

Safety Alert

MMS

U.S. Department of the Interior
Minerals Management Service
Gulf of Mexico OCS Region

Safety Alert No. 282
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Job Safety Analysis (JSA)

MMS has revised and is re-issuing Safety Alert No. 276 (SA 276) as the result of a fatality and injury during a recent hose lifting operation utilizing an air-operated hoist. SA 276 was originally issued August 22, 2002 and revised on February 17, 2009. SA 276 outlines the use of a Job Hazard Analysis (JHA) to review the scope of work being performed to uncover hazards overlooked in the original design, mock-up, or setup of a particular process, operation or task. It also describes that a JSA, on the other hand, is a process used to review site-specific detailed job steps and uncover hazards associated with the specific job undertaken. SA 276 was previously revised to include considering inclement weather as a potential hazard for both routine and non-routine operations. Once the hazards are identified, a strategy for eliminating or reducing the hazards should include the development of operating procedures, safe work practices, operating guidelines, or a combination of all three. SA 276 recommends a systemic approach to identify those tasks having potential severe or fatal consequences, conduct the necessary JHA and/or JSA to identify those hazards leading to potentially severe or fatal consequences, then eliminate the hazard or reduce the severity of the consequence through the use of design engineering, administrative controls, or written procedures and/or guidelines.

A Minerals Management Service (MMS) Panel investigation into the recent air-operated hoist hose lift fatality and injury revealed that although a verbal pre-job lift safety meeting was conducted by the drilling crew, the written JSA Form was not completed and signed by all parties until post-accident. As per the Drilling Contractor's Health, Safety and Environmental (HSE) policy, a pre-job written JSA Form was not completed since the lifting operation was deemed by the Driller as not involving known hazards with a "possible or probable" likelihood of causing an incident or has the potential to cause an incident of high severity. The Operator's HSE policy, however, required the need for a written JSA and pre-job safety meeting before a new job, at the beginning of each workday and in the event of a significant operational change. The Operator's HSE policy also states that when the Operator and Contractor procedures conflict, the more stringent rule should be followed. The absence of a formal JSA prior to the lifting accident implies: (a) an absence of the Contractor's commitment to the Operator JSA policy and (b) the apparent failure on the part of the Operator to provide the necessary oversight to ensure that a formal JSA protocol be followed for the hoist lifting operation.

Therefore, the MMS recommends SA 276 be revised and re-issued to include the following:

- Operator's and their Contractors review and communicate their respective HSE policies to determine if a formal written JSA and safety meeting for lifting or other operations is required.
- Workers understand that not performing formal written JSA safety meetings provides another opportunity of higher levels of risk associated with operational tasks rather than the tasks being reduced to As Low as Reasonably Practicable (ALARP).
- Workers understand that is not the JSA Form alone that will keep them safe on the job but rather the process the JSA represents. It is of little value to identify hazards and devise proper controls if the controls are not put in place.

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