

# Great Western Painting

## SEMS Management of Change

### SEMS Management of Change

30 CFR 250.1912 What criteria for management of change must my SEMS program meet?  
(See Below)

**Note:** On Oct. 1, 2011, the Department of the Interior formally established two new, independent bureaus – the Bureau of Safety and Environmental Enforcement (BSEE) and the Bureau of Ocean Energy Management (BOEM) – to carry out the offshore energy management and safety and environmental oversight missions that were under the jurisdiction of the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE). The establishment of BOEM and BSEE marks the completion of an effort to reorganize the former Minerals Management Service (MMS).

**Note:** The term “Contractor” means anyone, other than an employee of the lessee, performing well control, deepwater well control, or production safety duties for the lessee. We do not perform these duties.

**Note:** SEMS Definition:

**Operator:** the person the lessee(s) designates as having control or management of operations on the leased area or a portion thereof.

An operator may be a lessee, the BSEE-approved or BOEM-approved designated agent of the lessee(s), or the holder of operating right

**Note:** For the purposes of this program, “you” refers to the operator.

30 CFR 250.1912, What criteria for management of change must my SEMS program meet?, is in its entirety below:

- a) You must develop and implement written management of change procedures for modifications associated with the following:
  - (1) Equipment,
  - (2) Operating procedures,
  - (3) Personnel changes (including contractors),
  - (4) Materials, and
  - (5) Operating conditions.
- (b) Management of change procedures do not apply to situations involving replacement in kind (such as, replacement of one component by another component with the same performance capabilities).
- (c) You must review all changes prior to their implementation.
- (d) The following items must be included in your management of change procedures:
  - (1) The technical basis for the change;
  - (2) Impact of the change on safety, health, and the coastal and marine environments;
  - (3) Necessary time period to implement the change; and
  - (4) Management approval procedures for the change.
- (e) Employees, including contractors whose job tasks will be affected by a change in the operation, must be informed of, and trained in, the change prior to startup of the process or affected part of the operation; and
- (f) If a management of change results in a change in the operating procedures of your SEMS program, such changes must be documented and dated.

Our employees are aware that the operator for whom we are working must address training and inform employees affected by operational changes prior to startup.

Our employees are aware that the program developed by the operator for whom we are working must address how Management of Change (MOC) policies and procedures are utilized whenever there is a change in supervisory personnel. Routine personnel vacancies and replacements, rotation, and shift changes should not require and additional MOC action.

Our employees are aware that the MOC program developed by the operator for whom we are working must address procedures for safety and environmental considerations involved in proposed changes.

Our employees are aware that the program developed by the operator for whom we are working must address the necessary MOC procedures for revisions in operating procedures, safety work practices and training programs.

Our employees are aware that the MOC program developed by the operator for whom we are working must address communication of proposed changes to appropriate personnel.

30 CFR 250.1912(e) is important because our employees whose job tasks will be affected by a change in the operation, must be informed of, and trained in, the change prior to startup of the process or affected part of the operation. This would include:

1. Training and operational changes prior to startup.
2. MOC policies and procedures utilized whenever there is a change in supervisory personnel.
3. Procedures for safety and environmental considerations involved in proposed MOC changes.
4. Procedures for revisions in operating procedures, safety work practices and training programs.
5. Communication of proposed changes to appropriate personnel.