



Hazard Identification Report - Omar



AFPC Hazard Identification Report

Forward report to:.....			
Time of observation	14:30	Date of observation	01/08/2000 ✓
3 rd Party involved	OPT/1 OTS/3	Location :	Thayem 107

OBSERVATIONS

At the request of OTS/3 Keith MacDonald and Tariq Al Abed attended remedial work at THY- W-107.

The visit required a close visual examination of the flowline which due to a leak had been opened to the atmosphere. The work involved manually examination of the corroded piping spools to assess its internal condition.

After having completed the inspection which took a approx 40 mins, I returned to the OTS/3 office for the MEMAC Crew to re-assemble the said piping and carry out a hydrotest of the same. During this office visit I noticed the associated safety checks documentation which included a copy of the Radiological Report of the desk of the OTS/3 Site Rep.

The radiological report was completed at 08:09am of the 01/08/2000. In this report it highlighted high contamination of the internal scale which lined the pipework of THY-W-107.

As we know the conditions on the Radiological Report stipulated specific methods for protection of personnel and the environment these were not applied.

In addition to these omissions we were not informed upon arrival at site of ANY NORM hazards associated. What makes this more serious is that the weather conditions during this time were such that dust particles were in the atmosphere thus creating a serious potential for inhalation of Alpha and Beta particles.

The readings taken on the report were as follows Alpha – 60 CPS Beta 6336 CPS and Gamma 20 CPS. It is our understanding from the training that these are particularly high recordings and the appropriate safety precautions should have been put in place to ensure the safety of all staff associated with this job.

A full incident investigation on Safety processes should be undertaken at Thayem.

IMMEDIATE ACTION TAKEN

Informed line supervisor on return to OMAR base camp who asked for the HIR to be raised.

REPORTED BY:

Name	Indicator	Signature
Keith Macdonald	OTS/51	

COMMENTS BY RESPONSIBLE SUPERVISOR:

Agree with the above comments that a full investigation into safety processes are reviewed and the lessons learned shared with all AFPC Fields.

FOLLOW UP ACTION:

B.M. [Signature] OTS/5
HEALTH INSPECTION
AFPC [Signature] TEL. 32217

AFPC INCIDENT REPORT

Please print information

1. GENERAL INFORMATION

Date of Incident :	01/08/00	Time :	1430	General Location :	Thayyem	Reporting Department :	OTS/3 & 5
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Incident Type: *Tick appropriate box by copying the tick provided* ✓

Lost Time Injury		Medical Treatment		Fire / Explosion	
Non Lost Time Injury		Occupational Illness		Equipment / Material Damage	
Non Injurious Incident		Restricted Work		Road Traffic Accident	
Near Miss		First Aid		Environmental / Spillage (above 10 ltr)	
Security / Theft				Other,(specify): NORM working	✓

Parties Involved: *Complete as applicable*

AFPC Department(s):	OTS/3 & 5	Contractor Name:	MEMAC	Third Party Name(s):	OPT/1X
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2. INCIDENT DESCRIPTION

Event(s) leading up to incident:	OTS/3 repair work was underway on TH-107, OTS/5 were called for technical advise, external NORM check had previously been done showing only background readings.
What happened:	Line was broken (cold cut), new section was welded in place on the first day. Second NORM reading was requested at 6pm however staff from OSA were not available at the time. The following morning a NORM reading was taken showing high levels of Beta and Gamma radiation. That morning the damaged flange was inspected and repaired. During the complete exercise the staff involved did not wear PPE for Norm protection. During the review it was highlighted that the NORM protection was available from the morning of the 2.8.00. One day after the work had commenced.
Type of injury / damage:	None known
Follow up:	Incident Report not requested by OSA but both OTS/3 & 5 took the opportunity to determine the maximum learning value from carrying out a full investigation.
Underlying causes:	Failure to follow PTW / NORM working rules, perceived pressure to finish job, poor supervision, failure of communication - number of areas
Failed or missing barriers:	Procedures
Other significant information:	Significant line pressure had recently been applied to staff on another job meaning that they were prepared to ignore safety rules in order to finish the job.

Incident Actual Severity and Potential Risk Assessment: *See table in sec 2.4 of procedure 3.HSE.1.002*

Incident Actual severity :	Level:	3	At risk (P, A, E, or R):	P
Potential risk Assessment :				
Measure of Exposure (A-E):	D	Potential Consequence Level (1-5):	3	At risk (P, A, E or R):
Assessed by (name):		Reference Indicator:		
R.Gardiner / B.Welch		OTS/3 & 5		

5. RESULTS OF INVESTIGATION AND ANALYSIS (By Line Department)

5.1 Immediate Causes of incident: Incidents other than Vehicle. Tick as appropriate by copying. ✓ (Max. 4)

✓	Failure in Communication		Working Environment
✓	Failure to follow Rules / Procedures		Poor Housekeeping
✓	Inadequate Safety / Warning Devices		Worksite Access
	Improper Manual Handling	✓	External Factors (Weather, 3rd Party, etc.)
	Inadequate Personal Protection Equipment		Influence of Medication / Substances
✓	Failure to wear PPE		Other (Specify):
	Misuse of Equipment / Tools		

5.2 Underlying (Root) Causes: Incidents other than Vehicle. Tick as appropriate by copying. ✓ (Max. 4)
Reference SIEP – TRIPOD BETA Guidelines

	Hardware Defects		Incompatible Goals
	Design Deficiencies	✓	Communication Failures
✓	Maintenance Management Failures	✓	Organisational Deficiencies
	Unclear, Unavailable, Incorrect Procedures	✓	Inadequate Training
✓	Error Enforcing Conditions		Inadequate Defences
	Poor Housekeeping		Other (Specify):

5.3 Vehicle Incident Causes: Tick as appropriate by copying. ✓ (Max. 4)

	Excessive Speed		Lack of driving experience
	Crossing People		Lack of judgement
	Crossing animal(s)		Mechanical failure
	Third Party error		Failure to apply defensive driving techniques
	Lack of attention		Unknown / Other (Specify):

6. INVESTIGATION FINDINGS AND RECOMMENDATIONS BY LINE SUPERVISOR

A number of different stories were told as to how it came about that hot work was carried out on a NORM contaminated section of pipe without an internal NORM check being carried out and without correct PPE being worn.

The following day all the correct PPE (BA trailer) and paper coveralls were in place and internal NORM check was carried out.

What is clear is that work was requested by OTS/3 Rep and carried out by MEMAC Rep and inspected by OTS/5 Rep without taking necessary precautions and using correct PPE.

The major contributing factors are seen to be fear of reprisal for not completing the work the evening before (increased deferment) and MEMAC being prepared to do the work outwith NORM procedures.

Another contributing factor was the late arrival of equipment at the job and the fact that it overran without RPS or BA being planned in advance.

Conclusions prepared by Name: R.Gardiner / B.Welch

Reference Indicator: OTS/3 & 5

RT HON SIR ALAN DUNCAN MP



Foreign &
Commonwealth
Office

King Charles Street
London SW1A 2AH

Minister of State for
Europe and the Americas

25 November 2016

Your reference: ZA19600

Our reference: MIN/103253/2016

Byron Davies MP
House of Commons
London
SW1A 0AA

Dear Byron,

Thank you for your letter of 2 November to the Foreign and Commonwealth Office on behalf of your constituent Mr Keith MacDonald. I am replying as Minister responsible for our relations with Europe.

I was sorry to read Mr MacDonald's account of his experiences.

It is not clear from his email if Mr MacDonald has sought legal advice on whether he can seek compensation or take his former employer to a tribunal. However, given this is a matter concerning a Dutch company, you may wish to seek more information from the Embassy of the Netherlands in London. Their contact details are as follows.

Embassy of the Kingdom of the Netherlands
38 Hyde Park Gate
London SW7 5DP
United Kingdom
tel.: 0044 (0)20 7590 3200
email: lon@minbuza.nl

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Alan

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