
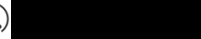

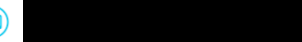


To: Chief Safety Officer
Canada Newfoundland & Labrador
Offshore Petroleum Board
240 Waterford Bridge Road
The Tower Corporate Campus – West Campus Hall
Suite 7100
St. John's, NL A1E 1E2

 
Hercules Rig Manager
Odfjell Drilling
Kokstadflaten 35 • 5257 Kokstad
NO-5863 Bergen • Norway

 odfjelldrilling.com

Date: 15.12.2023

DOCS-#2480821

Ref: Acceptance of Alternate Means of lifeboat Testing in Lieu Lifeboat Launching

Regulation:

Canada Newfoundland & Labrador Offshore Petroleum Board – Occupational Health and Safety Regulations, Part 5 – Emergency Response and Preparedness

Regulatory requirement:

30 (2) despite section (1), the employer must ensure that (d) if the workplace is equipped with lifeboats, (ii) if feasible, a lifeboat launching drill is conducted annually to test the integrity and operation of the lifeboats and launching equipment

Alternatively, Section 30 (3) of the same regulation states “if compliance with subparagraph (2)(d)(ii) is not feasible, the employer must ensure that additional inspections and testing of all components that would otherwise be tested by the launching drill are carried out in consultation with the lifeboat manufacturer and with the prior approval of the Chief Safety Officer”.

Proposal

Based on Section 30 (3), Odfjell Drilling has outlined the following to demonstrate the continued integrity of the lifeboat launch systems and lifeboats themselves by alternative means.

The risks posed to personnel during regular maintenance and testing deployments of lifeboats offshore has been well documented and discussed within the local and international offshore oil and gas industry. The associated risk will be to both the personnel onboard and subsequent damage to the lifeboats, resulting in the equipment being unavailable in an actual event.

Moreover, according to MSC.1/1578, “GUIDELINES ON SAFETY DURING ABANDON SHIP DRILLS USING LIFEBOATS”, launch and recovery of a free-fall lifeboat is considered a high-risk operation by the IMO. Paragraph 2.4.2 states that simulation **should** be used where permitted by other regulatory requirements.

The alternative is based on risk reducing measures for the boats and its crew by using OEM simulated launch equipment and procedures concurrence. Included in this package is attached an endorsement

from the OEM, as well as concurrence from the Offshore workforce who supports the current practices utilized to verify the integrity of the lifesaving appliances.

A simulated launch is an acceptable means of carrying out a lifeboat drill according to SOLAS III 19.3.4.4 and it is not considered a less effective alternative.

In lieu of launching, Odfjell Drilling has a robust internal and external vendor/OEM maintenance program that also meets SOLAS MSC.1/Circ.1206/Rev.1 requirements. Maintenance, inspection, and testing is performed on the lifeboats as per the following schedule:

- Each lifeboat has weekly routine checks to verify condition of each boat. These checks include but are not limited to testing of engine start system from two independent means (main battery and emergency battery), confirm charging function, testing of gear change, and steering (hydraulic and manual), and inspection of tank levels (coolant, oil and fuel). Air Cylinder pressures are checked, verification of no leaks from exhaust or other sources inside boats, and communications systems checked.
- For each lifeboat and monthly, the requirements of SOLAS regulation 20.7 and respective regulation 36.1 checklist, is followed to confirm life boat release gear examination (check for any free play, Cables for control and release), engage the simulated launching arrangement as specified by manufacturer, Operate the release mechanism, Reset the lifeboat in stowed Configuration, (previous points of the sequence to be done with backup release mechanism), Remove simulated launching arrangement, lifeboat to be placed in stowed position.
- On a three-monthly cycle, test the free fall release mechanism through the hydraulic pump, check for potential water contents in the fuel with sample collection, check control cabinet and oil sample from the hydraulic system is taken and analysed. By installing Norsafe SIM MKII Simulating Freefall kit and using OEM operating instruction it is possible to simulate a free fall release of Norsafe Ges40 lifeboats in a safe manner without exposing crew to any increased risk. The use of the simulation kit enables a full-scale test of both primary and secondary release system.
- On a 6 monthly basis cleaning of first aid kits and check for sealings, gearbox inspection. Test the sprinkler system, including the pump, with a freshwater supply to the sprinkler pump and using a Norsafe SIM MKII Sprinkler kit.
- Annually insulation resistance test is performed on AC motors, electric heater, panel, and cabinets. Inspection of coolant level and grade, change engine oil and filter element, change gearbox oil, fuel replacement. Lifeboat davit service on the HPU including oil filter change, hydraulic oil in power pack, and gearbox oil change. Annual service by the OEM; Inspection of release system and fastening. Inspection of cables/hoses, slings, fastening and loose equipment. Inspection of the above list and release test.
- 36 monthly: inspect first aid kits, pyrotechnical equipment namely hand flares and parachute rockets (substitute as required), sea sickness medicine (substitute as required), emergency provision water and food (substitute as required).
- 60 monthly by OEM: A winch overhaul followed by a dynamic load test (1.1 x winch SWL) of all davits is scheduled on a 5-yearly cycle in line with IMO requirements. Winch brakes are inspected following the load test. Lifeboats release test is performed in accordance with SOLAS; conduct 10% overload release test as per OEM procedure.



Safety and Environmental Critical Element (SECE) ER3 - TEMPSC Performance Standard (L4-MODU-DSH-E-MA-450-22) summarizes integrity routines and the maintenance texts for these routines up to and including the 5-year overhaul.

Annual and 5 yearly inspection, maintenance and testing is to be carried out by Viking AS (or an approved service provider by the OEM), on the lifeboats and associated launching appliance as required, including the lifeboat sprinkler testing.

Witness, Assurance and Verification:

Annual routines witnessed by DNV as Certifying Authority and Classification Society. Some routines may be completed more often than annually, however may only be witnessed by the CA annually as part of their verification scheme.

Training:

Familiarization and certification with the Hercules lifeboats and davit launch systems is achieved by weekly drills and coxswain training, simulation training for lifeboat launching and operation, planned maintenance routines conducted by the coxswains and through orientation for all personnel by the coxswains on quarterly and refresher training every 3 years.

Yours sincerely,

[Redacted Signature]

Hercules Rig Manager

[Redacted Signature]

VP Operations MODU

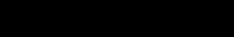
THE UNDERSIGNED CONCURS WITH THIS PROPOSAL

Certifying Authority

DNV



Odfjell Drilling AS



Postboks 33
Kokstad
5863 BERGEN
Norway

DNV Canada Ltd. Region Americas
Station St. Johns
121 Kelsey Drive
Suite 200
ST. JOHN'S NL A1B 0L2
Canada
Tel: +1 709 733 3131

Date: 2023-12-18
Our reference: M-AG-FJ/MAWI/
26926-J-11470

Your reference: Letter Dated 2023-12-15

HERCULES, ID 26926
CA Acceptance - Alternative Lifeboat Launching Frequency

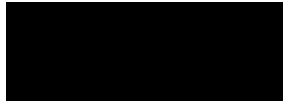
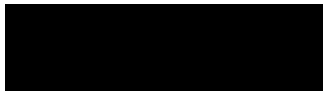
In accordance with paragraph 30(3), DNV Canada Ltd. acting as Certifying Authority to the C-NLOPB concur with the alternative arrangements proposed by Odfjell Drilling AS regarding alternative inspections in lieu of annual launching of Hercules lifeboats.

Rule/regulation: C-NLOPB Offshore Area Occupational Health and Safety Regulations (SOR/2021-247)

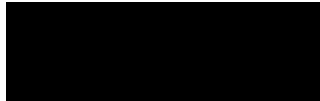
Sincerely
for DNV Canada Ltd.



Principal Surveyor/Station Manager



Senior Surveyor



From: [REDACTED]
To: [REDACTED]
Subject: RE: DOCS-#2480821-v3-Lifeboat_launching_frequency_acceptance_-_OHS_30_d_2_ii
Date: tirsdag 19. desember 2023 10:59:54
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image001.png](#)

Good day,

With reference to: Alternative Means of lifeboat testing.

VIKING agree on alternative test methods mentioned in document: 2480821- Alternative Means of lifeboat testing.

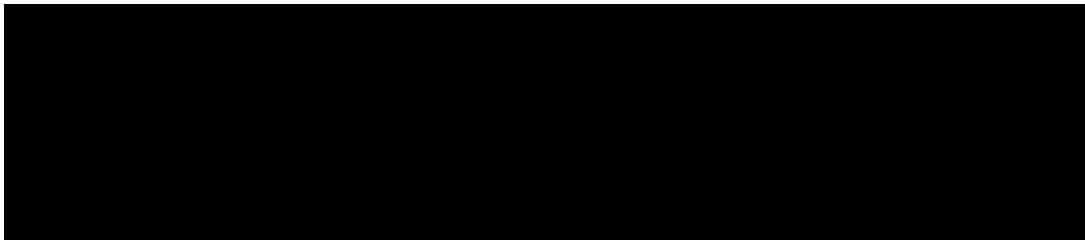
Viking service personnel shall attend during Annual and 5 yearly inspection/testing with reference to **MSC 402**.

Best regards,

[REDACTED]
Sales Manager Offshore
[REDACTED]



VIKING LIFE-SAVING EQUIPMENT Norway AS
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Tel.: +47 37058500



The Hercules Workplace Safety Committee has reviewed the following item during the meetings of December 12th, with no objections or concerns.

Topic: CSO Letter – Lifeboat launching frequency acceptance.

Workplace Safety Committee Co-Chair

Name: _____



Date: _____

12/12/2023