Canada Energy Regulator | Régie de l'énergie du Canada

APPLICANT: PROJECT: Inuvialuit Energy Security Project SUBJECT: Quality system requirement	**APPLICANT'S FILE:** C14386 DATE: Sept 29 2021 PAGE: 1 OF: 2
Name of Regulation: Oil and Gas Installations Regulations (R-	Section/Sub-section/Paragraph: 4(1), 4(2)

REQUESTING: Regulatory Deviation pursuant to sub-section 54(1)(a) of Oil and Gas Operations Act

REGARDING: Safety

TYPE OF DEVIATION / EXEMPTION: Standard

QUERY: Use of an equivalently safe and recognized standard for a quality assurance program

PROPOSAL: See attached

RATIONALE: See attached

(USE ADDITIONAL PAGES IF NECESSARY)

APPLICANT

NAME: Travis Balaski SIGNATURE: Travis Balaski Digitally signed by Travis Balaski Date: 2021.09.24 07:13:38 -06'00'

TITLE: Operations Lead TEL. #: 1 403-461-6513

REVIEWERS

OPERATOR'S CONCURRENCE (IF NOT APPLICANT)

NAME:	SIGNATURE:	
TITLE:	TEL. #:	DATE

WORKPLACE OH&S COMMITTEE OR REPRESENTATIVE CONSULTED (IF APPLICABLE)

NAME: Alan MacDonald	SIGNATURE:	
TITLE: HESQ Lead	TEL. #: 403 862 4905	DATE Sept 30/21

CERTIFYING AUTHORITY CONCURRENCE OR COMPETENT INDEPENDENT THIRD-PARTY FOR ONSHORE[1]

PROPOSAL MEETS REQUIREMENTS OF THE *OIL AND GAS CERTIFICATE OF FITNESS REGULATIONS*, SECTION 3(2)(a)(ii)

NAME: Nyssa Moore	SIGNATURE:	Nyssa Moore Digitally signed by Nyssa Moore DN: cn=Nyssa Moore, o, ou, email=nmoore@summitinspection.ca, c=CA Date: 2021.09.22 18:08:08 -06'00'
TITLE: Contract Chief Inspector	TEL. #: 1-403-607-5152	DATE Sept 22 2021

FOR USE BY CHIEF CONSERVATION OFFICER OR CHIEF SAFETY OFFICER:

Date Received:

Application No.:

[1] *Oil and Gas Certificate of Fitness Regulations* is applicable to installations at offshore production or drilling sites. For onshore areas, this section shall be signed by a competent independent third-party e.g., Professional Engineer.

IESP Deviation Request #01 – OGOA IR Section 4(2)

Proposal

The Oil and Gas Operations Act – Oil and Gas Installations Regulations 2014 (OGOA IR) Section 4(2) requires that:

4.(2) A quality assurance program must be developed in accordance with (a) Canadian Standards Association standard CAN3-Z299.l-85, Quality Assurance Program — Category 1; (b) Canadian Standards Association standard CAN3-Z299.2-85, Quality Control Program — Category 2; (c) Canadian Standards Association standard CAN3-Z299.3-85, Quality Verification Program — Category 3; and (d) Canadian Standards Association standard CAN3-Z299.4-85, Inspection Program — Category 4

CAN3-Z299.0-86, CAN3-Z299.1-85, CAN3-Z299.2-85, CAN3-Z299.3-85, CAN3-Z299.4-85 have been canceled and are no longer available for purchase and have been replaced with a standard that is only applicable to nuclear plants. Due to the desired longevity of the project being applied for, we propose that we develop and maintain our quality management system in accordance with the most current ISO 9001 quality system (ISO 9001:2015).

Rationale

As the CAN3-Z299 series of standards are no longer maintained, improvements and updates to the system and standards will not occur (it has been canceled and revisions withdrawn). It has been replaced with CSA N299 series, which apply to nuclear plants. ISO 9001 is an internationally recognized system that will meet the quality assurance requirements set forth in 4(1) of the Oil and Gas Installation Regulations and achieve the level of safety intended. Since the Inuvialuit Energy Security Project is not a nuclear plant, ISO 9001 would be the most relevant and recognized standard available to follow for the management of the design, construction, installation, and commissioning of the installation. No negative consequence to health, safety, environment, or resource conservation would be reasonably expected by granting this deviation. Safety, environmental protection, and resource conservation will be enhanced due to the application of better suited requirements, and in accordance with a globally recognized standard.