

# Guidelines for the management of structural ALE issues for mono-hull FPSOs

# GUIDELINES FOR THE MANAGEMENT OF STRUCTURAL ALE ISSUES FOR MONO-HULL FPSOs

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# 1 INTRODUCTION

## 1.1 INTRODUCTION

Worldwide, there are many mono-hull FPSOs in operation that are approaching, have reached, or exceeded their original design life. During the life cycle of these assets there is a need to ensure that they remain fit-for-purpose (including hull structural integrity), which can be achieved through the application of a robust Structural Integrity Management System (SIMS). The SIMS must ensure that, as the FPSO ages, any degradation is properly predicted, detected, monitored, assessed and remediated as required.

There is considerable information available publicly for the application of SIMS. This document aims to complement existing information on SIMS to address issues specifically related to ALE of the hull structures of mono-hull FPSOs.

This document aims to guide the reader through the management of this process, highlighting the key stages and supporting analysis through to the potential implications and remedial actions on the asset.

It is highlighted that this document considers the main hull structure of mono-hull FPSOs. Other ALE aspects of FPSOs are not included within; however, where possible, relevant signposts are provided to existing publications and guidance.

Although this document relates to mono-hull FPSOs, much of the guidance notes contained within are applicable to other FPSO/floating storage unit (FSU) designs.

## 1.2 SCOPE

This document provides guidance to address common issues relating to the ALE of mono-hull FPSOs. The focus of this document is on hull structures for mono-hull FPSOs, including cargo oil tanks, water ballast tanks, voids, internal caissons, topside module structural connections which integrate with the hull structure, etc.

This document excludes guidance for the following:

- semi-submersible structures;
- topside structures;
- marine systems;
- watertight integrity;
- operational aspects;
- turrets and station keeping systems, and
- subsea-to-surface interface equipment, i.e. risers, mid-water arches, umbilicals etc.



## 2 APPLICATION

This document is intended as a guide to support duty holders, operators and contractors with the Structural Integrity Management (SIM) of ageing FPSOs in the oil and gas industry.

The document should be used to guide the reader through the engineering assessment process in response to common ageing related assessment triggers. The guidance is intended to be informative and offer possible assessment approaches for FPSO hull structural issues, but it is not intended to be a prescriptive assessment approach. Instead it should be used to select a suitable and proportionate assessment approach in response to a given triggering event, whilst considering the data available as part of a holistic approach.

It should be used alongside other industry information sources available, such as *Guidance on the management of ageing and life extension for UKCS floating production installations* and International Association of Classification Societies (IACS) *Common structural rules (CSR)*.

## 3 REGULATORY REQUIREMENTS

### 3.1 INTRODUCTION

This section provides guidance on some of the key regulatory requirements relating to the operation of FPSOs.

This section signposts the key regulatory requirements for the operation of FPSOs, specifically relating to ALE structural issues.

Guidance is predominantly provided for the UK; however, much of this guidance applies to worldwide operations.

### 3.2 UK

The UK regulatory regime is largely goal setting, in that the duty holder can operate an asset in accordance with their own strategies and procedures, provided compliance can be demonstrated to the regulator.

Relevant regulations applicable to offshore structures include:

- Health and Safety at Work etc. Act 1974.
- Management of Health and Safety at Work Regulations 1999.
- Offshore Installations and Wells (Design and Construction etc.) Regulations 1996.
- Offshore Installations (Safety Case) Regulations 2015.
- Provision and Use of Work Equipment Regulations (PUWER) 1998.
- Offshore Installations (Prevention of Fire and Explosion, and Emergency Response) Regulations 1995.
- Offshore Installations and Pipeline Works (Management and Administration) Regulations 1995.
- International Convention for Safety of Life at Sea (SOLAS), 1974 including Protocol of 1978 and later amendments.
- International Convention for the Prevention of Marine Pollution from Ships (MARPOL), 1973 including Protocol of 1978 and later amendments.
- International Regulations for Prevention of Collision at Sea.
- International Convention on Load Lines, 1966, including supplements.
- International Convention on Tonnage Measurement of Ships.

The end of design life and, hence, start of a period of life extension, is not explicitly recognised in legislation; however, there is a requirement that the duty holder continuously maintain the integrity of the FPSO. Thus, to comply with this legislation the duty holder must demonstrate to the regulator that they are adequately managing the ageing process and any associated risk to the structural integrity of the vessel.

An overall framework for decision making which would ensure consistency and coherence across the full range of risks falling within the scope of the Health and Safety at Work etc. Act is set out in Health and Safety Executive (HSE) R2P2 *Reducing risk, protecting people*. Duty holder and code acceptance criteria for life safety are often linked to the criteria set out in this document, but it is noted that it is for the duty holder to set their own tolerability criteria.

There is a requirement to perform a thorough review of the Safety Case every five years, which normally addresses ALE.

### 3.3 OTHER REGIONS

Regulatory requirements and the associated stakeholders vary from region to region, from goal setting regimes like the United Kingdom Continental Shelf (UKCS), to more prescriptive approaches, for example as found offshore in Canada. It is important that operators fully understand the implications of the regulatory framework they are operating in, and act accordingly.

It is important to note that any regulatory requirements should be seen as minimum requirements, and that ultimately operators should ensure they implement a safety management strategy for their FPSO(s) which demonstrates that risks are mitigated to a level which is as low as reasonably practicable (ALARP). This is increasingly important in geographical areas where the regulatory requirements are less onerous than found elsewhere.

### 3.4 INDUSTRY STANDARDS AND GUIDANCE

Many FPSOs are operated under a Classification approach, typically following a similar path to trading tankers.

The Classification Society Rules have been a proven approach for shipping since 1760 and provide established rules and guidance defining prescriptive inspections schedules with scope typically increasing as the vessel ages.

It should, however, be noted that Class Rules are based on a five-year renewal (drydock) cycle that are not necessarily aligned with the business needs of the operator, and are certainly NOT a guarantee of structural integrity. FPSOs are not subject to periodic shipyard visits and cannot take action to avoid storms as per trading vessels.

The IACS document *Classification societies – What, why and how?* states the following:

*'A certificate of classification.... does not imply, and should not be construed as, a warranty of safety, fitness for purpose or seaworthiness of the ship.'*

*'It is an attestation only that the vessel is in compliance with the Rules that have been developed and published by the Society issuing the classification certificate.'*

Extract from *Structural Integrity Management of ageing offshore installations review of Class Rules for floating installations on the UKCS*.

*'Classification alone does not appear to meet the HSE regulatory requirements, which place responsibility for SIM on the duty holder. The experience to date of floating production installations is limited.'*