

The National Society of Professional Engineers’ Public Comment on Docket No. BSEE-2015-0002

The National Society of Professional Engineers (NSPE) commends the Bureau of Safety and Environmental Enforcement (BSEE) for proposing additional safety measures requiring a professional engineer in cementing and casing situations to examine, review, approve, and certify changes or remedial measures as part of its notice of proposed rulemaking (NPRM) for *Blowout Preventer Systems and Well Control, 1014-AA11* (30 CFR Part 250.428 parts (b) and (d)). NSPE greatly appreciates the BSEE’s recognition of the professional engineer’s important role in protecting the public health, safety, and welfare.

NSPE submitted comments to the Chemical Safety Board on December 15, 2010. We respectfully request that, in considering the final rule, the BSEE incorporate NSPE’s 2010 recommendation to require that licensed professional engineers have direct supervision over all engineering design, operations, and maintenance of offshore oil rigs. Offshore oil-drilling is an inherently risky activity and, as the BP oil spill demonstrated, an accident exposes the public and environment to potential catastrophe. The combined high-risk nature of offshore drilling and the possibility for disaster necessitate an additional degree of protection for the public that only licensed professional engineers provide.

The process to license professional engineers in all states and territories is among the most rigorous for any profession. All candidates for engineering licensure must (1) obtain a four-year accredited engineering degree, (2) demonstrate at least four additional years of progressive engineering experience to the satisfaction of a state licensure board (3) successfully complete a national examination on the fundamentals of engineering and (4) successfully complete a national examination on the principles and practice of engineering. In addition, a vast majority of states and territories require continuing education for professional engineers to maintain their license.

Licensure as a professional engineer is the highest credential an engineer can attain. Professional engineers are governed by a state licensing system specifically designed to ensure that they practice within their area of competence and in an ethical manner. Professional engineers are subject to state engineering licensure board rules of professional conduct and can be disciplined for violating those rules with censures, fines, suspensions, and license revocation for improper or incompetent practice.

Because of the professional engineer’s proven competence and commitment to the public health, safety, and welfare, NSPE recommends that offshore oil rigs require a licensed professional engineer to supervise all engineering design, operations, and maintenance decisions. This will not only improve the safety of offshore drilling, but also minimize the potential for disaster.

The National Society of Professional Engineers appreciates the opportunity to comment on these proposed rules and welcomes any opportunity to provide further input or information.

The National Society of Professional Engineers is a member-centric, nimble, future-focused, and responsive organization, serving as the recognized voice and advocate of licensed Professional Engineers. Through education, licensure advocacy, leadership training, multidisciplinary networking, and outreach, NSPE enhances the image of its members and their ability to ethically and professionally practice engineering. Founded in 1934, NSPE serves more than 32,000 members and the public through 53 state and territorial societies and just over 400 chapters.