

## **BNL Line Crew - 1**

### **Work to follow Power Transmission and Distribution Rules**

The Laboratory Electrical Safety Committee (LESC) views certain work of the BNL Line Crew as similar to that of a utility. The LESG intends this *BNL Line Crew - 1* document as an initial statement to justify additional interpretation documents to be issued by the LESG identifying specific types of approved line crew activities. Remaining work by the BNL Line Crew falls under work requirements of NFPA 70E - *Standard for Electrical Safety in the Workplace*.

### **Discussion**

OSHA provides the requirements for electrical work under 29CFR1910 Subpart S - *Electrical*. Article 1910.302(a)(1) provides the scope of coverage, and article (2) lists work not covered, including in para. (v) "Installations under the exclusive control of electric utilities for the purpose of communication or metering; or for the generation, control, transformation, transmission, and distribution of electric energy located in buildings used exclusively by utilities for such purposes or located outdoors on property owned or leased by the utility on public highways, streets, roads, etc., or outdoors by established rights on private property."

Despite the wording in the exclusion that implies the employer must actually be a public utility, BNL's Laboratory Electrical Safety Committee (LESC) views certain work of the BNL Line Crew as similar to that of a utility. The LESG bases this belief on Section 1, Para. 011 of the National Electrical Safety Code (NESC), which states that the NESC rules cover work practices employed by an electric supply utility, and "similar systems under the control of qualified persons, such as those associated with an industrial complex or utility interactive system."

Confirmation of this approach lies in OSHA's Section 1910.269 *Electric power generation, transmission and distribution*, which appears to be based on the NESC. The section begins with applicability, along with an explanatory note, which reads [underscore added]: "Power generation, transmission, and distribution installations, including related equipment for the purpose of communication or metering, which are accessible only to qualified employees; Note: The types of installations covered by this paragraph include the generation, transmission, and distribution installations of electric utilities, as well as equivalent installations of industrial establishments. Supplementary electric generating equipment that is used to supply a workplace for emergency, standby, or similar purposes only is covered under Subpart S of this Part."

Since BNL certainly has an installation for transmission and distribution equivalent to a utility, and since this system is under the exclusive control of the BNL line crew, the position of the LESG that certain work by the Line Crew is confirmed by this paragraph. The LESG intends to address such activities individually in other documents. Remaining work by the BNL Line Crew falls under work requirements of NFPA 70E - *Standard for Electrical Safety in the Workplace*. The LESG notes that incidental installations of standby generators throughout the site are viewed as normal electrical installations and subject to normal Subpart S work practices.