OOC JSA GUIDANCE DOCUMENT

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1 Scope

The purpose of this document is to provide guidance for managing safety and environmental risk associated with offshore activities. Identifying and mitigating hazards is a skill that needs to be developed with continual improvement.

2 Justification

The justification for this document is to periodically review the Job Safety Analysis (JSA) process to determine its effectiveness in meeting the desired performance objectives.

3 OOC SEMS JSA Workgroup

The OOC SEMS JSA Workgroup is comprised of the following representatives who contributed to the writing of the OOC JSA Guidance Document.

Table 1: OOC SEMS JSA Workgroup

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4 Roles and Responsibilities

4.1 Management

The role of company management in this process is to:

1. Support the company's JSA process
2. Enable field leadership/personnel's efforts to improve JSA process through:
   a. Planning
   b. Training (skills, knowledge, ability)
   c. Resources
3. Assuring employees complete training to mitigate hazards and the processes are being followed
4. Actions for management to take for improvement:
   a. Job site visits
   b. Participating in pre-job planning
   c. Reviewing completed JSAs against the actual task being performed
   d. Participating in post-job review
   e. Periodically reviewing the JSA templates against the actual tasks being performed to identify changes in process/equipment of regulation.

4.2 Task Supervisor

The role of the task supervisor in this process is to:

1. Participate in premobilization process/meeting
2. Lead personnel in site walkdown/HazID/hazard hunt
3. Ensure adequate barriers and/or controls are implemented based off the hierarchy of controls:
   a. Elimination
   b. Substitution
   c. Engineering
   d. Administrative
   e. Personal protective equipment (PPE)
4. Facilitate onsite pre-job meeting
5. Verify each individual understands their task, hazards, and barriers needed to perform their assigned task
6. Acknowledge and sign the JSA that the above was completed

4.3 Field Personnel

The role of the field personnel in this process is to:

1. Conduct job site walkthrough/HazID/hazard hunt
2. Participate in pre-job meetings
3. Ask questions/clarify understanding of scope and steps
4. Participate in completion of JSA

5 General / Best Practices

5.1 What is a Job Safety Analysis (JSA)?

A job safety analysis (JSA) is a guidance document which helps integrate accepted safety and health principles and practices into a particular task or job operation. OSHA defines as formal process vs guidance document.

1. An evaluation of hazards identified during the walkthrough should be included or modified prior to developing a task JSA.
2. Each job step should be analyzed to identify potential hazards, and barriers and controls to remove or mitigate the identified hazards.

5.2 Minimum steps for developing a Job Safety Analysis:

1. Selecting the task/activity to be analyzed
2. Breaking the task/activity down into a sequence of steps
3. Identifying potential hazards
4. Determining effective barriers or controls to remove and/or mitigate hazards

5.3 Factors to consider when determining the need for a job safety analysis for non-routine activities:

1. Infrequently performed jobs: workers may be at greater risk when undertaking non-routine jobs, and a JSA provides a means of reviewing, identifying, and communicating hazards.
2. Accident severity: the consequences of an accident, frequency, hazardous condition, or exposure to harmful substance.
3. New task or activity not previously analyzed: hazards may not be evident, identified or anticipated.
4. Modified scopes in task/activity: new or previously unidentified hazards that may be associated with changes in procedures, equipment and/or environment.

5.4 Minimum steps when documenting a job safety analysis:

1. Most task/activities can be described in less than ten steps. Should additional steps be required, it is recommended to divide the task/activities into two or more segments, each with its own separate JSA.
2. Document what steps are necessary by starting with an action verb to identify the steps to be completed versus how the job is to be performed.
3. Each step should be recorded in the correct sequence. Any step(s) out of order may impede an individual(s) in identifying potential hazards and/or introduce new hazards that may not have been previously identified.
4. When using a pre-populated or template JSA, review each step for applicability and verify that each hazard is identified or mitigated including site specific additions.

5.5 Identifying Potential Hazards

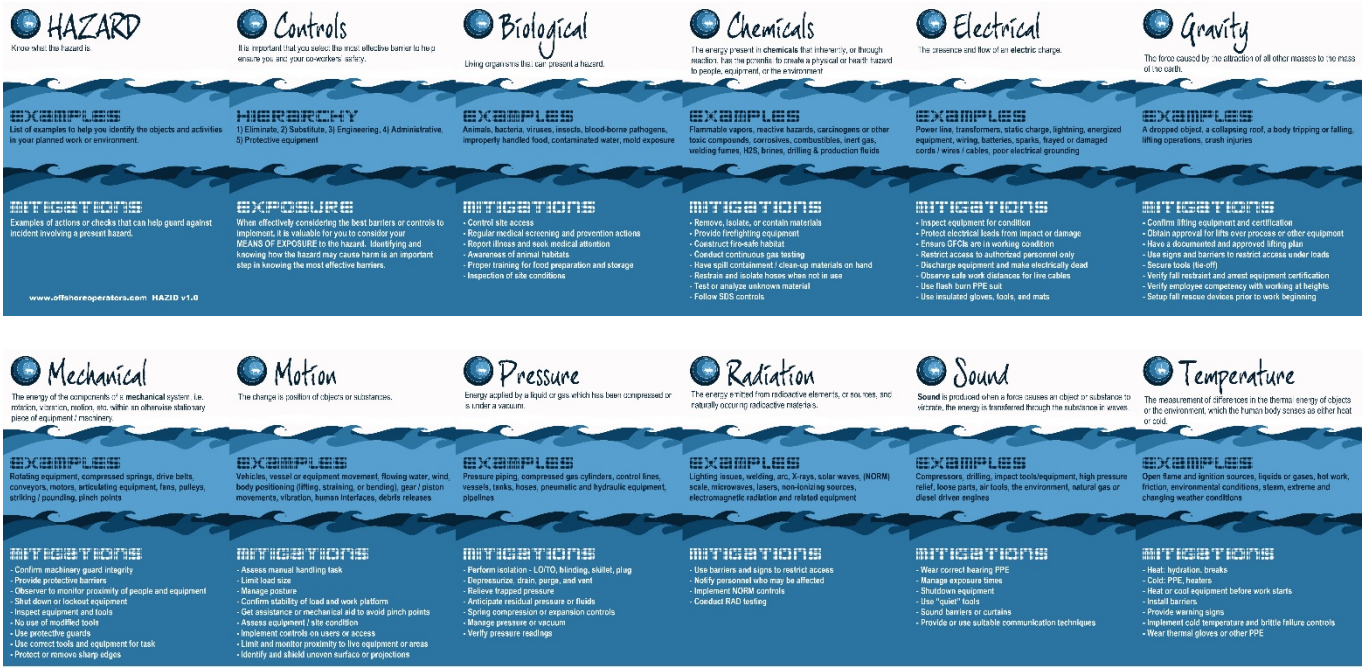
Potential hazards include:

Table 2: Potential Hazards

Biological	Motion
Chemical	Pressure
Electrical	Radiation
Gravity	Sound
Mechanical	Temperature

To help identify potential hazards, the following guidance tool could be used:

Figure 1: HazID Tool Graphic



5.6 Hierarchy of Controls

These countermeasures prioritized from most effective to least effective in reducing risk:

1. Elimination - Physically remove the hazard
2. Substitution – Replace with less hazardous energy source or safer job task
3. Engineering – Contain or control the hazard source
4. Administrative/Training – Manage the work
5. Personal Protective Equipment (PPE)

All workers who are or will be performing the job should participate in the completion of the JSA. Once the analysis is completed, the results must be communicated to concurrent operations.

6 JSA Development

6.1 How to Effectively Perform a JSA

1. Perform a worksite walkthrough with the work team to provide real-time identification for known or unknown hazards.
2. Define and review the task or scope of work including the identification of hazards through three elements:
   NOTE: where templates exists for the task, site specific notes or edits should be made
   a. Process (system hazards)
   b. Task (tools and equipment to be used)
   c. Jobsite (environmental/location hazards)
3. Break the tasks into logical steps, and list them in the order in which they are performed.
4. Identify and document potential hazards involved in the task.
5. Assign Responsibility:
   a. To the person(s) who will execute the control measures.
   b. To the person(s) performing the work and document their names.

6.2 JSA Review

Once the JSA is documented, it shall be reviewed by the workers for their input discussing the scope and approach to the work and raise any concerns prior to the start of the work.

During JSA review, the Task Supervisor should ensure that the workers understand the following:

1. The full scope of work, any conflicting work task (e.g. SIMOPS)
2. Details of the task steps involved
3. Hazards and risks identified for each step in the task
4. All control measures or barriers are identified and available
5. The reason why the precautionary measures are in place
6. Any individual accountability or responsibilities

7 Training

7.1 Content

1. Hazard identification
2. Hazard mitigation – using hierarchy of controls
3. JSA methodology
4. Company specific JSA requirements
5. Practical demonstration / individual assessments

7.2 Frequency

1. Initially and when requirements change

7.3 Training Verification

1. Field audits – scheduled and non-scheduled observations of personnel performing activities allowing direct feedback from leadership to personnel
2. Desktop/virtual audits – historical reviews of completed JSAs and providing feedback and/or coaching to personnel

8 Validation

Strong leadership engagement is necessary for an effective JSA Program

1. Management should communicate their commitment and expectation for the use and sustainment of the company's hazard identification and JSA programs.
2. Continuous improvement through validation is key to sustaining effective JSA programs.

Levels of validation include:

1. During task, planning vs execution:
   a. Observe task for comparison to written JSA.
   b. Are the job steps being performed identified in the JSA?
   c. Are the controls /barriers being implemented as identified in the JSA?
   d. Verify all appropriate personnel are present and participate in JSA discussion.
2. End of task / shift crew review:
   a. Discuss what went right/wrong and what could/should be improved.
   b. Were there an adequate number of personnel involved in the task?
   c. How well did the crew identify all hazards prior to beginning work?
   d. Was there a change of scope or additional hazards identified during the task and if so, was there an intervention in the job to discuss with affected personnel?
   e. How effective was the supervisor's instruction/discussion of the task during the meeting?
   f. What was the level of participation of those involved in the task?
3. Facility Person in Charge (PIC) / Task Supervisor:
   a. Was feedback provided on the content of the JSA?
   b. Did the PIC or task supervisor provide additional feedback on hazards or controls?
   c. Was the JSA followed during task?
   d. Did the PIC or task supervisor observe the task while being performed? Was any additional feedback provided?
4. Office Based Operation Leadership Review:
   a. Leadership reviews are necessary to ensure the company's JSA methodology is being followed as intended.
   b. Company leadership should establish a sampling rate and frequency of JSAs to measure the content of JSAs.
      i. JSAs selection should be based on risk and/or frequency of task
   c. Company should consider the results from verification audits to develop strategies to continually improve JSA content to include but not limited to:
      i. Did JSA follow company's hazard identification/JSA methodology?
      ii. Were specific hazards and controls provided in the JSA?
      iii. Was a JSA conducted for every applicable task?
      iv. Was it reviewed and signed by all personnel involved in the task?
      v. Was the scope of the task reviewed and authorized by the designated PIC?
5. Incident Investigation:
   a. During incident investigation/near miss, the JSAs should be reviewed for continual improvement of your JSA program.

9 JSA Retention

30 CFR 250.1928(b): For JSAs, the person in charge of the job must document the results of the JSA in writing and must ensure that records are kept onsite for 30 days. In the case of a MODU, records must be kept onsite for 30 days or until you release the MODU, whichever comes first. You must retain these records for 2 years and make them available to BSEE upon request.