

# 2007 NESC-Adoption Workshop

February 27, 2007

OPUC Bldg.

Salem, OR

## ARC-Flash Rule (Effective January 2009)

- JR (OPUC) What is the liability and risk to Operators....?
- PGE (Barb): Proposes the adoption of the rules as presented, with the stipulation that a workshop in Mid 2008 be initiated to evaluate the status of Operators in their implementation and cost analysis of full adoption of the code as it relates to Fire-Retardant (FR) clothing.
- Mike Mitchell (OR-OSHA) believes that OSHA is not looking to adopt the requirement, making reference to National Fire Protection Association (NFPA) Rule: 70E. But referred to the points below in assessing risk to occupational craft employees, worksite observers and the public
  - What is the Exposure potential
  - What is the Risk
- Dave VanB (PGE): Company concerned with the potential of interpretive overlap and disparity between State Agencies with enforcement of issues regarding Occupational Safety and NESC. i.e., OR-OPUC : OR-OSHA.
  - Mike Mitchell rebutted the point that OSHA and PUC have had a clear interpretation and one such that it does not dispute one agencies interpretation countermanding another's authority or responsibility.
- PPL: The Company starts with a base layer rated at 5Cal and layers the protection garb up to a 35 Cal Jacket.
- CLPUD (Mike Wilson) retorted that their group begins at the 2Cal level and protects to the 50Cal standard.
- A comment made that the time interim of February 2007 until January 2009, was not enough of a period to study the necessary contributing facts to gauge the potential of each and every circuit and the required protection to minimize the injury of a potential ARC Flash.
  - Additional comments from then audience noted that more attention needs to focus on efforts to mitigate the potential of an ARC Flash event, rather than suiting up for the event, that may or may not occur
  - Supplemental comments from a FR Clothing vendor were that modified clothing is in continuing development that is lighter in weight and less constricting without lessening the quantity and quality of protection.
- JR: Liability issue or a question of enforcement policy
  - Should OPUC inspect clothing when present at work activity site?

- PGE (Mike) Does FR Clothing assume the designation of Personal Protective equipment (PPE)?
- SprgFldUtilBd (Mike) Too much discussion relating to PPE, rather than curtailing the potential of ARC Flash, by modifying work practices.
- “MUST “(Consultant) Part 4 Enforcement by OPUC
  - Jerry Murray (OPUC) “Not Active Enforcement”, in the past.
- Comment: Employee Education, Conscious Situational Awareness and Acknowledgement of Training Received
- OR-OSHA (Mitchell) Eliminate the Potential, or, Avoid the situation through controlling the Situation, minimizing the Potential for an incident.
- JR: Restated the PGE proposal, sought group consensus, next workshop tentatively slated Mid-2008.
- PGE (Barb) inquiry to Waiver of specific code rules
  - John Wallace reference rule 013 (A-B)= footnote example
  - JR mentioned staff would entertain and evaluate proposed waiver on a case by case basis.