

LOTO Practices Working Group

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LOTO NEWSLETTER

LOTO Surveillances

As printed in the last newsletter, LOTO surveillances began in January. These observations were conducted by supervisors and managers within the organizations across BNL and additional observations were conducted by Safety and Health Services staff. In some cases the surveillances targeted one of the specific aspects of the LOTO program (training, planning, application of and removal of LOTO. In other cases the surveillance covered the entire LOTO process. **A total of sixty-nine LOTO surveillances were completed during the months of January and February. In looking at the surveillances, 9 out of 10 LOTOS went as expected—all satisfactory boxes checked.**

A few of the surveillances noted areas for improvement and these items are indicated on the tables below. It is too early for analysis of these items to indicate a pattern but with an open and healthy discussion at group meetings, we can prevent them from becoming trends.

Number of noted items for improvement by LOTO sub-process	
LOTO Training	1
LOTO Planning	2
LOTO Application	6
LOTO Removal	0

Noted items for improvement—Jan—Feb 2014 LOTO Surveillance analysis	
•	LOTO boundary not established correctly
•	Locks not personally identifiable
•	Primary Authorized Employee not identified on Lockbox lock
•	No record of a LOTO Job Performance Measure for a contractor
•	Chains on valve handles could be attached tighter
•	Hinged door allows possible operation of circuit breaker while LOTOed.
•	Use of proper PPE during zero energy checks
•	Complex LOTO plan not in place for LOTO with multiple isolation points

Lessons Learned - Ensure LOTO isolation points are secure as part of challenging your LOTO

While conducting a new installation inspection, an alert staff member noted that a breaker, when LOTOed, could possibly be bypassed by opening a hinged door on a specially designed elevator breaker assembly. This is a great example on how a questioning attitude helps all of us. The situation was promptly addressed. It presents us with the opportunity to discuss the idea of challenging your lock as described in the LOTO subject area and extending that idea to the entire LOTO in place.

When applying LOTO, take a good look around and ask yourself a question—Is there any other way this lock could be rendered ineffective other than the obvious? Maintaining a questioning attitude at all times keeps us safe.

Best Practice

Design systems for ease of energy isolation and LOTO

While designing a specialized system for experimental hutch entry, an engineer wanted to ensure that the design included lockable hazardous energy isolation points. The engineer consulted with ESH staff and discussed practical methods of simplifying the LOTO process once the equipment is installed. With ESH input, the engineer is now working on a design that ensures safe, easy application of LOTO for the system. A little work up-front improved safety in the long term.

Q and A

Question - When do you have to log a tag in a log-book?

Answer - All Locks used for a service and maintenance LOTO must be personally identifiable. At BNL, one way to make a lock personally identifiable is to attach a filled out LOTO tag to the lock.

According to the LOTO SBMS Subject Area for the Simple LOTO case or the Single Worker Complex LOTO case if a tag is used to make a lock personally identifiable and used for less than a shift the tag is not required to be logged. For any other case, the required tag must be logged. When a tag is logged, it is logged according to the process defined by the organization that owns the equipment.