Phillips, Kim (NRCan/RNCan)

From: david .. <prok@hotmail.com>
Sent: Friday, October 27, 2017 11:24 AM
To: Phillips, Kim (NRCan/RNCan)
Subject: Re: Offshore Diving Stakeholder Engagement - CLOSES TODAY
Attachments: Comments from David Prokipchuk.docx

Hi Kim, Sorry for the delay here are some comments for your consideration.

Kind Regards
David Prokipchuk
416 806-8395

From: Phillips, Kim (NRCan/RNCan)
Sent: October 27, 2017 12:21 PM
To: Phillips, Kim (NRCan/RNCan)
Subject: Offshore Diving Stakeholder Engagement - CLOSES TODAY

Good morning,

Just a reminder, the comment period for the offshore diving policy intent closes today. If you haven't already done so, please forward me any feedback you would like to have considered in the ongoing development of the future regulations.

Best regards,

Kim Phillips

Senior Regulatory Officer

Offshore Petroleum Management Division

Natural Resources Canada

Atlantic Canada Energy Office

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cell: (902) 402-0285

kim.phillips@canada.ca

From: Phillips, Kim (NRCan/RNCan)
Sent: Thursday, October 05, 2017 9:56 AM

To: Phillips, Kim (NRCan/RNCan)
Subject: Offshore Diving Stakeholder Engagement Session

Good morning,

Thank you for attending the offshore diving stakeholder session on Monday. We appreciate the valuable feedback received during the session and look forward to receiving your written comments by October 27, 2017.

For your records, please find attached the deck that was presented at the session.

Best regards,

Kim Phillips

Senior Regulatory Officer

Offshore Petroleum Management Division

Natural Resources Canada

cell: (902) 402-0285

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Comments from David Prokipchuk (Diving Safety Specialist):

Existing
"Surface-supplied diving" means a diving technique in which the diver is supplied from the dive location with air by way of an umbilical.

Proposed
"Surface-supplied diving" means a diving technique in which the diver is supplied from the dive location with air or nitrox by way of an umbilical.

Proposed
Topside non diving personnel medicals will have a two year validty time period.(Harmonized with OGP medicals and UKOAA)

Existing
1 h) the appropriate number of dive personnel required to safety carry-out the work;

This needs much more clarification I'm not sure how to start perhaps identifying roles for the diving project?

Existing
3 d) the treatment of decompression illness;

Proposed
3 d) the treament of decompression illness and any planned or unplanned omitted decompression

Existing
3 f) aborting a dive

Proposed
3 f) aborting a dive and recommencing or starting a diving operation shall only be started by the Diving Supervisor in charge of the operation.

Existing
7 1) Surface supplied air diving shall not exceed 50 msw.

Proposed
7 1) Surface supplied air/nitrox diving shall not exceed 50 msw or a PPO2 of 1.4 ATA.

Existing
In planning the dive activities, the Dive Contractor must conform to the time limits for saturation exposure limits outlined in CSA Z275.2 *Occupational Safety Code for Diving Operations.*

Consider adding limits for Air/Nitrox as well
Some countries or organizations limit the maximum bottom time that a surface supply diver is allowed to spend at any given depth. The International Association of Oil & Gas Producers (OGP) uses the UK HSE table of depths and times (OGP Report No. 411 – Diving Recommended Practice (table 2)). DCIEM Table 2(N) recommended bottom times limits for various PPO2 exposures may be used depending on jurisdictional requirements.

Existing
11 2) In the case of surface-supplied diving operations, the standby diver must not have any residual inert gas.

Proposed
11 2) In the case of surface-supplied diving operations, the standby diver must not have any residual inert gas which may be up to 18 hours depending on the dive tables used.

Existing

	Qualifications, Training and Competency
23	During execution of the work, the Operator must monitor the continued competence of the dive contractor.
24	All members of the dive team must be competent to carry out their respective roles.
25	Each position in the dive team, and any ROV pilot, where pilots are deployed in the diving operation, must conform to the competencies outlined in CSA Z274.4 *Competency Standard for Diving, Hyperbaric Chambers and Remotely Operated Vehicle Operations.*
26	All members of the dive team, other than the specialized diving physician, shall hold valid certificates issued by a certifying body acceptable to the Chief Safety Officer.
27	Certificates of competency shall be issued based on completion of formal training from an accredited institution.

Consider

This whole section is very tricky. We need to have a clearly established framework from the government regarding training qualifications of all dive site personnel. Competency is a whole different issue, which is usually specific to tasks or tools or procedures. Basic qualifications need to be established and monitored so dive training facilities cannot manipulate the basic skill set for profit. These facilities also need to be monitored and audited on a regular basis to ensure compliance with a federal and provincial qualification standard.

Existing
31 Pre- and post-dive medical checks, in accordance with procedures approved by the Specialized Dive Physician, shall be conducted routinely for all divers. For saturation divers these checks shall be performed upon entering and surfacing from saturation dives, and for air divers prior to and after completion of work periods.

Proposed
31 Pre- and post-dive medical checks, in accordance with procedures approved by the Specialized Dive Physician, shall be conducted routinely for all divers. For saturation divers these checks shall be performed upon entering and surfacing from saturation dives, and for air/nitrox divers prior to and after completion of their rotation or total dive campaign.

Existing
37 Standby divers shall be equipped with the same diving equipment as the primary diver.

This need more thought as a nitrox stanby diver might be using an air medium for added safety.

Existing
When diving in locations where the seabed or seawater may be contaminated, the dive activity shall conform to the requirements related to diving in contaminated waters laid out in CSA Z275.2 *Occupational Safety Code for Diving Operations.*

This particular section of CSA 275.2 has been drastically modified and would be unworkable for most offshore applications.

Existing
51 Compressed breathing air mixtures, reserve supply quantities and the analysis of the air shall conform to CSA Z275.2 *Operational Safety Code for Diving Operations, Appendices A-D*.

At this time this standard does not reflect the required changes to address oil and particulates particularly for air intervention on nitrox operations.

A new European Standard for Air exists **BS EN 12021:2014.** The oil and particulate matter in this standard is .1 mg/m3 the air is then oxygen compatible. The CSA needs to discuss Z180 and CSA tables 1 and 7 to reflect this modernization.

Existing
52 Any gas mixture containing more than 25% oxygen by volume should be handled as if it were pure oxygen.

Proposed
52 Any gas mixture containing more than 25% oxygen by volume shall/must be handled as if it were pure oxygen.