

**Chief Safety Officer Decision (Regulatory Exemption)**

**Date:** 29 January 2016

**C-NLOPB Reference:** 2015-RQ-0174

**Applicant:** Suncor Energy Inc

**Applicant Reference:** RQF 276

**Installation Name:** FPSO Terra Nova

**Authority:** *Canada-Newfoundland Atlantic Accord Implementation Act, subsection 151(1)*  
  
*Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1)*

**Regulation:** Subparagraph 17(5)(a) and subsections 8(2) of the *Newfoundland Offshore Petroleum Installations Regulations*

**Decision:**

The Chief Safety Officer accepts the Applicant's, the owner of the FPSO Terra Nova, request for a temporary exemption to use a manual means of flare ignition in lieu of the Installation Regulations requirement for an automatic ignition system with the following conditions:

1. The manual means of flare ignition shall be in accordance with the Suncor critical procedure *TN-PE-PR22-X00-051 Controlled ignition of hydrocarbon gas* except as otherwise noted in this decision and the procedure must be updated to include procedures and safety precautions in the event of a misfire of the flare gun.
2. The repairs to the automatic flare ignition system are to be implemented as soon as possible after receipt of the necessary replacement parts, and no later than April 1<sup>st</sup>, 2016. A detailed plan for the implementation of these repairs is to be submitted to the Chief Safety Officer by February 5<sup>th</sup>, 2016.
3. Due to inconsistency and the necessity to regularly use multiple flares to ignite the flare boom with a pistol, a more accurate means of manual ignition (i.e. shotgun style flare gun) will be required to be implemented. Suncor is to source and

implement a more accurate manual means of flare boom ignition and report to C-NLOPB by February 5<sup>th</sup>, 2016. Personnel tasked with using this equipment shall be appropriately trained in its safe usage and appropriate emergency safety precautions/ procedures, such as misfires. It is further expected that two such shotgun style flare guns will be acquired so that there is an emergency backup in the event that one misfires.

4. C-NLOPB considers that the use of flare guns as a manual means of igniting flare tips is an emergency backup to the fitted automatic ignition system required by regulation. Given the historical unreliability of the Terra Nova system, it is the C-NLOPB expectation that Suncor acquire and have readily available spare parts to avoid future delays in delivery of spare parts. It is further expected that permanent repairs to the fitted automatic ignition system will be implemented as soon as possible following any event that would require use of the emergency backup flare ignition system (i.e. Flare gun).



Chief Safety Officer