

LOTO

Practices

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BROOKHAVEN NATIONAL LABORATORY

LOTO NEWSLETTER

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LOTO Surveillances

We are halfway through the calendar year and BNL has been monitoring LOTO implementation for six months. We are maintaining an average of better than one observation per working day for the year. Each month the LOTO Practices Working Group analyzes the data. They have open discussions on the successes and challenges of LOTO implementation. Workers have attended group meetings and submitted suggestions that will result in changes to the LOTO subject area in the next revision cycle (Fall 2014). Would you like to know more? Would you like to attend a LPWG meeting? Ask your department representative listed on the left side of this newsletter or contact the LOTO SME (Rich Biscardi at X7760).

During the month of June, 2014, BNL organizations completed 21 Lockout/Tagout (LOTO) surveillances. Of those, 19 were found to have no deficiencies. One of the two remaining surveillances found that a signature that was not recognizable on a tag and another found that a staff member did not apply a lock to a group lockout.

Number of noted items for improvement by LOTO sub-process—June 2014

LOTO Training	0
LOTO Planning	0
LOTO Application	1
LOTO Removal	1

Noted items for improvement—June 2014 LOTO Surveillance analysis

- LOTO lock was not personally identifiable
- LOTO tag not logged per organizational process

Lessons Learned: Updating LOTO Procedures

Transition—the process of change: a process or period in which something undergoes a change and passes from one state, stage, form, or activity to another.

At times of transition we are vulnerable. Keep this in mind when we are coming out of shutdowns or bringing new equipment and facilities online. When moving from one operational state to another, we need to take a fresh look at hazard mitigation in our work procedures. Simple tasks like terminating cables and wires that did not require LOTO during construction may require LOTO when in commissioning or operations. At BNL, we recently had a case where a contract employee did not follow a required LOTO procedure. The procedure was relatively new. The organization had written and implemented the procedure as a result of change in operational status. The procedure had been discussed with the group and the contractor had been trained to the procedure. Not following a LOTO procedure can put people at risk. Fortunately, nobody was exposed to a hazard in this event.

Everyone working on equipment that requires LOTO must be trained in LOTO procedures for the equipment and then follow these procedures. One exception is if a worker feels there is a flaw in the procedure. In this case the worker should pause and contact their supervisor who will help resolve any issues before work is resumed.

Q and A

Question - Can you explain the difference between an Authorized LOTO Employee and an Affected LOTO employee?

Answer - An Authorized LOTO Employee is the person who actually performs the service and maintenance on the LOTOed equipment. An Authorized Employee must be trained, have the “ok” from line management to LOTO, apply their lock prior to and remove their lock upon completion of the maintenance according to the steps in the LOTO subject area. An Affected Employee is a person who operates the equipment or who is required to work in the area where a LOTO is in place. They must be notified not to attempt to start the equipment and not to enter the area where, if the equipment came on, they would be in danger.

Work planning will determine if you are an Authorized or Affected Employee for a job. Be careful of scope creep. An Affected employee will need to become an Authorized employee if their work changes to include performing service or maintenance on a machine or piece of equipment which is locked or tagged out. To ensure all are protected, check the definition of Service and Maintenance in the LOTO Subject Area before planning your next job.