

Chief Safety Officer Decision
(Application for Substitution, Equivalency, or Exemption)

Date: 22 March 2019

C-NLOPB Reference: 2019-RQ-0001

Applicant: Suncor Energy Inc.

Applicant Reference: 299.2

Installation Name: Terra Nova FPSO

Authority: *Canada-Newfoundland and Labrador Atlantic Accord Implementation Act, subsection 151(1) & section 205.069*

Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act, subsection 146(1) and section 201.66

Regulation: *Subparagraph 8(2) of the Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer accepts the Applicant's proposal to carry out hot-work on the Port Main Power Generator (MPG) during the Hot Gas Path inspection while the Terra Nova FPSO facility is in production. The Application has been approved subject to the following conditions:

1. The safety systems (e.g. fire and gas detection, fire suppression) that are either installed or proposed to be installed for protection of the immediate area and surrounding areas are operational for the entirety of this scope of work.
2. The MPG enclosure will be maintained as a positive pressure environment.
3. On loss of positive pressure within the enclosure, all hot work is to cease and any nonhazardous area equipment (i.e. welding machines) are electrically isolated.
4. All expectations addressed in the associated C-NLOPB Hot Work Interpretation Note 14-01 apply to this RQF decision and where required, the operator's Control of Work and Procedures System and Flame Hot Work Certificate Procedure shall reflect these expectations.

This Decision is effective from the date of issuance herein until the earlier of:

- a) the date a Regulation referenced herein is repealed or the date a particular subsection that is the object of a substitution or exemption being granted hereby is amended or replaced, or
- b) the date on which the CSO and /or CCO (as applicable) revokes this Decision as a result of
i) any enforcement action by the Board related to this Decision or ii) new information or analysis coming to light challenging the assessment upon which this Decision was based, including but not limited to any changes to commitments made by the Applicant in its application.



For greater certainty, Chief Safety Officer will no longer have authority under the *Accord Acts* to grant exemptions for Part III.1 transitional regulations once they are repealed.


Chief Safety Officer