



Reply to the attention of:

DEP/FAP/AL

FEB 14 2011

Mr. Bryan O'Connor
Chief, Safety and Mission Assurance
Headquarters
National Aeronautics and Space Administration
Washington, D.C. 20546

Dear Mr. O'Connor:

Thank you for your February 22, 2010, letter to the Occupational Safety and Health Administration (OSHA), Office of Federal Agency Programs. You had specific questions about the control of hazardous energy in reference to device standardization, maximum timeframes for lockout/tagout (LOTO) applications, and transfer of responsibility between persons in administering LOTO activities within your facility. We apologize for the delay in responding to your correspondence. This letter constitutes OSHA's interpretation only of the requirements herein, and may not be applicable to any questions and/or scenarios not delineated within your original request. Your paraphrased scenarios, questions, and our responses follow.

Scenario 1: Different types of LOTO devices are being applied depending on the individual program application, complexity, or type of hazard. For example, a machine shop LOTO program, a craft LOTO program, and a "red lock and tag" LOTO program for more complex LOTO applications all co-exist within the same Center and under a single program umbrella.

Each individual program implementation uses different types of LOTO devices. The machine shop employs a laminated picture identification card and yellow lock; a craft LOTO program uses a blue lock and laminated picture for maintenance on an HVAC system; and for LOTO of an Electrical Substation High Voltage Feeder Breaker, a "red lock and tag" is applied.

Question: Is it possible for a hazardous energy program (lockout/tagout) within a given facility (e.g., NASA Center) to have unique types of LOTO devices, based on the type of work or hazard levels, and still meet the intent of 29 CFR 1910.147?

Reply: Yes. It is possible to have unique types of lockout/tagout devices within the same facility (for example, one type of lock and/or tag for the machine shop's LOTO program, and another for a craft department's program). However, all such individualized types must be standardized in at least one of the following areas: color, shape, or size. See 29 CFR 1910.147(c)(5)(ii)(B). For example, if an organization has five crews that perform lockout/tagout, each crew may have its own specialized locks and tags. However, the devices used among all crews within the facility must be homogeneous in no less than one of the categories of size, shape, or color. Because your proposed program uses different colors, it is necessary that the devices maintain consistency in size or shape, or both. For tagout devices, both print and format must also be standardized (29 CFR 1910.147(c)(5)(ii)(B)).

Scenario 2: An individual is working on equipment or a system, under the LOTO program control, and did not verify deenergization or apply his or her own LOTO device. Therefore, the individual's safety is at the mercy of the system owner or safety operator responsible for deenergizing locking out and tagging the equipment or system.

Question: Can a program allow for one authorized employee (e.g., system owner or safety operator) to administer the LOTO and verify isolation of energy for another authorized employee (e.g., machinist, craftsman, electrician) who is working on the associated system?

Reply: No. Scenario 2 describes a situation where a system owner or safety operator applies a lockout device to isolate equipment to protect another individual working on the equipment. This practice is not acceptable under 29 CFR 1910, which requires the person performing the servicing or maintenance to apply the lockout or tagout, although a limited exception exists for the removal of a LOTO device where the worker who applied it is unavailable to remove it; see 29 CFR 1910.147(e)(3). This requirement applies whether the servicing or maintenance is being performed by an individual pursuant to 29 CFR 1910.147(c)(8) or by a group under a group LOTO situation pursuant to 29 CFR 1910.147(f)(3)(D). In all cases, each worker must be individually accountable for his or her personal LOTO device.

Scenario 3: An authorized person is performing maintenance on a piece of equipment that requires the isolation of the source of energy, which is necessary for operating the machinery or device. To perform this operation, the authorized person applies a lock and tag to prevent unauthorized energization of the machine.

Question: If a lock and tag are hung together and the tag identifies the protected employee and both lock and tag meet all other requirements, does the lock also require information to identify the employee?

Reply: Yes. Although the lock and tag are applied together, and the tag properly identifies who applied the devices, the standard requires that the locking device also identify the employee applying this device. 29 CFR 1910.147(c)(5)(ii)(D). This practice helps to prevent confusion, and a potential safety incident, if the tag were removed or became separated from the lock.

Scenario 4: A piece of equipment has been removed from service because of failure of a part deemed necessary for the proper and effective operation of the machine.

Question: Can an employing agency impose a maximum period of time for LOTO applications in situations where the authorized employee is no longer actively working on the associated equipment under LOTO control and cannot return the equipment to operable condition during this down time? Such a situation might occur when a repair is on hold until parts are procured or until management decides if procuring new equipment is more cost effective than repairing the old equipment.

Reply: No. An employer may not rely on the passage of a set amount of time to determine when to remove a LOTO application. The standard is clear about the circumstance under which the LOTO standard must be applied: to control energy during servicing or maintenance of

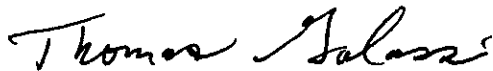
machines and equipment (29 CFR 1910.147(a)(2)(i)). In the examples you cited, if the equipment will be taken off-line permanently so that it can be replaced, then presumably it will no longer be serviced. At that point, the LOTO application may be removed. The state of the machine no longer being serviced and its permanent removal from all energy sources, rather than the passage of time, should determine when a LOTO application may be removed.

Alternatively, if the repair is temporarily on hold for parts procurement, the LOTO application may be removed only if there is no possibility that the machine will be serviced until the part is procured. In such an instance, the equipment should be securely placed in an inoperable and safe status or other status designated as "not authorized for use." However, once the part is received and servicing is to resume, another LOTO application would be required.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. OSHA requirements are set by statute, standards, and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances. However, they cannot create additional employer obligations. This interpretation constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules.

Also, from time to time we may update our guidance in response to new information. To keep apprised of such developments, you may consult OSHA's website at <http://www.osha.gov>. If you have further questions, please call the Office of Federal Agency Programs at 202-693-2122.

Sincerely,



Thomas Galassi, Director
Directorate of Enforcement Programs

DEP 17578

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