

October 27, 1997

Gary M. Boswell, Senior Safety Specialist
Portland General Electric
121 S.W. Salmon Street
Portland, Oregon 97204

Dear Mr. Boswell:

This letter is in response to your letter of October 24, 1997, and to the meeting that was held on September 30, 1997 involving you, Dennis Klein, Portland General Electric Safety Coordinator, Mike Mitchell, OR-OSHA Occupational Safety Specialist, and me. As your letter indicates, and as was discussed in the meeting, your company has concerns about the use of harnesses, which will be required beginning January 1, 1998, by workers doing "hot work", with hot sticks, from aerial lift buckets. Your concerns seem to be based on two conditions: (1) if safety belts are used as positioning devices, equipped with lanyards short enough so as to limit a free fall to two feet or less, then mobility is inadequate to accomplish the task; and (2) if harnesses with longer lanyards are used then there is the potential for interference with arm movement and distraction caused by the elevated position of the lanyard, attached at the center of the back.

Since Oregon has adopted the federal standard for fall protection, it was decided in the meeting to contact Federal OSHA and inquire into the possibility of allowing electrical workers doing "hot work" the option of wearing safety belts with longer than two foot lanyards. Telephone contact was made with David Wallis, Electrical Standards Section, OSHA, Washington, D.C. Mr. Wallis had already researched the concerns and had consulted with Jim Tomaseski of the National Office of I.B.E.W. Both agreed that the standard should not be changed or waived and that all workers, including those doing "hot work", with hot sticks, be required to wear harnesses when the potential free fall is greater than two feet.

Mr. Wallis suggested that if the elevated position of the lanyard is a concern when wearing a harness, then possibly a break-away clip could be added to the back of the harness that would hold the lanyard near waist height and out of the way of arm movements, yet would not interfere with the proper operation of the harness and lanyard during a fall. Mr. Tomaseski suggested the use of velcro to hold the lanyard near the waist. Mr. Wallis said that there are not any federal standards that prohibit the use of such a clip.

For further information or assistance please contact Mike Mitchell at 378-3272. You are also invited to see the OR-OSHA pages on the Internet at www.cbs.state.or.us/external/osha/index.html.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources Section
Oregon Occupational Safety & Health Division

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