

## LOTO

### Practices

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BROOKHAVEN NATIONAL LABORATORY

# LOTO NEWSLETTER

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## LOTO Surveillances

The LOTO surveillances in March included joint efforts between LOTO Practices Working Group members and line organization representatives. These surveillances included "in the field" discussions of the observed LOTO in process and provides a mechanism for direct feedback to supervisors and others responsible for LOTO oversight within the departments at BNL. If you would like a LOTO Practices Working Group member to join you on a LOTO surveillance, contact any member listed on the left hand side of this newsletter.

BNL completed 32 LOTO surveillances, 28 with no findings, during the month of March. The information is consistent with previous data. It is not hard to see that our major challenge comes when applying LOTO. Findings for March involve using appropriate PPE, keeping Affected staff outside the work boundary, using personally identifiable locks and assuring the LOTO device is secure.

Number of noted items for improvement by LOTO sub-process	
LOTO Training	0
LOTO Planning	0
LOTO Application	4
LOTO Removal	0

### Noted items for improvement—March, 2014 LOTO Surveillance analysis

- Worker in the work zone and not "on" the LOTO
- Lock not personally identifiable
- Staff not wearing ear protection
- Lock not challenged

## Worker Feedback

The LOTO Practices Working Group received a visit from staff who maintain elevators under a repetitive prescribed preventative maintenance procedure. The workers explained that the required maintenance is completed on a regular basis and always uses the same process. They suggested the use of pre-filled laminated LOTO tags with a current date added to the tag at the time of the maintenance.

The LPWG noted that the LOTO Subject Area does not prohibit the use of pre-filled tags for repetitive routine maintenance. All required information must be on the tag, including an accurate description of the task at hand and the correct date. The LPWG consulted with F&O and SHSD management and communicated that pre-filled laminated tags are not prohibited under the present LOTO Subject Area. As a result of that visit, staff from F&O will work with department ESH staff and Safety and Health Services Division to develop pre-filled tags consistent with the present LOTO Subject Area to be used as a trial. ESH staff will review the effectiveness of using pre-filled tags for this specific maintenance task several times over the next few months during LOTO surveillances. This effort does emphasize the effectiveness of staff feedback to the LOTO process. If you have a question or concern about the current LOTO process, bring it to the LPWG.

## Q and A

**Question** - When performing zero energy checks for the simple LOTO case, does each Authorized Employee have to go through the zero energy check steps themselves or can an Authorized Employee watch another Authorized Employee perform the zero energy verification?

**Answer** – In the simple LOTO case, each Authorized employee must verify the absence of energy for themselves. Per the LOTO Subject Area, one Authorized Employee can watch another Authorized Employee perform the zero energy check as verification on a simple LOTO. But remember that you must be trained and have line supervision approval to perform the zero energy check for the hazardous energy involved on that equipment. The LOTO Job Performance Measure only allows you to do this on the equipment for which your group is responsible.

When you LOTO for service and maintenance on equipment outside your group, it requires a Primary Authorized Employee assigned with a Complex Group LOTO instruction.

**Got a Question? Ask the LPWG.**