



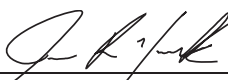
## UPF PAGE/PROCEDURE CHANGE NOTICE (PRCN)

PRCN Number:	PRCN-Y17-95-64-801-R07-01	Effective Date:	9/13/2023
<b>NOTE: PRCN Effective Date cannot precede effective date of associated document.</b>			
<input checked="" type="checkbox"/> Intent Change		<input type="checkbox"/> Non-Intent Change	
Associated Document Number:	Y17-95-64-801	Rev:	07
Associated Document Title: UPF Energy Isolation Management (EIM) - Lockout/Tagout (LOTO)			
Justification for Change: Incorporate CFN-1317, <i>UPF Electrical Hazard Risk Assessment &amp; Testing Form</i>			
Identify the scope of the change, including mark-up (i.e., strike-through for deletions, colored text for additions) of any new, removed, or changed content.			
<b>Update Section 4.3.1, 2<sup>nd</sup> paragraph, 17<sup>th</sup> bullet:</b>  <b>FROM:</b> <ul style="list-style-type: none"> <li>The WGS ensures the zero-energy check has been performed and signs and dates where applicable on the permit form and submits paperwork to the TA.</li> </ul> <b>TO:</b> <ul style="list-style-type: none"> <li>The WGS ensures the zero-energy check has been performed and signs and dates where applicable on the permit form and submits paperwork to the TA. <i>When absence of voltage has been verified to be zero, complete and attach CFN-1317, UPF Electrical Hazard Risk Assessment &amp; Testing Form, to the isolation permit in accordance with UPF-MANUAL-CM-001.</i></li> </ul>			
<b>Add Reference to Section 6.3, Forms:</b>  <i>CFN-1317, UPF Electrical Hazard Risk Assessment &amp; Testing Form</i>			

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**UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)**


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Effective Date

**RC-UPF DMC**

08/14/23 15:31

UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)
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## REVISION LOG

Revision 7	<input checked="" type="checkbox"/> Intent <input type="checkbox"/> non-Intent
<ul style="list-style-type: none"> <li>• This revision incorporates the changes identified in and supersedes PRCN-Y17-95-64-801-R06-01</li> <li>• No forms have been edited as part of this revision</li> <li>• An evaluation determination has been performed confirming that this Procedure, does implement requirements tracked in the Programmatic Requirements Management System (PRMS)</li> <li>• Other changes include: <ul style="list-style-type: none"> <li>◦ Clarified AE responsibilities in Section 3.3, 2<sup>nd</sup> paragraph, bullet 1</li> <li>◦ Added training matrix to Sections 3.3, <i>Authorized Employee</i>; 3.4, <i>Authorized Operator</i>; 3.5, <i>Independent Verifier</i>; 3.7, <i>Permit Requester</i>; 3.11, <i>Tagging Authority</i>; 3.13, and <i>Work Group Supervisor</i></li> <li>◦ Added Note 1 to Section 4.3.1, <i>EIP – Preparation, Issue, and Implementation (Refer to Appendix B)</i></li> <li>◦ Clarified last step of AE process in appendices B, C, and D work process diagrams</li> <li>◦ Updated Appendix H, <i>Permitting Competency Tracking (Example)</i></li> <li>◦ Incorporation of CR 04223 (Enhance training to include practical and proficiency exam)</li> <li>◦ Addressed 25774-000-GCA-GAM-04367, <i>Gaps in UPF Procedure on Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)</i></li> <li>◦ Revised Section 5.0, <i>Records</i>, to update the Records Table in accordance with Y15-95-235</li> <li>◦ Revised Section 6.0, <i>References</i>, to add Section 6.3, <i>Forms</i>, in accordance with Y15-95-235</li> <li>◦ Updated references</li> <li>◦ Updated acronyms</li> <li>◦ Editorial changes</li> </ul> </li> </ul>	
Revision 6	<input checked="" type="checkbox"/> Intent <input type="checkbox"/> non-Intent
<ul style="list-style-type: none"> <li>• The following changes are in response to Condition Report 25774-000-GCA-GAM-03366, <i>Interpretation Required on Differences Between UPF LOTO Procedure and OSHA 1910 Action # 2, Revision to Y17-95-64-801</i> <ul style="list-style-type: none"> <li>◦ Added Note to Section 3.3, <i>Authorized Employee</i>, for new form CFN-1328, <i>System Boundary Master Clearance Work Group Sign ON/OFF Log</i></li> <li>◦ Added information for use of CFN-1328 via the following: <ul style="list-style-type: none"> <li>▪ Section 3.3, <i>Authorized Employee</i> – New paragraph and end of section</li> <li>▪ Section 3.11, <i>Tagging Authority</i> – Added bullet 11</li> <li>▪ Section 3.13, <i>Work Group Supervisor</i> – Added bullet eight and two additional Notes</li> <li>▪ Section 4.3.5, <i>Implementing an Emergency Closure</i> – Added bullet two</li> <li>▪ Section 4.7.2, <i>System Boundary Master Clearance</i> – Added new Note</li> </ul> </li> <li>◦ Added to Section 4.7.2, <i>System Boundary Master Clearance</i>: <ul style="list-style-type: none"> <li>▪ Four bullets to clarify System Boundary Master Clearance process and to add CFN-1328</li> <li>▪ Added to process for releasing to have Authorized Employee(s) (AE[s]) sign off form CFN-1328 and also Work Group Supervisor (WGS) verification of all Authorized Employees(s) off form CFN-1328 then WGS signs off Form CFN-1328</li> </ul> </li> <li>◦ Updated flowchart in Appendix B, <i>EIP Work Process</i></li> <li>◦ Updated flowchart in Appendix C, <i>Change to Existing EIP Work Process</i></li> <li>◦ Updated flowchart in Appendix D, <i>Emergency Change to EIP Work Process</i></li> <li>◦ Updated flowchart in Appendix E, <i>Emergency Closure to EIP Work Process</i></li> <li>◦ Updated flowchart in Appendix F, <i>EIP Closure Work Process</i></li> </ul> </li> <li>• This revision incorporates the changes identified in and supersedes the following PRCNs</li> </ul>	

UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)
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- PRCN-Y17-95-64-801-R05-01
- PRCN-Y17-95-64-801-R05-02
- The following form changes have been made as a result of this revision:
  - CFN-1312A, *Energy Isolation Permit* - New
  - CFN-1312B, *Energy Isolation Permit Sign-On Sheet* – New
  - CFN-1312INST, *Energy Isolation Permit/Sign-On Sheet Instructions* - Revised
  - CFN-1313, *Energy Isolation Permit* - Obsolete
  - CFN-1313INST, *Energy Isolation Permit Instructions* - Obsolete
  - CFN-1314, *Safety Tagging for STT* - Revised
  - CFN-1315, *Sanction to Test (STT) Cover Sheet* - Revised
  - CFN-1316, *Sanction to Test (STT) Log* - Revised
  - CFN-1328, *System Boundary Master Clearance Work Group Sign ON/OFF Log* - New
- An evaluation determination has been performed confirming that this Procedure does implement requirements tracked in the Programmatic Requirements Management System (PRMS)
- Added the following to Section 1.0, *Purpose*:
  - OSHA CFR 1910 Subpart S, *Electrical*, and more detail of OSHA 1910 applicable Sections
  - To be worked in parallel with UPF-MANUAL-CM-001, *Uranium Processing Facility Construction Electrical Safety Manual*
  - OSHA 1910.333, *Selection and Use of Work Practices*, as a mandatory requirement
  - NFPA 70E® 2015, *Standard for Electrical Safety in the Workplace®*, Article 120, *Establishing Electrical Safe Work Conditions*, as a Mandatory requirement
- Added to Section 3.4, *Authorized Operator* – Note for Low Voltage Qualified Electrical Person (LQEP) LQEP and Medium Voltage Qualified Electrical Person (MQEP) Qualification required for Electrical AO
- Added to Section 4.5, *EIP Closure* – Note for Emergency Closure
- Section 4.6, *Sanction to Test Instructions* – Moved Bullet for Sanction to Test (STT) form CFN-1315, *Sanction To Test (STT) Cover Sheet*, to proper location for bullet further down in sequence
- In Section 4.6, *Sanction to Test Instructions* – Added new Bullet concerning CFN-1314, *Safety Tagging for STT*, and placed in proper sequence
- Updated flowchart in Appendix G, *Sanction to Test (STT) Work Process*
- Other changes include:
  - Section 4.3.1, *EIP – Preparation, Issue, and Implementation* for WGS Lock placement on Lockbox
  - Section 4.5, *EIP Closure* – Added Lockbox in fifth bullet
  - Section 4.6, *Sanction to Test Instructions* – added clarification to several bullets
  - Updated references
  - Updated definitions
  - Editorial changes updated throughout
- This revision is a total rewrite; due to the extent of changes, revision bars are not shown

<b>Previous revisions on record</b>
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## 1.0 PURPOSE

This Procedure defines the work process for the control/isolation of systems and equipment containing hazardous energy. The work process within this Procedure standardizes the approach for controlling hazardous energy from different entities (Environmental, Safety and Health [ES&H], Engineering, Construction, and Startup). This Procedure implements the Electrical Safety functional area of the Rule of 10 Code of Federal Regulations (CFR) 851, *Worker Safety and Health Program*. This Procedure meets or exceeds the applicable requirements of Occupational Safety and Health Administration (OSHA) 29 CFR 1926, Subpart K, *Electrical*, and 29 CFR 1910, Subpart S, *Electrical*. This Procedure follows all applicable CFR 1910 sections and covers all sources of energy (Electrical and Mechanical) through the roles and responsibilities of the Authorized Operator (AO) and Independent Verifier (IV). Implementation of this Procedure will:

- Protect personnel and equipment from hazardous energy sources during the construction and startup phases of the Project
- Be used in parallel with UPF-MANUAL-CM-001, *Uranium Processing Facility Construction Electrical Safety Manual*
- Provide a means for describing and documenting the status of equipment, components, and systems that are out of service, or are in limited service under the control of an Energy Isolation Permit (EIP) (CFN-1312A, *Energy Isolation Permit*)
- Include all mandatory requirements by the United States Department of Labor in the following documents:
  - 29 CFR 1910.147, *The Control of Hazardous Energy (Lockout/Tagout)*
  - 29 CFR 1910.333, *Selection and Use of Work Practices*
  - National Fire Protection Association (NFPA) 70E® 2015, *Standard for Electrical Safety in the Workplace®*, Article 120, *Establishing an Electrical Safe Work Condition*

**NOTE:** *Commentary in this Procedure provides clarification or supporting information.*

**Commentary** *This Procedure provides Authorized Employees (AEs) with a level of protection equal to the use of a personal lock or tag, with the following considerations:*

- *The preferred method for providing this type of protection involves the use of locks and key control as described further in this Procedure*
- *When an energy-isolating device is not capable of being locked out, the energy control program utilizes tagout(s)*
- *Other alternatives to this method are acceptable if they require the AE or supervisor to take a physical step (e.g., signing on to a permit) that uniquely identifies that employee before starting work*
- *The same method (e.g., signing off the permit) is utilized before the energy isolating device is released and the equipment reenergized*
- *A personal sign-in/sign-out log or permit is acceptable in lieu of lock and tag and considered a personal tagout device if:*
  - *The log or permit identifies each AE being protected*
  - *The Work Group Supervisor (WGS) can reliably account for each individual AE who is being protected*

29 CFR 1910.147(f)(3)(i), *The Control of Hazardous Energy (Lockout/Tagout)*, *Group Lockout or Tagout*, states: “When servicing and/or maintenance is performed by a



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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.” (Underline added to the OSHA standard text for emphasis.)

**Commentary** *In many cases, especially with large work groups (e.g., Project-Wide Master Clearance, System Boundary Master Clearance), it is impractical to install lockout or tagout devices for every person. Implementing this Procedure will provide the same level of protection (e.g., keys to lockout devices are isolated and cannot be tampered with) as if every person had installed a lockout or tagout device on every component.*

## 2.0 SCOPE

### 2.1 Applicability

This Procedure is applicable to all employees and contractors at the Uranium Processing Facility (UPF) who are engaged in construction, modification, maintenance, startup, or demolition where the administration of the Energy Isolation Management (EIM) is under the jurisdictional control of Bechtel National, Inc. (BNI). The scope of this Procedure includes permanent plant systems and equipment, as well as associated test equipment (e.g., test rigs and temporary piping and power installations).

This Procedure addresses work performed on a system or equipment that contains or has the potential to contain energy/substance that could expose a worker to injury or cause damage to equipment if released and where the worker is not in direct control of the energy isolating means.

Engica Q4 Safety is a software program used for electronic EIP/Lockout/Tagout (LOTO) in which LOTOs are planned, approved, tracked, and closed using electronic forms. This is Bechtel's standard electronic EIP/LOTO Program.

**NOTE:** *Engica Q4 Safety Software is controlled in accordance with Y60-95-015, Uranium Processing Facility Software Quality Assurance.*

If Q4 is unavailable, hard copies can be printed from Just-in-Time Forms (JIT).

This Procedure is not applicable to:

- Isolation management of components or systems after jurisdictional turnover to a third-party or to the customer
- Maintenance and operations working under customer or owner isolation management control
- Project-Wide Master Boundary Clearances that are used for EIM of the main UPF terminal points (e.g., main power feeds, gas supplies, and connections to existing Consolidated Nuclear Security [CNS] Y-12 National Security Complex [Y-12] facilities outside the scope of the UPF); these UPF main terminal points are isolated in accordance with Y18-107, *Lockout/Tagout Execution for Personnel Protection*
  - Example: Power Distribution Work Permits (PDWPs), where UPF work scope interfaces with Y-12 Power Operations (Transmission and Distribution lines)
- Testing activities performed where a device or equipment is required to be continuously energized



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- Work performed on cord and plug connected electric equipment; exposure to the hazards of unexpected energization or startup of the equipment is controlled by unplugging the equipment from the energy source so the plug is under the direct control of the employee performing the servicing or maintenance
- Hot tap operations performed on pressurized pipelines involving transmission and distribution systems for substances such as gas, steam, water, or petroleum products, provided that:
  - Continuity of service is essential
  - Shutdown of the system is impractical
  - Documented procedures are followed, and special equipment is used to provide proven effective protection for employees
- Minor tool changes and adjustments, and other minor servicing activities that take place during normal production operations, are not covered by this standard if they are routine, repetitive, and integral to the use of the equipment for production, provided the work performed uses alternative measures that provide effective protection
- A Red Tag (sometimes called “Car Seal”) installed to lock a component in a normal operating position as designated on a Piping and Instrument Diagram (P&ID), drawing, or procedure is NOT part of the EIM Program. Red Tags are only utilized to identify a component placed in a locked position (open, throttled, closed) because of operational requirements, (e.g., CSO, CSC, LO, LC, LT as indicated on the P&ID). These component positions are tracked on a locked valve/component list issued by Startup or the owner/customer organization
- Where UPF personnel perform work according to another organization’s (e.g., CNS Y-12, City of Oak Ridge) EIM system, the Site Manager/Project Startup Manager (PSUM) and Project ES&H Manager collectively ensure the requirements of this Procedure are met
- Single point isolations (i.e., an isolation performed by the individual doing the work where a LOTO device is applied to an energy isolating device that is not under direct control of the individual performing the work) are not governed by this Procedure

**Commentary** *Single-point isolations are specifically not permitted under this Procedure because a Single-Point Isolation removes the independent reviews to ensure the adequacy of the isolation and the proper implementation of the isolation.*

Mobile and towed equipment isolation for maintenance will be performed in accordance with Y17-95-64-851, *UPF Construction Equipment Maintenance*.

## **2.2 Subcontractor Applicability**

Subcontractors will be trained as required to the requirements of this Procedure and shall comply with this Procedure. The requirements of this Procedure will be communicated to subcontractors, as appropriate, through subcontract language.

### 3.0 RESPONSIBILITIES

**NOTE:** *Individuals can have multiple responsibilities under their job title depending on their training and how the Project structures Control of Work (e.g., a Permit Requestor [PR] could perform AE/Responsible Field Engineer [RFE]/Startup Test Engineer [STE] or AO tasks; a WGS could perform AE/PR tasks).*

#### 3.1 Affected Employee

The Affected Employee (AFE) understands the purpose and use of the isolation management procedure and any prohibitions related to energizing systems or components.

AFEs are NOT permitted to:

- Sign onto EIPs or hang personal locks, tags, or other devices as part of this Procedure
- Perform work on any system or component under an EIP unless they become an AE

An AFE may work on equipment downstream of a Project-Wide Master Boundary Clearance (**Section 4.7.1, *Project-Wide Master Boundary Clearance***).

#### 3.2 Supervision

Supervision is responsible for:

- Selecting personnel for EIM/LOTO roles
- Verifying personnel involved in EIM/LOTO activities have successfully completed EIM/LOTO training and Verification of Competency (VOC), as applicable, for their respective role, in accordance with this Procedure

#### 3.3 Authorized Employee

The AE will complete the following required training:

- UPF LOTO Authorized Employee (Q51603876)
- UPF Lockout/Tagout Annual (Q51605072)

The AEs are responsible for:

- Verifying (prior to performing work) the Equipment being worked on has been Properly Isolated by a field walk-down and Isolation Points have been verified
- Verifying, prior to performing work, the equipment or system being worked on has been properly isolated in the field and verified on the EIP
- Verifying Zero-Energy Check has been completed on the EIP
- Signing onto the EIP and implementing work in accordance with this Procedure and the conditions of the permit

**NOTE:** *For System Boundary Master Clearance, in lieu of personal lock or tag, CFN-1328, UPF System Boundary Master Clearance Work Group Sign On/Off Log, is used.*

- Placing their company-provided personal lock on the lockbox prior to performing work and removing their lock on completion of work, in cases where applicable

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- Removing their company-provided personal lock before signing off the CFN-1312B, *Energy Isolation Permit Sign-On Sheet*:
  - If there is an extended break in work
  - If they transfer to another work area
  - If there is a Sanction to Test (STT) of Isolation(s) (refer to **Section 4.6, Sanction to Test Instructions**)
  - If the permit is revoked
  - At the end of each shift, prior to leaving site if required by Site Manager or PSUM
  - Upon completion of the work
- Stopping all work and notifying the WGS if conditions change and/or have the potential to void the conditions of the permit or if any isolation point is compromised
- Stopping all work, ensuring the work is in a safe, secure condition, and signing the permit upon notification the EIP will be released

An AE may work on equipment downstream of a System Boundary Master Clearance (**Section 4.7.2, System Boundary Master Clearance**) after:

- Their WGS has signed onto the System Boundary Master Clearance for the Startup System their Work Group is working on
- The AE signs CFN-1328 for that Startup System

### 3.4 Authorized Operator

The AO will complete the following required training:

- UPF Authorized Operator (Q51603920)
- UPF LOTO Authorized Employee (Q51603876)
- UPF Lockout/Tagout Annual (Q51605072)
- UPF Authorized Operator Verification of Competency (Q51603950)

The AO is responsible for:

- Performing lockout or tagout of equipment, processes, and system components to allow servicing, maintenance, or testing
- Reviewing EIPs for accuracy

**NOTE:** *AO personnel to perform an Electrical LOTO must be Qualified to Low Voltage Qualified Electrical Person (LQEP) < 600 Volts, or Medium Voltage Qualified Electrical Person (MQEP) ≥ 600 Volts in accordance with UPF-MANUAL-CM-001 as well as complete CPR First Aid AED training (Q51307715).*

- Positioning or configuring components as specified on the permit (implementing the protective measures) to establish zero-energy conditions within the isolation boundary
- Hanging locks and confirming isolations
- Removing locks or tags for STT or upon completion of tasks prior to closure of the permit

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- Positioning or configuring components in a safe mode upon removal of tags and locks

### **3.5 Independent Verifier**

The IV will complete the following required training:

- UPF Authorized Operator (Q51603920)
- UPF LOTO Authorized Employee (Q51603876)
- UPF Lockout/Tagout Annual (Q51605072)
- UPF Authorized Operator Verification of Competency (Q51603950)

The IV is responsible for:

- Independently verifying the protective measures have been installed on the isolations as listed on the EIP
- Independently verifying the isolation points are placed in the position as listed on the EIP
- Verifying that zero-energy conditions exist within the isolation boundary

**NOTE:** *Section 3.5, Independent Verifier, requires verification by physical field walk down for the listed IV responsibilities.*

### **3.6 Startup Shift Supervisor**

The Startup Shift Supervisor (SSS) is responsible for:

- Establishing conditions on operating systems to implement isolations
- Coordinating the activities of the various STEs and others as they affect facility operation

**NOTE:** *The SSS is given authorization to concur for the STE on off-hours. The SSS notifies the STE or their lead of the permit status upon their return.*

- Confirming, in conjunction with the RFE/STE, as required, that equipment/systems are ready to be de-isolated after work is complete

### **3.7 Permit Requestor**

The PR will complete the following required training:

- UPF Permit Requestor (Q51603923)
- UPF LOTO Authorized Employee (Q51603876)
- UPF Lockout/Tagout Annual (Q51605072)

The PR is responsible for:

- Completing the permit for defining the work or testing to be performed, providing enough detail to allow adequate evaluation of the isolation boundary
- Recommending the equipment and/or electrical circuits to be tagged or locked out
- Requesting guidance and assistance from the RFE/STE and Tagging Authority (TA), as needed, to understand all potential energy sources
- Submitting the permit to TA for review

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- Assisting the AO in establishing zero-energy within the isolation boundary, if needed
- Involving the WGS if applicable and/or as required

### 3.8 **BNI Environmental Safety and Health Manager**

The BNI ES&H Manager is responsible for:

- Ensuring workers have been trained in this Procedure to perform job duties in accordance with this Procedure
- Ensuring certification/documentation of worker training, including name, date, and content, is current
- Providing technical assistance to support the implementation and sustainability of this Procedure, ensuring safety equipment necessary to perform the work tasks required are identified and provided
- Ensuring accident and incident data related to this Procedure is analyzed to identify issues and trends and that this data is communicated to all relevant parties
- Ensuring procedures are performed in a way that provides each individual AE full protection
- Scheduling annual audits of the LOTO program. Audits to be performed by Electrical Contractor Authority Having Jurisdiction (ECAHJ) (or designee)/ Electrical Design Authority Representative (DAR) (or designee)
- Participating in inspections, audits, and investigations pertinent to this Procedure
- Providing the results of the field observations to the Site Manager/PSUM
- Ensuring workers affected by this Procedure (i.e., AFE) receive training on the applicable aspects of this Procedure (refer to **Section 3.1, *Affected Employee***) during site orientation

### 3.9 **Site Manager/Project Startup Manager**

Typically, the EIM/LOTO program falls under control of the Site Manager prior to turnover of systems from Construction to Startup and under the PSUM after turnover, but transfer of the program can occur at any time mutually agreed to by the Site Manager and PSUM.

The Site Manager or PSUM is responsible for:

- Implementing the requirements of this Procedure
- Ensuring, at minimum, the protection provided by this Procedure is met when the Project is working under another organization's tagging procedure (e.g., owner/customer)
- Ensuring equipment and systems under their jurisdictional control are properly protected from inadvertent operation, energization, or pressurization
- Ensuring individuals authorized to request and release EIPs are trained and competent, as applicable
- Ensuring all TAs are trained and competent to perform their duties in accordance with this Procedure
- Approving VOC for personnel assigned TA responsibilities

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- Ensuring all AEs are trained to this Procedure
- Reviewing the open and closed EIP files and requesting random EIP verifications
- Authorizing emergency releases, emergency changes, and forced lock removal
- Ensuring periodic field audits of the implementation and adherence to this Procedure are completed

### **3.10 Responsible Field Engineer/Startup Test Engineer**

**NOTE:** *For Subcontractor Structure, System, or Components (SSCs) work, the Subcontract Technical Representative is equivalent to the RFE role.*

The RFE/STE is responsible for:

- Concurring with the protective measures, safety tagging and lockouts defined in the EIP (with special emphasis on any interlocks, backfeeds, or temporary energy sources), as needed
- Consulting with PR/WGS/AO, as needed, for protective safety measures and isolations on equipment/systems under their responsibility
- Confirming, as needed, in conjunction with the SSS, that equipment/systems are ready to be de-isolated after work is complete
- Requesting LOTO to support testing

### **3.11 Tagging Authority**

The TA will complete the following required training:

- UPF LOTO Tagging Authority (Q51604044)
- UPF Lockout/Tagout Annual (Q51605072)
- UPF Permit Requestor (Q51603923)
- UPF Authorized Operator (Q51603920)
- UPF Tagging Authority Verification of Competence (Q51604009)

The TA is responsible for:

- Issuing, modifying, and closing EIPs as required under this program
- Advising and consulting with the PR, RFE, and/or STE regarding the protective measures required for component(s) or system(s) identified on the EIP
- Verifying the isolations, tags, and protective safety measures have been implemented and independent verification and zero-energy check have been completed
- Considering any known site conditions/conflicts that could impact the work being performed
- Coordinating with area superintendents and/or customer representatives to obtain approval for any additional isolation
- Maintaining safety tagging records and the master lockout key
- Maintaining and controlling the lockbox and/or key safe systems
- Verifying the isolations, tags, and protective safety measures have been removed by the AOs when work is complete (on permit paperwork and review of returned



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isolation devices) so system/components can be restored to the required positions/state

- Responding to questions and providing clarification regarding this Procedure
- Maintaining the Master Clearance protecting the workforce (refer to **Section 4.7, Master Clearance**)
- Maintaining CFN-1328 for each Work Group by Startup System
- Functions as the AE for Project-Wide Master Clearances established in accordance with Y18-107
- Tracking open and closed EIPs
- Possessing a list of personnel who are trained and competent to perform PR/AO/IV/AE roles, as applicable, in accordance with this Procedure
- Approving (after conducting an assessment with appropriate supervision) and maintaining a list of personnel trained and competent to complete AO and IV EIP duties
- Revoking EIPs where any unsafe or unsatisfactory isolation or work practice has been identified during inspections or work performed under the permit
- Informing the Site Manager/PSUM about the overall state of any isolations within a designated work area
- Participating in any audits and investigations relative to the isolation procedures
- Establishing guidance for the control of lockboxes where there is a need to allow lockboxes and permits to be taken to the field

### **3.12 Startup Completion Lead**

In accordance with Y15-95-912, *UPF Completion and Turnover*, the Startup Completion Lead, or designee, is responsible for:

- Issuing Work Authorizations (WAs) and the associated permits to work
- Rescinding authority to work on an open WA if plant conditions change, making a WA or one of its associated permits to work invalid
- Coordinating construction completion activities on systems jurisdictionally transferred to Startup
- Acting as the single point of contact for coordinating construction punchlist and completing efforts on systems transferred for testing
- Acting as work approval authority for punchlist work or maintenance activities on tested SSCs
- Reviewing and processing all turnover packages for subsequent turnover to facility/system owners

### **3.13 Work Group Supervisor**

The WGS will complete the following required training:

- UPF LOTO Authorized Employee (Q51603876)
- UPF Lockout/Tagout Annual (Q51605072)
- UPF Authorized Operator (Q51603920)

The WGS is responsible for:



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- Performing, witnessing, or verifying a zero-energy check was performed in accordance with the permit requirement prior to issuance of the EIP
- Ensuring a trained and competent IV performs the independent verification (the WGS can perform if trained and competent as AO/IV)
- Functioning as the AE for System Boundary Master Clearances
- Signing the EIP signifying the boundary is adequate before starting the work
- Verifying personnel under their supervision are aware of the area hazards and verifying controls are in place to manage those hazards
- Coaching all personnel they supervise in all aspects of isolations, ensuring they are competent (verifying with TA) and conducting all work in accordance with Project requirements
- Ensuring AEs working under this Procedure receive the same level of protection otherwise afforded them by using a personal lock (i.e., in cases where WGS hangs lock on behalf of work group) for System Boundary Master Clearances.
- Ensuring when AE(s) work on equipment downstream of a System Boundary Master Clearance (**Section 4.7.2**) that:
  - As the WGS, they will serve as the AE for System Boundary Master Clearances and will hang a lock and sign on to the permit on their work group's behalf for the Startup System on which their Work Group is working
  - Personnel, who are to be protected by the System Boundary Master Clearance and are under their Supervision, are VERIFIED to be AE Qualified
  - The AE(s), under supervision of the WGS, have signed onto CFN-1328 for that Startup system

**NOTE 1:** *CFN-1328 is turned in to and maintained by Startup System for each Work Group at the TA office.*

**NOTE 2:** *The AE(s) are to sign ON to the CFN-1328 once and do not sign OFF until the protection provided by the System Boundary Master Clearance is no longer needed.*

- Ensuring all AEs involved with the work 1) place locks on and remove locks (when personal lock is applicable) from the lockbox or place locks on and remove locks with legible isolation tags from the isolation point, and 2) sign on/off the EIP as required
- Verifying all work is performed in accordance with the relevant Project procedure(s)
- Monitoring the effectiveness of controls imposed by the EIP
- Stopping all work and notifying the TA, or designee, if conditions change that have the potential to void the conditions of the isolation(s) or if isolation point(s) are compromised
- Placing a lock on the lockbox containing the key(s) to the locks used in the energy isolations, when using a lockbox

**Commentary** *Workers (at their personal request) may always elect to place a personal lock on the lockbox if they feel the need for another layer of protection. If workers place personal locks on lockboxes, it is the WGS's responsibility to manage the workers placing/removing their personal locks.*

- Submitting the lockbox to the TA, when using a lockbox, at the appropriate time in the work flow

- Showing each lock that has been placed to all AEs who will sign onto the LOTO
- Ensuring work is complete and signing the EIP when the work is completed
- Manipulating, as required, components tagged with a CAUTION – RESTRICTED OPERATION tag or designating specific individuals in the work group to do so
- Leading, facilitating, and coordinating weekly inspections to identify any unsafe or unsatisfactory isolation or work practice
- Participating in auditing and investigations pertinent to this Procedure
- Attending EIM/LOTO training
- Ensuring planning and coordination required for this Procedure is performed in a safe, efficient manner, including, but not limited to, safety of personnel, protection of the environment, and adherence to all aspects of this Procedure

## 4.0 REQUIREMENTS

### 4.1 General

All potentially hazardous energy sources are to be removed or controlled before commencing work.

Refer to **Appendix A, Acronyms and Definitions**, for a description of the positions in EIM (e.g., AFE, AE, AO), including the level of training, competence, and qualification. The work process for EIM is shown in the flow diagrams in **Appendix B, Energy Isolation Permit Work Process**, through **Appendix G, Sanction to Test Work Process**.

**Appendix H, Permitting Competency Tracking (Example)**, is an example of the means by which VOC will be tracked for key positions within the EIM process.

**Appendix M, Methods of Isolation**, and **Appendix N, Guidance on Application of Lockout/Tagout**, give examples of energy isolation and guidance on application of LOTO, respectively.

### 4.2 Prerequisites to Isolation

The following are prerequisites to isolation:

- Personnel shall not isolate a piece of plant equipment until they possess the appropriate training, competencies, and authorization to isolate a specific item of plant or equipment
- Personnel shall not work on or within safe approach boundaries of a piece of plant equipment until they possess the appropriate training, competencies, and authorization
- Any personnel escorting a visitor ensures the visitor does not manipulate or otherwise tamper with any plant component under control of this Procedure
- As specified in **Appendix N**, an EIP is not always required for certain work scopes that can be executed by isolation under direct control of the individual performing the work
- Personal locks shall only be attached and removed by their owner utilizing the lock's uniquely matched key

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**Commentary** *In the rare occurrence where workers who have signed on to permits and/or have placed LOTO devices are not available for the close or change of those permits, OSHA allows the employer to remove their LOTO devices.*

*In the above scenario and as discussed in **Section 4.3.5, Implementing an Emergency Closure**, the Site Manager or PSUM will designate the unavailable person's Supervisor/Foreman as the person to remove any locking devices on that person's behalf and close-out any necessary paperwork, subject to following the correct procedural steps.*

### 4.3 Work Process for Isolation

Locks are the preferred isolation devices; however, there may be exceptions to this requirement (e.g., when customer procedures prohibit locks or situations where no physical means of locking isolation devices exist, such as removing fuses). It should be noted this Procedure ensures a tag affords the user the same level of protection as a lock.

29 CFR 1910.147(c)(3)(ii), *The Control of Hazardous Energy (Lockout/Tagout), Full Employee Protection*, states that when a lock and tag is not used: "In demonstrating that a level of safety is achieved in the tagout program which is equivalent to the level of safety obtained by using a lockout program, the employer shall demonstrate full compliance with all tagout-related provisions of this standard together with such additional elements as are necessary to provide the equivalent safety available from the use of a lockout device." (Underline added to the OSHA standard text for emphasis.)

Examples of Additional Elements that would reduce the likelihood of inadvertent energization:

- Removal of isolating circuit element
- Blocking of a control switch
- Opening of an extra disconnect switch
- Removal of a valve handle

Following are general administrative requirements for energy isolation:

**NOTE 1:** *If isolation tags are found loose in the facility, notify the TA immediately. **DO NOT REMOVE** tags from the area; the TA will determine the disposition of the tag.*

- The TA ensures lockout keys are kept in a lockbox and/or key safe under their control
- Company-provided personal locks shall not be placed without signing onto the permit; all locks need to be traceable to name and badge number

**Commentary** *Alternative methods such as key safes and peg boards may be utilized if they provide equivalent protection.*

- The TA issues all locks. Individual locks (if required) will be allowed only on the lockbox; unauthorized locks will be removed and documented
- If any lockout keys are lost or misplaced, the TA removes affected lock(s) utilizing the master key and installs a replacement lock. If the lost or misplaced keys are not found, the lock shall be destroyed. The EIP shall be updated with the NEW lock number

**NOTE 2:** *Master keys are under the control of the TA and are only used in emergency situations or as described above.*

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- The PR/STE/TA/RFE or AO (with the permission of the PR/TA and the RFE/STE) may temporarily lift and replace safety tags to support work or testing (refer to **Section 4.6**)
- DANGER – DO NOT OPERATE tags (**Appendix J, Danger – Do Not Operate/Do Not Remove Tag [Example]**) and Caution – Restricted Operation tags (**Appendix K, Caution – Restricted Operation Tag [Example]**) shall not be hung on the same component
- CAUTION – RESTRICTED OPERATION tags shall not be used for personnel protection for isolating hazardous energy sources
- Components tagged with CAUTION – RESTRICTED OPERATION tags shall only be operated with the permission of the PR; the PR may delegate this authority to the WGS
- No one shall remove a component with a CAUTION – RESTRICTED OPERATION tag
- No one shall operate a component with a DANGER – DO NOT OPERATE/REMOVE tag or DANGER – DO NOT OPERATE/REMOVE tag and lock attached
- No one shall remove a component with a DANGER – DO NOT OPERATE/REMOVE tag or DANGER – DO NOT OPERATE/REMOVE tag and lock attached

**WARNING**

**Violations of the above are life critical violations and may result in serious injury to personnel, including death**

- An STT shall only be performed while a WGS is in control of the lift

**NOTE 3:** *An STT can be carried across shifts if a WGS is present and in control of the work (e.g., transfer at shift change from one WGS to another WGS).*

#### 4.3.1 EIP – Preparation, Issue, and Implementation (refer to **Appendix B**)

The intent of CFN-1312A and CFN-1312B is to protect people. If any doubt exists regarding the level of protection that an isolation might provide, any potential hazards and mitigation necessary shall be fully addressed via the Job Hazard Analysis (JHA) process.

**NOTE 1:** *No work shall proceed within the boundary of the EIP until the isolation points are verified, the permit has been signed as issued by the TA, and the WGS and/or AE for the working group have signed on the permit accepting the permit and zero-energy has been verified.*

Following are requirements for positions within the EIP process:

- The PR performs a walkdown of the equipment or system boundary and identifies the recommended protective measures and safety isolation management measures
- In the instance where a Temporary Ground is required on any equipment or cable, the ground is tagged with a DANGER tag and included on the EIP; the Panel cover where the Temporary Ground is installed and the Circuit Breaker cover that

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isolates the circuit should have a **Danger sign** attached stating a Temporary Ground has been installed

- The PR completes the applicable sections of the EIP (CFN-1312A and CFN-1312B) to request safety tagging or lockout of equipment, component(s), or system(s)
- The PR consults with the RFE/STE, as required, to ensure adequacy of the isolation points for the scope of work to be performed
- The PR signs the permit and submits the permit with supporting documentation (e.g., drawings, P&ID mark-ups) to the TA for approval
- The TA confirms PRs are authorized to request EIPs
- The TA confirms the isolation boundary and required protective measures recommended by the RFE/STE/PR are adequate for the work or testing identified in the EIP
- The TA uses an appropriate Subject Matter Expert (SME) for independent review of EIP isolation designs, as required
- The TA reviews the EIP and associated tags and may assist the PRs with preparation; the safety tags shall be numbered using the EIP number and a sequential number (e.g., 201-1, 201-2, and 201-3)
- The TA consults with the RFE/STE/PR about the EIP request, if necessary, to verify the EIP is adequate for the scope of work to be performed
- The TA logs the new EIP on CFN-1311, *EIP/Lockout Permit Log*
- The TA gives the required energy isolation devices to the AO, as appropriate, after verifying the adequacy of the EIP
- The AO implements the protective measures (install energy isolation devices) as required by the EIP
- After required tags and locks are placed, the keys are placed in a lockbox or key safe. Where a lockbox is used, it shall be returned to the TA for retention and control. The TA places a TA lock on the lockbox latch hasp position

**Commentary** *Generally, the lockboxes should be kept in a central location (e.g., in the tagging office).*

*The TA may allow the lockbox and permit to go out on a per shift basis if the work location is remote.*

*Lockboxes must be returned to the permit office at end of each shift or they must be physically controlled in the field (e.g., lock the lockbox down to a physical location in the field).*

- The IV (typically WGS, as best practice) independently (not side-by-side with the AO) verifies all energy isolation points. Where the WGS or delegates are not trained and competent as an IV, the WGS shall utilize a trained and competent IV to perform the independent verification (this is the independent field verification of energy isolation points)
- In rare instances, independent verification may not be possible (e.g., underground valves where the hole cover is locked after orientation of valve in accordance with the EIP); in these instances, the TA may allow concurrent verification to be completed by the AO and IV
- The WGS ensures the zero-energy check has been performed and signs and dates where applicable on the permit form and submits paperwork to the TA. When absence of voltage has been verified to be zero, complete and attach



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PRCN 01

CFN-1317, *UPF Electrical Hazard Risk Assessment & Testing Form*, to the isolation permit in accordance with UPF-MANUAL-CM-001

**Commentary** *Verifying versus challenging an isolation: The intent of the verification process is to verify, not challenge, the isolation. Challenging the isolation could lead to potentially unsafe conditions for those working on or near the equipment under isolation or potentially impact plant operations:*

- *Verifying (allowed):*
  - *An IV may verify an isolated component's position by turning or moving it to the "off" and/or isolated condition.*  
*Example: Pulling a hand wheel of a tagged closed valve in the close direction to ensure it is fully closed*
- *Challenging (not allowed):*
  - *An IV CANNOT try to challenge an isolated component by turning or moving it to "on" and/or non-isolated position*  
*Example: Trying to open a locked closed valve to challenge if the chain and lock will prevent it from opening*  
*Example: Trying to close a locked open circuit breaker*
- The TA signs and dates the permit to issue the permit after all component positions and zero-energy has been verified
- The TA issues personal LOTO devices (locks) to WGS and AEs and ensures the individual's name and entity are clearly identified
- No work on the system will be started until the TA has issued the permit AND AEs have verified isolation boundary on the EIP and signed on to the permit
- When any of the following conditions are met during execution of the work, an informal, undocumented zero-energy follow-up is performed:
  - Prior to the start of work each shift
  - When returning to the job location after it has been left unattended
  - If there is a circuit condition change, system configuration change, or work conditions have changed
- Use one or more of the following methods to complete an informal, undocumented zero-energy follow-up under guidance of the WGS:
  - Ensure personnel are clear of potential hazard and then attempt to start equipment via local or remote controls
  - Conduct voltage checks
  - Verify equipment or system instrumentation indicate no energy
  - Verify blocking devices still installed properly
  - Verify drain and vent valves indicate no flow

**NOTE 2:** *DANGER – DO NOT OPERATE-tagged components that are in areas (e.g., confined spaces) that pose an additional safety hazard may be excluded from periodic zero-energy follow-up.*

**NOTE 3:** *Formal zero-energy check requirements do not apply for a zero-energy follow-up (e.g., voltage PPE, M&TE).*

#### 4.3.2 EIP Change/Modification (refer to **Appendix C, Change to Existing Energy Isolation Permit Work Process**)

**Commentary** *Personnel preparing EIPs should consider the structuring of permits (refer to **Section 4.7.2**, and **Figure 1** for an explanation of Master/Subordinate Boundary Clearances) to minimize the need for permit modifications in the future. Large numbers of permit modifications create opportunities for human performance issues that may lead to inadvertent release of an isolation point or permit. Examples include:*

- *Permits to isolate all downstream loads on an Motor Control Center (MCC) that is to be energized may be written as an individual permit for each MCC breaker; this way, each individual breaker permit may be released when the load is energized, rather than a single permit with all MCC loads on it that must be modified as many times as required to clear each individual breaker on the MCC*
- *Permits to isolate all downstream loads on a distribution panel board that is to be energized may be written as an individual permit for each panel board breaker; this allows each individual breaker permit to be released when the load is energized, rather than a single permit with all panel board loads on it that must be modified as many times as required to clear each individual breaker on the panel board*
- *Permits to isolate all downstream loads on a cooling water system that is to be energized should be written as an individual permit for each cooling system user; this allows each individual user to be released when it is placed in service, rather than a single permit with all users on it that must be modified as many times as required to clear each individual cooling water user on the system*

*There may be multiple similar examples in the facility to which this philosophy applies.*

- The WGS, in conjunction with the RFE/STE, as required, continuously monitors the effectiveness of established protective measures, changing plant conditions, and EIP boundaries to determine if there is a need to modify the EIP
- If it is determined an EIP requires change or modification, the PR and WGS discuss the need for change and consult with RFE, STE, and TA, as required, to modify the EIP:
  - If the modification is administrative only (e.g., change in description or scope/type of work within current isolations), the paperwork is updated and the WGS informs personnel working under the EIP of the changes
  - If the modification requires changes in isolation points and protective measures, the WGS ensures work is ceased and all AE(s) remove their lock from lockbox then sign-off, then the WGS removes their lock from lockbox then signs-off the EIP
- The TA provides any new locks/tags required for the modification
- All isolation points and protective measures are validated then changed and verified (including zero-energy check) and permitting/work continues in accordance with the standard process
- If the change is an emergency change, refer to **Section 4.3.4, Implementing an Emergency Change**

**NOTE:** *If one or more of AEs or WGSs is not available, the TA may authorize an emergency closure or change (with the Site Manager/PSUM approval).*



#### 4.3.3 Offsite Authorizations

##### **Available**

If a WGS and/or AE is off-site but can be contacted by telephone, the individual is considered available and shall verbally authorize the closure or change.

If the WGS and/or AE agrees with the closure or change, the TA shall document the agreement over teleconference, then proceed with a permit closure or change as outlined in **Appendix C**.

This verbal authorization to close or change the EIP shall be documented (CFN-1312A and CFN-1312B).

##### **Unavailable**

If the agreement of the unavailable WGS and/or AE cannot be obtained, the supervisor of the unavailable WGS and/or AE shall be contacted to discuss the boundary changes or EIP release with the TA.

If the TA agrees the change or release is necessary, the TA will proceed as outlined in **Appendix C**.

#### 4.3.4 Implementing an Emergency Change

Refer to **Appendix D, *Emergency Change to Energy Isolation Permit Work Process***.

When implementing an emergency change:

- The TA and the Site Manager/PSUM, or designee, approve the emergency change
- All AEs and available WGSs shall approve the EIP change by removing their lock from lockbox then signing-off the EIP
- The supervisor (with training equivalent to WGS) of the unavailable WGS and/or AE ensure the WGS and/or AEs working under the EIP held by the unavailable WGS are signed-off the EIP by the supervisor and locks are removed by the TA, as applicable
- The supervisor ensures correct boundaries are established and forwards the signed EIP to the TA
- The TA, RFE/STE, and AO, as required, modify isolation points and protective measures to incorporate the change
- The TA identifies the emergency change on the EIP
- The supervisor of the unavailable WGS and/or AE notifies the unavailable WGS and/or AE upon their return to site

#### 4.3.5 Implementing an Emergency Closure

Refer to **Appendix E, Emergency Closure of Energy Isolation Permit Work Process**.

When implementing an emergency closure:

- The TA and the Site Manager (Construction jurisdiction)/PSUM (Startup jurisdiction), or their designee, shall approve the emergency closure; the TA shall document the approval, including the unavailability of any personnel signed on the EIP and circumstances affecting their unavailability (CFN-1312A and CFN-1312B)
- For System Boundary Master Clearance, the WGS or supervisor (with training equivalent to WGS) of the unavailable WGS shall ensure all available AE(s) sign OFF of the System Boundary Master Clearance Work Group Sign ON/OFF Log (CFN-1328) and then the WGS shall sign to release the CFN-1328
- All available AE(s) working under the EIP shall remove locks from lockbox then sign-off and the available WGS shall remove their lock from lockbox then release the EIP by signing-off
- The supervisor (with training equivalent to a WGS) of the unavailable WGS and/or AE ensures the available WGS and AE working under the EIP are signed-off the EIP by the supervisor, and locks are removed from the lockbox by the TA, as applicable
- The TA ensures AOs remove all tags and locks
- The TA closes the permit after ensuring all LOTO devices have been removed
- The TA closes out the EIP on CFN-1311
- The TA identifies the permit as an emergency closure
- The supervisor of the unavailable WGS/AE shall notify the unavailable WGS/AE of the emergency closure upon their return to site

**NOTE:** *The notification from the supervisor to unavailable WGS/AEs after emergency changes/closures is accomplished prior to the re-start of work on the closed system, (i.e., when the unavailable WGS or AE returns to work at the start of his next scheduled shift).*

#### 4.4 Performing Isolations

Isolating involves the disconnection, de-energization, or de-activation at the designated isolation point and removal of hazardous energy from all possible sources at the point where work is being performed on the system.

Regardless of the hazardous energy type, all isolations involve five common steps:

1. Isolation and removal of energy source (closing and/or opening valves)
2. Removal of stored/residual energy (draining, inerting, clearing piping)
3. Implementing protective measures (hanging locks/tags, electrical disconnects, installing blinds)
4. Verification (independent or concurrent)
5. Proof (Zero-Energy Check)

**Commentary** *The means of achieving each step varies according to the plant or equipment and energy source involved. It may be the act of implementing an isolation requires in itself an isolation to be performed (such as a valve isolation for the placement of a spade into pipework).*

#### 4.5 Energy Isolation Permit Closure

Refer to **Appendix F, Energy Isolation Permit Closure Work Process**, for the EIP Closure work process.

When the work is completed:

- The WGS verifies the work is complete
- All AEs remove personal locks from lockbox and sign-off the EIP
- The WGS notifies the RFE/STE work is complete
- The RFE/STE/SSS (as applicable for operating systems) verifies work is complete in accordance with the scope and the system is safe to return to service
- The WGS removes lock from lockbox and signs off the EIP and surrenders it to the TA
- The TA ensures all WGS/AE on the permit have signed-off

**NOTE 1:** *If one or more AEs or WGSs is not available, the TA may authorize an Emergency Closure in accordance with **Section 4.3.5**.*

**NOTE 2:** *If all AEs have not signed-off, the EIP shall remain active.*

- The RFE/STE/SSS (as applicable) confirms the equipment is ready to be de-isolated; the TA removes their lock from the lockbox
- The AO removes all protective measures and restores the isolation points to the position designated by the RFE/STE/SSS (as applicable)

**NOTE 3:** *De-isolation of the EIP should be performed in the reverse order (i.e., bottom-up) following the listing of the isolation points/protective measures on the EIP. Deviations/hold points to this sequence need to be explained in the special conditions section of the EIP.*

- The TA closes the EIP after ensuring all LOTO devices have been returned and protective measures have been restored
- The TA closes the EIP on CFN-1311
- After the permit is closed, the TA destroys or removes the labels (Q4 system) from all released tags, submits the closed permit to the UPF Document Management Center (DMC), and stores the locks and keys

#### 4.6 Sanction to Test Instructions

Refer to **Appendix G**; CFN-1314, *Safety Tagging for STT*; CFN-1315, *Sanction to Test (STT) Cover Sheet*; and CFN-1316, *Sanction to Test (STT) Log*. Following are requirements for personnel involved in the STT work process:

- The STT requestor completes the STT forms and submits it to the TA (CFN-1315 and CFN-1316)

**NOTE:** *CFN-1315 is considered a cover sheet and should be conspicuous, unique, and easily identified (e.g., a colored sheet [this color should not be used anywhere else]).*

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- The TA reviews the request with the RFE/STE and PR to concur the STT is correct
- If the STT is correct, the TA assigns the STT number in the STT form (CFN-1315) and the STT log (CFN-1316) and informs the WGS
- The WGS informs all personnel signed on the affected EIP of the STT and ceases work
- All personnel signed on the EIP will sign off the EIP and remove their locks (if applied)
- All work on the EIP is stopped and only scope listed on the STT Cover Sheet (CFN-1315) may be executed
- If personnel listed on the EIP are unavailable, follow the Emergency Change rules in **Section 4.3.3, Offsite Authorizations**
- The TA informs the AO to remove protective measures and document on CFN-1314
- The STT will be in force and testing can commence once all persons involved in the test are signed on the STT cover sheet (CFN-1315)
- All personnel involved in the test shall sign-on the STT Form (CFN-1315)
- The STT is considered in force until all signatures are in the Lift Release (sign) column and the WGS and TA have signed the STT cover sheet (CFN-1315)
- After testing is complete, the WGS ensures the STT is released and all AE(s) have signed the Lift Release column on CFN-1315 PRIOR to leaving the site
- The TA shall remove the STT Form from the front of the EIP, place it behind the EIP, and close the STT in the STT Log
- The TA shall maintain CFN-1316 in the same area as CFN-1311
- The TA notifies the AO to use CFN-1314 to restore protective measures to the original state as designated in the EIP
- Restore isolations in accordance with the EIP and CFN-1314
  - Complete verifications on CFN-1314
  - Complete Zero Energy Check (WGS or witnessed by WGS) on CFN-1314
  - TA issues EIP on CFN-1314
- WGS(s) and AE(s) who signed off the EIP during the STT period can sign-on the EIP again and work can continue

## 4.7 Master Clearance

A Master Clearance is a process that allows for either a Project-Wide Boundary Clearance (**Section 4.7.1**), System Boundary Clearance (**Section 4.7.2**), or a Master/Subordinate Permit Clearance process that allows group protection through use of a single Isolation Management permit.

### 4.7.1 Project-Wide Master Boundary Clearance

A Project-Wide Master Boundary Clearance is limited to main terminal points to a site and is designed to ensure construction workforce protection. The TA will function as the AE for Project-Wide Master Clearances and ensures they are applied correctly. Examples include:

## UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)

- Main power feeds
- Gas supplies
- Connections to existing owner facilities outside the scope of the Project. These EIPs will be governed by Y18-107, but the Site Manager/PSUM will ensure, at minimum, the same level of protection provided by this Procedure is met (e.g., may elect to lock Y-12 PDWP original paperwork in UPF lockbox via a UPF EIP)

When a Project-Wide Master Boundary Clearance LOTO is used, the following minimum requirements apply:

- The TA controls all keys that shall be under lockbox or key control
- The Site Manager, BNI ES&H Manager, TA, and PSUM, where applicable, place their lock at the Project-Wide Master Boundary Clearance isolation point

To remove a Master Boundary Clearance:

- Formal notification is sent to AFEs and AEs, including, but not limited to, the following:
  - Published notice (Y15-95-915, *Notice of Energization*)
  - Meeting announcements
  - Signage
- Downstream EIP (if required) needs to be established prior to release of the Project-Wide Master Boundary Clearance
- The TA performs a physical walkdown and verifies necessary downstream EIPs are in place and adequate, prior to the release of the Project-Wide Master Boundary Clearance

**NOTE:** *Formal notice guidelines as outlined in **Section 4.7.1** shall also apply prior to release of such clearance.*

- Agreement and release by all personnel recorded on the Project-Wide Master Clearance EIP and removal of their locks

*Commentary* Coordination and agreement is necessary with upstream/downstream infrastructure owners/operators, especially in the case of placing locks on components that are outside of Project jurisdiction. Buy-in from external stakeholders supports their adherence to the requirements of this Procedure.

#### 4.7.2 System Boundary Master Clearance

**NOTE 1:** See **Section 4.7.1** for notification requirements.

System Boundary Master Clearances are to isolate systems prior to turnover to Startup, for the testing/commissioning activities from systems remaining under construction work scope. The WGS will function as the AE for System Boundaries and ensures they are applied correctly.

While a typical EIP looks at isolating energy out of an area/system, a System Boundary Master Clearance is typically installed at the boundary of an energized system to keep the energy in and provide downstream work force protection.

*Commentary* Typical examples of System Boundary Master Clearances are:

- *The clearance (lock open) of all load breakers on an electrical switchgear/panel that is preparing for test*

## UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)

- *A positive mechanical isolation (e.g., valves, blinds or spades), which enable safe work on upstream/downstream systems/equipment*
- *Mechanical isolation of an instrument air header at each take-off prior to initial test and startup of the header with instrument air; in this case, the boundary may be progressively extended as each sub-header becomes ready for commissioning*

When a System Boundary Master Clearance is used as an isolation point for work, the following minimum requirements apply:

- The WGS will serve as the AE for System Boundary Master Clearances and will hang a lock and sign on to the permit on their work group's behalf
- The personnel who are to be protected by the System Boundary Master Clearance and are under the WGS supervision are VERIFIED to be AE Qualified
- The AE(s) under supervision of the WGS have signed on to CFN-1328 for the Startup system that requires work to be performed for protection
- *The AE(s) are to sign ON to the CFN-1328 once and do not sign OFF until the protection provided by the System Boundary Master Clearance is no longer needed*
- TA maintains CFN-1328 for each Work Group by Startup System
- WGSs sign on/off and place their LOTO device on the System Boundary Master Clearance isolation lockbox on behalf of their work group or as designated by the TA, and all verifications shall be completed in accordance with the implementation of the EIP process
- All keys controlling energy isolation points shall be under a lockbox or key control

**NOTE 2:** *System Boundary Master Clearances are planned by the Construction team, coordinating with the Startup team, to correspond with the Turnover of Systems to Startup and for the commissioning and startup evolutions required for systems during the Project life cycle. System Boundary Master Clearances will often extend.*

**NOTE 3:** *An AE may always elect to hang their own lock or sign on to a System Boundary Master Clearance if they so choose.*

### **Releasing a System Boundary Master Clearance**

The TA ensures the following requirements apply before releasing a System Boundary Master clearance:

- Formal notification including, but not limited to, the following:
  - Published notice of Energization as required by Y15-95-915
  - Meeting announcements
  - Signage
  - WGS notifies their AEs who have signed ON to CFN-1328 to Sign OFF (WGS signs to release the CFN-1328)
- Verification all AE(s) signed OFF CFN-1328s and the WGS has signed to release the form that is utilizing the Clearance that is to be released
- Establishment of any required downstream EIPs prior to release of the System Boundary Master Clearance



**UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)**

- Physical walkdown and verification downstream clearances/protection is acceptable and in place prior to the release of the System Boundary Master Clearance
- Agreement and release by all personnel recorded on the System Boundary Master Clearance EIP and removal of their appropriate locks

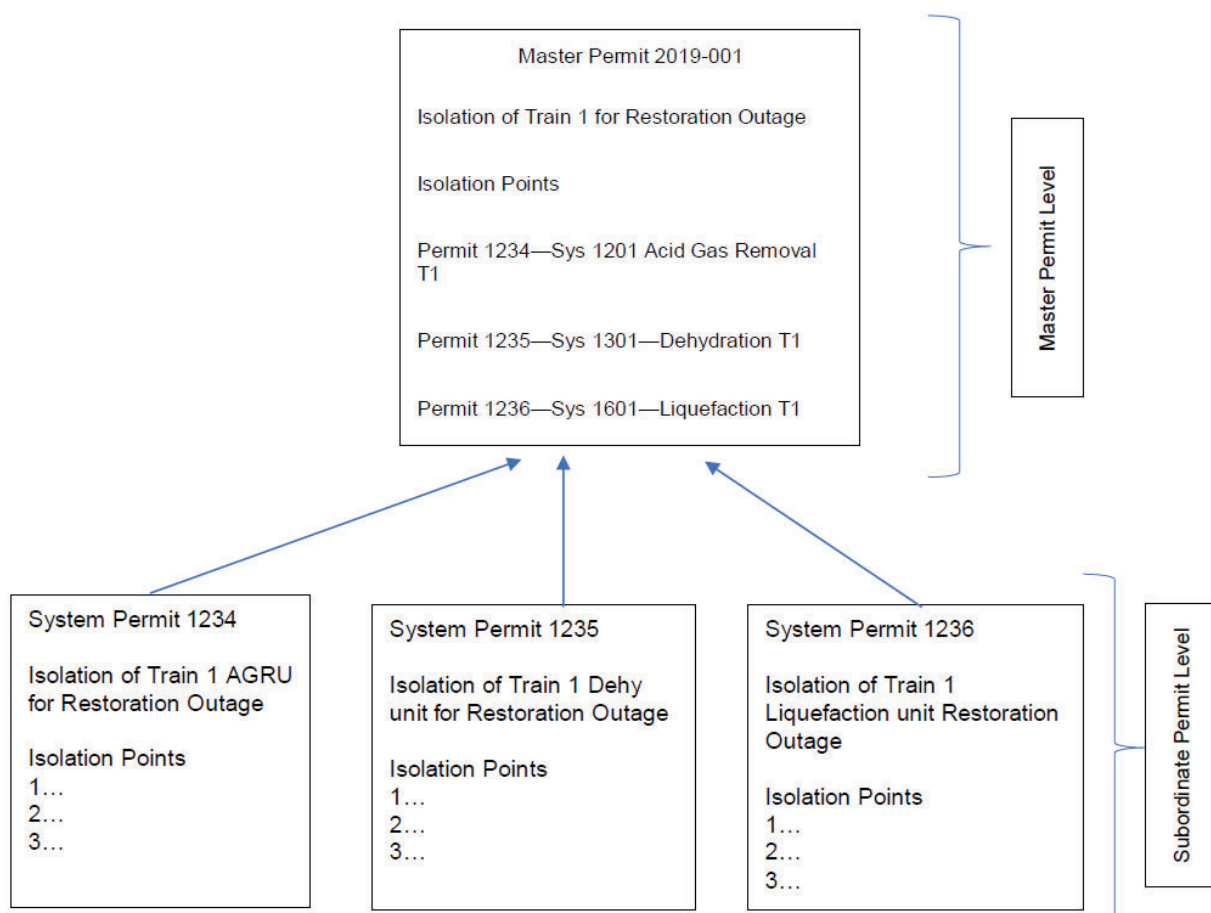
**Master/Subordinate Boundary Clearances**

**NOTE 4:** *Master/Subordinate Clearances are isolation permits arranged in a hierarchy to facilitate work generally associated with major facility outages. This process streamlines return to service of systems while minimizing the number of EIPs site personnel need to sign.*

**NOTE 5:** *A master permit in this context has isolation points generally consisting of sub-tier level subordinate isolation permits.*

Subordinate isolation permits are generally permits for individual systems, equipment or groups of such.

An example of the hierarchy of such permits is shown in **Figure 1**.



**Figure 1. Hierarchy of Permits**



<i>UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)</i>
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- The TA shall sign on to each subordinate permit, noting the number of the Master permit in the sign-on
- The TA shall sign on to the Master permit that has the subordinate permits as the isolation points after they sign on to each subordinate permit
- WGSs and AEs may then sign on to the Master permit, as applicable

## 5.0 RECORDS

Records generated by this Document shall be maintained in accordance with Y15-95-800, *UPF Document Management*.

The following records generated are:

Record or Form Number	Record Title	System/ Location	Document Type
Document Specific	<i>UPF Lockout/Tagout Permit (may include CFN-1331, CFN-1312A/B, CFN-1314, CFN-1315, CFN-1316, CFN-1328)</i>	InfoWorks	LOTO

## 6.0 REFERENCES

### 6.1 Source References

29 CFR 1910, Subpart O, *Machinery and Machine Guarding*  
 4MP-T11B-M105, *Work Process Procedures*  
 4MP-T81-01306, *Retention of Construction Records*  
 4MP-T81-02303, *Construction Equipment Maintenance*  
 4MP-T81N-01308, *Telecommunications System and Equipment Safety Tagging/Lockout*  
 CP-106, *Hazard Analysis*  
 CP-111, *Assessments and Audits*  
 CP-221, *Lockout/Tagout Procedure*  
 TGUI-TR-801768-A003, *UPF Training Requirements Matrix (TRM)*

### 6.2 Interfacing References

10 CFR 851, *Worker Safety and Health Program*  
 29 CFR 1910, Subpart S, *Electrical*  
 29 CFR 1910.119, *Process Safety Management of Highly Hazardous Chemicals*  
 29 CFR 1910.147, *The Control of Hazardous Energy Standard (Lockout/Tagout)*  
 29 CFR 1910.333, *Selection and Use of Work Practices*  
 29 CFR 1926, Subpart K, *Electrical*  
 ASME B31.3, *Process Piping*

NFPA 70E® 2015, *Standard for Electrical Safety in the Workplace®*, Article 120,  
*Establishing Electrical Safe Work Conditions*

TGUI-TR-801768-A003, *UPF Training Requirements Matrix (TRM)*

TPST-SU-801768-A004, *Line/Containment Break*

UPF-MANUAL-CM-001, *Uranium Processing Facility Construction Electrical Safety Manual*

Y15-95-800, *UPF Document Management*

Y15-95-912, *UPF Completion and Turnover*

Y15-95-915, *Notice of Energization*

Y17-95-64-851, *UPF Construction Equipment Maintenance*

Y18-107, *Lockout/Tagout Execution for Personnel Protection*

Y60-95-015, *Uranium Processing Facility Software Quality Assurance*

### 6.3

#### Forms

CFN-1311, *EIP/Lockout Permit Log*

CFN-1312A, *Energy Isolation Permit*

CFN-1312B, *Energy Isolation Permit Sign-on Sheet*

CFN-1314, *Safety Tagging for STT*

CFN-1315, *Sanction to Test (STT) Cover sheet*

CFN-1316, *Sanction to Test (STT) Log*

CFN-1317, *UPF Electrical Hazard Risk Assessment & Testing Form*

CFN-1328, *UPF System Boundary Master Clearance Work Group Sign On/Off Log*

### 7.0

## SUPPLEMENTAL INFORMATION

Appendix A, *Acronyms and Definitions*

Appendix B, *Energy Isolation Permit Work Process*

Appendix C, *Change to Existing Energy Isolation Permit Work Process*

Appendix D, *Emergency Change to Energy Isolation Permit Work Process*

Appendix E, *Emergency Closure of Energy isolation Permit Work Process*

Appendix F, *Energy Isolation Permit Closure Work Process*

Appendix G, *Sanction to Test Work Process*

Appendix H, *Permitting Competency Tracking (Example)*

Appendix I, *Energy Isolation Permit Entry Instructions (Q4 System) (Example)*

Appendix J, *Danger – Do Not Operate/Do Not Remove Tag (Example)*

Appendix K, *Caution – Restricted Operation Tag (Example)*

Appendix L, *Energy Isolation Management Procedure Inspection Instructions*

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Appendix M, *Methods of Isolation*

Appendix N, *Guidance on Application of Lockout/Tagout*

## **APPENDIX A**

### **Acronyms and Definitions**

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#### **Acronyms**

<b>AE</b>	Authorized Employee
<b>AFE</b>	Affected Employee
<b>AO</b>	Authorized Operator
<b>BNI</b>	Bechtel National, Inc.
<b>CFR</b>	Code of Federal Regulations
<b>CNS</b>	Consolidated Nuclear Security
<b>EIM</b>	Energy Isolation Management
<b>EIP</b>	Energy Isolation Permit
<b>ES&amp;H</b>	Environmental, Safety and Health
<b>IV</b>	Independent Verifier
<b>JHA</b>	Job Hazard Analysis
<b>LOTO</b>	Lockout/Tagout
<b>LQEP</b>	Low Voltage Qualified Electrical Person
<b>MCC</b>	Motor Control Center
<b>MQEP</b>	Medium Voltage Qualified Electrical Person
<b>NFPA</b>	National Fire Protection Association
<b>OSHA</b>	Occupational Safety and Health Administration
<b>PDWP</b>	Power Distribution Work Permit
<b>P&amp;ID</b>	Piping and Instrument Diagram
<b>PR</b>	Permit Requestor
<b>PSUM</b>	Project Startup Manager
<b>RFE</b>	Responsible Field Engineer
<b>SME</b>	Subject Matter Expert
<b>SSC</b>	Structure, System, or Component
<b>SSS</b>	Startup Shift Supervisor
<b>STE</b>	Startup Test Engineer
<b>STT</b>	Sanction to Test
<b>TA</b>	Tagging Authority
<b>UPF</b>	Uranium Processing Facility
<b>VOC</b>	Verification of Competency
<b>WA</b>	Work Authorization
<b>WGS</b>	Work Group Supervisor
<b>Y-12</b>	Y-12 National Security Complex

## APPENDIX A

### Acronyms and Definitions

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#### Definitions

<b>Additional Element</b>	An additional safety measure such as the removal of an isolating circuit element, blocking of a controlling switch, opening of an extra disconnecting device, or the removal of a valve handle to reduce the likelihood of inadvertent energization.
<b>Affected Employee (AFE)</b>	<p>A person whose job requires them to work or traverse in an area in which isolation management is being performed or whose work requires them to operate or use a machine, system, or equipment on which work is being performed under isolation management, but is not signed on to an EIP (i.e., any individual on a jobsite). An AFE does not work on isolated equipment and cannot sign on to a permit unless they become an AE. An AFE may work on equipment downstream of a Project-Wide Master Boundary Clearance (<b>Section 4.7.1</b>).</p> <p><i>Commentary An AFE must be aware of the tags used on a Project site to control hazardous energy, and:</i></p> <ul style="list-style-type: none"> <li>• <i>An AFE must be aware of the rules associated with such tags and the potential consequences for violating such</i></li> <li>• <i>This shall be part of the jobsite orientation training to obtain unescorted access to the Project site</i></li> </ul>
<b>Audit</b>	A systematic, independent, and documented assessment of the compliance to, and effectiveness of, this Procedure and/or the implementation of this Procedure.
<b>Authorized Employee (AE)</b>	A person who has completed the required EIM training to work on isolated systems. A person signed on the EIP and who performs or directs work on equipment or systems that have been isolated for personal protection against hazardous energy.
<b>Authorized Operator (AO)</b>	A competent person authorized by the TA and supervision to operate and isolate process equipment (e.g., open/close valves, drain or vent fluids, startup/shutdown equipment, close electrical breakers or circuits) for establishing the safe boundary conditions described in the EIP. Competency will be determined by supervision, and training accreditation. AO personnel to perform an Electrical LOTO must be Qualified to Low Voltage Qualified Electrical Person (LQEP) < 600 Volts, or Medium Voltage Qualified Electrical Person (MQEP) ≥ 600 Volts in accordance with UPF-MANUAL-CM-001.
<b>Caution – Restricted Operation Tag</b>	An all-weather equipment or system tag that controls the methods personnel use to operate, energize, or pressurize equipment and electrical circuits.
<b>Completions Lead</b>	On projects where Bechtel has an operations group within the Startup organization, the Completions Lead/Designee is either an SSS or a dedicated individual reporting to the SSS tasked with the duties of a Completions Lead/Designee. On other projects, the Completions Lead/Designee is a TA designated by the PSUM. The UPF Startup Systems Completion Lead is responsible for the coordination of construction completion activities on systems that have been jurisdictionally transferred to Startup.

## APPENDIX A Acronyms and Definitions

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<b>Competent Person</b>	<p>A person fulfilling a role defined in this Procedure who is deemed competent through training accreditation and experience to perform the actions required to satisfy the requirements of their role. Possesses the technical knowledge required to identify and mitigate hazards specific to the work task(s).</p> <p><i><b>Commentary</b> A person with VOC in a discipline/craft will be considered competent to determine if a component or components have isolated the energy for the work to be performed safely.</i></p> <p><i>Site supervision will make the final determination of VOC using <b>Appendix H</b> and the definition of Competent Person as the minimum requirement.</i></p> <p>VOC requires agreement from a person's Supervision and the Site TA for Permit to Work/LOTO roles.</p>
<b>Component</b>	Uniquely identified hardware installed at a specific location. A component may be an individual device (e.g., a valve or instrument), equipment (e.g., a heat exchanger), or an assembly (e.g., a rack).
<b>Danger – Do Not Operate/Remove Tag</b>	An all-weather tag placed on equipment or components to prevent the position or condition from being altered from the position stated on the tag.
<b>De-Energized</b>	Free from all energy sources within the isolation boundary.
<b>De-Isolate</b>	<p>To remove the isolation lock(s) from the isolation point(s). "De-Isolation in Progress" is when the keys for component locks leave care, custody, and control of the tagging office and locks are removed. De-isolation does not necessarily mean the state of the control device has been restored to its original position (i.e., a breaker could still be in the open position).</p> <p><b>NOTE:</b> <i>From the instance the keys change hands, the LOTO is no longer in use as protection.</i></p>
<b>Direct Control</b>	<p>Control of an energy isolating device by the individual(s) performing the work that could be affected by the energy should the energy isolating device be operated. This specifically implies the individual protected by the energy-isolating device can physically prevent someone from operating said device.</p> <p><i><b>Commentary</b> Examples include:</i></p> <ul style="list-style-type: none"> <li>• <i>Direct Control:</i> <ul style="list-style-type: none"> <li>○ <i>Instrument technician needs to calibrate or remove a pressure transmitter. The manifold block valves are directly on the instrument; thus, the instrument technician has direct control</i></li> <li>○ <i>A pipefitter finds a gauge faulty on a pressure test tree for hydro testing. There is a means to bleed off the stored energy in the 2 ft. (60.96 cm) distance of SB pipe between the root valve and the gauge in a controlled manner. This is direct control: bleed-off pressure through a drain point</i></li> </ul> </li> <li>• <i>Not Direct Control:</i> <ul style="list-style-type: none"> <li>○ <i>Isolating means for the component is within line of sight but not within arm's reach at all times</i></li> </ul> </li> </ul>
<b>Drain Point</b>	A valve used to drain, vent, or de-pressurize plant or equipment or a process line that releases all stored energy. For the drain point to be used in an isolation procedure, the drain point must have no known deficiencies prior to taking the equipment off-line and serve as a verification point when proving zero-energy.



## APPENDIX A Acronyms and Definitions

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<b>Downstream</b>	For the purposes of isolating energy, downstream means the flow path/direction after or away on a fluid system or towards the load on an electrical system from a single isolation point or system being isolated.
<b>Emergency Release/ Emergency Change</b>	<p>A release or change of an EIP when the WGS or AE is not available to release the system/component by removing their individual tag or signing off on the permit.</p> <p><i>Commentary An emergency release would entail the complete release of the EIP from being in an isolated state.</i></p> <p>An emergency change would only require a change to a portion of the protection boundary without closing the entire permit.</p>
<b>Energized</b>	Connected to an energy source or containing residual or stored energy.
<b>Energy Isolating Device</b>	<p>A device that provides a physical barrier that prevents the transmission or release of energy (e.g., valve, circuit breaker).</p> <p><b>NOTE:</b> <i>Interlocks (control circuit) are NOT a means of isolation in accordance with 29 CFR 1910.147 (b) Definitions: “Energy isolating device. A mechanical device that physically prevents the transmission or release of energy, including but not limited to the following: A manually operated electrical circuit breaker; a disconnect switch; a manually operated switch by which the conductors of a circuit can be disconnected from all ungrounded supply conductors, and, in addition, no pole can be operated independently; a line valve; a block; and any similar device used to block or isolate energy. Push buttons, selector switches and other control circuit type devices are not energy isolating devices.”</i></p>
<b>Energy Isolation Permit (EIP)</b>	An authorization form used to request, record, issue, and release EIM protection for equipment and/or systems
<b>Energy Isolation Permit (EIP) Change</b>	A regular permit change or modification required when altering or shifting the permit boundary as needed without closing the entire permit (e.g., lifting tags no longer required in the boundary).
<b>Engica Q4 Safety</b>	The Bechtel Standard Application Program used for electronic implementation of EIM (LOTO).
<b>Entity</b>	(Within this Procedure) Company or sub-contractor or type of craft, where applicable.
<b>Hazardous Energy Source</b>	<p>A form of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or *other energy that has the potential to harm personnel or damage plant and equipment.</p> <p><i>*Stored batteries, radiation, mass and height (suspended loads), falling, sliding, or slipping objects and tension springs, belts, cables, chains, or ropes, etc.</i></p> <p>See <b>Appendix N</b> for a hazardous level table.</p> <p><b>NOTE:</b> <i>Personnel, when developing permits, must consider any (not just common or conventional) potential source of energy that could be harmful and the best method of isolating the potential energy source.</i></p>
<b>Independent Verifier (IV)</b>	A person (typically the WGS) competent and authorized by the TA and supervision to verify the proper installation of protective measures and safe boundary conditions described in the EIP. Competency is determined by supervision and training accreditation. Must be a different individual from the AO that applied the protective measures on the EIP. An individual trained and competent as an AO is also considered trained and competent as an IV.

## APPENDIX A

### Acronyms and Definitions

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<b>Isolation/Isolating</b>	The physical act undertaken (e.g., closing a valve and locking it in position, opening a breaker and locking it in position, removing an electrical component to create an energy break, inserting a blind or spade in a segment of piping) to prevent the release of energy that may cause injury to personnel, damage to plant or equipment, or harm to the environment.
<b>Isolation Boundary</b>	Encompasses the physical location of isolations at the perimeter of an energized system to the interface of a non-energized system (e.g., upstream/downstream valves closed, locked, and drained/vent valves open to isolate Startup and construction activities; breakers locked open to form an isolation in an electrical supply from Startup to construction).
<b>Isolation Point</b>	A uniquely identifiable physical component (e.g., valve, breaker, spool piece) within a system that meets the criteria of an energy isolating device.
<b>Job Hazard Analysis (JHA)</b>	A process that identifies key job activities/tasks associated with a definable activity, examines key job activities/tasks to determine the foreseeable hazards associated with the task (e.g., chemical, biological, physical, workplace), and establishes criteria to eliminate or control the hazards.
<b>Lockout</b>	The placement of a locking device on an energy isolation component to ensure the related equipment or system cannot be energized or operated until the locking device is removed.
<b>Lockbox/Key Control</b>	A lockbox is a box designed to accommodate multiple locks and keys. The lockbox is configured so it cannot be opened until all locks have been removed from the box. Key control is established via the lockbox system (keys are placed in the box prior to locking) or by utilizing a central key safe in conjunction with lockboxes. One or both methods (lockbox/key safe) for key control may be used.
<b>Lockout/Tagout (LOTO) Device</b>	A device that utilizes a positive means such as a lock, or non-removable tag to hold an isolation point in the safe position. (Also refer to “Isolation/Isolating.”)
<b>Permit</b>	A document used to manage specific tasks and/or work areas that require a further degree of control or task preparation (e.g., confined space entry).
<b>Permit Requestor (PR)</b>	A person who submits/requests EIPs who has successfully completed EIM/LOTO training . This person may or may not be the WGS.
<b>Personal Lock/Tag Device</b>	<p>A person's Project-provided unique isolation device used as a secondary means of energy control, such as a lock and/or tag and a means of attachment, which can be securely fastened to a component. Lock ONLY is applied to the lockbox.</p> <p><i>Commentary The tag identifies the AE and indicates that the equipment or system being controlled is not energized or operated until the isolation device is removed.</i></p> <p>One personal device is allowed per person, per lockbox or component(s) as designated by the TA.</p>
<b>Piping and Instrument Diagram (P&amp;ID)</b>	A visual representation of plant or equipment, indicating location of vessels, piping, valves, instruments, etc., in diagrammatic form.

## APPENDIX A Acronyms and Definitions

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<b>Protective Measure</b>	The position or configuration in which the isolation point is placed to affect the isolation. Other protective measures may include lockouts, tagouts, barriers, signage, posting sentries, etc., that, when in place, eliminate or reduce the risk to all personnel working on or near the work area.
<b>Return to Service</b>	To bring the plant and/or equipment back into service or operation after work has been completed and the permit has been closed.
<b>Responsible Field Engineer (RFE)/Startup Test Engineer (STE)</b>	An individual who is the SME for the correct installation, pre-commissioning, commissioning, and startup of a system and associated equipment.
<b>Sanction to Test (STT)</b>	The ability to remove and replace isolation devices while performing the work described on the permit. Used for the purposes of testing/commissioning and manipulating/calibrating equipment, components, or systems; this allows work to be completed without opening/closing the permit for the sake of the testing/commissioning activities.
<b>Shall</b>	Mandatory requirement.
<b>Should</b>	Recommended practice to be implemented where circumstances dictate.
<b>Startup Shift Supervisor (SSS)</b>	Typically, supervises operators who control systems and processes that run simultaneously with Project activities.
<b>Supervision</b>	Persons responsible for supervising Field Non-Manual (FNM) or Field Manual (FM) personnel on a project. Supervision have direct reports (Craft FM, Operators FM, and Engineers FNM). Depending on the project type and staffing, supervision can be of several types and titles (e.g., Site Manager, PSUM, WGS, SSS, and Completions Lead/Designee).
<b>Tagging Authority (TA)</b>	The individual(s) designated by the Site Manager or PSUM to implement the isolation management of required equipment or systems.
<b>Tagout</b>	The placement of a tagout device on an energy-isolating device (e.g., valve, disconnect switch, circuit breaker, fuse holder, lifted lead) to indicate the equipment/system being controlled is not operated until the tagout device is removed. This method is used when a lock cannot be installed.
<b>Temporary Energy Source</b>	These are closely inspected to ensure safety of personnel working on systems or equipment; these include, but are not limited to: <ul style="list-style-type: none"> <li>• Temporary construction or site backfeed electrical power supplies</li> <li>• Portable generators, batteries, or uninterruptible power supplies (UPS)</li> <li>• Temporary pumps, tanks, or boilers</li> <li>• Any other temporary source of energy identified by the owner/customer</li> </ul>
<b>Test</b>	An activity covered by a procedure to prove the functionality or suitability of equipment, systems, a component, or group of components. Testing can occur during construction, commissioning, startup, or maintenance activities.

## APPENDIX A

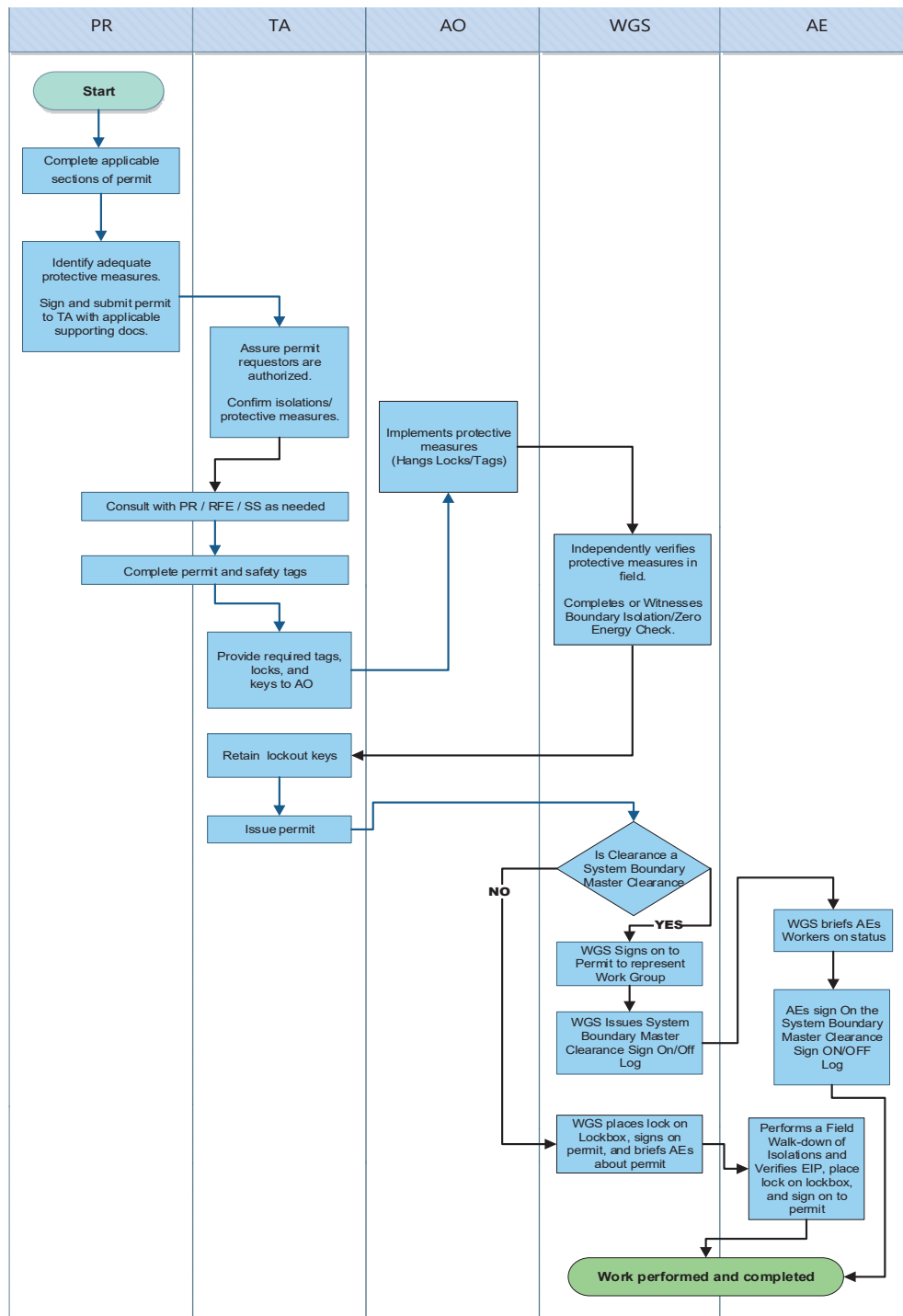
### Acronyms and Definitions

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<b>Upstream</b>	For the purposes of isolating energy, upstream means the flow path/direction before or leading up to on a fluid system and away from the load or towards the power supply on an electrical system an energy isolation point or system.
<b>Visitor</b>	A person who gains access to site and has NOT completed the full site orientation. The visitor is always directed and fully supervised by an authorized person.
<b>Work Group Supervisor (WGS)</b>	A person who oversees the work of individuals and work teams.
<b>Work Scope</b>	The description of work detailed on the EIP.
<b>Zero-Energy Check</b>	<p>A term used for checking a potential energy source for zero-energy (e.g., no electricity, no process, pneumatic or hydraulic pressure, no fluid flow, no heat). Workers must be able to verify or have verification shown to them that a system, equipment, or process has no energy prior their start of work.</p> <p><i><b>Commentary</b> Examples: The verification for piping zero-energy is an open drain or vent, for electricity; a voltage check on a circuit. Zero-energy check on electrical equipment with push buttons or start/stop switches includes trying to start them at local and remote locations by pushing the buttons or activating the switches to ON and AUTO. These are final checks to be performed prior to work.</i></p>

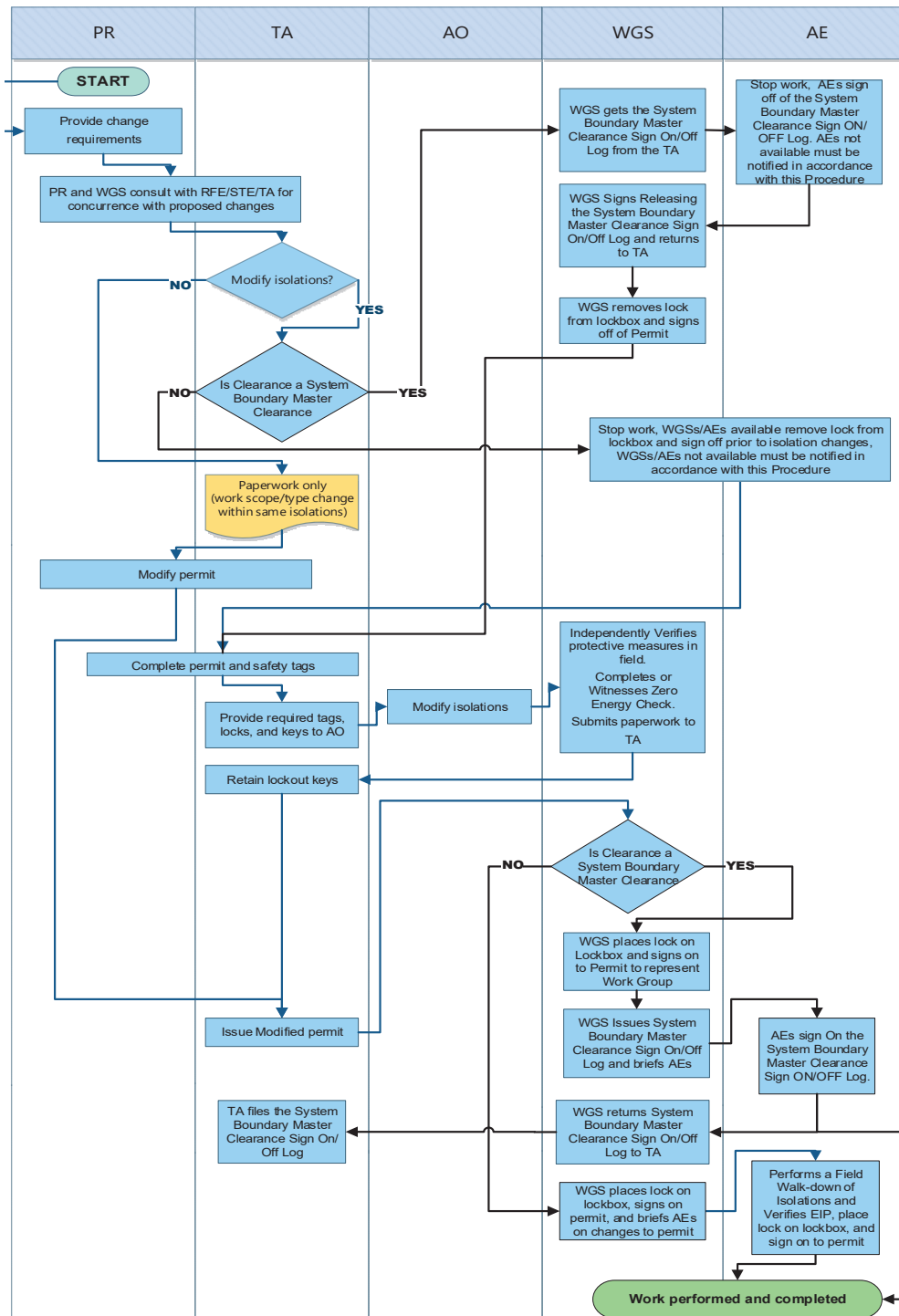
## APPENDIX B

### Energy Isolation Permit Work Process



## APPENDIX C

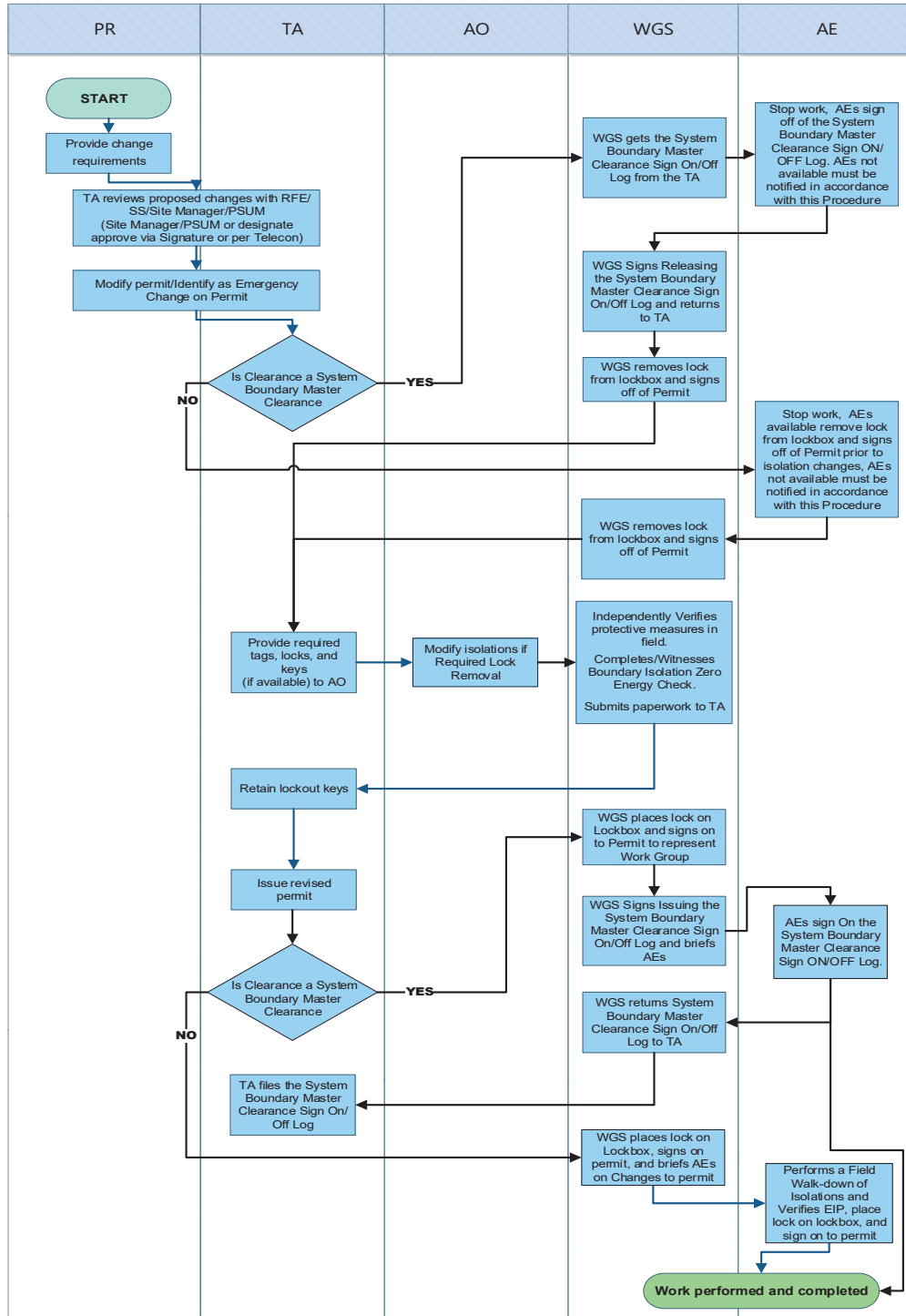
### Change to Existing Energy Isolation Permit Work Process





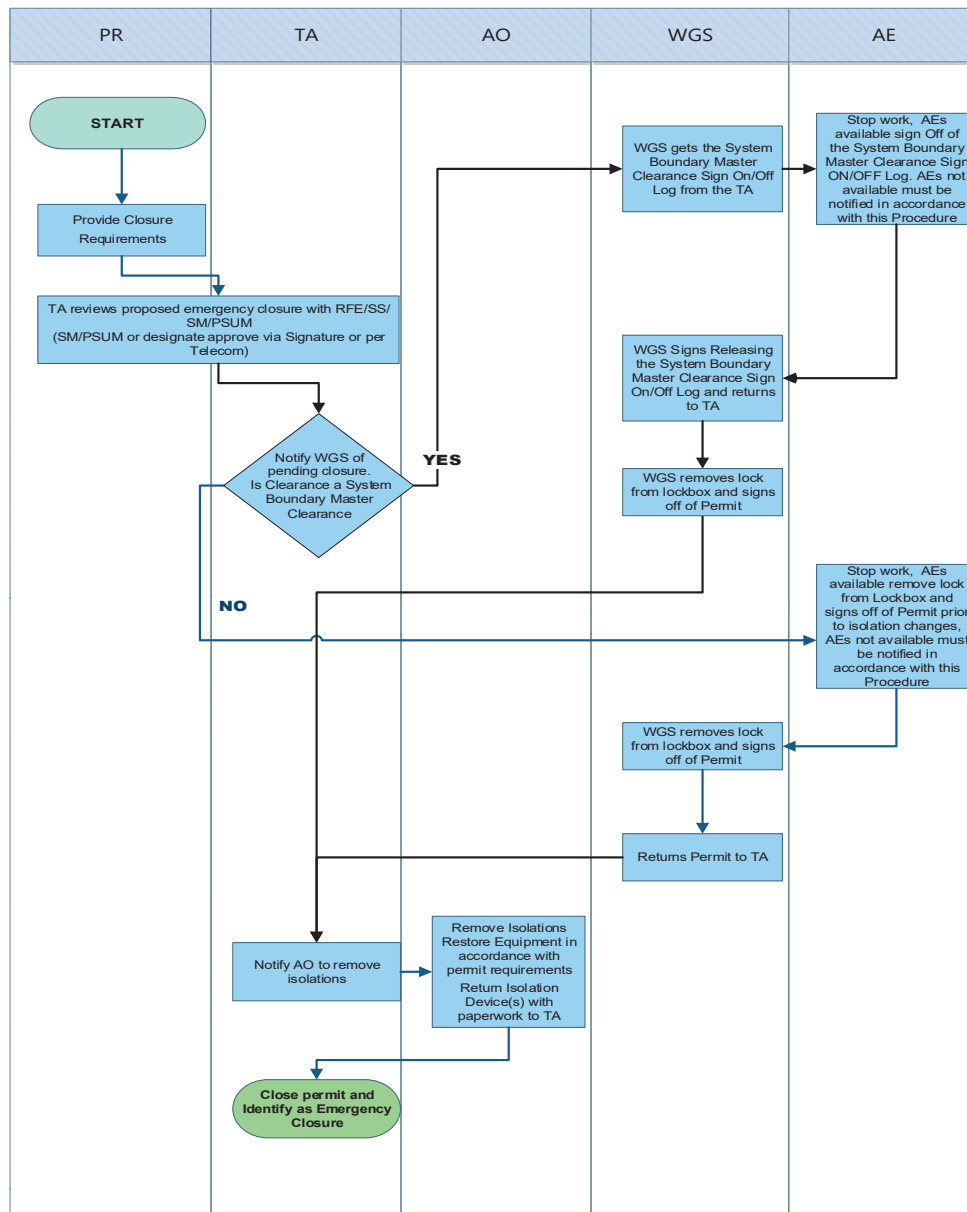
## APPENDIX D

### Emergency Change to Energy Isolation Permit Work Process



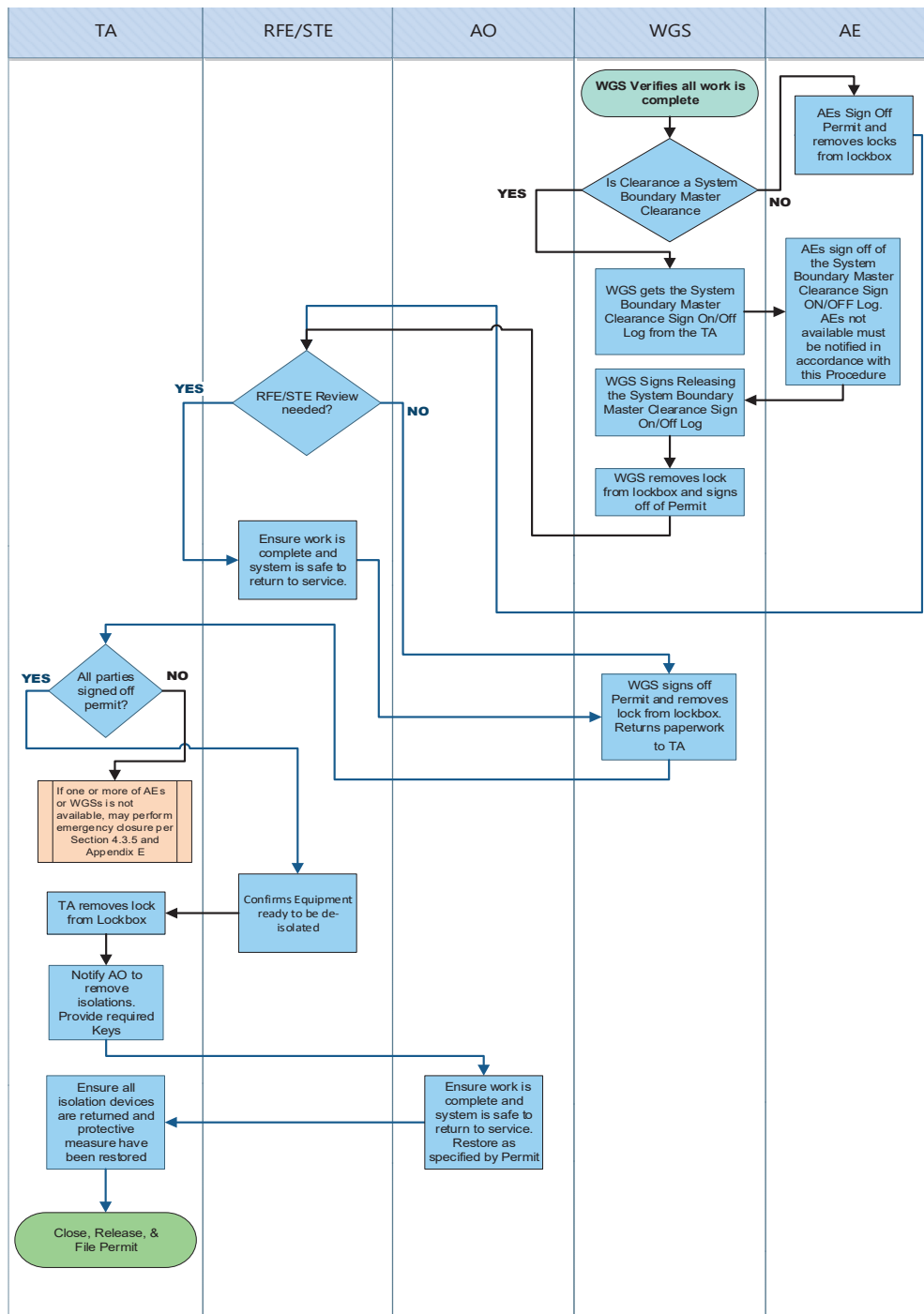
## APPENDIX E

### Emergency Closure to Energy Isolation Permit Work Process



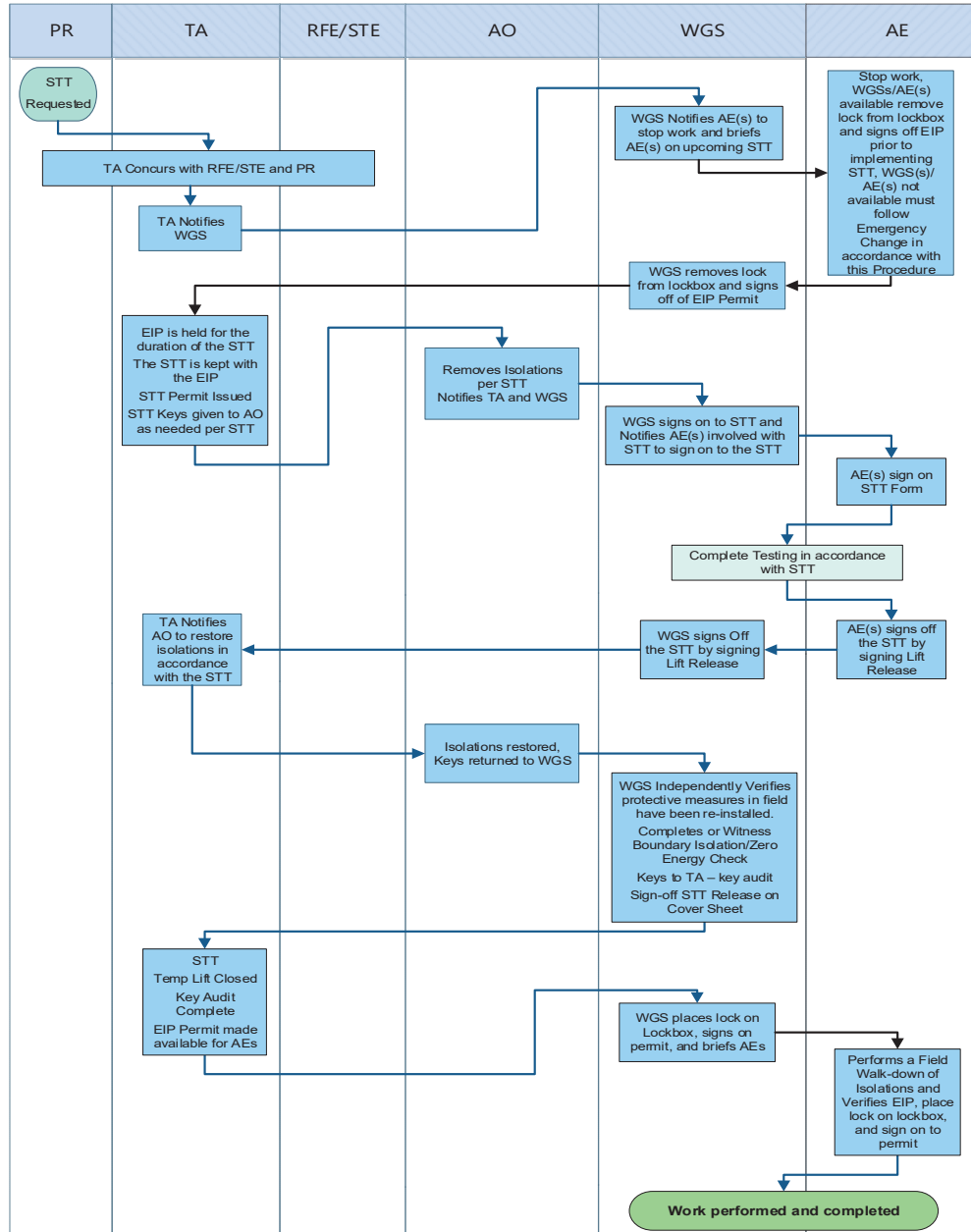
## APPENDIX F

### Energy Isolation Permit Closure Work Process



## APPENDIX G

### Sanction to Test Work Process











UPF Energy Isolation Management (EIM) – Lockout/Tagout (LOTO)
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## APPENDIX I

### Energy Isolation Permit Entry Instructions (Q4 System) (Example)

Illustrated below are entries needed to create a permit request in the Q4 system. Requests must include enough detail that someone new to the jobsite can understand what they need to perform work safely and the energy that is controlled with the EIP. This information may be part of their risk assessment.

ENERGY ISOLATION PERMIT															
OGO Space Part of Q4 Program Not User Editable		Not User Editable													
		Project: <i>Project name will be here – Part of Q4 Program Not User Editable</i>				Permit iD: <i>Not User Editable</i>									
		iD: <i>Project Number here– Part of Q4 Program Not User Editable</i>				JHA iD: <i>Not User Editable</i>									
Permit Requester name:		*Required Entry Select from DATA		Request Date:		*Required Entry – Select from DATA		Company Name:		*Required Entry Typed Data		Entity: *Required Entry – Typed Data		Not User Editable	
Scope of Work:		Not User Editable						Equipment ID:		*Required Entry – Select from DATA		Not User Editable			
*Required Entry -Typed Data Typed Data Typed Data Typed Data								Equipment Description:		Derived from selection above					
								Location:		*Required Entry – Select from DATA		Not User Editable			
								System Number:		*Required Entry -Typed Data		Not User Editable			
								Lock Box:		*Optional Entry Typed Data		Key Safe:		*Optional Entry Typed Data	
Other Information (1):		*Optional Entry Typed Data										Not User Editable			
Other Information (2):		*Optional Entry Typed Data										Not User Editable			
Notification / Communication Method:		*Required Entry -Typed Data										Not User Editable			
Special Conditions Required:		Not User Editable													
*Optional Entry - Typed Data															
Safety Tagging															
Tag No.	Tag Type	Lock No.	IP No.	Component	Position	Installed	Date/Time	Verified	Date/Time	Removed	As Left Position				
Selected data from "Build Permit" page						Managed by User Login – user selectable <input checked="" type="checkbox"/>									
Approved for isolation by:															
Signature:		Managed by User Login				Date/Time:		Derived from state change Not User Editable							
Zero Energy Check Performed or Witnessed by:															
Signature:		<input type="checkbox"/>		Managed by User Login				Date/Time:		Derived from <input checked="" type="checkbox"/> change Not User Editable					
Permit Issued By:															
Signature:		Managed by User Login				Date/Time:		Derived from state change Not User Editable							
SDN: H-030-02111												Page __ of __			

## APPENDIX J

### Danger – Do Not Operate/Do Not Remove Tag (Example)

#### Visibility and Language

These are qualities associated with an isolation tag; the tag is visible (in plain sight) and in language(s) understood by the Project work force. If the tag is handwritten, the ink is non-erasable, waterproof, and durable. Faded tags are re-written and/or replaced. The handwriting is legible.

*Commentary On projects where English is not the primary language, tags need to be in both English and the common language(s) of the project work force.*

*Consider using jobsite posters displaying example tags to educate/inform the workforce.*

Tags are to have a white background with black letters except for the DANGER area, which should have white letters in a red oval with red diagonal lines inside a black rectangle.

Where possible, one-piece, non-reusable, self-locking cable ties shall be used to attach the tag to the component.

MINI TAGS or MINI STICKERS may be used in close or confined locations (i.e., panels, controls, or consoles where normal size tags cannot be installed).

**Left Tag (Do Not Operate):**

SYS. \_\_\_\_\_ TAG NO. \_\_\_\_\_

**DANGER**

**DO NOT OPERATE**

EQUIPMENT: \_\_\_\_\_

\_\_\_\_\_

POSITION: \_\_\_\_\_

\_\_\_\_\_

WORK GROUP SUPERVISOR: \_\_\_\_\_

\_\_\_\_\_

ENTITY: \_\_\_\_\_

ISSUING TAGGING AUTHORITY: \_\_\_\_\_

\_\_\_\_\_

DATE: \_\_\_\_\_

REMARKS: \_\_\_\_\_

**Right Tag (Do Not Remove Tag):**

**DANGER**

**DO NOT REMOVE TAG**

DISCIPLINARY ACTION WILL BE  
TAKEN IF THESE ORDERS ARE  
DISREGARDED.

SEE OTHER SIDE

## APPENDIX K

### Caution – Restricted Operation Tag (Example)

#### Restricted Operation Process

- “Caution – Restricted Operation” tags shall be used in situations where a system or component is required to be energized or operated to safely facilitate a work activity (e.g., open/close a vent valve to facilitate a hydrostatic test, or verification of zero-energy at start of shift)

**NOTE:** *Equipment or systems shall only be energized or operated at direction of the WGS, or person/party indicated on the tag. An example tag is shown in **Figure 2**.*

- Where possible, one-piece, non-reusable, self-locking cable ties should be used to attach the tag to the component
- Caution tags shall **NOT** be used for personnel Protection
- Systems or components with a Bechtel Caution - Restricted Operation tag attached shall be operated only by (or under the direction of) the WGS
- CAUTION – RESTRICTED OPERATION and DANGER – DO NOT OPERATE tags can be requested on the same EIP Permit but **SHALL NOT** be hung together on the same component; the permit shall clearly indicate components to be tagged with a CAUTION – RESTRICTED OPERATION tag

The figure displays two examples of yellow 'CAUTION – RESTRICTED OPERATION' tags. The left tag is a simple rectangular tag with a hole at the top, featuring the word 'CAUTION' in large white letters on a black background, followed by 'RESTRICTED OPERATION' in smaller black letters. At the bottom, it says 'SEE OTHER SIDE'. The right tag is a more complex form, also with a hole at the top. It has a similar black header with 'CAUTION' in white. Below this, it says 'RESTRICTED OPERATION'. The form includes several fields for information: 'SYS. \_\_\_\_\_ TAG NO. \_\_\_\_\_', 'EQUIPMENT: \_\_\_\_\_', 'POSITION: \_\_\_\_\_', 'WORK GROUP SUPERVISOR: \_\_\_\_\_', 'ENTITY: \_\_\_\_\_', 'ISSUING TAGGING AUTHORITY: \_\_\_\_\_', 'DATE: \_\_\_\_\_', and 'REMARKS: \_\_\_\_\_'. A large, light gray 'SAMPLE' watermark is oriented diagonally across the center of both tags.

(Tag sizes are approximate)

**Figure 2. CAUTION – RESTRICTED OPERATION Tag Example**

## APPENDIX L

### Energy Isolation Management Procedure Inspection Instructions

(Page 1 of 3)

#### Inspections of EIM/LOTO Procedure for Compliance

The Site Manager ensures an inspection (annually, at minimum) of this Procedure is completed and documented by a Hazardous Energy SME, in accordance with OSHA 29CFR 1910.147 (c)(6)(i), which states:

*“The employer shall conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.”*

The periodic inspection shall include or be in accordance with the following (in accordance with OSHA 29 CFR 1910.147 (c)(6)(i)(A-D) and (ii)):


- Be conducted by an SME trained and competent in Isolation Management/LOTO who is not governed by this Procedure; the SME will be selected by Corporate Manager of Construction, Startup, and ES&H
- Correction of any deviations (other than those approved) or inadequacies
- A review between the SME/Inspector and AEs and AFEs of their respective responsibilities
- Be conducted on a Bechtel site where this Procedure is being utilized for isolation management
- Certification of the review/inspection by including the following documentation:
  - The machine or equipment utilized
  - Date of the review/inspection
  - AEs and AFEs included in the review/inspection
  - Person conducting the review/inspection
- Documentation of the completion of action items captured in the inspection
- A copy of EIP being inspected

**NOTE:** *The schedule for this inspection will be noted on the appropriate corporate schedule.*

## APPENDIX L

### Energy Isolation Management Procedure Inspection Instructions

(Page 2 of 3)

 <b>EIM/LOTO PROCEDURE INSPECTION FORM</b>		
Project No.:	Project Name:	Date:
Equipment or System:	Location:	Permit No.:
Procedure No:	Procedure Title:	Rev. No.:
<b>Authorized Employee (AE) Responsibilities</b>		
S = Safe   A = At-Risk   N/A = Not Applicable/Observed		
Item	S / A / NA	Comments
Equipment or system being worked on is properly isolated (Valves, electrical devices, etc. are locked in correct position, isolation devices on valves keep valve from moving)?		
Zero Energy Check provided (for piping – bleed open, for electrical - Volt/Ohm Meter)?		
All required safety precautions are in place (correct PPE for electrical and other work, insulated tools where required, proper signage, labeling and barricades, grounding/earthing correct, temporary wiring disconnections protected dielectrically and mechanically, all exposed conductors are contained within approved cabinets, observer present if working on live equipment)?		
EIP (paperwork/signage) completed in accordance with SWPP-1307?		
TA and WGS lock or tag placed on the lock box as applicable before performing work?		
Tags provide correct information and are legible?		
Personnel working under this procedure are trained to the correct competency level for their role?		
<b>Affected Employee (AFE) Responsibilities</b>		
Item	Satisfactory Response? Yes/No	Comments
Who is authorized to sign permits, hang personal locks, tags, or other devices as part of the procedure?		
Who is authorized to perform work on any system or component under permit?		

**Figure 3. EIM/LOTO Procedure Inspection Form Sample**



## APPENDIX L

### Energy Isolation Management Procedure Inspection Instructions

(Page 3 of 3)

Comments/Action Items:			
Names/Signatures			
Inspection Performed by:	<i>Print Name/Title</i>	<i>Signature</i>	<i>Date</i>
Authorized Employee (only one AE signature required):	<i>Print Name</i>	<i>Signature</i>	<i>Date</i>
Affected Employee (only one AFE signature required):	<i>Print Name</i>	<i>Signature</i>	<i>Date</i>

FORM 4MP-T81-01307-I, EIM/LOTO Procedure Inspection Form

**NOTE:** Inspector: once completed, forward this form with copy of EIP and Sign-on to Corporate Manager of Construction, Corporate Manager of CSU, Corporate Manager of ES&H for sign-off and assignment of any action items for follow-up.

**NOTE:** After forms are complete, forward all forms to Corporate ES&H ECMS for filing.

**Figure 4. EIM/LOTO Procedure Inspection Form Sample Continued**

## APPENDIX M

### Methods of Isolation

Images show typical isolation devices and tags.



Breaker Lockout



Valve Lockout



Lockbox

## APPENDIX N

### Guidance on Application of Lockout/Tagout

(Page 1 of 4)

**NOTE 1:** *Regardless of whether a LOTO is applied or not, hazardous energies shall always be controlled when work is being performed on a component or system when the component or system is in a configuration that could result in the release of hazardous energy if it were energized.*

**NOTE 2:** *Requirements of TPST-SU-801768-A004, Line/Containment Break, apply regardless of the whether the component/system is isolated by a LOTO or under means of direct control.*

Hazardous Energy (energy levels are considered to be nominal values)	LOTO Not Required if Direct Control Maintained	LOTO Required	Examples (application is not limited to those listed)
Biological	Each situation must be evaluated based on the risk of the activity		Sewage
Chemical, mildly toxic/corrosive	Each situation must be evaluated based on the risk of the activity		Aqueous ammonia, water treatment chemicals, hypochlorite (OCI-)
Chemical, highly toxic/corrosive	Not Permitted	Required	ASME B31.3, <i>Process Piping</i> , Category M fluids, e.g. chlorine (Cl <sub>2</sub> ), dihydrogen sulfide (H <sub>2</sub> S), phosgene (COCl <sub>2</sub> ), toxic chemicals listed on OSHA 29 CFR 1910.119, <i>Process Safety Management of Highly Hazardous Chemicals</i> , Appendix A, strong acids and bases
Elastic (energy stored in objects that are stretched)	Each situation must be evaluated based on the risk of the activity		Lines and straps under tension
Electrical (AC and DC) < 50V or < 10J (8 mF @ 50V) stored in a capacitor or < 20 Wh stored in a battery	Energy level generally not addressed as hazardous by electrical code, e.g., NFPA 70E, isolation only required as dictated by risk of the work activity.		24 VDC control loops; 1-5 VDC control loops
Electrical (AC/DC) ≥ 50 V and < 600 V or ≥ 10 J (8 mF @ 50V) stored in a capacitor or ≥ 20 Wh stored in a battery	Not Permitted	Required	120/240 VAC control loops; 125 VDC control loops; 120/208/240 VAC circuit breakers; 380/480/600 VAC circuit breakers & MCC buckets; fuses; disconnect switches
Electrical (AC/DC) ≥ 600 V	Not permitted	Required	Medium and high voltage switchgear, switchyard equipment, temporary grounds (earths)

## APPENDIX N

### Guidance on Application of Lockout/Tagout

(Page 2 of 4)

Hazardous Energy (energy levels are considered to be nominal values)	LOTO Not Required if Direct Control Maintained	LOTO Required	Examples (application is not limited to those listed)
Flammable, flashpoint < 200°F	<ul style="list-style-type: none"> <li>• ≤ 1" (25mm) NPS when energy isolating means is under the direct physical control of the worker</li> <li>• Compressed gas cylinders, bottles, Dewar's flasks regardless of pressure or temperature, refueling equipment, fuel loading/unloading transfer equipment</li> <li>• Instrumentation calibration ports/connections regardless of pressure/temperature when energy isolating means is under the direct physical control of the worker</li> </ul>	> 1" (25mm) NPS or when energy isolating means is NOT under the direct physical control of the worker	Methane, natural gas, LNG, NGLs (C <sub>2</sub> , C <sub>3</sub> , C <sub>4</sub> ,...), hydrogen, gasoline, acetone, cryogenic refrigerants, welding gases
Flammable, Flashpoint ≥ 200°F	<ul style="list-style-type: none"> <li>• ≤ 2" (50mm) NPS when energy isolating means is under the direct physical control of the worker</li> <li>• refueling equipment, fuel loading/unloading transfer equipment, lube oil make-up and filtration equipment</li> <li>• Instrumentation calibration ports/connections regardless of pressure/temperature when energy isolating means is under the direct physical control of the worker</li> </ul>	> 2" (50mm) NPS or when energy isolating means is NOT under the direct physical control of the worker	lubricating oils, hydraulic/control oils, diesel, heavy fuel oils, heavy residuals
Gravity	Not permitted	Required	Conveyor gravity take-ups, elevators (lifts), counterweights
Ionizing Radiation/Nuclear	Each situation is evaluated based on the risk of the activity and considered in conjunction with the requirements of the Radiation Protection Program and Jobsite Hazard Control Program		Nuclear systems, nuclear instrumentation, nuclear sources
Lasers/Light	Each situation must be evaluated based on the risk of the activity		Light curtains, communications, distance measuring instrumentation
Magnetic (energy causing push or pull)	Each situation must be evaluated based on the risk of the activity		Strong magnets used in machinery or for carrying metals
Motion/Kinetic	Each situation must be evaluated based on the risk of the activity		Rail car positioners, palletizers, automatic guided vehicles

## APPENDIX N

### Guidance on Application of Lockout/Tagout

(Page 3 of 4)

Hazardous Energy (energy levels are considered to be nominal values)	LOTO Not Required if Direct Control Maintained	LOTO Required	Examples (application is not limited to those listed)
Mechanical	When energy isolation is under direct physical control of the worker	When energy isolation is NOT under direct physical control of the worker	Rotating equipment, reciprocating equipment, conveyors
Potential (Stored Energy)	Each situation must be evaluated based on the risk of the activity		Batteries, spring loaded equipment, hydraulics
Pressure (Compressed Gas)	<ul style="list-style-type: none"> <li>• <math>\leq 4"</math> (100mm) NPS and <math>\leq 130</math> psig (900 kPag) and <math>\leq 125^{\circ}\text{F}</math> (<math>52^{\circ}\text{C}</math>) and</li> <li>• <math>&gt; -30^{\circ}\text{F}</math> (<math>-34^{\circ}\text{C}</math>) and when energy isolating means is under the direct physical control of the worker</li> <li>• Compressed gas cylinders, bottles, Dewar's flasks regardless of pressure or temperature</li> <li>• Instrumentation calibration ports/connections regardless of pressure/temperature when energy isolating means is under the direct physical control of the worker</li> </ul>	$> 4"$ (100mm) NPS and $> 130$ psig (900 kPag) and $> 125^{\circ}\text{F}$ ( $52^{\circ}\text{C}$ ) and $< -30^{\circ}\text{F}$ ( $-34^{\circ}\text{C}$ )	Instrument air, nitrogen, service air, carbon dioxide, HVAC/chiller refrigerants, welding gases, vacuum
Pressure (Liquids)	<ul style="list-style-type: none"> <li>• <math>\leq 4"</math> (100mm) NPS and <math>\leq 150</math> psig (1030 kPag) and <math>\leq 125^{\circ}\text{F}</math> (<math>52^{\circ}\text{C}</math>) and <math>&gt; -30^{\circ}\text{F}</math> (<math>-34^{\circ}\text{C}</math>) and when energy isolation is under the direct physical control of the worker</li> <li>• Instrumentation calibration ports/connections regardless of pressure/temperature when energy isolation is under the direct physical control of the worker</li> </ul>	$> 4"$ (100mm) NPS and $> 150$ psig (1030 kPag) and $> 125^{\circ}\text{F}$ ( $52^{\circ}\text{C}$ ) and $< -30^{\circ}\text{F}$ ( $-34^{\circ}\text{C}$ )	Demineralized water, potable water, fire water, cooling water, service/utility water, raw/filtered/UF/RO water, circulating water, glycol/water mixtures, steam condensate
Radio Frequency	Each situation must be evaluated based on the risk of the activity		RADAR, microwave transmitters, radio antennae
Sound	Each situation must be evaluated based on the risk of the activity		Ultrasonic level transmitters, sirens

## APPENDIX N

### Guidance on Application of Lockout/Tagout

(Page 4 of 4)

Hazardous Energy (energy levels are considered to be nominal values)	LOTO Not Required if Direct Control Maintained	LOTO Required	Examples (application is not limited to those listed)
Thermal (Hot)	Liquids or gases < 125°F/52°C Surfaces < 140°F/60°C (surfaces are defined as having no leakage of liquid or gas outside of the pipe, containment, vessel, etc.)	Liquids or gases ≥ 125°F/52°C Surfaces ≥ 140°F/60°C	Processes using heat mediums (e.g., Steam, condensate, hot oil)
Thermal (Cold)	Liquids and surfaces ≥ -30°F/- 34°C (surfaces should not leak liquid or gas outside of the pipe, containment, vessel, etc.)	Liquids and surfaces < - 30°F/-34°C	Cryogenic processes (e.g., liquefied gas processes and sub-cooled liquid and gas processes)



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