

Interpretation of the Electrical Safety Committee – May 2008

Simple Lockout/Tagout Procedures may last longer than one day

Summary

In the Complex Lockout/Tagout Procedure, NFPA 70E Paragraph 120.2 (D) (3) (a) (8) “A job or task that continues for more than one work period”, does not mean that a Simple Lockout/Tagout Procedure that lasts longer than one day is required to be a Complex Lockout/Tagout Procedure with a Specific Written Plan.

Relevant Codes Sections

NFPA 70 E

120.2 Working On or Near Deenergized Electrical Conductors or Circuit Parts That Have Lockout/Tagout Devices Applied.

(D) Hazardous Electrical Energy Control Procedures.

(3) Complex Lockout/Tagout Procedure.

(a) A complex lockout/tagout plan shall be permitted where one or more of the following exist:

(8) A job or task that continues for more than one work period

Annex G - Sample Lockout/Tagout Procedure

10.0 Complex Lockout (Tagout).

A complex lockout/tagout plan is required where one or more of the following exist: (8) Continues for more than one shift, that is, new workers

OSHA 1910.147

1910.147(c)(4)(i)

Procedures shall be developed, documented and utilized for the control of potentially hazardous energy when employees are engaged in the activities covered by this section.

Note: Exception: The employer need not document the required procedure for a particular machine or equipment, when all of the following elements exist: (1) The machine or equipment has no potential for stored or residual energy or reaccumulation of stored energy after shut down which could endanger employees; (2) the machine or equipment has a single energy source which can be readily identified and isolated; (3) the isolation and locking out of that energy source will completely deenergize and deactivate the machine or equipment; (4) the machine or equipment is isolated from that energy source and locked out during servicing or maintenance; (5) a single lockout device will achieve a locker-out condition; (6) the lockout device is under the exclusive control of the

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authorized employee performing the servicing or maintenance; (7) the servicing or maintenance does not create hazards for other employees; and (8) the employer, in utilizing this exception, has had no accidents involving the unexpected activation or reenergization of the machine or equipment during servicing or maintenance.

1910.147(f)(3)

Group lockout or tagout.

1910.147(f)(3)(i)

When servicing and/or maintenance is performed by a crew, craft, department or other group, they shall utilize a procedure which affords the employees a level of protection equivalent to that provided by the implementation of a personal lockout or tagout device.

1910.147(f)(3)(ii)

Group lockout or tagout devices shall be used in accordance with the procedures required by paragraph (c)(4) of this section (editors note: requirement for a specific written procedure)

OSHA 1910.333 - Selection and use of work practices

1910.333(b)(2)(iii)(E)

A lock may be placed without a tag only under the following conditions:

1910.333(b)(2)(iii)(E)(1)

Only one circuit or piece of equipment is deenergized, and

1910.333(b)(2)(iii)(E)(2)

The lockout period does not extend beyond the work shift... (editors note: OSHA allows to extend beyond one work shift with a tag)

OSHA Standard Interpretations

07/28/2006 - Clarification about 29 CFR 1910.333 and 29 CFR 1910.147 as they relate to work inside an electrical panel and on related equipment.

Neither the location of the disconnecting switch, nor the duration of the project, obviates the need for proper lockout/tagout procedures. The fact that the lockout period does not exceed the employee's shift only allows the employee to place a lock without an accompanying tag if only one piece of equipment or machinery is de-energized and the employees exposed to the hazards associated with the re-energizing the circuit of equipment or familiar with this procedure. This exception is noted at §1910.333(b)(2)(iii)(E). (editors note: emphasis requires a tag after one shift)

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Discussion / Analysis

One of the requirements for a Complex Lockout/Tagout Procedure is a written plan of execution that identifies a person in charge. NFPA 70E states that a complex lockout/tagout procedure shall be permitted when a job or task continues for more than one work period. The LESC interprets “more than one work period”, in this instance, to mean “more than one work shift with different workers on each shift”. This interpretation is to keep the BNL requirements for complex lockout/tagout procedures aligned with the OSHA requirements and also with Annex G in NFPA 70E (not part of the requirements of the Standard but is included for informational purposes). The Annex defines that a complex lockout/tagout procedure is required “...for more than one shift, that is, new workers” (both of these sentences are number (8) in the complex lockout (tagout) procedure section). All the other permitted instances are for occasions that are the same as the OSHA requirements and are complicated lockout situations that should have a written procedure. For a worker performing a simple lockout/tagout, who is responsible for their own lockout/tagout on one lockout device, that happens to take longer than one work day to finish, should not raise the simple lockout/tagout procedure to a complex lockout/tagout requiring a written procedure. However, the Lockout/Tagout Subject Area does encourage the use of a written plan for Simple Lockout/Tagout Procedures.

As can be seen by the above threads, the only mention of a simple lockout/tagout that goes beyond one work period being a Complex lockout/tagout is in the NFPA 70E Standard Section 120.2 (D) (3) (a) (8) as a “shall be permitted.” However, in the Annex G of NFPA 70E “Sample Lockout/Tagout Procedure”, paragraph 10.0 states that a complex lockout/tagout is required when “(8) Continues for more than one shift, that is, new workers” which is the location (number (8)) of the one work shift in the body of the Standard. Therefore BNL is interpreting “shall be permitted” not as a requirement that a Simple LOTO requires a written plan when the task exceeds one work period.