

**LOTO
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BROOKHAVEN NATIONAL LABORATORY

LOTO NEWSLETTER

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LOTO Observations

Of the thirty-one LOTO-related observations conducted in the first quarter of FY16, twenty-eight had no noted issues. The three remaining observations had multiple items noted. One involved contractors who were not aware of BNL requirements. In the other two cases, the multiple items indicated that the initial LOTO planning was inadequate. Fortunately, none of these instances resulted in injury to the workers involved. In all three cases, work was paused and the proper LOTO planning was completed and implemented. The box at right gives additional information.

Number of noted items for improvement by LOTO sub-process October, November & December - 2015

LOTO Training	1
LOTO Planning	5
LOTO Application	2
LOTO Removal	0

LOTO Surveillance Analysis

Noted items for improvement—October, November & December - 2015

- LOTO training not adequate
- Work planning did not identify hazardous energy sources
- Complex LOTO instruction not adequate
- LOTO tag not completed per the subject area
- Zero energy verification not adequate

Reminder—Updates to the LOTO subject area were made in January 2016. These modifications resulted from input the LOTO Practices Working Group received from staff. The updates clarify BNL requirements for filling out LOTO tags.

Staff noted that there are cases when a building number is not appropriate to identify the location of a LOTO. However, the Subject Area specified that a building number was necessary while the new LOTO tag specified "location." The new Subject Area now clearly allows a location (i.e. building number, description of outside location, manhole number) to be used on the LOTO tag.

Additional feedback from staff addressed completing tags by Primary Authorized Employees. Note that tags completed by Primary Authorized Employees and attached to a hasp or lockbox must be completely filled out.

Thanks for the comments! Input from the field is greatly appreciated.

LOTO Work Planning

When something is missed in the initial LOTO work planning, multiple items may not be addressed. This could lead to unintentional exposure to a source of hazardous energy. Planning issues were noted in two LOTO observations this quarter. One of these observations involved contractors.

When contractors are on site, it is essential that the BNL point contacts understand the scope of work. LOTO considerations must be included in the work planning. A discussion with the contractor is essential in communicating the BNL requirements and if LOTO is required, the contractor must follow BNL's process.

A complex LOTO plan must be in place when:

- BNL staff and contractor staff are working together and they may be exposed to hazardous energy during their work
- There is possible exposure to multiple energy sources during the work

Remember that LOTO requirements hold for service contracts as well as construction contracts. Effective flow down of requirements to contractors working at BNL requires conversation.

Take a minute and consider whether you need to have a discussion with your service contractors about LOTO.