

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

Date: September 27, 2022

C-NLOPB Reference: 2022-RQ-0027

Applicant: Suncor Energy

Applicant Reference: RQF 135.12 Rev. 1

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) & section 201.66

Regulation: Section 22(1), (2)(h) of the *Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *Terra Nova FPSO*, proposal to increase POB to 160 during the return voyage from an international dry dock. Suncor will maintain the ability to evacuate 100% of the personnel onboard by means of the five lifeboats with 75% POB capacity available on port side and 113% POB capacity available on starboard side in lieu of the requirements in Section 22 of the *Newfoundland Offshore Petroleum Installations Regulations* requirements relating to the capacity and distribution of lifeboats. This approval is subject to the following conditions:

- 1) The Applicant must submit a written request to the Chief Safety Officer and obtain approval prior to increasing the number of personnel above the approved complement of 120 persons;
- 2) The complement of personnel on board for this time period must not exceed 160 persons;
- 3) The Applicant must ensure that all hydrocarbon production systems remain flushed, drained and purged, and gas systems drained and purged during this time period;
- 4) There are no process hydrocarbon inventories onboard when the complement is increased above 120 persons;
- 5) Prior to increasing above the approved complement of 120 persons, the Applicant must advise the C-NLOPB of any outstanding Certifying Authority evacuation system limitations;
- 6) Prior to increasing above the approved complement of 120 persons, the Applicant must ensure 200% complement of immersion suits, and 100% complement of life rafts, life jackets and grab bags, suitable for 160 persons;
- 7) All gas and fire detection systems, all fire suppression systems and all other safety systems are to be confirmed as fully operational before the POB complement is increased above 120 persons;

- 8) The Applicant shall notify the C-NLOPB if a lifeboat has to be taken out of service (or is anticipated to be out of service) for greater than 12 hours during this time period;
- 9) Adequate standby/escort/tow vessel capacity is provided to accommodate the additional complement in the event of an evacuation;
- 10) The maximum POB complement is to revert back to 120 persons prior to the resumption of production, and written confirmation of this is to be provided to the satisfaction of the Chief Safety Officer prior to the introduction of hydrocarbons; and
- 11) The conditions noted in MTRB Decision No. M18539 are to be followed and where there is a discrepancy the more stringent requirement is to be met.

Original signed by Paul Alexander

Chief Safety Officer