

IADC: MMS plan to revamp OCS training a good idea—mostly!

THE US MINERALS Management Service aims at radically restructuring the way well-control training is conducted in the US Outer Continental Shelf, and IADC believes it's a great idea—with some reservations. MMS, which oversees offshore well-control training in the US, has long managed its mandate by certifying training programs according to agency-determined standards.

MMS now wants to step back into a less-involved and less-prescriptive role. The new rules would shift responsibility for well-control training to the offshore leaseholder, i.e., the operator. MMS would shift to a new mode—that of assessing training programs, through audits, employee interviews, and written and hands-on tests.

“We believe that the proposed rule retains critical safety elements from the current system and provides added flexibility by allowing lessees to develop training programs in a performance-based environment,” writes MMS in the 20 April, 1999, “Federal Register”. “Under the proposal, lessees, not MMS will be responsible for ensuring that personnel employed at their facilities are trained and competent. We intend to focus our resources on evaluating lessee performance, not on accrediting schools.”

The final rule is expected to be published by the end of 1999 and implemented by the end of the first quarter 2000. IADC well-control and training professionals, including Well Control Committee Chairman **Bob Burnett** of **Global Marine** and the committee's redoubtable Vice Chair-

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—IADC comments on MMS proposal to revamp training rules for the US OCS

man-Training **Dr Allen Kelly** of **Diamond Offshore**, plan to meet with MMS officials at the agency's Herndon, Va, headquarters in mid-July.

MORE GOOD THAN BAD

This new approach will offer far more advantages than disadvantages, IADC believes. The Association's letter of comment on the proposal states, “We believe that such a system is necessary if the industry is to be given the flexibility to adapt to changes in technology and the concomitant changes in operations and operating areas.... The elimination of a specific MMS certification will make it easier for contractors with international operations to move crews and rigs from one region to another.”

One of the main sticking points, though, is that the proposal appears to remove minimum training standards from the equation. Requirements for course duration, class size, periodic retraining and other critical elements of well-control training are totally absent from the proposed regulation.

In fairness, MMS is highly unlikely to permit shoddy training practices to slip by. However, it's equally unlikely that all operators will agree on a single training program for all US OCS activities. On the

contrary, the problem contractors—the major employer of rig workers—will face is adapting to a different training regime and requirements with every different operator—the lessee responsible to MMS.

“In the absence of MMS's acknowledgement of an industry benchmark, operators may adopt too wide a variety of different training requirements,” IADC comments. “Ultimately, this could be more burdensome to drilling contractors than the situation that currently exists when operating internationally.”

There is also the danger of a race to bot-

tom, for operators seeking to shave costs from the training process.

Note the IADC comments, “Some companies, in the interest of economics, could make an overly broad interpretation of the flexibility afforded by the new regulations. This might cause certain training practices to be put in place that are not appropriate or in the best interests of the industry.”

THE WELLCAP BENCHMARK

Fortunately, one widely accepted benchmark for well-control training already exists—WellCAP, the Well Control Accreditation Program. WellCAP, introduced in 1995, was designed by industry training and well-control professionals to serve as a global training standard for regions where none existed.

Since then, 35 WellCAP-accredited schools have trained almost 12,000 students. WellCAP-accredited courses have been taught in 10 languages from 106 locations in 34 nations.

Several operators and drilling contractors, including **Diamond Offshore** and **R&B Falcon**, have already established WellCAP as their global standard.

“The new regulations position WellCAP to become the global standard it was orig-

inally hoped to be,” IADC wrote. “We are hoping to obtain an official reference to either WellCAP or its associated curriculum documents in the final regulations to help accomplish this.”

So far, MMS has declined to endorse WellCAP. The reason why is unclear, especially since the agency endorses specifications of the American Petroleum Institute.

Even so, IADC suggests that one or more WellCAP documents, such as the WellCAP “Handbook for Accreditation” and curriculum outlines, be referenced.

MMS TESTING

MMS indicates that it could gauge the effectiveness of training programs through several methods, including written, simulator and hands-on testing. IADC views this proposal askance. The major concern with written tests is that they are largely ineffective.

For instance, MMS solicited comments on what written test score should signify competency. In response, IADC wrote, “We do not believe that a written examination alone may be an adequate demonstration of competency.” The comments explain that 70% is typically considered acceptable. “However, without reviewing the questions to ensure their relevancy or difficulty, it is impossible to say that scoring 70%—or any other threshold—on a written test establishes an understanding of the subject matter of competency.”

IADC suggested that MMS validate the exam by testing representative well-control workers on the OCS and extrapolating from the scores. Another option would be to allow a group of industry experts to develop or review the test and questions.

The idea of “hands-on” exams, defined as simulator or live-well testing is also flawed, the Association said. Simulators vary widely from manufacturer to manufacturer, and hands-on tests at live wells is just plain dangerous.

“We are opposed to ‘hands-on’ testing as defined in the proposed rule,” the comments say. “While simulators are an excellent means of teaching a principle, the actual operation of the well-control simulators available on the market today can vary greatly. An employee might be very skilled at the operation of one type of simulator and understand all the principles taught on that simulator, while they

might have no skill in the operation of a different simulator.

“Testing on a live well, where the employee is not familiar with blowout preventer configuration, manifold configuration or pump operation, is not only dangerous, but as confusing as putting the employee on a simulator with which he is unfamiliar.”

IADC says it does not oppose observation of simulator testing at a well-control school, nor to MMS evaluating workers about their familiarity with existing equipment on the rig. Also, IADC is not

opposed to MMS observing or participating in pit drills or inside blowout prevention drills aboard the rig.

Some question why MMS is revamping its system. The current arrangement not only appears to have secured well-control safety on the US OCS, but was just revised 2 years ago, and then 4 years before that. Still, the agency appears determined on the new course. The best move for the industry is to unite behind a common standard to minimize confusion and redundancy in the Gulf of Mexico and offshore drilling markets worldwide. ■