

Phillips, Kim (NRCAN/RNCAN)

From: Ian White <diverian68@hotmail.com>
Sent: Friday, October 27, 2017 10:00 PM
To: Phillips, Kim (NRCAN/RNCAN)
Subject: Re: Offshore Diving Stakeholder Engagement - CLOSES TODAY

Hey Kim

Followup on two items

Contaminated diving, and Competency

Contaminated Diving; Proposed wording

Any planned Contaminated diving must first go through a detailed risk assessment that identifies the hazards . The assessment shall select suitable

protective equipment and procedures in order to carry out operations safely to mitigate contaminants from contact with diving equipment and entry into the body which may include;Inhalation, Skin/Body Contact, Ingestion, Aspiration, or Ionizing radiation: Mitigating control measures to considered;

a) Elimination; Removal of the contamination without the aid of divers

b) Substitution; Utilize Remotely Operated Vehicle (ROV)

c) Engineering controls such as; isolation, enclosure, containment, limitation

If diving is to be considered procedural controls shall be put in place to minimizing exposure as low as reasonable possible including;

i)monitoring, equipment service and personal protective equipment;

ii)All reasonably foreseeable emergencies should also be considered;

iii)Prepare detailed procedures to follow and providing copies to the diving supervisor including any other relevant parties.

iv) adequate briefings of all involved personnel.

v)Monitoring for ionising radiation levels on deck such that personnel can be withdrawn to a safe distance.

vi) To minimize Hydrocarbons and condensate contamination hyperbaric hydrocarbon monitors shall be used.

Personal Protective Equipment

Personal protective equipment (PPE) is the last control measure to be considered once all other methods have been thoroughly considered.

Protective measures shall be in place to limit points of entry.

a) proper gloves and boots that seal to the suit, neck protection. This could include some form of protective neck and shoulder latex top to be worn next to the skin.

b) Use properly fitting disposable over-suits(barrier-suits) . These must be discarded and left outside the bell before entering the bell.

For Closed Bell Diving;

i)Any contaminated equipment that can be left outside the bell, i.e. bail-outs, should be left on the clump weight.

ii)Proper scrub down procedures for the diver when returning to the system.

iii)Regular change-out of helmets for cleaning and inspection.

iv)Prior to locking on the bell should be totally drained of excess water, to prevent.

For more detailed guidance refer to IMCA D 021 Guidance on Diving in Contaminated Waters

Item 26) All members of the dive team, other than the specialized diving physician, shall hold valid certificates issued by a certifying body acceptable to the Chief Safety Officer.

Proposed wording change: All members of the dive team, other than the specialized diving physician, shall hold valid certificates issued by a **Canadian** certifying body acceptable to the Chief Safety Officer.

A Canadian certifying body ensures competency standards meeting CSA Z275.4 are achieved and maintained. Canadian third-party vetting can also ensure the boards oversight is maintained through cooperation fostered by detailed MOUs enabling access to records of all diving personnel, including training, medical certificates(records), and logged experience immediately available for examination if required. In-addition it maintains the ability to revoke certification due to competency issues that may a raise from an incident. Competency is a complex issue that currently employs three full time staff at DCBC supported by 9 directors with oversight provided by the Petroleum Boards. Z275.4 Competency Standard for Diving, Hyperbaric Chambers and Remotely Operated Vehicle Operations is developed and reviewed by industry contractors and follows international best practice to establish a level of competency that reflects Canada's industry needs and safety culture. It involves the efforts of countless individuals and untold hours all to address diving competency.

How will the integrity of competency and the Chief Safety Officer be maintained? If this wording is left standing foreign based head offices of Operators and Diving Companies would be constantly making attempts to avoid Canadian certification. All sort of arguments and persuasion efforts (in all forms) would be lobbied at the Chief Safety Officer with each new project. I see it as not a matter of if, but when. Eventually a Chief Safety Office will be lobbied strongly effort that competency vetted by a Canadian based independent certifying body is ignored. Once considerations are accepted to ignore third-party vetting of competency, where does it stop? Can it be stopped? With each new project the lobbying continues broadening recognition and with it the lowering competency levels, a decline in safety culture, third world competition may follow, quality of work drops, eventually asset integrity is negatively impacted. Having wording that requires a Canadian based vetting process for competency strengthens regulators ability to regulate.

Sorry for the delay. I hope this helps.

Kind Regards'

Ian

From: Phillips, Kim (NRCan/RNCan)

Sent: October 27, 2017 4:45 PM

To: 'Ian White'

Subject: RE: Offshore Diving Stakeholder Engagement - CLOSSES TODAY

Thank you, Ian.

Have a great weekend.

Kim

From: Ian White [mailto:diverian68@hotmail.com]
Sent: Friday, October 27, 2017 4:10 PM
To: Phillips, Kim (NRCan/RNCan)
Subject: Re: Offshore Diving Stakeholder Engagement - CLOSES TODAY

Hello Kim

Sorry for the delay. I will also followup today with supporting guidance regarding contaminated diving and additional comments.

In the attachment is a copy of the Transitional Diving regulations. I have highlighted wording and provide comments where needed. Highlighted sections is guidance I recommend including in the new diving regulations in some form. These sections provide an level of detail to insure safe diving operations. Recommendations are included in comment sections. There is a duplication that can be reduced without impacting safety. I hope this helps.

Thank you for all your hard work in drafting new diving regulations.

Kind Regards

Ian

From: Phillips, Kim (NRCan/RNCan) <kim.phillips@canada.ca>
Sent: October 27, 2017 9:51 AM
To: Phillips, Kim (NRCan/RNCan)
Subject: Offshore Diving Stakeholder Engagement - CLOSES TODAY

Good morning,

Just a reminder, the comment period for the offshore diving policy intent closes today. If you haven't already done so, please forward me any feedback you would like to have considered in the ongoing development of the future regulations.

Best regards,

Kim Phillips

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From: Phillips, Kim (NRCan/RNCan)
Sent: Thursday, October 05, 2017 9:56 AM
To: Phillips, Kim (NRCan/RNCan)
Subject: Offshore Diving Stakeholder Engagement Session

Good morning,

Thank you for attending the offshore diving stakeholder session on Monday. We appreciate the valuable feedback received during the session and look forward to receiving your written comments by October 27, 2017.

For your records, please find attached the deck that was presented at the session.

Best regards,

Kim Phillips

Senior Regulatory Officer
Offshore Petroleum Management Division

Natural Resources Canada
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Phillips, Kim (NRCan/RNCan)

From: Ian White <diverian68@hotmail.com>
Sent: Friday, October 27, 2017 3:10 PM
To: Phillips, Kim (NRCan/RNCan)
Subject: Re: Offshore Diving Stakeholder Engagement - CLOSES TODAY
Attachments: Transitional regulation Review IW.pdf

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