



Interoffice Communication

Environment, Safety, Health & Assurance

G40 TASF

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To: File

From: Shawn Nelson, Industrial Safety Specialist

Date: September 27, 2012

Subject: **2012 Topical Appraisal of the Confined Space Entry Program**

The Topical Appraisal is attached.

Topical Appraisal- Standard for Confined Space Entry Program

1.0 Scope

This topical appraisal is being performed to assess the compliance with the regulatory requirements per 29 CFR 1910.146 Confined Entry Program. The appraisal includes a review of applicable regulatory standards, Ames Laboratory Written Program, OSHA Interpretations, the training program and training status, inspections, and interviews with appropriate staff.

2.0 Dates

The appraisal was performed during the month of September 2012.

3.0 Summary Discussion

The requirements of 29 CFR 1910.146 are determined to be compliant and effective. There are no DOE specific requirements that exceed those required by OSHA. The primary audience for confined space entry is the Facilities Services Group. The permits are being completed effectively. A few of those authorized to enter a confined space were interviewed, no concerns.

3.1 Requirements

29 CFR 1910.146, Permit Required Confined Spaces, is the standard that applies to Ames Laboratory for compliance. The OSHA application states that general industry must implement the requirements for practices and procedures to protect employees from the hazards of entry into permit-required confined spaces. A review of the OSHA Standard 29 CFR 1910.146 Confined Space Entry was performed. This regulation was last revised December 1, 1998. No changes have been instituted in the standard requiring corrective actions to the Ames Laboratory program.

The Ames Laboratory written program - Section 5.18 of the ESH&A Program Manual was reviewed for the purposes of this topical appraisal. The program manual was last reviewed in 2010 and no changes to the confined space entry program were deemed necessary.

3.2 Program Documentation

The Permit Required Confined Space Entry Permits and the Pre-Entry Checklists for Non-Permit Required Confined Spaces were reviewed for compliance and completeness for the previous 12 months. There were ten (10) permit-required confined space permits and six (6) Non-Permit Checklists completed in FY 2012. No deviations or concerns were noted with permits. Atmospheric monitoring was within limits and no concerns were noted by the entrants or attendants. . No further action is required.

There were no pertinent OSHA Interpretations written since the last Topical Appraisal.

There is no specific DOE Lessons Learned of interest or applicability.

3.3 Training

Facilities and Engineering Services crafts workers are the primary audience affected by this program. The Confined Space Entry Training is presented by the Industrial Safety Specialist and refresher training is required every five (5) years. The outline of the training mirrors the required criteria stated in 29 CFR 1910.146(g).

The Power Point presentation, supporting video, handouts and learning assessment tool are documented in the Ames Laboratory Confined Space Entry Lesson Plan (AL-023). The lesson plan was reviewed and determined to be effective to communicate the requirements and goals of the training.

The trigger question on the Training Needs Questionnaire (TNQ) for Confined Space Entry Training was reviewed and determined to be successful in identifying personnel that require training.

3.4 Performance

The Confined Space Entry Program is compliant with the requirements of 29 CFR 1910.146. The permits and checklist are complete and effective in ensuring a safe environment before entry is performed. Authorized employees are trained.

There are three (3) active TMX Multi-Gas Monitors used to evaluate the atmospheric conditions prior to entry into a Permit Required Space for monitoring Oxygen, Lower Explosive Limit (LEL), Carbon Monoxide (CO) and Hydrogen Sulfide concentrations. The TMX Monitors are calibrated monthly and the records are maintained with the monitors. Batteries and monitoring sensors periodically reach end of service life and are easily and quickly replaced. There have been no concerns with the TMX units. The remote monitoring pumps are operable. The fall protection harnesses, tripod, and winch are all maintained and accessible. No safety concerns were identified.

Walk-Throughs are conducted annually of all Ames Laboratory spaces and spaces leased to Ames Laboratory from ISU. All observations are tracked utilizing the Ames Laboratory Corrective Action Tracking System (ALCATS). There were no findings in the last 12 months.

Interviews were performed with William Martin, PPS, and Steve Gilliland, FSG, to determine if there were any concerns, complaints or opportunities for improvement. No concerns were voiced.

Confined Space Entry equipment enhancements have not been necessary nor have new procedures or processes been needed to improve the program.

4.0 Conclusions

The Ames Laboratory is compliant with the requirements of 29 CFR 1910.146. The Confined Space Entry Program is effective and compliant. Feedback from the Entrants, Attendants and Plant Protection is positive. The Confined Space Entry Permits are working effectively, meeting the requirement of the annual review [1910.146(d)(14)].

5.0 References

29 CFR 1910.146 Permits Required Confined Spaces

6.0 Personnel Interviewed

William Martin, Plant Protection Sargent
Steve Gilliland, Lead Electrician

7.0 Assessment Results

7.1 Strengths

None

7.2 Noteworthy Practices

None

7.3 Findings

There are no findings as a result of this topical appraisal.

8.0 Attachments

None

9.0 Post Performance

Upon completion, this Topical Appraisal will undergo categorization for reportability.

A copy of this report will be filed and saved in G:\Admin\Topical Appraisals\2011.