



# ADDENDUM E: SEMS INTERFACE DOCUMENT

V1 (January 7, 2018)

## Disclaimer

The information contained within this document was captured from the 2017 OOC SEMS Forum held on November 2, 2017. The opinions and information expressed within do not represent any one organization's position, rather the results of open dialogue on the topic. This information should not be utilized out of context or without a clear understanding of the event and topics covered.

## SEMS Interface Document Template Instructions

---

**Purpose and Use** This template will be used to create a SEMS Interface Document showing how SEMS requirements will be met by Operator, its Contractors, and any subcontractors they may employ.

This document is intended for use between Operator Businesses operating in OCS waters and Contractors.

---

**The Tabs** Tabs have been created containing questions to establish how Operator and Contractor Safety and Environmental Management Systems will interface to address each API RP 75 Element. As part of the contract agreement, Operator and Contractor representatives will provide answers to these questions, explaining which management system will be used and how gaps will be addressed.

The Approvals tab will be updated and signed by both parties once agreement on the answers has been reached.

Elements 9, 11 and 12 are omitted from this interface document template.

---

**The Columns** For each question, place an X in one of the following response columns: Yes, In Part, No, and N/A (not applicable).

For example, "Do you follow Operator's MOC procedures for equipment?" might be answered as follows:

- Yes - All equipment changes are managed using Operator's MOC procedures.
- In Part - Some aspect of equipment change is managed using Operator's procedures, but other aspects are controlled by Contractor procedures.
- No - Operator's procedures are not used.
- N/A - The contracted service does not involve equipment.

If not following Operator requirements, please provide detailed explanation in the next column. A final column is provided for any additional comments or actions needed to clarify SEMS compliance.

---

### Instructions

- 1) Please complete the Interface Document.
  - 2) Email the completed form **before October 21, 2011**. **Please email the document in its *original Excel format to Company***
  - 3) Document will be reviewed by Operator and returned for comments / changes if necessary.
  - 4) After a successful review, please have an Authorized Representative of your company sign and return to SEMS@Operator.COM.
  - 5) Operator will sign and return a copy.
-

## SEMS Interface Document Approvals

**Operator** Operator Offshore Inc.  
**Contractor** Contractor

This Agreement is made between [Operator Offshore Inc.], the Operator, and [Contractor], the Contractor, in conformance with 30 CFR 250 Subpart S (the SEMS rule). It is effective November 15, 2011 and continues during the performance of any scope of work for SOI until superseded by an updated or replacement agreement.

[Contractor] confirms that they have reviewed and understand [Operator Offshore Inc.'s] SEMS program and HSE Management System.

[Operator Offshore Inc.] and [Contractor] agree that they have each reviewed the completed Interface Document and agree that the Interface Document, including any Comments or Actions, will form the basis of compliance with 30 CFR 250 Subpart S. Further, this document is an integral part of [Operator Offshore Inc.'s] ensuring that contractor has adopted [Operator Offshore Inc.'s] SEMS program (or has its own safe work practices where specifically denoted).

[Contractor] confirms that they can and will perform their duties under and conform to all pertinent elements of [Operator Offshore Inc.'s] SEMS program and HSE Management System.

[Contractor] confirms that personnel used to perform the Scope of Work will be knowledgeable and experienced in work practices necessary to perform their job in a safe and environmentally sound manner.

[Contractor] confirms that this agreement will extend to all sub-contractors engaged by [Contractor] as evidenced by this SEMS

**[Operator Offshore Inc.] and [Contractor] subscribe to the principles of API RP 75 and [Operator Offshore Inc.'s] HSE Management System. By our signatures, we affirm and endorse the content of this SEMS Interface Document.**

Company Representative	Signature	Date
[Operator Representative] [Title]		
[Contractor Representative] [Title] EHS Manager		

# 1 SEMS Interface Document

Question	Must I have a SEMS program? (§250.1900 / API RP 75 section 1)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
1.01	Have you established safety and environmental policies and practices that are consistent with the Operator's SEMS program? (Please describe how in the comments section)						
Please continue to Element 2.							

## 2 SEMS Interface Document

Question	Safety and Environmental Information Required (§ 250.1910/ API RP 75 section 2)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
2.01	Is the facility you work on (while contracted to Operator) owned by a company other than yours?	X					
If Yes to 2.01, please go to Element 3.							
2.02	Is process design information available (e.g. simplified process flow diagram and acceptable upper and lower limits for temperature, pressure, flow and composition)?						
2.03	Are the following available and retained for the life of the facility:						
	(a) piping design information?						
	(b) mechanical design information?						
	(c) facilities design information?						
2.04	Is the following mechanical design information available:						
	(a) Equipment arrangement drawings?						
	(d) Design basis of the relief system?						
	(e) Description of alarm systems?						
	(f) Description of shutdown systems?						
	(g) Description of interlock systems?						
	(h) Description of well control systems						
	(i) Design basis for fire protection features and systems?						
2.05	Is your mechanical/facility design consistent with government regulations and applicable consensus codes and standards or, in the absence of codes and standards, generally accepted engineering practices?						
2.06	If design is not consistent with applicable consensus codes and standards, is suitability of design for intended use documented?						
2.07	If your original mechanical design information no longer exists, has suitability of design for intended use been verified and documented?						
2.08	Does your design and installation of new facilities and major modifications include consideration of human factors?						
Please continue to Element 3.							

### 3 SEMS Interface Document

Question	Hazards Analysis (§ 250.1911 / API RP 75 section 3)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
3.01	Is criteria established to identify when a job safety analysis (JSA) is required?						
3.02	Are copies of your most recent JSAs kept at the job site and readily accessible to employees?						
3.03	Do your JSAs identify, analyze and record:						
	(a) steps involved in performing a specific job?						
	(b) existing or potential safety and health hazards associated with each step?						
	(c) recommended actions/procedures to eliminate or reduce hazards and the risk of workplace injury or illness?						
3.04	Does the supervisor or person in charge of the task approve the JSA before work begins?						
3.05	Is the facility you work on (while contracted to Operator) owned by a company other than yours?						
If Yes to 3.05, please go to Element 4.							
3.06	Have facility level hazards analyses been conducted for your facilities/offshore structures?						
3.07	Are your hazard analyses appropriate to the complexity of the operation and do they identify, evaluate and manage the hazards involved in the operation?						
3.08	Do your hazard analyses address the following:						
	(a) operation hazards?						
	(b) previous incidents related to the operation, including any incident where an Incident of Noncompliance or a civil or criminal penalty was issued?						
	(c) control technology applicable to the operation?						
	(d) qualitative evaluation of safety, health, and environmental impacts of control technology failure?						
	(e) human factors?						
3.09	Are current hazard analyses for all operations documented and maintained for the life of the operations? (A complete report with updates should be kept for the life of the facility).						
3.10	Have your hazard analyses been updated when internal audits are conducted so that analyses are consistent with current operations?						
3.11	For hazard analyses performed on new or modified facilities, has special consideration been given to the following:						
	(a) Previous experience with a similar facility?						
	(b) Design circumstances, such as changes in design or design team, after the project is underway?						

### 3 SEMS Interface Document

Question	Hazards Analysis (§ 250.1911 / API RP 75 section 3)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
	(c) Unusual facility location, design, configuration, equipment arrangement, or emergency response considerations?						
	(d) Clear identification of findings that must be brought to resolution immediately or before startup?						
	(e) Operating procedures and practices, including simultaneous operations guidelines?						
3.12	Do you periodically review/update hazard analyses based on priority (with typical review intervals of 5 years for high-priority facilities and 10 years for low-priority facilities)?						
3.13	Are hazards analyses performed by:						
	(a) Persons knowledgeable in engineering, operations, design, process, safety, environmental, etc.?						
	(b) Persons experienced in the operations evaluated?						
	(c) At least one person proficient in the hazard analysis methods employed?						
	(d) A person not involved in original design or modification when the assessment team consists of only one person?						
3.14	Have findings of current hazard analyses been presented in a written report that describes hazards identified and recommended mitigation actions?						
3.15	Have your facility level hazards analysis recommendations been resolved and was the resolution documented?						
3.16	Have JSAs been conducted for offshore structures attached to the seabed and used for exploration, development, production, and transportation of oil, gas, or sulphur? (E.g. MODUs; floating production, storage and offloading facilities; TLPs; spars; and DOI-regulated pipelines.)						
Please continue to Element 4.							

# 4 SEMS Interface Document

Question	Management of Change (§ 250.1912 / API RP 75 section 4)	Operator	Contractor	Primary Contractor	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
4.01	Whose management of change (MOC) procedures do you use for modifications associated with:						
	(a) Equipment?						
	(b) Operating procedures?						
	(c) Personnel changes when there is a change in the organization or in personnel that supervise or operate the facility?						
	(d) Materials?						
If Operator for all parts of 4.01, please go to Element 5.		Y	In Part	N	N/A		
4.02	Do you review all changes before implementation?						
4.03	Do your written MOC procedures address the following:						
	(a) Technical (process and mechanical design) basis?						
	(b) Impact on safety, health, and coastal and marine environments, including hazard analyses where needed?						
	(c) Effects on separate but unrelated upstream or downstream facilities and area-wide emergency plans?						
	(d) Time needed to implement changes?						
	(e) Management approval procedures for changes?						
	(f) Revisions needed to operating procedures, safe work practices, and training program?						
	(h) Revisions needed to safety and environmental information?						
	(g) Communication of the change and its consequences to affected personnel?						
	(i) Duration of the change, if temporary?						
4.04	Are personnel whose job tasks will be affected:						
	(a) informed of the change before startup of the process or affected part of the operation?						
	(b) trained in the change before startup of the process or affected part of the operation?						
4.05	Does your MOC process document and date changes in operating procedures and the SEMS program?						
Please continue to Element 5.							



## 5 SEMS Interface Document

Question	Operating Procedures (§ 250.1913 / API RP 75 section 5)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
5.01	Do you use Operator's Operating Procedures (while contracted to Operator)? Please select "Yes" if you use only Operator's procedures or "In Part" if you use other procedures in addition to Operator's.						
If Yes to 5.01, please go to Element 6.							
5.02	Do operating procedures include job title and reporting relationship of persons responsible?						
5.03	Are operating procedures reviewed as part of the MOC process?						
5.04	Are operating procedures accessible to all employees involved in the operations?						
5.05	Are operating procedures reviewed periodically to verify that they reflect actual operating practices?						
5.06	Does operating procedure review frequency correspond to the degree of hazard presented?						

## 5 SEMS Interface Document

5.07	Are operating procedure reviews and changes documented and communicated to affected personnel?						
5.08	Is the facility you work on (while contracted to Operator) owned by a company other than yours?						
	If Yes to question 5.08, please go to Element 6.	Operator	Contractor	Primary Contractor	N/A		
5.09	Whose written operating procedures do you follow to address the following?						
	(a) Initial startup?						
	(b) Normal operations?						
	(c) Emergency operations (such as medical and weather related evacuations and emergency shutdown)?						
	(d) Normal shutdown?						
	(e) Startup after turnaround or emergency shutdown?						
	(f) Temporary operations?						
	(g) Simultaneous operations?						
	(h) Bypassing and flagging out-of-service equipment?						
	(i) Operating limits, safety and environmental impact of deviating from operating limits and steps to correct or avoid deviation?						
	(j) Properties hazards of chemicals used in operations?						
	(k) Steps to prevent exposing personnel and the environment to these chemicals? (Must include control technology, personal protective equipment, and measures to take if physical contact or airborne exposure occurs.)						
	(l) Any special or unique hazards?						
	(m) Governmental limits on continuous and periodic discharge of hydrocarbon materials, contaminants, or undesired byproducts into the environment?						
	(n) Raw materials used in operations and quality control procedures used to purchase them?						
	(o) Control of hazardous chemical inventory?						
	(p) Impacts to the human and marine environment identified through hazards analyses?						
	(q) Lease or concession stipulations established by governmental authority?						
Please continue to Element 6.							

## 6 SEMS Interface Document

Question	Safe Work Practices & Contractor Selection (§ 250.1914 / API RP 75 section 6)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
6.01	Is documentation available for each worker's (including subcontractors) knowledge and skills to perform his/her job?						
6.02	During subcontractor selection, did you obtain and evaluate information regarding the subcontractors':						
	(a) safety and environmental management policies and practices?						
	(b) safety and environmental performance?						
6.03	Do you follow Operator's safe work practices (while contracted to Operator)? Please select "Yes" if you follow only Operator's practices or "In Part" if you follow other practices in addition to Operator's.						
6.04	If Yes to 6.03, please go to Element 7.						
6.05	Are human factors considered developing safe work practices?						
6.06	Do safe work practices for all personnel (including subcontractors) provide for safe operating, maintenance, and modification activities, including Simultaneous Operations?						
6.07	Do specific safe practices cover the following:						
	(a) Opening pressurized/energized equipment or piping?						
	(b) Lock out tag out of electrical/mechanical energy sources?						
	(c) Hot work and other work involving ignition sources?						
	(d) Confined space entry?						
	(e) Crane operations?						
6.08	Is a work authorization or permit-to-work system implemented for tasks involving:						
	(a) Opening pressurized/energized equipment or piping?						
	(b) Lock out tag out of electrical/mechanical energy sources?						
	(c) Hot work and other work involving ignition sources?						
	(d) Confined space entry?						
6.09	Does the permit-to-work system include communication of work activities to shift change and replacement personnel?						
6.10	Are contractors included in permit-to-work communications if they will perform or may affect or be affected by the work?						
6.11	Do safe work practices meet the most current provisions of federal, state, or local regulations or flag state requirements?						

## 6 SEMS Interface Document

Question	Safe Work Practices & Contractor Selection (§ 250.1914 / API RP 75 section 6)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
6.12	Have materials specifications, inventories, separation, confinement, and handling of toxic/hazardous materials been determined, documented, and communicated to appropriate personnel?						
6.13	Is a copy of your safety policies and procedures available upon request? (And subcontractor's safety policy if different than yours.)						
6.14 Please continue to Element 7.							

# 7 SEMS Interface Document

Question	<b>Training</b> <b>(§ 250.1915 / API RP 75 section 7)</b>	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
7.01	Do your personnel and subcontractors contracted to Operator possess the knowledge and skills to carry out their duties and responsibilities?						
7.02	Do you use Operator's Training Program (while contracted to Operator)? Please select "Yes" if you use only Operator's program or "In Part" if you use another program in addition to						
If Yes to 7.02, please go to Element 8.							
7.03	Does the training program address:						
	(a) operating procedures?						
	(b) safe work practices?						
	(c) emergency response and control measures						
7.04	Are the qualifications of all instructors documented?						
7.05	Does your training program address each of the following:						
	(a) initial training for the basic wellbeing of personnel and protection of the environment?						
	(b) personnel possess the knowledge and skills needed to carry out their duties and responsibilities, including startup and shutdown?						
	(b) periodic training to maintain understanding of/adherence to current operating procedures, using periodic drills to verify retention of required knowledge and skills?						
	(c) communication of changes to operating procedures, safe work practices, or emergency response and control measures, ensuring that personnel are trained in/ informed of changes before they are expected to operate the facility?						
7.06	Has training been documented for:						
	(a) operating procedures?						
	(b) safe work practices?						
	(c) emergency response and control measures?						
Please continue to Element 8.							

## 8 SEMS Interface Document

Question	Mechanical Integrity of Critical Equipment (§ 250.1916 / API RP 75 section 8)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
8.01	Is the facility you work on (while contracted to Operator) owned by a company other than yours?						
8.02	Do you follow Operator's Mechanical Integrity Program (while contracted to Operator)? Please select "Yes" if you follow only Operator's program or "In Part" if you use another program in addition to Operator's.						
If Yes to 8.02, please go to Element 10.							
8.03	Does your mechanical integrity program identify and maintain critical equipment/systems?						
8.04	Are procurement procedures in place to verify compliance with design and material specifications?						
8.05	Are quality control procedures in place during fabrication to confirm that materials and construction meet design specifications?						
8.06	Do your procedures address installation of new equipment their appropriate application?						
8.07	Do your procedures address modification of existing equipment and ensure modifications are appropriate to their application?						
8.08	Do your procedures ensure before startup that installation is consistent with design specifications/manufacture's instructions?						
8.09	Have human factors been considered, particularly regarding accessibility for operation, maintenance and testing?						
8.10	Is a quality assurance program developed at the beginning of the project, is it part of the project execution plan and maintenance program, and does it carry over into operating procedures and management of change?						
8.11	Does the quality assurance program document the technologies and measurement systems used in testing, inspection, calibration and monitoring programs?						
8.12	Is a maintenance program in place including testing/ inspection to sustain ongoing mechanical integrity, enhance safety and protect the environment?						
8.13	Are employees properly trained to maintain critical equipment/ systems?						
8.14	Does the maintenance program include:						
	(a) procedures to maintain equipment integrity?						
	(b) training on application of these procedures, relevant hazards and safe work practices for personnel involved in maintenance.						
	(c) quality control procedures to verify that maintenance materials and spare equipment/parts meet design specifications?						

## 8 SEMS Interface Document

Question	Mechanical Integrity of Critical Equipment (§ 250.1916 / API RP 75 section 8)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
	(d) procedures to review all facility changes in accordance with Management of Change?						
8.15	Do procedures address test/inspection frequency?						
8.16	Do procedures address correction of equipment deficiencies, and are corrections made before further equipment use?						
8.17	Do testing, inspection, calibration and monitoring programs for critical equipment include:						
	(a) list of equipment tested/inspected, specifying methods, frequencies, acceptable limits, and passing criteria?						
	(c) documentation of completed tests/inspections?						
	(1) Is pressure vessel documentation retained for the life of the equipment?						
	(2) Is other documentation retained for 2 years OR as needed to determine frequency changes for test/inspection/preventive maintenance or prepare/revis hazard analyses OR as required by regulatory agencies?						
	(d) procedures to document/correct deficiencies/operation outside acceptable limits?						
	(e) system for reviewing/authorizing changes in tests/inspections?						
	(f) appropriate auditing procedures to ensure program compliance?						
8.18	Does test/inspection documentation include:						
	(a) test/inspection date?						
	(b) name, position, and signature of person performing test/inspection?						
	(c) serial number or other identifier of the equipment tested/inspected?						
	(d) description of test/inspection performed?						
	(e) test/inspection results?						
8.19	Do the testing and inspection procedures follow commonly accepted codes and standards?						
Please continue to Element 10.							

# 10 SEMS Interface Document

Question	Emergency Response and Control (§ 250.1918 / API RP 75 section 10)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
10.01	Do you follow Operator's Emergency Response Program (while contracted to Operator)? Please select "Yes" if you follow only Operator's program or "In Part" if you use another program in addition to Operator's.						
If Yes to 10.01, please go to Element 13.							
10.02	Are written action plans established to assign authority to the appropriately qualified person(s)?						
10.03	Are emergency response plans validated by drills and carried out to a schedule in accordance with a training program?						
10.04	Do the drills:						
	(a) address personnel readiness and interaction with equipment?						
	(b) address realistic scenarios?						
	(c) exercise elements of the area emergency action plan?						
	(d) get conducted on a periodic basis?						
	(e) get analyzed and critiqued to identify and correct weaknesses?						
10.05	Do you use Operator's emergency control center(s) exclusively for each facility contracted to Operator?						
If Yes to 10.05, please go to Element 13.							
10.06	Does the emergency control center have access to:						
	(a) emergency action plans that address:						
	(1) spills of hazardous substance?						
	(2) collision?						
	(3) fire and/or blowouts?						
	(b) oil spill contingency plan?						
	(c) other necessary safety and environmental info?						
	(d) piping design information?						
	(e) mechanical design information?						
Please continue to Element 5.							



# 13 SEMS Interface Document

Question	Recordkeeping (Records and Documentation) & add'l BOEMRE reqs (§ 250.1928 / API RP 75 section 13)	Y	In Part	N	N/A	Please list your controlling documents / procedures for each question (When not following Operators). If N/A, please explain why.	Comments or Actions
13.01	Do you follow Operator's Record Keeping Program (while contracted to Operator)? Please select "Yes" if you follow only Operator's program or "In Part" if you use another program in addition to Operator's.						
If Yes to 13.01, please follow the instructions for completing this SEMS Interface Document.							
13.03	Are documented JSA results maintained on site for 30 days?						
13.04	Are documented JSA results and JSA records maintained and made available on request for two years?						
13.05	Are JSA results documented in writing by the person in charge of the activity?						
13.06	Are all MOC provisions documented, dated, retained, and made available for 2 years?						
13.07	Are injury/illness logs maintained and made available for 2 years?						
13.08	Are records of contractor safety policy and procedure evaluations maintained and made available for 2 years?						
13.09	Are all records and documents:						
	(a) kept in an orderly manner?						
	(b) readily identifiable?						
	(c) retrievable?						
	(d) legible?						
	(e) identified with the date of any and all revisions?						
13.10	Do you have a documentation control system that ensures that records and documents are maintained.						
13.11	Do maintained records include:						
	(a) information on applicable regulations?						
	(b) complaint records?						
	(c) training records?						
	(d) process information?						
	(e) product information?						
	(f) inspection, maintenance and calibration records?						
	(g) pertinent contractor and supplier information?						
	(h) incident reports?						
	(i) emergency preparedness and response information?						
	(j) information on significant environmental aspects?						
	(k) audit reports?						
	(l) management reviews?						
Please follow the instructions for completing this SEMS Interface Document.							