



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

Date: 2021-Apr-21 | 9:37:59 AM NDT

C-NLOPB Reference: 2021-RQ-0033

Applicant: Stena Drilling Ltd.

Applicant Reference: SFO-RQ-20-028

Installation Name: Stena Forth

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: Subsection 28(4) and (5) of the *Newfoundland Offshore Petroleum Installations Regulations*

Decision:

The Chief Safety Officer approves the Applicant's, the owner of the *Stena Forth*, use *IMO Mobile Offshore Drilling Unit (MODU) Code 1989* with amendments to 2001, *IMO SOLAS 1974 Convention* as amended and *DNV-OS-D301 – Fire Protection October 2007*, for foam systems in lieu of the requirements in Section 28 (4) and (5) of the *Newfoundland Offshore Petroleum Installations Regulations*, which requires foam systems to meet the requirements of *National Fire Protection Association 16, Standard on Deluge Foam-Water Sprinkler and Foam-Water Spray Systems*, and fire-extinguishing systems utilizing pressure water spray to meet the requirements of *National Fire Protection Association 15, Standard for Water Spray Fixed Systems for Fire Protection*, subject to the following condition:

- 1) The water/foam system is to be inspected, maintained and tested in accordance with NFPA 25, as referenced in NFPA 15 and NFPA 16 in the regulations, as well as any additional requirements from the OEM, DNV and IMO.

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- a) the date a Regulation referenced herein is repealed or the date a particular subsection that is the object of a substitution or exemption being granted hereby is amended or replaced, or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, the 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longer have authority under the Accord Acts to grant exemptions for Part III.1 transitional regulations once they are repealed.

DocuSigned by:

Chief Safety Officer