

SEMS—Questions for MMS

General

1. Does the definition of “facility” in §250.1905 apply all the sections in Subpart S? If so, what are MMS expectations for each operator who contracts a MODU? Does MMS expect each operator to fully develop and implement all of the elements in the SEMS program for a “facility” he neither owns or operates? If not, what is the expectation?
2. What are MMS expectation for covering coastal and marine environmental impacts in each of the SEMS elements covered under the rulemaking? Can you give examples?

Hazards Analysis

1. How does MMS perceive the difference between a Job Hazard Analysis (JHA) and a Job Safety Analysis (JSA)? Is the JHA for each general operation or for the immediate task at hand?
2. What is MMS expectation for what triggers an internal audit and updating a facility hazard analysis?

Operating Procedures

1. What is MMS definition of “temporary operations”?

Mechanical Integrity

1. What does MMS perceive the difference between documenting the inspection and tests that have been performed and verification that inspections and tests are being performed?

Management of Change

1. What is MMS definition of “Personnel change”?
2. Does MMS support API RP75 guidance on MOC as being sufficient to direct operators in developing an effective MOC process?

Contractor Selection

1. Particularly in light of the expanded definition of “production operations” under Subpart O, are there contractor groups that MMS believes are not being addressed by the existing Subpart O requirements? If so, please identify the type of contractors not already covered under Subpart O.

Audit and Evaluation for Effectiveness

1. What does MMS envision their role as participants in an audit?
2. What does MMS envision as the difference between verifying corrective actions from an audit in §250.1910(d) and §250.1913?

OCS Performance Measure Data

1. Can you provide detailed instructions and examples for filling out MMS 131?