off time.
- While in self isolation / quarantine, Operators would set up meal deliveries.
- Crew changes are spaced out or platooned to prevent cross contamination.

Pandemic Management PBRI - Best Practices



BSEE Website: www.bsee.gov











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