

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

(API RP 75 Element 13) § 250.1928 Records and Documentation

A documentation system for the safety and environmental management program must be established to ensure that records and documents are maintained in a manner sufficient to implement the management system. Records or documentation may be in either paper or electronic form. The safety and environmental management program documentation does not have to be retained in a separate file or binder, but can be integrated into the company's filing or document control system. All records and documentation should be dated (with dates of revision) and readily identifiable. Audit requirements in Section 12 should be considered when formatting, distributing and filing the records and documentation related to the safety and environmental management plan.

1. **Records and documents related to the SEMS program must be maintained for a period of six (6) years, except as provided below. A copy of SEMS program documents must be maintained at the nearest onshore office.**
2. **For JSAs, the person in charge of the activity must document the results of the JSA in writing and must ensure that records are kept onsite for 30 days. Site supervisors must retain these records for two (2) years and make them available to BSEE upon request.**
3. **Management must document and date all management of change provisions as specified in § 250.1912 (API RP 75 – Element 4). These records must be maintained for two (2) years and made them available to BSEE upon request.**
4. **Management must keep injury/illness log for two (2) years and make them available to BSEE upon request.**
5. **Management must keep all evaluations completed on contractor's safety policies and procedures for two (2) years and make them available to BSEE upon request.**
6. **For Stop Work Authority (SWA), management must document all training and reviews required by § 250.1930(e). Management must ensure that these records are kept onsite for 30 days. The company must retain these records for 2 years and make them available to BSEE upon request.**
7. **For Employee Participation Plans (EPP), management must document employees' participation in the development and implementation of the SEMS program. The company must retain these records for 2 years and make them available to BSEE upon request.**
8. **Management must keep all records in an orderly manner, readily identifiable, retrievable and legible, and include the date of any and all revisions.**

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

Records

Various elements in the safety and environmental management program identify requirements for record keeping. Examples of records that should be maintained include the following:

- a. Information on applicable regulations or other information
- b. Complaint records
- c. Training records
- d. Process information
- e. Product information
- f. Inspection, maintenance and calibration records
- g. Pertinent contractor and supplier information
- h. Incident report
- i. Information on emergency preparedness and response
- j. Information on significant environmental aspects
- k. Audit results
- l. Management reviews.

Related Documentation

The following are examples of related documentation that may be used in developing or implementing the safety and environmental management program.

- a. Organizational Charts
- b. Internal Standards
- c. Operational Procedures
- d. Emergency Response Plan
- e. Emergency Evacuation Plan
- f. Oil Spill Response Plans

Record and Document Control

The company must establish and maintain procedures for controlling records and documents pertaining to SEMS that includes the following considerations:

- a. They can be located and are maintained in an orderly manner
- b. They are readily retrievable and protected against damage, deterioration or loss.
- c. They are periodically reviewed, revised as necessary and approved for adequacy by authorized personnel.
- d. The current versions of relevant documents are available at all locations where operations essential to the effective functioning of the safety and environmental system are performed.
- e. They are retained for specified periods of time.

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

- f. Obsolete documents are promptly removed from all points of issue and points of use or otherwise assured against unintended use.
- g. Any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.
- h. Confidential records and documentation are identified and properly handled.

§ 250.1929 Submitting OCS Performance Measure Data

Management must submit Form BSEE–131 on an annual basis by March 31st. The form must be broken down quarterly, reporting the previous calendar year’s data.

§ 250.1930 Stop Work Authority (SWA)

Every company employee and contractor has the right, obligation, authority, and responsibility to stop any unsafe work without repercussion. This procedure commonly known as Stop Work Authority (SWA) is intended to ensure the capability to immediately stop work that is creating imminent risk or danger. All personnel are granted the responsibility and authority, without fear of reprisal, to stop work or decline to perform an assigned task when an imminent risk or danger exists.

Imminent risk or danger means any condition, activity, or practice in the workplace that could reasonably be expected to cause:

1. **Death or serious physical harm; or**
2. **Significant environmental harm to: land; air; or mineral deposits, marine, coastal, or human environment.**

The person in charge of the project is responsible for ensuring the work is stopped in an orderly and safe manner. Individuals who receive a notification to stop work must comply with that direction immediately.

Work may be resumed when the individual with Ultimate Work Authority (UWA) determines that the imminent risk or danger does not exist or no longer exists. The decision to resume activities must be documented in writing as soon as practicable.

SWA procedures and expectations must be included in JSAs as a standard statement. Training on SWA procedures must be included as part of orientations for all new personnel who perform activities on the OCS facility. Additionally, the SWA procedures must be reviewed during all meetings focusing on safety on facilities subject to this program.

§ 250.1931 Ultimate Work Authority (UWA)

The highest ranking person (usually a site supervisor), or person in charge (PIC) of the facility has the Ultimate Work Authority (UWA). If the person with UWA is unclear, or there are multiple facilities, refer to the facility station bill and/or company organization chart for clarity.

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

Site supervisors must ensure that all personnel clearly know who has UWA and who is in charge of a specific operation or activity at all times, including when that responsibility shifts to a different individual.

In every case, if an emergency occurs that creates an imminent risk or danger to the health or safety of an individual, the public, or to the environment, the individual with the UWA is authorized to pursue the most effective action necessary in that individual's judgment for mitigating and abating the conditions or practices causing the emergency.

§ 250.1932 Employee Participation Plan (EPP)

Management has and will continue to consult with employees on the development, implementation, and modification of this SEMS program. Information regarding this SEMS plan is freely shared among facilities and offices.

The intent of the employee participation plan (EPP) is to ensure involvement by employees and their representatives in the development of the elements of the SEMS program. The employee participation plan applies to all company employees and contractors who provide services at OCS facilities.

Additionally, management shall make it policy to include affected employees in the development of such items as operating procedures, process hazard analysis, incident investigations and compliance audits.

Employee contribution to other elements of the SEMS program is performed through regularly scheduled safety meetings, training programs, or anonymously via internal company protocol.

Information sharing is a key part of any successful SEMS program. Employees have access to the entire content of this SEMS program via intranet and hard copies located at emergency control centers.

§ 250.1933 Reporting Unsafe Working Conditions

All personnel are permitted, under § 250.193, to report to BSEE any hazardous or unsafe working conditions and any possible violations of an order, regulation, or any other provision of federal law relating to offshore safety.

A notice must be placed at each OCS facility in a visible location frequently visited by personnel that contains the following reporting information:

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

REPORT AND INVESTIGATION OF POSSIBLE VIOLATIONS

Any person may report to BSEE a hazardous or unsafe working condition on any facility engaged in OCS activities, and any possible violation or failure to comply with:

1. Any provision of the Act,
2. Any provision of a lease, approved plan, or permit issued under the Act,
3. Any provision of any regulation or order issued under the Act, or
4. Any other Federal law relating to safety of offshore oil and gas operations.

To make a report a person is not required to know whether any legal requirement has been violated.

When BSEE receives a report of a possible violation, or when a BSEE employee detects a possible violation, BSEE will investigate according to BSEE procedures and notify any other federal agency for further investigation, as appropriate.

BSEE investigations of possible violations may include:

1. Conducting interviews of personnel;
2. Requiring the prompt production of documents, data, and other evidence;
3. Requiring the preservation of all relevant evidence and access for BSEE investigators to such evidence; and
4. Taking other actions and imposing other requirements as necessary to investigate possible violations and assure an orderly investigation.

Reports should contain sufficient credible information to establish a reasonable basis for BSEE to investigate whether a violation or other hazardous or unsafe working condition exists.

To report hazardous or unsafe working conditions or a possible violation contact BSEE by:

Phone at 1-877-440-0173 (BSEE Toll-free Safety Hotline),

Internet at www.bsee.gov, or

Mail to: U.S. DOI/BSEE, 1849 C Street NW., Mail Stop 5438, Herndon, VA 20240 Attention: IRU Hotline Operations.

When a possible violation is reported,
BSEE will protect a person's identity to the extent authorized by law.

Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

Appendix A

30 CFR 250.1900-1933, Subpart S-Safety and Environmental Management Systems (SEMS II)

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Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

Appendix B

API RP 75, Safety and Environmental Management Program (SEMP)

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Safety and Environmental Management Systems (SEMS)	Revision Number:	1
	Revision Date:	2/16/14

Appendix C

Safety and Environmental Management Systems (SEMS II), Audit Questionnaire

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