

BSEE Sponsor Agency Update

John Cushing

Chief, Inspection Policy Branch

BSEE Sterling office

November 18th, 2021

“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”



BSEE Sponsor Agency Update

Topics:

- Offshore Renewable Energy
- Cybersecurity
- Decommissioning & Bankruptcies
- Regulatory priorities
- Research initiatives
- Safe Lifting initiative

Offshore Renewable Energy

a. Rule-split between BOEM & BSEE

- i. All of DOI's offshore renewable energy regulations (30 CFR Part 585) are still under BOEM
- ii. BSEE & BOEM are working on a Direct Final Rule to split out the regulations for safety and environmental enforcement into a separate section within BSEE's regulations

b. MOU between USCG/BOEM/BSEE

- i. BSEE, BOEM, and the USCG are currently collaborating on a new MOU to help clarify the roles and responsibilities for each agency on offshore renewable energy projects
- ii. This new MOU will replace the existing MOA OCS-06, "Offshore Renewable Energy Installations on the OCS" between BOEMRE and the USCG that was signed in 2011

c. BSEE role as lead safety regulator on offshore wind facilities

- i. BSEE has preempted OSHA, and will be the lead federal regulator for safety and environmental enforcement on the offshore wind facilities
- ii. The USCG will exercise its traditional vessel safety role for the support vessels involved

d. BSEE is developing HS&E guidelines for offshore wind farms

e. BSEE is developing its inspection and enforcement approach for offshore wind farms

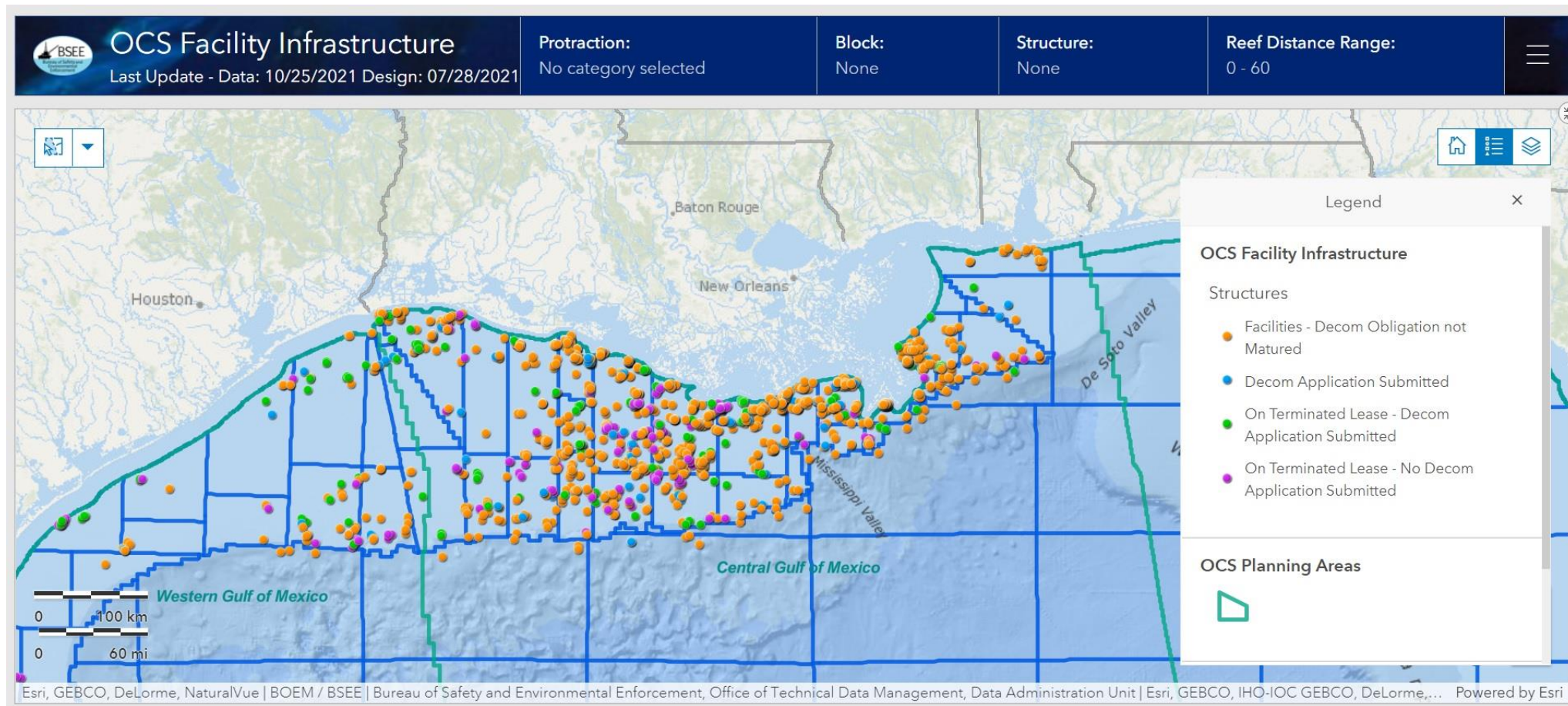


Cybersecurity

- a. BSEE is working with industry to gain better awareness of industrial control systems (ICS) cyber vulnerabilities and promote systematic approaches to maintain the safety and environmental security of all operational technology on offshore infrastructure.
- b. BSEE is advertising via USAJobs to hire new staff with a background in ICS cybersecurity.
- c. BSEE is working with the Cybersecurity & Infrastructure Security Agency (CISA), the USCG, the Department of Energy (DOE), and other federal agencies to develop its relationship with all the key stakeholders and ensure our approaches are coordinated with our federal partners.

Decommissioning & Bankruptcies

BSEE Offshore Infrastructure Dashboard: <https://www.bsee.gov/stats-facts/offshore-infrastructure-dashboard>



Regulatory priorities

- a. **High Pressure High Temperature (HPHT) and Subpart B revisions** (*proposed rule*)
 - i. Revises the Deepwater Operations Plan process
 - ii. Clarifies requirements for the use of new or unusual technology (e.g., HPHT operations)
- b. **Pipelines and Pipeline ROW Revisions** (*proposed rule*)
 - i. Revises the 30 CFR 250 Subpart J pipeline regulations
 - ii. Clarifies the permitting process
 - iii. Updates the requirements for applicable pipeline system or ROW design, installation, operation, inspection, & decommissioning.
- c. **Updates of Documents Incorporated by Reference** (*proposed rule*)
 - i. Updates certain incorporated industry standards to the current editions
 - ii. incorporates new industry standards into the regulations
- d. **Risk Management, Financial Assurance and Loss Prevention – Decommissioning Activities and Obligations** (*final rule*)
 - i. BSEE-only final rule – the proposed rule was joint BOEM-BSEE, and BOEM will continue its associated provisions in a proposed separate rulemaking
 - ii. Revises policies and procedures for compliance with decommissioning obligations
 - iii. Clarifies the operational and procedural aspects of applicable decommissioning responsibilities of OCS lessees and grant holders
- e. **BOEM-BSEE Renewable Energy Split** (*final rule*)
 - i. BOEM-BSEE joint rulemaking
 - ii. Codifies a regulatory split of functions between the two bureaus for renewable energy activities

Research initiatives

a. Offshore Energy Safety Institute (OESI) version 2.0:

- i. Texas A&M Engineering Experiment Station (TEES) is manager of new OESI.
- ii. OESI goal is to create safer workplaces, improve environmental stewardship and increase U.S. energy security.
- iii. OESI to host 3 virtual Industry Roadmap Workshops (to sign up, send email to Lisa.Grant@bsee.gov)
 - i. Offshore Oil & Gas: Nov 30th @ 1:00 PM EST
 - ii. Offshore Wind: Dec 9th @ 11:00 EST
 - iii. Marine Hydrokinetic (MHK) or “Marine Energy”: Dec 14th @ 12:00 EST

b. Study on BSEE’s Incident of Non-Compliance (INC) usage:

- i. BSEE seeking recommendations on how to improve INC issuance, documentation and enforcement process.

c. Study on Remote Inspection Technologies for Offshore Renewable Energy:

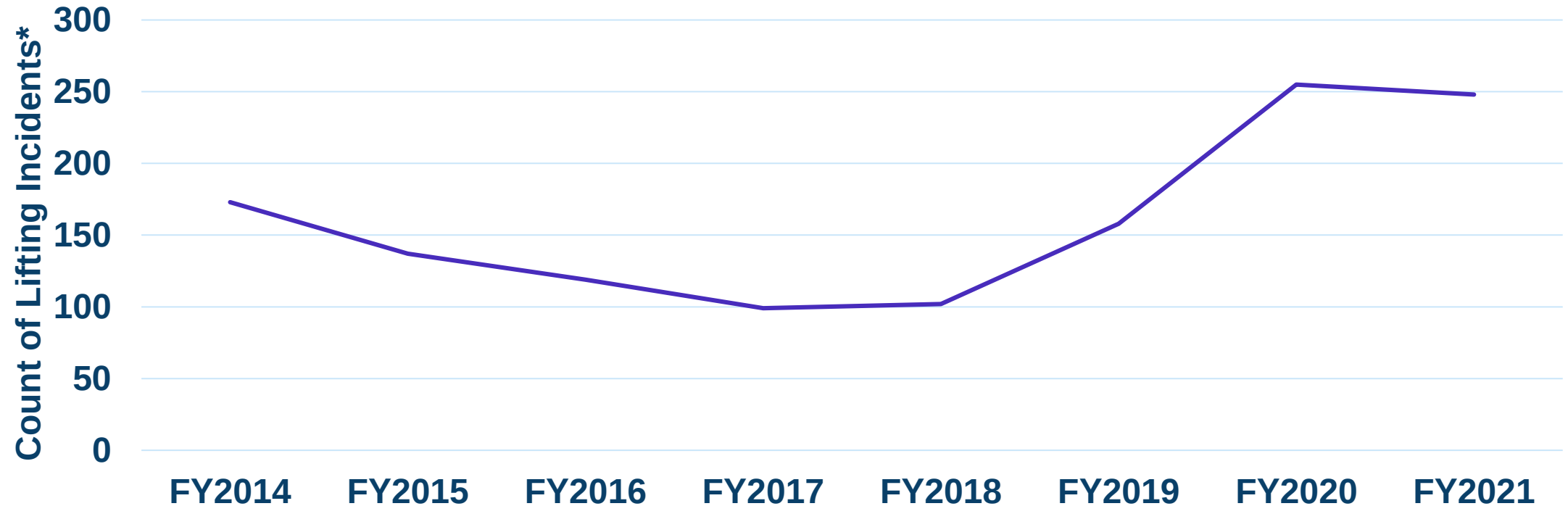
- i. Evaluate available options for conducting remote inspections on offshore wind turbines

d. Study on Fire Protection for Offshore Renewable Energy:

- i. Evaluate available options and performance of both passive and active fire safety systems
- ii. Assess practices, guidelines, and regulations related to fire safety systems use and testing
- iii. Perform a global review of current industry-standard systems and research

Safe Lifting initiative – “50% Reduction Challenge”

Lifting Incidents are the most frequently reported offshore incident - line shows estimated count of OCS lifting incidents)



* Reported Lifting and Crane Incidents in the BSEE TIMS Database; does not account for frequency of lifts nor differentiate by types or seriousness of incidents.

Safe Lifting initiative – “50% Reduction Challenge”

- Basis for BSEE action: Most incidents occur during “routine” lifts
 - “Routine” => drives complacency
 - Need to reduce complacency
- BSEE-led initiatives and current focus
 - “Lifting Our Awareness” poster campaign
 - “Lifting Playbook”
 - BSEE “Lifting Webpage”



Any Questions?

“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”



BSEE Website: www.bsee.gov



@BSEEdgov



BSEEdgov



**Bureau of Safety and
Environmental Enforcement**



BSEEdgov

