



COS SEMS Audit Protocol-Checklist

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Disclaimer

The Code of Federal Register 30 CFR Part 250 - *Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Safety and Environmental Management Systems Final Rule* (SEMS) requires each “operator (a lessee, the owner or holder of operating rights, or the designated operator)”¹ on the Outer Continental Shelf of the US to develop and implement a SEMS plan. SEMS clearly states that operators will be held accountable for complying with this new regulation, it is understood that operators cannot do this alone. Contractors, defined in SEMS as “anyone performing work for the lessee,”² must also be aware of the regulation and be prepared to support operators in their efforts.

The purpose of this document is to assist operators and contractors in assessing readiness to meet SEMS requirements including the required contents of an operator’s SEMS plan. This tool represents the collective view of professionals from the oil and gas industry that have reviewed the SEMS rule and identifies where contractors / facility owners need to take specific actions and/or supply documents or records in support of an operator’s SEMS plan.

DISCLAIMER: Because each operator’s SEMS plan will be different, these documents are generalized and are published to facilitate the broad variety of possible approaches. The formulation and publication of these documents is not intended in any way to inhibit anyone from using any other practices. Users of these documents should not rely exclusively on the information contained in the COS SEMS Toolkit. Sound business, scientific, engineering, safety and legal judgment should be used in employing the information contained herein, and these documents cannot provide specific guidance or assure compliance with any given operator’s SEMS plan.

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- Each operator’s SEMS plan will be different. Mapping safety and environmental management policies, procedures, or operations using this document does not guarantee compliance with an operator’s SEMS plan.
- These documents do not represent the views of any one company or organization, and are not approved or endorsed in any way by API or COS. Likewise the listing of a company or organization as providing a participant to the development process does not signify that company’s or organization’s endorsement of this document.
- Under BSEE’s SEMS regulations, an operator has responsibility for complying with SEMS. Contractors are not required to have a SEMS plan. Any references to contractor actions indicated in this document mean that the contractor’s participation in the SEMS process may be required to help the operator comply with SEMS.
- Not every action suggested for contractors will be required of every contractor. Subject to existing contractual obligations, contractors must determine the applicability of each suggested action to their business.

¹ Federal Register/Vol. 75, No. 199/ Friday, October 15, 2010/Rules and Regulations pg. 63610 / UPDATED Federal Register/Vol.78, No. 66/Friday, April 5, 2013/Rules and Regulations pg. 20423

² §250.1914(a) “A contractor is anyone performing work for the lessee. However, these requirements do not apply to contractors providing domestic services to the lessee or other contractors. Domestic services include janitorial work, food and beverage service, laundry service, housekeeping, and similar activities.”

- Although a contractor may have a SEMS plan in place, 30 CFR 250 does not require contractors to have a SEMS plan.

The developers of these documents invite contractors and operators alike to use them as tools for helping with evaluation of a company's readiness to assess SEMS requirements. They may also assist in identifying gaps in a company's current policies, procedures or documentation.

Element I: General

ID	Question	Reference
10	Has a safety and environmental management system (SEMS) been (a) developed? Y__N__N/A__ (b) implemented? Y__N__N/A__ (c) maintained? Y__N__N/A__	RP 75 1 §250.1900
20	REMOVED AND RESERVED – NO QUESTIONS ADDED	
30	Has management ensured that goals and performance measures are established for the SEMS?	RP 75 1 - 1.2.2(b) §250.1909(a)
40	Do the safety and environmental objectives, goals and performance measures address the following: (a) a commitment to continuous improvement? Y__N__N/A__ (b) responsibilities for achieving objectives and goals at each relevant function and level of the organization? Y__N__N/A__ (c) specific means and timeframe by which the goals and objectives are to be achieved? Y__N__N/A__ (d) performance measures established to gauge safety and environmental performance? Y__N__N/A__ (e) an internal program established and implemented to communicate the safety and environmental objectives, goals and performance measures? Y__N__N/A__	RP 75 1 - 1.2.3
50	Has a management representative been appointed that is responsible for establishing, implementing and maintaining the SEMS?	RP 75 1 - 1.2.2(c) §250.1909(b)
60	Have management representatives been designated who are responsible for reporting to management on the performance of the SEMS program?	RP 75 1 - 1.2.2(d) §250.1909(c)
70	Is the SEMS program reviewed at least annually, to determine if it continues to be suitable, adequate and effective?	RP 75 1 - 1.2.2(e) §250.1909(d)
80	Did the SEMS program review document the need for changes to policy, objectives and other elements of the SEMS based on: (a) audit program results? Y__N__N/A__ (b) changing circumstances? Y__N__N/A__	RP 75 1 - 1.2.2(e) §250.1909(d)

ID	Question	Reference
	(c) a commitment to continual improvement? Y__N__N/A__	
90	Has a written description of the safety and environmental policies been developed and endorsed by management?	RP 75 1 - 1.2.2(f) §250.1909(e)
100	Has a written description of the organizational structure been developed and endorsed by management?	RP 75 1 - 1.2.2(f) §250.1909(e)
110	Does the written description of the organizational structure define the responsibilities, authorities and lines of communication required to implement the SEMS program?	RP 75 1 - 1.2.2(f) §250.1909(e)
120	Are personnel utilized with expertise in (a) identifying safety hazards? Y__N__N/A__ (b) environmental impacts? Y__N__N/A__ (c) optimizing operations? Y__N__N/A__ (d) developing safe work practices? Y__N__N/A__ (e) developing training programs? Y__N__N/A__ (f) investigating incidents? Y__N__N/A__	RP 75 1 - 1.2.2(g) §250.1909(f)
130	Are facilities designed, constructed, maintained, monitored and operated in a manner compatible with applicable (a) industry codes? Y__N__N/A__ (b) consensus standards? Y__N__N/A__ (c) generally accepted practices? Y__N__N/A__ (d) compliance with applicable government regulations? Y__N__N/A__	RP 75 1 - 1.2.2(i) §250.1909(g)
140	Is management of safety hazards and environmental impacts an integral part of the (a) design? Y__N__N/A__ (b) construction? Y__N__N/A__ (c) maintenance? Y__N__N/A__ (d) operation? Y__N__N/A__ (e) monitoring of each facility? Y__N__N/A__	RP 75 1 - 1.2.2 (j) §250.1909(h)
150	Have you ensured that Contractors are familiar with the SEMS program?	RP 75 1 - 1.1.2
160	Have the contractors established safety and environmental policies and practices that are consistent with your SEMS program?	RP 75 1 - 1.1.2
170	Have procedures been established for the internal communication of safety and environmental information?	RP 75 1 - 1.2.4
180	Do the internal communication procedures address communication of SEMS information between the various levels and functions within the organization?	RP 75 1 - 1.2.4(a)

ID	Question	Reference
190	Have procedures been established for the external communication of safety and environmental information?	RP 75 1 - 1.2.4
200	Do the external communication procedures address receiving, documenting and responding to communications from external interested parties?	RP 75 1 - 1.2.4(b)
210	Do the external communication procedures address communicating information relating to significant safety and environmental events as well as the SEMS program?	RP 75 1 - 1.2.4(c)
220	Has a procedure been established for identifying the environmental impacts of its activities, products or services?	RP 75 1 - 1.3.1.2
230	Has a procedure been developed for determining those environmental impacts which can be expected to have or can have significant impact on the environment?	RP 75 1 - 1.3.1.2
240	Does the environmental impacts analysis, at a minimum, include toxics, flammables, and other materials as identified in RP 75, Sections 1.3.1.3 and 1.3.1.4?	RP 75 1 - 1.3.1.2
250	Has a process / procedure been established and implemented for monitoring changes to government regulations?	RP 75 1 - 1.5.2

Element II: Safety and Environmental Information

ID	Question	Reference
260	Does the SEMS program require that a compilation of safety and environmental information be developed and maintained for the facility?	RP 75 2 - 2.1 §250.1910(a)
270	Does the SEMS program safety and environmental information include all program RP 75 elements?	RP 75 2 - 2.1 §250.1910(b)(1)
280	Does the SEMS program safety and environmental information include process design information including, as appropriate, a simplified process flow diagram and acceptable upper and lower limits, where applicable, for items such as temperature, pressure, flow and composition?	RP 75 2 - 2.2.1 §250.1910(b)(2)
290	Does the SEMS program have a written requirement that (a) process design information be retained for the life of the facility and available? Y__N__N/A__ (b) mechanical design information be retained for the life of the facility and available? Y__N__N/A__ (c) facilities design information be retained for the life of the facility and available? Y__N__N/A__	RP 75 2 - 2.1
300	If the original process design information no longer exists, has information been developed in conjunction with a hazards analysis in sufficient detail to support the analysis?	RP 75 2 - 2.2.2
310	If the SEMS program allows common documentation for simple or nearly identical facilities within the same area, (a) does it require that site specific differences be addressed? Y__N__N/A__ (b) does the documentation address site-specific differences in common information and facilities? Y__N__N/A__	RP 75 2 - 2.1
320	Does the process design information include, as appropriate, a simplified process flow diagram?	RP 75 2 - 2.2.1 §250.1910(b)(2)
330	Does the process design information, as appropriate, address acceptable upper and lower limits for items such as temperature, pressure, flow and composition, where applicable?	RP 75 2 - 2.2.1 §250.1910(b)(2)
340	Does the process design information include, where available, design material and energy balances?	RP 75 2 - 2.2.1
350	Does the SEMS program safety and environmental information, including mechanical design information, include, as appropriate: (a) P&ID diagram? Y__N__N/A__ (b) electrical area classifications? Y__N__N/A__	RP 75 2 - 2.3.1 §250.1910(b)(3)

ID	Question	Reference
	(c) equipment arrangement drawings? Y__N__N/A__ (d) design basis of the relief system? Y__N__N/A__ (e) description of alarm systems? Y__N__N/A__ (f) description of shutdown systems? Y__N__N/A__ (g) description of interlock systems? Y__N__N/A__ (h) description of well control systems (i) design basis for passive and active fire protection features and systems? Y__N__N/A__ (j) design basis for emergency evacuation procedures? Y__N__N/A__	
360	Does the mechanical and facility design for Mobile Offshore Units (MOU) conform to the applicable requirements of the flag state and classification society?	RP 75 2 - 2.3.2
370	Is the mechanical and facility design consistent with the applicable consensus codes and standards in effect at the time the design was prepared or, in the absence of such codes and standards, recognized and generally accepted engineering practices, as well as the applicable governmental regulations?	RP 75 2 - 2.3.3
380	If the mechanical design is not consistent with applicable consensus codes and standards, or when a hazard analysis or other review reveals that existing equipment is designed and constructed in accordance with consensus codes, standards, or practices no longer in general use, is suitability of design for intended use documented?	RP 75 2 - 2.3.3
390	If the original mechanical design information no longer exists, has suitability of equipment design for intended use been verified and documented?	RP 75 2 - 2.3.4
400	Does the design and installation of new facilities and major modifications include consideration of human factors?	RP 75 2 - 2.3.5

Element III: Hazards Analysis

ID	Question	Reference
410	Does the SEMS require that a hazards analysis be performed for the facility, in order to identify and evaluate the likelihood and consequences of uncontrolled releases and other safety or environmental incidents?	RP 75 3 - 3.1
420	Has a hazards analysis (facility level) been developed and implemented for all of your facilities and activities identified or discussed in your SEMS?	RP 75 3 – 3.1 §250.1911
430	Have JSA(s) (operations/task level) been developed and implemented for all of your facilities and activities identified or discussed in your SEMS?	RP 75 3 – 3.1 §250.1911
440	Are the hazards analyses appropriate to the complexity of the operation and do they identify, evaluate and manage the hazards involved in the operation?	RP 75 3 §250.1911(a)
450	Do hazards analyses address the following: (a) hazards of the operation? Y__N__N/A__ (b) previous incidents related to the operation being evaluated, including any incident in which an Incident of Noncompliance or a civil or criminal penalty was issued? Y__N__N/A__ (c) control technology applicable to the operation being evaluated? Y__N__N/A__ (d) a qualitative evaluation of the possible safety and health effects on employees, and potential impacts to human and marine environments, which may result if the control technology fails? Y__N__N/A__ (e) human factors? Y__N__N/A__	RP 75 3 - 3.1 §250.1911(a)(1)
460	Are current analyses for each operation documented and maintained for the life of the operation at the facility? (NOTE: a complete hazards analysis report, including updates, should be kept on file for the life of the facility)	RP 75 3 - 3.6 §250.1911
470	Have the analyses been updated when an internal audit is conducted to ensure that the analyses are consistent with the current operations on the facility?	RP 75 3 - 3.4 §250.1911
480	Have locations with clusters of structurally interconnected platforms been analyzed together?	RP 75 3 - 3.2.1
490	For hazard analyses performed on new or modified facilities, is special consideration given to the following: (a) previous experience with a similar facility? Y__N__N/A__ (b) design circumstances, such as changes in the design team or the design itself, after the project is underway? Y__N__N/A__	RP 75 3 - 3.3.2

ID	Question	Reference
	(c) unusual facility location, design or configuration, equipment arrangement, or emergency response considerations? Y__N__N/A__ (d) any findings that need to be brought to resolution before startup or that require immediate attention should be clearly identified? Y__N__N/A__ (e) operating procedures and practices, including simultaneous operations guidelines? Y__N__N/A__	
500	Has a program been established for the periodic review and updating of hazards analyses based on priority (with typical review intervals ranging between 5 years for high-priority facilities and 10 years for low-priority facilities)?	RP 75 3 - 3.4
510	Are hazards analyses performed by (a) persons knowledgeable in engineering, operations, design, process, safety, environmental, and other specialties as appropriate? Y__N__N/A__ (b) person(s) with experience in the operations being evaluated? Y__N__N/A__ (c) at least one person proficient in the hazards analysis methodologies being employed? Y__N__N/A__ (d) for assessment teams consisting of only one person, that person was not involved in the original design or modification? Y__N__N/A__	RP 75 3 - 3.5 §250.1911(a)(2)
520	Have the findings of a current (initial or periodic) hazard analysis been presented in a written report that describes the hazards identified and recommended mitigation actions?	RP 75 3 - 3.6
530	Have hazards analysis recommendations been resolved and were the resolutions documented?	RP 75 3 - 3.6 §250.1911(a)(3)
540	Does the SEMS require the communication of all identified hazards and follow-up actions to appropriate personnel?	RP 75 3 - 3.6
545	If you have simple and nearly identical facilities, such as well jackets and single well caissons, and if you have elected to perform a single hazards analysis to fulfill the requirements, has verification been conducted that any site-specific deviations are addressed in each of your SEMS program elements?	§250.1911(a)(4)
550	If the hazard analysis stipulates action or resolution before startup, or when immediate action is required, does the SEMS require that such action is taken or that the hazardous conditions are otherwise remedied?	RP 75 3 - 3.6
560	Does your SEMS program ensure that JSA are prepared, conducted and approved for OCS activities identified or discussed in your SEMS program? NOTE: The JSA is a technique used to identify risks to personnel associated with their job activities. The JSAs are also used to determine the appropriate mitigation measures needed to reduce job risks to personnel	§250.1911(b)

ID	Question	Reference
565	Does your SEMS program require that JSA include all personnel involved with the job activity?	250.1911(b)
570	REMOVED AND RESERVED – NO QUESTIONS ADDED	*moved to 250.1928(b)
580	Does your SEMS program require that JSAs identify, analyze and record (a) the steps involved in performing a specific job? Y__N__N/A__ (b) the existing or potential safety, health and environmental hazards associated with each step? Y__N__N/A__ (c) the recommended action(s) and/or procedure(s) that will eliminate or reduce these hazards, the risk of a workplace injury or illness, or environmental impacts? Y__N__N/A__	§250.1911(b)(1)
590	Does your SEMS program require the immediate supervisor of the crew performing the job onsite: (a) conduct the JSA? Y__N__N/A__ (b) sign the JSA? Y__N__N/A__ (c) ensure that all personnel participating in the job understand and sign the JSA? Y__N__N/A__	§250.1911(b)(2)
593	Does your SEMS program require the individual you designate as being in charge of the facility approve and sign all JSAs before personnel start the job?	§250.1911(b)(3)
595	If your SEMS program allows that a JSA for an individual recurring job is not required (where the parameters of the recurring jobs do not change), does your SEMS program require the person in charge of the job to consider, but not be limited to, the following parameters in making this determination: a) changes in personnel? Y__N__N/A__ b) procedures? Y__N__N/A__ c) equipment? Y__N__N/A__ d) environmental conditions associated with the job? Y__N__N/A__	250.1911(b)(4)
597	Does your SEMS program require you to verify that all personnel, including contractors, are trained in accordance with 250.1915 prior to performing a job?	250.1911(c) 250.1915

Element IV: Management of Change

ID	Question	Reference
600	Does the SEMS establish and implement written management of change (MOC) procedures for modifications associated with the following: (a) equipment? Y__N__N/A__ (b) operating procedures? Y__N__N/A__ (c) personnel changes (including contractors) whenever there is a change in the organization or in personnel that supervise or operate the facility? Y__N__N/A__ (d) materials? Y__N__N/A__ (e) operating conditions? Y__N__N/A__	RP 75 4 - 4.2 §250.1912(a)
610	If this facility is a new acquisition or under new management, has a screening level review been conducted and has the facility incorporated the new organization’s safety and environmental management program?	RP 75 4 - 4.3
620	Is there a plan in place to review all changes prior to implementation?	§250.1912(c)
630	Do the written management of change (MOC) procedures address the following issues, as applicable: (a) the technical (process and mechanical design) basis for proposed changes? Y__N__N/A__ (b) impact of a change on safety, health, and the coastal and marine environments, including as appropriate a hazards analysis? Y__N__N/A__ (c) the effects of proposed changes on separate but unrelated upstream or downstream facilities and on area wide emergency plans? Y__N__N/A__ (d) necessary time period to implement changes? Y__N__N/A__ (e) management approval procedures for changes? Y__N__N/A__ (f) necessary revisions of the operating procedures, safe work practices, and training program? Y__N__N/A__ (g) communication of a proposed change and the consequences of that change to appropriate personnel? Y__N__N/A__ (h) the necessary revisions of the safety and environmental information? Y__N__N/A__ (i) the duration of the change, if temporary? Y__N__N/A__	RP 75 4 - 4.4 §250.1912(d)
640	Are employees, including contractors, whose job tasks will be affected by a change (a) informed of the change prior to startup of the process or affected part of the operation?	RP 75 4 – 4.4(d) §250.1912(e)

ID	Question	Reference
	Y__N__N/A__ (b) trained in the change prior to startup of the process or affected part of the operation? Y__N__N/A__	
650	If an MOC results in a change in the operating procedures of the SEMS program, are such changes documented and dated?	§250.1912(f)

Element V: Operating Procedures

ID	Question	Reference
660	Does the SEMS program include requirements for written facility operating procedures designed to enhance efficient, safe, and environmentally sound operations? Y__N__N/A__ Are human factors associated with format, content, and intended use of the operating procedures considered? Y__N__N/A__	RP 75 5 - 5.1
670	Have written operating procedures been developed and implemented that provide instructions for conducting safe and environmentally sound activities involved in each operation addressed in your SEMS program?	RP 75 5 - 5.1 §250.1913(a)
680	Have written operating procedures been developed and implemented which include the job title and reporting relationship of the person or persons responsible for each of the facility's operating areas?	RP 75 5 - 5.2(a) §250.1913(a)
690	Do the facility's written operating procedures include instructions that are consistent with the safety and environmental information and address the following: (a) initial startup? Y__N__N/A__ (b) normal operations? Y__N__N/A__ (c) all emergency operations (including, but not limited to, medical evacuations, weather-related evacuations and emergency shutdown operations)? Y__N__N/A__ (d) normal shutdown? Y__N__N/A__ (e) startup following a turnaround, or after an emergency shutdown? Y__N__N/A__ (f) temporary operations? Y__N__N/A__ (g) simultaneous operations? Y__N__N/A__ (h) bypassing and flagging out-of-service equipment? Y__N__N/A__ (i) operating limits, and safety and environmental consequences of deviating from equipment operating limits and steps required for correcting or avoiding this deviation? Y__N__N/A__ (j) properties of, and hazards presented by, the chemicals used in the operations? Y__N__N/A__ (k) precautions to be taken to prevent the exposure of chemicals used in operations to personnel and the environment? (The precautions must include control technology, personal protective equipment, and measures to be taken if physical contact or airborne exposure occurs.) Y__N__N/A__ (l) any special or unique hazards? Y__N__N/A__	RP 75 5 - 5.2(b-d) §250.1913(a)

ID	Question	Reference
	(m) continuous and periodic discharge of hydrocarbon materials, contaminants, or undesired by-products into the environment restricted by governmental limitations? Y__N__N/A__ (n) raw materials used in operations and the quality control procedures used in purchasing these raw materials? Y__N__N/A__ (o) control of hazardous chemical inventory? Y__N__N/A__ (p) impacts to the human and marine environment identified through a hazards analysis? Y__N__N/A__ (q) any lease or concession stipulations established by the recognized governmental authority? Y__N__N/A__	
700	Are the facility's written operating procedures reviewed as part of the facility's MOC process when changes are made in facilities?	RP 75 5 - 5.3
710	Are the facility's written operating procedures accessible to all employees involved in the operations?	§250.1913(b)
720	Are the facility's written operating procedures reviewed at the conclusion of specified periods and as often as necessary to verify that they reflect current and actual operating practices?	RP 75 5 - 5.3 §250.1913(c)
730	Does the frequency of review of the facility's written operating procedures correspond to the degree of hazard presented?	RP 75 5 - 5.3 §250.1913(d)
740	Is the review of, and any changes made to, the facility's written operating procedures documented and communicated to appropriate personnel?	RP 75 5 - 5.3 §250.1913(e)

Element VI: Safe Work Practices

ID	Question	Reference
750	Does the SEMS establish and implement safe work practices designed to minimize the risks associated with operations, maintenance, modification activities, and the handling of materials and substances that could affect safety or the environment?	RP 75 6 - 6.1 §250.1914
760	Are human factors considered in the development of safe work practices?	RP 75 6 - 6.1
770	Do safe work practices for all personnel, including contractors, provide for the safe conduct of operating, maintenance, and modification activities, including simultaneous operations?	RP 75 6 - 6.2
780	Where applicable, do specific safe practices cover the following: (a) opening of pressurized or energized equipment or piping? Y__N__N/A__ (b) lockout and tagout of electrical and mechanical energy sources? Y__N__N/A__ (c) hot work and other work involving ignition sources? Y__N__N/A__ (d) confined space entry? Y__N__N/A__ (e) crane operations? Y__N__N/A__	RP 75 6 - 6.2
790	Is a work authorization or permit-to-work system implemented for tasks involving the following: (a) opening of pressurized or energized equipment or piping? Y__N__N/A__ (b) lockout and tagout of electrical and mechanical energy sources? Y__N__N/A__ (c) hot work and other work involving ignition sources? Y__N__N/A__ (d) confined space entry? Y__N__N/A__	RP 75 6 - 6.2
800	Does the permit-to-work system include provisions for adequate communication of work activities to shift change and replacement personnel?	RP 75 6 - 6.2
810	Are contractors included in these work authorizations or permit-to-work communications of work activities, regarding shift change and replacement personnel, if they will perform the work or may affect or be affected by it?	RP 75 6 - 6.2
820	Do safe work practices meet the most current provisions of any applicable federal, state, or local regulations or flag state requirements?	RP 75 6 - 6.2
830	Have materials specifications, inventories, separation, confinement, and handling of toxic or hazardous materials that can affect safety and environmental protection been determined, documented, and communicated to appropriate personnel?	RP 75 6 - 6.3
840	Does the SEMS program document contractor selection criteria?	RP 75 6 - 6.1, 6.4 §250.1914

ID	Question	Reference
850	During selection of contractors, did you obtain and evaluate information regarding the contractors' (a) safety and environmental management policies and practices? Y__N__N/A__ (b) selection of subcontractors? Y__N__N/A__ (c) safety and environmental performance? Y__N__N/A__	RP 75 6 - 6.4 §250.1914
860	Have you communicated your safety and environmental management system expectations and specific requirements to contractors?	RP 75 6 - 6.4
870	Have you ensured contractors have their own written safe work practices?	RP 75 6 - 6.1 §250.1914
880	Have you and contractor documented an agreement on appropriate contractor safety and environmental policies and practices before the contractor begins work at your facilities?	RP 75 6 - 6.1 §250.1914
890	Have you documented that contracted employees are knowledgeable and experienced in the work practices necessary to perform their job in a safe and environmentally sound manner?	§250.1914(b)
900	Is documentation of each contracted employee's expertise to perform his/her job, and a copy of the contractor's safety policies and procedures, available upon request?	§250.1914(b)
910	Does the SEMS include procedures that verify that contractors are conducting their activities in accordance with your SEMS program?	§250.1914(c)(1)
920	Does the SEMS include procedures and verification that contractors have the skills and knowledge to perform their assigned duties and are conducting these activities in accordance with the requirements in your SEMS program?	§250.1914(c)(2)
930	Are the results of your verification for selecting contractors available upon request?	§250.1914(c)(3)
940	Does the SEMS include procedures and verification that contractor personnel understand and can perform their assigned duties for activities such as, but not limited to, the following: (a) installation, maintenance, or repair of equipment? Y__N__N/A__ (b) construction, startup, and operation of your facilities? Y__N__N/A__ (c) turnaround operations? Y__N__N/A__ (d) major renovation? Y__N__N/A__ (e) specialty work? Y__N__N/A__	§250.1914(d)
950	Do you perform periodic evaluations of the performance of contract employees that verifies they are fulfilling their obligations?	§250.1914(e)(1)
960	Do you maintain a contractor employee injury and illness log for 2 years related to the contractor's work in the operation area?	§250.1914(e)(2)
965	Do you include the contractor employee injury and illness information related to the contractor's work in the operation area on Form BSEE-0131?	§250.1914(e)(2)

ID	Question	Reference
970	Have you informed its contractors of any known hazards at the facility they are working on including, but not limited to, fires, explosions, slips, trips, falls, other injuries, and hazards associated with lifting operations?	§250.1914(f)
980	Have you developed and implemented safe work practices to control the presence, entrance, and exit of contract employees in operation areas?	§250.1914(g)

Element VII: Training

ID	Question	Reference
990	Does the SEMS program establish and implement a training program so that all personnel are trained in accordance with their duties and responsibilities to work safely and are aware of potential environmental impacts?	RP 75 7 - 7.1 §250.1915 250.1911(c)
1000	Does the training program address: (a) operating procedures (§ 250.1913)? Y__N__N/A__ (b) safe work practices (§ 250.1914)? Y__N__N/A__ (c) emergency response and control measures (§ 250.1918)? Y__N__N/A__ (d) SWA (§ 250.1930)? Y__N__N/A__ (e) UWA (§ 250.1931)? Y__N__N/A__ (f) EPP (§ 250.1932)? Y__N__N/A__ (g) reporting of unsafe working conditions (§ 250.1933)? Y__N__N/A__ (h) how to recognize and identify hazards and how to construct and implement JSAs (§ 250.1911)? Y__N__N/A__	RP 75 7 - 7.1 §250.1915 250.1911(c)
1010	Are the qualifications of all instructors conducting training documented?	RP 75 7 - 7.1 §250.1915
1020	Has applicable training been documented?	RP 75 7 - 7.1
1030	Does the SEMS program address each of the following: (a) initial training for the basic wellbeing of personnel and protection of the environment, to ensure that persons assigned to operate and maintain the facility possess the required knowledge and skills to carry out their duties and responsibilities, including startup and shutdown? Y__N__N/A__ (b) periodic training to maintain understanding of, and adherence to, the current operating procedures, using periodic drills, to verify adequate retention of the required knowledge and skills? Y__N__N/A__ (c) communication requirements to ensure that personnel will be informed of and trained as outlined in this section [§ 250.1915] whenever a change is made in any of the areas in your SEMS program that impacts their ability to properly understand and perform	RP 75 7 - 7.1, 7.4 §250.1915(a-c)

ID	Question	Reference
	their duties and responsibilities? Y__N__N/A__ (d) Has training and/or notice of change been given before personnel are expected to operate the facility?	
1040	Does the SEMS plan address how you verify that contractors are trained in the work practices necessary to understand and perform their jobs in a safe and environmentally sound manner, in accordance with the provisions of § 250.1915?	RP 75 7 - 7.5 §250.1915(d)
1050	Is the following training provided for the basic well-being of personnel and protection of the environment: (a) orientation training for all personnel per API RP T-1, <i>Recommended Practice for Orientation Program for Personnel Going Offshore for the First Time</i> (latest edition) or the equivalent, prior to their first work assignment offshore? Y__N__N/A__ (b) for all personnel regularly assigned offshore, training, as applicable, in non-operating emergencies per API RP T-4, <i>Recommended Practice for Training of Offshore Personnel in Non-Operating Emergencies</i> (latest edition), rescue of persons in the water per API RP T-7, <i>Recommended Practice for Training of Personnel in Rescue of Persons in Water</i> (latest edition), and fire fighting per API RP 14G, <i>Recommended Practice for Fire Prevention and Control on Open Type Offshore Production Platforms</i> ? Y__N__N/A__ (c) for appropriate personnel, regularly or occasionally assigned as required by the circumstances, training in safe work practices (e.g., hot work, hot tapping, safe entry, lockout/tagout), simultaneous operations planning, and hazards communication? Y__N__N/A__ (d) for all regularly assigned offshore personnel, training as appropriate per applicable governmental regulations? Y__N__N/A__	RP 75 7 - 7.2.1
1060	Does the SEMS program require that qualification criteria be developed and implemented for operating and maintenance personnel?	RP 75 7 - 7.2.2
1070	Have procedures been developed to evaluate whether persons assigned to operate and maintain the facility possess the required knowledge and skills to carry out their duties and responsibilities, including startup and shutdown?	RP 75 7 - 7.2.2
1080	If hydrogen sulfide is present at levels that require training, are all personnel and visitors trained?	RP 75 7 - 7.2.2(e)
1090	Do all regularly assigned personnel receive training in environmental protection and pollution control?	RP 75 7 - 7.2.2 (f)
1100	Is refresher training provided to maintain understanding of and adherence to the current operating procedures?	RP 75 7 - 7.3
1110	Have procedures been established, such as periodic drills, to verify adequate retention of the required knowledge and skills?	RP 75 7 - 7.3
1120	Does the training provided to contract personnel include applicable site-specific safety and environmental procedures and rules pertaining to the facility and the applicable provisions of emergency action plans?	RP 75 7 - 7.5

ID	Question	Reference
1130	Do contractors providing incidental services receive training in transportation safety, emergency evacuation and other applicable safety and environmental procedures?	RP 75 7 - 7.5
1140	Do you verify contractor training using audits of the contractor’s environmental, health and safety training programs, observation of contractor work performance, or other methods?	RP 75 7 - 7.5

Element VIII: Mechanical Integrity

ID	Question	Reference
1150	Does the SEMS program require that procedures be in place and implemented so that (a) critical equipment for the facility is designed, procured, fabricated, installed, tested, inspected, monitored, and maintained in a manner consistent with appropriate service requirements, manufacturer's recommendations, or industry standards? Y__N__N/A__ (b) contractors have programs in place to address their own critical equipment? Y__N__N/A__	RP 75 8 - 8.1 §250.1916(a)
1160	Is there a mechanical integrity program which encompass all equipment and systems used to prevent or mitigate uncontrolled releases of hydrocarbons, toxic substances, or other materials that may cause environmental or safety consequences?	§250.1916
1170	Do the mechanical integrity procedures address training of each employee involved in maintaining equipment and systems so that employees can implement the mechanical integrity program?	RP 75 8 – 8.5(b) §250.1916(b)
1180	Do the mechanical integrity procedures address the frequency of inspections and tests of equipment and systems?	§250.1916(c)
1190	Is the frequency of inspections and tests in accordance with BSEE regulations and does it meet the manufacturer's recommendations?	§250.1916(c)
1200	Does the mechanical integrity procedures address the documentation of each inspection and test that has been performed on equipment and systems? Y__N__N/A__ Does the documentation include: (a) the date of the inspection or test? Y__N__N/A__ (b) the name, position, and signature of the person who performed the inspection or test? Y__N__N/A__ (c) the serial number or other identifier of the equipment on which the inspection or test was performed? Y__N__N/A__ (d) a description of the inspection or test performed? Y__N__N/A__ (e) the results of the inspection test? Y__N__N/A__	§250.1916(d)
1210	Do the mechanical integrity procedures address the correction of deficiencies associated with equipment and systems that are outside the manufacturer's recommended limits and are corrections made before further use of the equipment and systems?	RP 75 8 – 8.6(d) §250.1916(e)

ID	Question	Reference
1220	Do the mechanical integrity procedures address the installation of new equipment and constructing systems and the application for which they will be used?	RP 75 8 – 8.4 §250.1916(f)
1230	Do the mechanical integrity procedures address the modification of existing equipment and systems and ensure that they are modified for the application for which they will be used?	§250.1916(g)
1240	Do the mechanical integrity procedures address the verification that inspections and tests are being performed?	§250.1916(h)
1250	Are the mechanical integrity procedures appropriate to ensure that equipment and systems are installed consistent with design specifications and the manufacturer's instructions?	§250.1916(h)
1260	Do the mechanical integrity procedures address the assurance that maintenance materials, spare parts and equipment are suitable for the applications for which they will be used?	RP 75 8 – 8.5(c) §250.1916(i)
1270	Have human factors been considered, particularly regarding equipment accessibility for operation, maintenance and testing?	RP 75 8 - 8.1
1280	Is there a quality assurance program to require conformance to specifications/requirements developed at the beginning of the project and did it become a part of the overall project execution plan and maintenance program?	RP 75 8 - 8.1
1290	Does the quality assurance strategy carry over into the operating and maintenance procedures and management of change?	RP 75 8 - 8.1
1300	Have written procedures for procurement of critical equipment been developed as part of the overall quality and mechanical integrity assurance program to verify equipment compliance with applicable design and material specifications?	RP 75 8 - 8.2 §250.1916(a)
1310	Have written quality control procedures and specifications for critical equipment been established and implemented to confirm that materials and construction, during the fabrication stage, are in accordance with design specifications?	RP 75 8 - 8.3 §250.1916(a)
1320	Have appropriate checks and inspection procedures been established and implemented before startup to verify that installation of critical equipment is consistent with design specifications and manufacturer's instructions?	RP 75 8 - 8.4 §250.1916(a)
1330	Have maintenance programs that include appropriate inspection and testing been established and implemented for critical equipment to sustain ongoing mechanical integrity, enhance safety and protect the environment?	RP 75 8 - 8.5 §250.1916(a)
1340	<p>Does the maintenance program include the following provisions:</p> <p>(a) procedures and work practices to maintain the mechanical integrity of equipment? Y__N__N/A__</p> <p>(b) training of maintenance personnel in the application of the procedures, relevant hazards and safe work practices? (NOTE: maintenance personnel includes both operator and contract employees involved in maintenance) Y__N__N/A__</p> <p>(c) quality control procedures to verify that maintenance materials and spare equipment and parts meet design specifications? Y__N__N/A__</p> <p>(d) procedures to review all changes in facilities in accordance with Management of Change?</p>	RP 75 8 - 8.5

ID	Question	Reference
	Y__N__N/A__	
1350	Does the management plan document the technologies utilized and measurement systems used for compliance with the testing, inspection, calibration and monitoring programs for critical equipment?	RP 75 8 - 8.6
1360	<p>Do the testing, inspection, calibration and monitoring programs for critical equipment include the following items:</p> <p>(a) list of critical equipment and systems subject to inspection and testing? Does the list specify the method and interval of testing and inspection, acceptable limits, and criteria for passing the test or inspection? Y__N__N/A__</p> <p>(b) do the testing and inspection procedures follow commonly accepted codes and standards? Y__N__N/A__</p> <p>(c) documentation of completed testing and inspection? (NOTE: Pressure vessel testing and inspection documentation must be retained for the life of the equipment. All other documentation must be retained for a minimum of 2 years or as needed to determine any changes that may be needed in frequency of testing, inspection, and preventive maintenance, or as required by regulatory agencies or for the preparation or revision of hazards analyses) Y__N__N/A__</p> <p>(d) procedures to document and correct critical equipment deficiencies of operations that are outside acceptable limits? Y__N__N/A__</p> <p>(e) a system for reviewing and authorizing changes in tests and inspections? Y__N__N/A__</p> <p>(f) do the testing, inspection and monitoring programs include appropriate auditing procedures to ensure compliance with the program? Y__N__N/A__</p>	RP 75 8 - 8.6

Element IX: Pre-startup Review

ID	Question	Reference
1370	<p>Does the SEMS program require that the commissioning process include a pre-startup safety and environmental review for new and significantly modified facilities to confirm that the following criteria are met:</p> <p>(a) construction and equipment are in accordance with applicable specifications? Y__N__N/A__</p> <p>(b) safety, environmental, operating, maintenance, and emergency procedures are in place and are adequate? Y__N__N/A__</p> <p>(c) safety and environmental information is current? Y__N__N/A__</p> <p>(d) hazards analysis recommendations have been implemented as appropriate? Y__N__N/A__</p> <p>(e) training of operating personnel has been completed? Y__N__N/A__</p> <p>(f) programs to address management of change and other elements of this publication are in place? Y__N__N/A__</p> <p>(g) safe work practices are in place? Y__N__N/A__</p>	<p>RP 75 9 - 9.1 §250.1917</p>

Element X: Emergency Response and Control

ID	Question	Reference
1380	Does the SEMS require that emergency response and control plans be in place and ready for immediate implementation?	RP 75 10 - 10.1 §250.1918
1390	Are emergency response plans validated by drills and carried out to a schedule in accordance with the SEMS training program?	RP 75 10 - 10.1 §250.1918
1400	Do the drills address personnel readiness and their interaction with equipment?	RP 75 10 - 10.1
1410	Are written action plans established to assign authority to appropriately qualified person(s) for initiating effective emergency response and control?	RP 75 10 - 10.2 §250.1918(a)
1420	Does the Emergency Action Plan address emergency reporting and response requirements and compliance with all applicable governmental regulations?	RP 75 10 - 10.2 §250.1918(a)
1430	Has an emergency control center(s) been designated for each facility?	RP 75 10 - 10.3 §250.1918(b)
1440	Does the emergency control center have access to (a) emergency action plans that address: Y__N__N/A__ (1) spills of hazardous substance (2) collision, and (3) fire and/or blowouts? (b) oil spill contingency plan? Y__N__N/A__ (c) other safety and environmental info as referenced in 30 CFR 250.1910? Y__N__N/A__ (1) information that provides the basis for implementing all SEMS program elements (2) process design information (3) mechanical design information	RP 75 10 - 10.3 §250.1918(b)
1450	Are training and drills, incorporating emergency response and evacuation procedures, conducted periodically for all personnel, including contractors, as required by the SEMS training program (30 CFR 250.1915)? (a) initial training? Y__N__N/A__ (b) periodic training? Y__N__N/A__ (c) communication requirements? Y__N__N/A__	RP 75 10 - 10.4 §250.1918(c)

ID	Question	Reference
	(d) contractor training verification? Y__N__N/A__	
1460	Are drills based on realistic scenarios and conducted periodically to exercise elements of the area emergency action plan?	RP 75 10 - 10.4 §250.1918(c)
1470	Is an analysis and critique of each drill conducted to identify and correct weaknesses?	RP 75 10 - 10.4 §250.1918(c)

Element XI: Investigation of Incidents

ID	Question	Reference
1480	Does the SEMS establish procedures for investigation of all incidents with serious safety or environmental consequences?	RP 75 11 - 11.1 250.1919
1490	Does the SEMS require investigation of incidents that are determined by facility management or BSEE to have possessed the potential for serious safety or environmental consequences?	RP 75 11 - 11.1 250.1919
1500	Are incident investigations initiated as promptly as possible, with due regard for the necessity of securing the incident scene and protecting people and the environment?	RP 75 11 - 11.1 §250.1919
1510	Are incidents investigated by personnel designated by you to be knowledgeable in the process involved, investigation techniques, and other specialties that are viewed as relevant or necessary?	RP 75 11 - 11.1 §250.1919
1520	Do the incident investigations address the following: (a) nature of the incident? Y__N__N/A__ (b) factors (human or other) that contributed to the initiation of the incident and its escalation/control? Y__N__N/A__ (c) recommended changes identified as a result of the investigation? Y__N__N/A__	RP 75 11 - 11.2 §250.1919(a)
1530	Has a corrective action program been established based on the findings of the investigation in order to analyze incidents for common root causes?	RP 75 11 - 11.1 §250.1919(b)
1540	Does the corrective action program (a) retain the findings of investigations for use in the next hazard analysis update or audit, or for a minimum of 2 years, whichever is greater? Y__N__N/A__ (b) determine and document the response to each finding to ensure that corrective actions are completed in a timely manner? Y__N__N/A__ (c) implement a system whereby conclusions of investigations are distributed to similar facilities and appropriate personnel within their organization? Y__N__N/A__	RP 75 11 - 11.3 §250.1919(b)

Element XII: Auditing

ID	Question	Reference
1550	Have you implemented and maintained an audit program and procedures for the periodic audit of the safety and environmental management program in order to determine if the program elements have been properly implemented? Y__N__N/A__ Has information on the results of the audit program been reported to management? Y__N__N/A__	RP 75 12 - 12.1
1560	Have sufficient resources been committed by management to the audit in order to meet its intended scope?	RP 75 12 - 12.1
1570	Does the SEMS program require an audit by an accredited ASP according to the requirements of 30 CFR 250 Subpart S and API RP 75, Section 12? Y__N__N/A__	RP 75 12 §250.1920(a)
1575	Does the SEMS audit plan process: (a) meet or exceed the criteria in sections 9.1 through 9.8 of Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations COS-2-03 (incorporated by reference as specified in § 250.198) or its equivalent? Y__N__N/A__ (b) require a comprehensive audit including all elements of the SEMS program, including identifying safety and environmental performance deficiencies? Y__N__N/A__ (c) require that the audit team lead must be an employee, representative, or agent of the ASP, and must not have any affiliation with you and that the remaining team members may be chosen from <i>[operator]</i> personnel and those of the ASP?	§250.1920(a)
1580	When selecting facilities to audit, was consideration given to common features (e.g., field supervisors, regulatory districts, facility design, systems and equipment, office management, etc.) to obtain a cross-section of practices for the facilities operated?	RP 75 12 - 12.3
1590	Does the audit coverage provide for (a) a testing system based on interviews and inspections conducted at fields that differ significantly (e.g., oil vs. dry gas), rather than at each facility? Y__N__N/A__ (b) assessment of a sufficient number of facilities to evaluate management’s commitment to API RP 75 Section 12.2 a, b, and c? Y__N__N/A__ (c) audit of at least fifteen percent (15%) of the facilities operated, with a minimum of one facility, being audited? Y__N__N/A__ (d) exclusion of facilities included in the previous audit? Y__N__N/A__ (e) expansion of the sample test size when sufficient deficiencies were identified in the effectiveness of any SEMS element? Y__N__N/A__	RP 75 12 - 12.3
1600	REMOVED AND RESERVED – NO QUESTIONS ADDED	
1610	Does the audit plan and procedures meet or exceed all recommendations included in API RP 75 section 12 (as specified in §250.198)and include information on how recommendations are addressed, such as:	RP 75 12 – 12.4 §250.1920(b)

ID	Question	Reference
	(a) Section 12.1 General? Y__N__N/A__ (b) Section 12.2 Scope? Y__N__N/A__ (c) Section 12.3 Audit Coverage? Y__N__N/A__ (d) Section 12.4 Audit Plan? Y__N__N/A__ (e) Section 12.5 Audit Frequency? Y__N__N/A__ (f) Section 12.6 Audit Team? Y__N__N/A__	
1620	Was a written Audit Plan submitted to BSEE at least 30 days before the audit and the facility listing revised if required by BSEE?	§250.1920(b)(4)
1625	Was the start date for the current SEMS audit 3 years or less from the completion date of the previous SEMS audit?	§250.1920(b)(5)
1630	Was the audit submitted to BSEE performed by an ASP as described in § 250.1921?	§250.1920(b)(6)
1635	Were ASP qualifications included in audit plan submitted to BSEE?	§250.1920(b)(6)
1640	Does the scope of the audit include (a) determination of whether the SEMS elements of Section 2 -11 are in place? Y__N__N/A__ (b) determination of whether the SEMS elements incorporated the required components? Y__N__N/A__ (c) a testing system to evaluate the effectiveness of the SEMS? Y__N__N/A__ (1) does the testing system include a review of the records and documentation as discussed in Section 13, (2) private interviews of various levels and disciplines of personnel, and (3) facility inspections (d) identify areas of potential improvement in the SEMS? Y__N__N/A__	RP 75 12 - 12.2
1650	Did the audit plan include the following elements to the extent they are applicable to the specific audit: (a) audit objectives and scope? Y__N__N/A__ (b) audit criteria? Y__N__N/A__ (c) identification of the audit team? Y__N__N/A__ (d) identification of the facilities to be audited? Y__N__N/A__ (e) identification of the program elements to be audited? Y__N__N/A__ (f) procedures to be used in the audit? Y__N__N/A__ (g) confidentiality requirements? Y__N__N/A__ (h) report contents and format, expected date of issue and distribution of the audit report? Y__N__N/A__	RP 75 12 - 12.4
1660	Did the audit team prepare an audit report considering the topics determined in the audit plan?	RP 75 12 - 12.7

ID	Question	Reference
	Did the audit report include: (a) audit findings? Y__N__N/A__ (b) date and signatures of the audit team? Y__N__N/A__	
1670	Were the findings and conclusions of the audit provided to the management personnel responsible for the SEMS?	RP 75 12 - 12.7
1680	Did management establish a system to determine and document the appropriate response to the findings and to assure satisfactory resolution?	RP 75 12 - 12.7
1690	Was the audit report retained so that it could be a reference until the completion of the next audit?	RP 75 12 - 12.7
1700	Does the audit plan require submitting an audit report of the audit findings, observations, deficiencies identified, and conclusions to BSEE within 60 days of the audit completion date?	§250.1920(c)
1710	REMOVED AND RESERVED – NO QUESTIONS ADDED	
1720	Does the audit plan require a Corrective Action Plan (CAP) for addressing the deficiencies identified in the audit be provided to BSEE within 60 days of completion of the audit?	§250.1920(d)
1730	Does the audit plan require the Corrective Action Plan (CAP) to include the name and job title of the personnel responsible for correcting the identified deficiency(ies)? Y__N__N/A__	§250.1920(d)
1740	Were there procedures to avoid conflicts of interest related to the development of the SEMS program and the independent third party auditor and/or the designated and qualified personnel?	§250.1926(b)
	§250.1921 – INFORMATIONAL – NO QUESTIONS ADDED	
	§250.1922 – INFORMATIONAL – NO QUESTIONS ADDED	
	§250.1923 – RESERVED – NO QUESTIONS ADDED	
	§250.1924 – INFORMATIONAL – NO QUESTIONS ADDED	
	§250.1925 – INFORMATIONAL – NO QUESTIONS ADDED	
	§250.1926 – REMOVED AND RESERVED – NO QUESTIONS ADDED	
	§250.1927 – INFORMATIONAL – NO QUESTIONS ADDED	

Element XIII: Recordkeeping

ID	Question	Reference
1750	Have SEMS program audit records been maintained for 6 years?	RP 75 13 - 13.5(f) §250.1928(a)
1760	Does the SEMS program require that copies of program documents be maintained at an onshore location?	RP 75 13 - 13.5(f) §250.1928(a)
1770	Have the results of JSAs been documented in writing by the person in charge of the activity?	RP 75 13 - 13.5(f) §250.1928(b)
1780	Have the documented JSA results been maintained on site for 30 days? Or, in the case of a MODU, on site for 30 days or until MODU is released, whichever comes first?	RP 75 13 - 13.5(f) §250.1928(b)
1790	Have the documented results of JSAs and JSA records been maintained and made available on request for two years?	RP 75 13 - 13.5(f) §250.1928(b)
1800	Have all MOC provisions been documented, dated, retained, and made available for 2 years?	RP 75 13 - 13.5(f) §250.1928(c)
1810	Have injury / illness logs been maintained and made available for 2 years?	RP 75 13 - 13.5(f) §250.1928(d)
1820	Have records of evaluations that were completed on contractor's safety policies and procedures been maintained and made available for 2 years?	RP 75 13 - 13.5(f) §250.1928(e)
1823	Has documentation of all training and reviews of SWA, as required by §250.1930(e), been kept on site for 30 days? Or, in the case of a MODU, on site for 30 days or until MODU is released, whichever comes first?	§250.1928(f)
1825	Has documentation of all training and reviews of SWA been maintained and made available on request for two years?	§250.1928(f)
1827	Has employees' participation in the development and implementation of the SEMS program been documented, retained, and made available for 2 years?	§250.1928(g)
1830	Are all records and documents (a) kept in an orderly manner? Y__N__N/A__ (b) readily identifiable? Y__N__N/A__ (c) retrievable? Y__N__N/A__ (d) legible? Y__N__N/A__	RP 75 13 - 13.5 §250.1928(h)

ID	Question	Reference
	(e) identified with the date of any and all revisions? Y__N__N/A__	
1840	Has a documentation control system been established and implemented to ensure that records and documents are maintained in a manner sufficient to implement and support the SEMS?	RP 75 13 - 13.1
1850	Is the SEMS documentation sufficient to describe the core program elements and the interaction between the elements?	RP 75 13 - 13.2
1860	Do the maintained records include, as applicable: (a) information on applicable regulations or other information? Y__N__N/A__ (b) complaint records? Y__N__N/A__ (c) training records? Y__N__N/A__ (d) process information? Y__N__N/A__ (e) product information? Y__N__N/A__ (f) inspection, maintenance and calibration records? Y__N__N/A__ (g) pertinent contractor and supplier information? Y__N__N/A__ (h) incident reports? Y__N__N/A__ (i) information on emergency preparedness and response? Y__N__N/A__ (j) information on significant environmental aspects? Y__N__N/A__ (k) audit reports? Y__N__N/A__ (l) management reviews? Y__N__N/A__	RP 75 13 - 13.3
1870	Have you considered establishing and implementing procedures for controlling documents and records?	RP 75 13 - 13.5

Element XIV: Stop Work Authority

ID	Question	Reference
1880	<p>Does your SEMS program have SWA procedures that ensure the capability to immediately stop work that is creating imminent risk or danger?</p> <p>NOTE: Imminent risk or danger means any condition, activity, or practice in the workplace that could reasonably be expected to cause:</p> <p>(1) Death or serious physical harm; or (2) Significant environmental harm to: (i) Land; (ii) Air; or (iii) Mineral deposits, marine, coastal, or human environment.</p>	250.1930 (a)
1890	Do your SWA procedures grant all personnel 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?	250.1930 (a)
1900	Do your SWA procedures make the person in charge of the conducted work responsible for ensuring the work is stopped in an orderly and safe manner?	250.1930(b)
1910	Do your SWA procedures require that individuals who receive a notification to stop work must comply with that direction immediately?	250.1930(b)
1920	Do your SWA procedures specify that work may be resumed when the individual on the facility with UWA determines that the imminent risk or danger does not exist or no longer exists?	250.1930(c)
1930	Do your SWA procedures specify that decisions by the UWA to resume activities are documented in writing as soon as practicable?	250.1930 (c)
1940	Does your SEMS program require you to include SWA procedures and expectations as a standard statement in all JSAs?	250.1930(d)
1950	Does your SEMS program require you to conduct training on your SWA procedures as part of orientations for all new personnel who perform activities on the OCS?	250.1930(e)
1960	Does your SEMS program require that SWA procedures must be reviewed during all meetings focusing on safety on facilities subject to this subpart?	250.1930(e)

Element XV: Ultimate Work Authority

ID	Question	Reference
1970	Does your SEMS program have a UWA process to identify the individual with the UWA on your facility(ies)?	250.1931(a)
1980	Does your UWA process designate this individual taking into account all applicable USCG regulations that deal with designating a person in charge of an OCS facility?	250.1931(a)
1990	Does your SEMS program clearly define who is in charge at all times?	250.1931(a)
2000	In the event that multiple facilities, including a MODU, are attached and working together or in close proximity to one another to perform an OCS operation, does your SEMS program identify the individual with the UWA over the entire operation, including all facilities?	250.1931(a)
2010	Does your SEMS program 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?	250.1931(b)
2020	Does your SEMS program provide that 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 (as specified in § 250.1930(a)), 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?	250.1931(c)

Element XVI: Employee Participation Plan

ID	Question	Reference
2030	Does your EPP require your management consult with their employees on the development, implementation, and modification of your SEMS program?	250.1932(a)
2040	Does your EPP require your management develop a written plan of action regarding how your appropriate employees, in both your offices and those working on offshore facilities, will participate in your SEMS program development and implementation?	250.1932(b)
2050	Does your EPP require your management to ensure that employees have access to sections of your SEMS program that are relevant to their jobs?	250.1932(c)

Element XVII: Reporting Unsafe Working Conditions

ID	Question	Reference
2060	Does your SEMS program include procedures for all personnel to report unsafe working conditions in accordance with § 250.193?	250.1933(a)
2070	Do your procedures for reporting unsafe working conditions take into account applicable USCG reporting requirements for unsafe working conditions?	250.1933(a)
2080	Is a notice posted at the place of employment in a visible location frequently visited by personnel that contains the reporting information in § 250.193?	250.1933(b)

Disclaimer

The Code of Federal Register 30 CFR Part 250 - *Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Safety and Environmental Management Systems Final Rule* (SEMS) requires each “operator (a lessee, the owner or holder of operating rights, or the designated operator)”³ on the Outer Continental Shelf of the US to develop and implement a SEMS plan. SEMS clearly states that operators will be held accountable for complying with this new regulation, it is understood that operators cannot do this alone. Contractors, defined in SEMS as “anyone performing work for the lessee,”⁴ must also be aware of the regulation and be prepared to support operators in their efforts.

The purpose of this document is to assist operators and contractors in assessing readiness to meet SEMS requirements including the required contents of an operator’s SEMS plan. This tool represents the collective view of professionals from the oil and gas industry that have reviewed the SEMS rule and identifies where contractors / facility owners need to take specific actions and/or supply documents or records in support of an operator’s SEMS plan.

DISCLAIMER: Because each operator’s SEMS plan will be different, these documents are generalized and are published to facilitate the broad variety of possible approaches. The formulation and publication of these documents is not intended in any way to inhibit anyone from using any other practices. Users of these documents should not rely exclusively on the information contained in the COS SEMS Toolkit. Sound business, scientific, engineering, safety and legal judgment should be used in employing the information contained herein, and these documents cannot provide specific guidance or assure compliance with any given operator’s SEMS plan.

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³ Federal Register/Vol. 75, No. 199/ Friday, October 15, 2010/Rules and Regulations pg. 63610 / UPDATED Federal Register/Vol.78, No. 66/Friday, April 5, 2013/Rules and Regulations pg. 20423

⁴ §250.1914(a) “A contractor is anyone performing work for the lessee. However, these requirements do not apply to contractors providing domestic services to the lessee or other contractors. Domestic services include janitorial work, food and beverage service, laundry service, housekeeping, and similar activities.”



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