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Subcontractors	Program Requirements Document	For Additional Info: http://EDMS	Effective Date: 12/04/23
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Manual: Subcontractor Requirements

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*The current revision can be verified on EDMS.

1. PURPOSE

This document provides requirements for subcontractors to follow in performing lockouts and tagouts. Any subcontractors performing lockout/tagout (LOTO) within the confines of the Idaho Environmental Coalition, LLC (IEC), Idaho Cleanup Project (ICP) must meet the requirements of OSHA and NFPA 70E. Stricter requirements may be imposed by subcontractors upon their employees or sub-tier contractors. This document implements requirements from codes and standards along with *contractor* (see def.) requirements. Any applicable regulatory or contractor requirements must be followed with the most stringent requirement being met.

2. APPLICABILITY

This document applies to all subcontractors at the ICP working with or around *hazardous energy sources* (see def.).

3. REQUIREMENTS

- 3.1 All subcontractors who perform work at the ICP shall follow and require their employees to follow IEC management requirements when working with or around sources of hazardous energy for systems owned by the contractor. The isolation of energy sources shall preferably be the IEC LOTO program in accordance with PRD-5051, "Lockout and Tagout," and MCP-3651, "Level I & II Lockouts and Tagouts." LOTO may be conducted using the subcontractor's LOTO program for these systems if the subcontractor has been given exclusive control of the system or area and a memorandum of understanding (MOU) exists between the subcontractor and IEC.
- 3.2 On all construction subcontracts, the isolation of hazardous energy sources (other than a Level I or simple LOTO) shall be documented. The documentation will be used to determine the level of isolation required and if circuit tracing is required.
- 3.3 Subcontractors who perform work on Power Management or INTEC Power Operations (IPO) controlled Transmission and Distribution systems at the ICP shall require their employees to follow the applicable Idaho National Laboratory (INL) program and/or IPO clearance management requirements in accordance with MCP-1383, "INTEC Power Operations Clearances."
 - 3.3.1 Subcontractors must be able to demonstrate their employees have been trained to applicable portions of 29 CFR 1910.269, Electric Power Generation, Transmission, and Distribution or 10 CFR 1926 Subpart V, Power Transmission and Distribution.

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3.4 Subcontractors who perform work on hazardous energy sources for systems they own and control and are independent of the Company's systems must meet the following requirements:

3.4.1 The Lockout and Tagout procedure and training must meet the requirements of OSHA 29 CFR 1910.147 and NFPA 70E.

3.4.2 Subcontractors who use their own Lockout and Tagout procedure shall provide a copy of their Lockout and Tagout procedure to the contractor representative. The subcontractor's program must be made available to and is subject to review for program differences and approval by the contractor.

3.4.3 A MOU between the respective cognizant director and the subcontractor shall define the areas of responsibility for exclusive control of a system or area where the Company's LOTO procedure is not used.

4. DEFINITIONS

Contractor. Employees of IEC (also referred to as "the company" for purposes of this document) working the Idaho Cleanup Project.

Hazardous energy sources. Electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy identified through the hazard identification and mitigation processes defined by MCP-101, "ICP Integrated Work Control Process;" and MCP-3562, "Hazard Identification, Analysis, and Control of Operational Activities." Examples include:

- Electrical conductors and circuit parts operating at 50 Volts or more. [NFPA 70E]
- Any energy, including mechanical (such as power transmission apparatus, counterbalances, springs, pressure, gravity), pneumatic, hydraulic, electrical, chemical, nuclear, and thermal (such as high or low temperature) energies that could cause injury to employees. Danger is only present when energy may be released in quantities or at rates that could injure employees.

NOTE: *Thermal energy may be generated as a result of electrical resistance, mechanical work, radiation, or chemical reaction, such as is the case with anhydrous ammonia, chlorine, or sulfuric acid reacting with skin, lung, or eye tissue causing chemical burns.*

- Hazardous chemical energy, for purposes of this PRD, includes chemicals (such as flammable and combustible liquids; flammable gases; acids and alkaline chemicals) that may thermally produce burn injury through high or low temperature. [OSHA Directive CPL 02-00-147]

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5. REFERENCES

5.1 Source Documents

29 CFR 1910.269, “Electric Power Generation, Transmission, and Distribution”

29 CFR 1910.147, “Control of Hazardous Energy”

29 CFR 1926.417, “Lockout and Tagging of Circuits”

29 CFR 1926, Subpart V, “Power Transmission and Distribution”

NFPA 70E, “Standard for Electrical Safety in the Workplace,” 2018 Edition

5.2 Related Requirements

The following documents may also contain requirements that apply to this activity:

MCP-1383, “INTEC Power Operations Clearances”

MCP-3651, “Level I & II Lockouts and Tagouts”

PRD-5051, “Lockout and Tagout”

6. APPENDIXES

None