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Manual: Subcontractors Requirements

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1. PURPOSE

This document provides requirements for the use of scaffolding by Idaho Cleanup Project (ICP) subcontractors to ensure worker safety. 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 working at the ICP who erect, alter, work upon, move, or dismantle scaffolds, as specified in their contract with the contractor. Stricter requirements may be imposed by subcontractors upon their employees or sub-tier contractors. The requirements of this document shall be followed by subcontractors; however, the means of implementation may vary as determined by the subcontractor.

3. REQUIREMENTS

3.1 General Requirements

- 3.1.1 Scaffolding shall be constructed, accessed and used in conformance with the requirements of this document and 29 CFR 1926, Subpart L, “Scaffolds.”

NOTE: *For situations when scaffolding identified in 29 CFR 1926, Subpart L, cannot be used, the scaffolding shall be designed by a registered professional engineer.*

- 3.1.2 Scaffolding, formwork, decking, and partitions used inside *radiation areas* (see def.) or *radiological areas* (see def.) shall be noncombustible or fire-retardant treated.

- 3.1.2.1 If wood is used, it shall be one of the following:

- Listed, pressure-impregnated, fire-retardant lumber
- Treated with a listed fire-retardant coating (not opaque – see Section 3.1.3)
- Timbers 6 × 6 in. (15.2 × 15.2 cm) or larger.
<NFPA 801 4.3(9)(a & b) and best management practice>

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- 3.1.3 Wood platforms shall not be covered with opaque finishes, except that platform edges may be covered or marked for identification. Platforms may be coated periodically with wood preservatives, fire-retardant finishes, and slip-resistant finishes; however, the coating may not obscure the top or bottom wood surfaces. <29 CFR 1926.451 (b)(9)>
- 3.1.4 The employer shall have each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold (Scaffold Builder/Erector) trained per 29 CFR 1926, Subpart L.

3.2 Preparation for Scaffold Operations

- 3.2.1 A work control document or job safety analysis (JSA), shall be used under the following circumstances:
- A. For erecting, moving, altering, or dismantling scaffolding
 - B. When scaffolding deficiencies, identified on the scaffold tag, must be mitigated as described in Section 3.5.2 in order to be safe for employees use.
- 3.2.2 Before scaffolding is designed or erected, the work area shall be analyzed to identify existing hazards (overhead lines, elevated temperatures, structural stability, soil condition, etc.) that could affect personnel as they erect, alter, move, or dismantle, or work on scaffolding.
- 3.2.3 Hazards that are thus identified shall be mitigated, when possible, as follows:
- 3.2.3.1 Electrical power sources shall be locked out and tagged out if appropriate. See PRD-2011, “Electrical Safety,” for requirements and distance for working near electrical systems.
 - 3.2.3.2 Barricades and signs shall be used as appropriate.
 - 3.2.3.3 Appropriate competent personnel, safety professionals, or facility personnel shall be consulted as necessary.
 - 3.2.3.4 Scaffolding shall be selected as appropriate to reduce hazards identified during the analysis.

3.3 Scaffold Inspections

- 3.3.1 A scaffold competent person shall inspect scaffolding in accordance with the requirements of 29 CFR 1926, Subpart L.

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NOTE: *Manually propelled mobile scaffolds do not need to be re-inspected after each movement.*

- 3.3.2 When scaffold is erected and safe for use, the scaffold competent person will sign a Scaffold Acceptance Tag (see example in Appendix A, Sample Scaffold Acceptance Tag and Tag Holder) indicating that the scaffold has been inspected for that work shift.
- 3.3.3 Scaffold acceptance tags shall be legible, shall list any deficiencies, shall list any special instructions or limitations, and shall be signed and dated daily prior to work on scaffold.
- 3.3.4 The completed scaffold acceptance tags shall be attached at all access points.
- 3.3.5 Scaffold tags used during erection, alteration, movement (except manually propelled scaffolds), or dismantling of scaffolds shall be completed and attached that state “Do Not Use,” or use of a scaffold tag holder stating “Do Not Use Scaffolding” shall be hung on the scaffold (see example in Appendix A), or an equivalent.
- 3.3.6 Employees shall inspect scaffold components, as applicable, during erecting, altering, moving, or dismantling.
 - 3.3.6.1 Check for structural integrity including nicks, indications that welding arc has been struck, rust, cracks in weld zones and tubing, and hazards that would prevent their use.
 - 3.3.6.2 If defective components are found, danger tags shall be used to indicate the equipment is defective and must be repaired or disposed of, or must be immediately disposed of

3.4 Erecting, Altering, Moving, or Dismantling Scaffolding

- 3.4.1 Scaffolding shall not be erected, moved, dismantled or altered except under the supervision of a scaffold competent person.
- 3.4.2 Each scaffold shall have a standard guardrail (such as top rail, mid rail and toeboard) installed on all open ends of platforms to protect workers when working at 6 feet or more above the floor or lower level.
 - 3.4.2.1 In cases where guardrails cannot be installed, the workers must be protected by personal fall protection systems (see PRD-2002, “Fall Protection”).
- 3.4.3 A fall protection competent person, in assistance with a scaffold competent person, shall determine the feasibility and safety of providing fall protection for employees erecting or dismantling scaffolds.

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3.4.4 Access to scaffolding must include properly installed ladders, stairs, ramps or walkways; or direct access from another scaffold, structure or lift; or use of scaffold frames when allowed by the manufacturer.

3.4.5 The following components shall not be climbed upon for accessing the scaffold platform or other elevated work area:

- A. Scaffold framing, unless it is an integral, prefabricated scaffold access frame
- B. Bracing members
- C. Guardrails.

3.4.6 Access to the scaffold platform(s) must be provided with either a gate or pair of chains (top and mid chain), which must be closed, other than during access, when the scaffold is in use.

3.4.7 Scaffolding shall not obstruct exits and exit access for a facility, unless an outage request is obtained.

NOTE: *Outage requests may be required in other situations, such as working on or near elevated power lines. If in doubt, the contractor POC should be contacted.*

3.4.8 Appropriate signs and boundaries shall be used to mark areas obstructed by the scaffolding, such as doorways, aisles, corridors or pathways.

3.4.9 Appropriate signs and barricades shall be used as work area boundaries when erecting, moving, altering, and dismantling a scaffold.

3.4.10 Structural members (I-beams, roof truss members) to be used as support of scaffolding shall be inspected and approved by Engineering; assistance from the contractor POC shall be obtained as necessary.

3.4.10.1 The barricaded area shall be large enough to encompass the entire work area and provide an adequate safety buffer to other employees.

3.5 Working from Erected Scaffolding

3.5.1 Scaffolding shall not be used until a scaffold acceptance tag has been attached (scaffolding without an acceptance tag is considered incomplete and under construction).

3.5.2 Scaffolding with an ACCEPTED tag indicating deficiencies shall not be used unless specific work practices and precautions are identified on a work control document.

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- 3.5.3 Employees shall comply with all restrictions and precautions identified on the acceptance tag or in work control documents and procedures.
- 3.5.4 Scaffolds shall not be loaded in excess of the working load for which they are intended.
- 3.5.5 Excess accumulation of materials, tools, or debris shall not be allowed.
- 3.5.6 Where there is a danger of tools, material, or equipment falling from a scaffold and striking employees, the area where objects can fall shall be controlled, through barriers and signs, to prevent entry.
 - 3.5.6.1 Toe boards or additional protection (such as fencing material installed along the guardrail) may be used on the scaffold to prevent tools, materials and equipment from falling.
- 3.5.7 Weather conditions must be evaluated by a scaffold competent person prior to use of the scaffold. These conditions include snow, ice, rain and wind which must be mitigated as determined by the scaffold competent person prior to use of the scaffold.
- 3.5.8 Employees shall not stand or sit on guardrails.
- 3.5.9 Manually-propelled scaffolds shall not be used (ridden) while being moved.
- 3.5.10 Scaffold framing, bracing, or guardrails shall not be used to secure rigging equipment (chain or wire rope hoists, block-and-tackle, etc.) for hoisting.
- 3.5.11 Scaffold components shall be stored as follows:
 - A. Away from hazardous atmospheres
 - B. In a manner that will not cause added stress and fatigue to the components
 - C. In accordance with the manufacturer's instructions
 - D. In a manner that does not create a hazard to personnel placing or removing the components from storage.

4. DEFINITIONS

See LST-27, "Glossary"

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5. REFERENCES

5.1 Source Documents

29 CFR 1910.28, “Safety Requirements for Scaffolding”

29 CFR 1910.29, “Manually Propelled Mobile Ladder Stands and Scaffolds (Towers)”

29 CFR 1926, Subpart L, “Scaffolds”

NFPA 801, “Standard for Fire Protection for Facilities Handling Radioactive Materials”

5.2 Related Requirements

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

PRD-2002, “Fall Protection”

PRD-2011 “Electrical Safety Requirements for Subcontractors”

PRD-2012, “Lockouts and Tagouts”

PRD-2022, “Safety Signs, Color Codes, and Barriers”

6. APPENDIXES

Appendix A, Sample Scaffold Acceptance Tag and Tag Holder

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Appendix A

Sample Scaffold Acceptance Tag and Tag Holder

