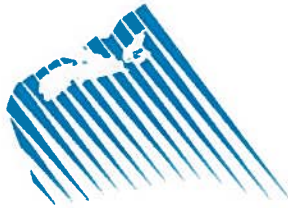


# CNSOPB



CANADA-NOVA SCOTIA  
OFFSHORE PETROLEUM BOARD

## Notice for Public Comment - Request for Regulatory Deviation

Posting Date: 13 August 2019  
Applicant: Heerema Marine Contractors  
Reference: HMC0477-CNSRQ-001 – Offshore Cranes  
Project: Sable Offshore Energy Project  
Installation Name: All Sable Platforms  
Regulation: Canada-Nova Scotia Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations (TOHS Regulations), Sections: 209 and 231

Heerema Marine Contractors (HMC) has made an application for deviations to the TOHS Regulations sections pursuant to Part III.1 (federal version) and Part IIIA (provincial version) of the Accord Acts. These deviations relate to TOHS Regulations sections 209 and 231 covering the Design, Operations, Maintenance and Inspection of Offshore Cranes and are supported by the Operator of the Sable Fields, ExxonMobil Canada Properties (EMCP)

HMC's submission describes the circumstances as well as the measures to be in place for these deviations during specified phases of decommissioning activity for the each of the Sable Platform removals.

Notice at the workplace has been provided, and the request has been reviewed by Heerema's workplace committee.

Public comment respecting the application will be open for thirty (30) days until September 12, 2019. Submissions may be directed by email to: [RQSubmissions@cnsopb.ns.ca](mailto:RQSubmissions@cnsopb.ns.ca)

The attached documentation has been provided by EMCP in its request for regulatory deviation. Please note that personal information or commercially sensitive information has been severed.

Richard Loughery, P.Eng, CRSP  
Acting Chief Safety Officer



### REGULATORY QUERY FORM

RQ NO.: \_\_\_\_\_

FILE NO.: \_\_\_\_\_

**APPLICANT:** Heerema Marine Contractors  
**PROJECT:** Sable Offshore Energy Project  
**SUBJECT:** Offshore Cranes

**APPLICANT'S FILE:** HMC0477-CNSRQ-001  
**DATE:** 18<sup>th</sup> of June, 2019  
**PAGE:** 1 **OF:** 3

**REGULATION:** Canada – Nova Scotia Offshore Marine installations and structures occupational health and safety transitional regulations (SOR/2015-2)

**SECTION:** 209, 231

#### REQUESTING REGULATORY DEVIATION\*

##### QUERY:

<p><b>209. (2)</b> The design and construction of offshore cranes must meet the standards set out in API standard 2C, Specification for offshore pedestal mounted cranes, sixth edition, published in 2004</p>	<p><b>231. (2)</b> The operation, Maintenance and inspection of offshore cranes must meet the standards set out in API standard RP 2D, Recommended practice for operation and maintenance of offshore cranes, sixth edition, published in 2007</p>
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##### PROPOSAL:

##### **Design & Construction:**

1. The SSCV Thialf's Amhoist Model 5000 port & starboard electric revolving deck cranes have been designed and constructed in accordance with the following standards
  - a. ABS 1975 "Certification of Cargo Gear on Merchant Vessels"
  - b. British Standard BD-2573 Part 1: 1983 (crane structural design)
  - c. ANSI / ASME – B30.8
  - d. AISC standards for steel structures (year 2000 upgrade to 7,100 mT)
  - e. JIS standards
2. The SSCV Thialf's auxiliary self-propelled cranes MEDA Calimero and Sennebogen Crawler Cranes have both been designed and constructed in compliance with EU machinery Directive EN ISO 12100 & EN13000

##### **Operation, maintenance and inspection:**

- Thialf cranes are operated, maintained and classed under Lloyd's Code for lifting appliances in a marine environment and Lloyd's Rules for Offshore Units

##### **Proposed Deviation:**

1. Propose to accept the alternate industry standards for design and construction as listed above, to which the Thialf cranes are designed and reviewed to, as equivalent standards that meet the intent of section 209.
2. Propose to accept the alternate industry standard: Lloyd's Register code for lifting appliances in a marine environment 2016 and LR Rules for Offshore Units as equivalent standards that meet the intent of section 231.



RQ NO.: \_\_\_\_\_

FILE NO.: \_\_\_\_\_

## REGULATORY QUERY FORM

### **RATIONALE:**

1. Thialf Main cranes were designed and built in accordance with the ABS, BS ANSI / ASME standards. In the year 2005, a design check and gap analysis were performed between the original design specifications and EN13852-1. The cranes are operated and maintained in accordance with the OEM manuals and classed under Lloyd's Rules and Regulations.
2. Thialf Maeda Calimero and Sennebogen Crawler cranes were designed and built in compliance with EU Machinery Directive EN ISO 12100 and EN 13000, and these cranes are also operated and maintained in accordance with the OEM manuals and certified under Lloyd's Rules and Regulations

### **Attachments:**

1. Thialf Main Crane Specification
2. Thialf Main Crane Annual Certificate
3. CE Declaration of Conformity – Sennebogen 7700
4. CE Declaration of Conformity – Maeda LC785M-8B
5. Sennebogen 7700 – Crane Annual Certificate
6. Maeda LC785M-8B - Crane Annual Certificate



CANADA-NOVA SCOTIA  
OFFSHORE PETROLEUM BOARD

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Shaded Areas for CNSOPB Use Only

### REGULATORY QUERY FORM

RQ NO.: \_\_\_\_\_

FILE NO.: \_\_\_\_\_

#### APPLICANT

NAME: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

TITLE: \_\_\_\_\_ TEL. #: \_\_\_\_\_

#### REVIEWERS

##### OPERATOR'S CONCURRENCE (IF NOT APPLICANT)

NAME: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

TITLE: \_\_\_\_\_ TEL: \_\_ DATE: \_\_\_\_\_

DocuSigned by:

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##### WORKPLACE COMMITTEE OR COORDINATOR CONSULTED

[Accord Act, Part III.1 (Federal Version), paragraph 210.07(5)(b), 210.071(5), or 93(5)(b) under Related Provisions]

NAME: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

TITLE: \_\_\_\_\_ TEL: \_\_ DATE: \_\_\_\_\_

##### CERTIFYING AUTHORITY CONCURRENCE

PROPOSAL MEETS REQUIREMENTS OF NOVA SCOTIA OFFSHORE CERTIFICATE OF FITNESS

NAME: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

TITLE: \_\_\_\_\_ TEL: \_\_ DATE: \_\_\_\_\_

#### CNSOPB DECISION:

- APPROVED WITHOUT CONDITIONS
- APPROVED WITH CONDITIONS
- REJECTED

NAME: \_\_\_\_\_ SIGNATURE: \_\_\_\_\_

TITLE: \_\_\_\_\_ TEL. #: \_\_\_\_\_ DATE: \_\_\_\_\_

*\*Deviations may include exemptions or substitutions (equivalent standards) as permitted by the Accord Acts, and as indicated in decision letters.*