



US GOM Diving Safety Work Group

Company Diving Representative Committee

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COMMITTEE WORK GROUP

Company Diving Representative Committee

*JULY 2016*



## DISCLAIMER

This US GOM DSWG document is not meant to be all inclusive, and not every rule and regulation is contained herein. The US GOM DSWG does not issue policy or create regulations. The reader should consult additional resources and subject matter experts for more detailed information as required.



## US GOM Diving Safety Work Group

### Company Diving Representative Committee

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The GOM Diving Safety Workgroup is a US GOM focused, non-competitive and non-commercial group of oil and gas operators, transmission companies, commercial diving companies, supporting sub-Contractors, organizations and industry stake holders. The group will provide a unified voice to promote and improve diving safety, through the following:

- Identification and sharing of best practices
- Identify and seek solutions to industry challenges and issues
- Review and comment of existing and proposed standards and guidelines
- Provide input to the regulators and industry associations

### Purpose of Committee

**This document has been prepared by the US GOM DSWG as guidance for:**

The Company Diving Representative Committee has been formed to identify recommended qualifications, roles and responsibilities for Client Company Diving Representatives.

While this committee is focused on the US Oil and Gas Operators; this is not a “one size fits all” and does not necessarily apply to all Operators. Each Company should conduct an assessment as to what qualifications, roles and responsibilities should apply to their Diving Representatives.



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**Please Note: The committee has modified the standard template into the sections listed below:**

- **Part 1: Executive Summary / Introduction**
- **Part 2: Definitions**  
Defines the activity being evaluated and provides definitions from regulatory or industry groups that are associated with the activity.
- **Part 3: Regulatory / Industry Considerations**  
Identifies regulatory and industry associations and guidelines in which the Diving Client Representative should have knowledge.
- **Part 4: Purpose of the Diving Client Representative (DCR)**  
Outlines why a Diving Client Representative is necessary for the project.
- **Part 5: Qualifications of a Diving Client Representative (DCR)**  
Outlines the experience and the knowledge base a Diving Client Representative should possess.
- **Part 6: Roles and Responsibilities of the Diving Client Representative (DCR)**  
Defines the roles and responsibilities of the Diving Client Representative.
- **Part 7: Interfacing with the Contractor**  
Outlines how a Diving Client Representative should interface with the Diving Contractor and what the Diving Contractors expect from a representative.



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#### Part 1: Executive Summary / Introduction

Diving Client Representatives are the eyes, ears, and voice of a Client Company on diving projects. They are responsible for the oversight of the operation's safety and regulatory and Client compliance. The DCR provides communication links and quality control between the Client and the Contractor(s) doing the work.

DCRs may function alone or in some cases provide a single focal point when other representatives are required to cover the scope of work. The DCR may represent the various disciplines found on the jobsite, such as welding inspectors, dynamic positioning (DP) consultants, specialty tool or equipment consultants, or diving representatives.

#### Part 2: Definitions

- **ADCI:** Association of Diving Contractors International
- **ASOG:** Area Activity Specific Operational Guideline; A set of operational, environmental and equipment performance limits for dynamically positioned (DP) vessels to operate within pre-established parameters for a specific location and activity. .
- **BSEE:** Bureau of Safety Environmental Enforcement
- **Client Representative :** A person, chosen by virtue of training and experience, to be the appointed representative of a Client or contract holder with the duties of oversight and authority of the Client on the work site. This could include numerous other disciplines besides diving.
- **Commercial Diving Operator (CDO):** Defined in NPR 46CFR 197-subpart B (aka; Operator, Client or Company).
- **Diving Client Representative (DCR):** An appointed representative of a Client or contract holder with the duties of oversight and authority of the Client on the dive work site. *For this document we will use **Diving Client Representative** or the acronym **DCR**.*
- **IMCA:** International Marine Contractors Association
- **NCR:** Non-Conformance Report
- **IOGP:** International Oil and Gas Producers Association
- **OVID:** Oil Companies International Marine Forum-Offshore Vessel Inspection Database
- **PMS:** Planned Maintenance System - A record of maintenance and repair to specifically identified equipment through its life.
- **SIMOPs:** Simultaneous Operations
- **SUMS/BUMS:** Surface Umbilical Management System; Bell Umbilical Management System



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#### Part 3: Regulatory Considerations

There are no direct laws that mandate the DCR's responsibilities and each DCR should work per the guidance and requirements of their Client Company; however, the representative should be aware of the following:

- The US Coast Guard details Person-in-Charge and Master of Vessel responsibilities
  - The DCR is not specifically addressed. However, he/she must know the chain of command.
  - NPR 46 CFR 197 Subpart B identifies responsibilities for the Commercial Diving Operator and by default the Diving Client Representative.
- BSEE requires individuals be selected who act as the person in charge and those who are named to have Ultimate Stop Work Authority
  - DCR is not specifically addressed. However, he/she must know the chain of command.

#### Industry References

- International Oil and Gas Producer's Association (IOGP) Report 431; Diving Worksite Representative Roles, Responsibilities and Training, Nov 2009
- International Marine Contractors Association (IMCA): IMCA TCPC 12/04; Competence of Client Representatives

#### Part 4: Purpose of the Diving Client Representative (DCR)

Competent oversight during a diving project is paramount to the safe and successful conclusion of the work scope. Diving is a service that may require utilization of many work disciplines or types of work besides diving intervention. Welding, underwater demolition, rigging and lifting, dealing with pollutants, vessel logistics, regulatory issues, permitting, and coordination of large segments of a project are to name but a few of the considerations that can take place on a dive operation. The DCR provides on-site representation for the Client; providing a single focal point for on-site communication and acts as a direct liaison between the company and onsite Contractors. A DCR will also confirm compliance to company requirements, competency verification of the workforce and adherence to safety and regulatory considerations as well as a quality control monitor to verify completed work is as required.



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#### Part 5: Qualifications of a Diving Client Representative (DCR)

***Operator companies may decide the DCR qualifications appropriate to their Company.***

Consideration should be taken when selecting a DCR. The DCR will be expected to represent the Client company in all things related to the work scope and should be selected based on the requirements of the work assignment. It is the responsibility of the DCR's contracting company to ensure that the selected DCR has the competency, knowledge, training, and experience based on the project's requirements.

Leadership qualities and personnel management skills should be considered when making the DCR selection. These qualities greatly contribute to the success of a project. A representative that is engaged in the job is a valuable asset to the project.

The experience level of a Diving Client Rep may vary with the complexity of the project and the expected mode of diving. Experience as a diver or diving supervisor provides great insight for the DCR as they represent the Client and interface with the dive Contractor. The number of projects and the complexity of the projects that a DCR has participated on as a DCR, a diver or dive supervisor are all just as important as the number of years spent offshore. The DCR's offshore experience should be in diving, subsea intervention, offshore construction, and/or marine operations. It is important that the DCR's diving experience is in the mode of diving proposed. For projects requiring special disciplines the DCR should be able to demonstrate a working knowledge in the specific discipline. The DCR should provide a résumé or a Curriculum Vitae (CV) listing all of their qualifications, ask for references and refer to these people for verification of records.

Job Specific Skills and Knowledge Verification Assessment: All DCR's should have adequate skills and knowledge to perform their assigned job duties in a safe and competent manner. This should be reviewed annually or as job duties change. Supporting documentation should be maintained on file for each individual.

#### Qualifications for the DCR

- Knowledge of USCG Diving Regulations
  - CFR's relative to diving.
  - The candidate should understand local laws and regulations.
- BSEE /BOEM Regulations
  - Individuals should understand where the information can be found. They are not expected to know the regulations and best practices from memory.
  - Safety and Environmental Management Systems (SEMS) and SEMS 2.
- State or Local Regulatory Regulations – When Applicable to the Operator's Location
  - E.g. - Alabama Oil and Gas (AOGB) or California State Lands Commission (CSLC).



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- Working knowledge of Industry Best Practices and Guidelines *as applicable to the Operator*
  - ADCI, IMCA, IOGP, DSWG, etc.
- Leadership Skills
- Safety Management, Risk Analysis - Training and Experience
  - Individuals should be competent in the use of Hazard Identification (HazID) studies and Job Safety Analysis (JSAs).
- Technical Knowledge of Tools and Equipment
  - Surface Diving or Saturation System - Equipment Assurance.
  - Assurance Audits/NCR/PMS.
  - Moored and DP vessels (if applicable).
    - Basic knowledge and/or awareness, of a DP vessels operation and capabilities.
    - Anchoring procedures and guidance's.
    - Vessel Assurance Processes – OVID, DP Trials, FMEAs.
    - DP diving guidance's, SUMs/BUMs, ASOG, USCG Variance.
  - Special tooling for projects – dredges, winches, pipeline repair clamps, etc.
- Possess a current “fitness to work” medical exam - as per Client/Operator requirements.
- Understanding of drawings and schematics.
- Basic computer skills.
- Verbal communication skills.
- Written and documentation skills.
  - The records and documentation that are produced during a project could be subpoenaed into a court case. A DCR's logs are records of the project. They should accurately describe the events that took place on a project. Details surrounding work or incidents should be clearly presented with all relevant information.

#### **These specific training areas are required before working for some operators.**

- Operator Specific Training Requirements
  - Knowledgeable of Operator Safety Expectations or Safety Manual.
  - Operator specific Dive Standard or Guidance.
  - Operator guidelines/restrictions for specific diving tasks.
  - Operator Permit- to-Work system.
- Field Knowledge of the Work Site
  - Field maps, pipeline surveys and field logistics.
  - Platform or facility familiarization for SIMOPs and hazards.



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#### Part 6: Roles and Responsibilities of the Diving Client Representative (DCR)

*Operator companies may decide the DCR roles and responsibilities appropriate to their company.*

The DCR shall oversee the Contractors' activities to ensure that Client requirements are adhered to and the work is performed in accordance with all drawings, specifications, procedures and the scope of work in a safe manner.

When possible, include the DCR in the planning phases of the work scope. Some of the pre-project planning activities may include the following:

- Technical review of project design/diver install-ability.
- Work scope definition, project required drawings /documentation and procedure development.
- Construction planning and logistical support.
- Hazard or Risk Analysis/Hazard Identification participation.
- Dive Equipment and Vessel - Testing and audit/assurance process.
- Review the Contractor's emergency response/evacuation plans.

During Mobilization the DCR should assist the Client Project Manager with the following:

- Logistical support including equipment/material tracking.
- Conducting a Project Kick-off meeting with the entire crew prior to going offshore. This meeting should cover safety and project expectations as well as a project overview.

The DCR should oversee the safe execution of all work performed by the Contractor's personnel and keep the Client informed of all work planned and in progress. Safety should be at the forefront of all activities and communications. The DCR shall work with the dive Contractor to:

- Verify all equipment complies with Client or industry requirements.
- If applicable, issue or participate in the writing of the "Permit to Work" (PTW) and re-issue as required.
- Jointly discuss the daily work plans with the Offshore Manager or Dive Superintendent and include the Client's Operations personnel as needed. Adherence to the Client's SIMOPs plan and procedures is a critical function.
- Confirm that the Safe Work Plan and its appendices are understood and followed by everyone involved with executing the work.
- Participate in the daily safety meetings with Contractor personnel.
- Participate with the dive crew for the planning and execution of emergency drills, the DCR should encourage and support these drills. Observe the drills and afterwards offer constructive criticism of what was observed and can be learned during the drill.
- Participate in the Job Safety Analysis (JSA) with the Contractor's personnel.
- Stop any operation where the DCR feels an unsafe condition exists.



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- Monitor, inspect, and accept/reject the work both in progress and as completed by the Contractor.
- Monitor the work area to ensure personnel safety. The DCR should be present where the work activity is being commenced.
- The DCR should maintain a presence on deck to observe work habits and coach if necessary.
- Proactively observe equipment conditions and intervene if conditions warrant to prevent the release of hydrocarbon.
- Observe Contractor's work habits to verify they are working in a safety conscious manner. Intervene in a positive manner – Offering constructive criticism or praise when due.
- Maintain all project documentation including copies of checklists and permits throughout the duration of the construction until job completion.
- Report and document near misses and incidents to the Client and assist in initial investigation as per Client requirements
- Review and verify the Contractor's personnel are trained and certified as required.
- Provide daily progress reporting, cost tracking and provide information on work activities/plans, safety aspects and schedule.
- Provide marine logistical support when necessary including material and equipment tracking.

#### Critical Task Responsibility

- A critical task is when the risk level is elevated. During these times the Client representative should be at a location that permits interaction with the personnel supervising the work. Examples of this would be: During the cutting or disconnection of a pipeline, tasks involving differential pressure, underwater burning, lift bag use, deep ditch jetting, heavy lifts etc.
  - Be present in dive control or on deck.
  - Remotely monitor with audio and visual.
- Confirm that a hold point is written in the procedure before a critical task is performed.
- Establish a clear communication plan with a backup protocol.
- Observe the testing of critical equipment prior to it going in the water.
- Confirm that rigging certifications and other required documentation has been checked.
- Consult industry best practice guidelines.

#### Dive Vessel Moored to or alongside Offshore Structures

- Review the procedures and equipment to moor vessel alongside or attach to the structure.
- Understand workable weather conditions and vessel stability limitations during inclement weather.
- Responsible for SIMOPS and interaction with platform.  
Understand and make the crew aware of all platform emergency alarms.



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#### Dive Vessel Working Remotely

- Review the emergency procedures and establish communication with the closest manned structure and or helicopter landing site.
- Establish the protocol for Permit to Work system prior to mobilization.
- Review mooring procedures and weather limitations for mooring integrity.

#### Multiple Vessels

- Establish a communication protocol between all vessels.
- Ensure the coordination of all vessels in emergency drills.

#### Working from Deepwater TLP / Floater

- Establish and maintain the SIMOPS protocol.
- Interface with platform personnel on equipment placement when required.
- Equipment may need to meet additional intrinsically safe / explosive / fire conditions.

#### Barge Diving

- Review the mooring plan.
- Understand weather condition limitations for barge operations.
- Participate with the barge operations personnel on SIMOPS issues.
- Additional site representation may be needed because of the high activity level on barges.



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#### **Part 7: Interfacing with the Contractor**

Providing the project specific information and documentation to the diving Contractor is essential to the success of the project. The DCR is the liaison/interface between the Contractor and the Client and should be able to present the job scope to the crews in a manner that is understood by everyone. The DCR should have a good understanding of and be able to communicate the hazards and potential SIMOPs at the specific dive location, for example, the location of firewater intakes or the daily crew-boat schedule.

The DCR should communicate the Client's 100% commitment to SAFETY. A DCR shows this commitment by participating in the safety process. Attending and participating in daily safety meetings, JSA meetings and pre-dive briefings are paramount. Leading by example with an integrity and authority for all things safety is the key to completing a safe and efficient project.

Communication of the specific Client's expectations to the Diving Contractor is important due to the vast differences between the Clients. An example of a specific difference would be a Client's Work Management system; some Clients use an electronic system, some use paper permits, while some may not use any at all. Other different systems may include JSA formats or equipment auditing requirements. Different Clients also may have different paperwork requirements; daily time sheets, JSAs and dive sheets may be required by some and not by others. The Client Representative should be familiar with these differences and be able to clearly communicate them to the Contractor.

Dive Contractors appreciate having a knowledgeable DCR involved with the diving project. This allows them to conduct their work in a professional manner without spending time explaining why things are done a certain way. The DCR should be an asset to the Contractor and work together for the overall success of the project. It is imperative for the DCR to have diving knowledge and a strong understanding of how to complete the tasks associated with the project, but at the same time allows the Contractor to conduct their job safely. A DCR should always remember their role is for oversight, and the dive supervisor has the ultimate responsibility for the safety of their crews. Managing a worksite and project is important, but a good dive rep knows not to overstep his role and try to micromanage the diver in the water.