



## **Scaffolding and Fall Protection**

### **A. Hazard**

1. At NNS, scaffolding is most often referred to as staging. It is used as work platforms to place workers at elevated work sites safely. NNS considers access ladders an integral part of staging.
2. Fall protection is required when employees work on unguarded surfaces above 5 feet.
3. Many hazards are created with the erection, alteration, dismantling, use of scaffolding and work performed on other unguarded surfaces. Fall protection is a means to eliminate or reduce associated risks of slipping, tripping and falling to lower levels.

### **B. Regulations for erection, altering and dismantling of scaffolds are:**

1. General Industry 29 CFR 1910.28
2. Maritime 29 CFR 1915.71 (scaffolds/staging) and 1915.72 (ladders)
3. Construction 29 CFR 1926 Subpart L
4. ANSI/ASSP A10.8

### **C. NNS requirements for Contractor erection, altering and dismantling of scaffolds:**

1. All onsite contractor-built staging will be inspected and documented daily on an inspection tag at the staging access by the contractor through the end of the contract or as specified by the purchase order.
2. NNS personnel may not access contractor built staging until an inspection of the staging has been completed by X36 staging inspectors.
3. NNS inspections of contractor-built staging (initial installation and modifications) will be performed by X36 staging inspectors, X36 stage builder supervision, or other qualified individuals as determined by X36 management.
4. NNS Best management practices Y-1045 Staging Standards

### **D. Standards for Fall Protection are:**

1. General Industry 29 CFR 1910.140 Personal fall protection systems



2. Maritime 29 CFR 1915.159 Personal fall arrest systems
3. Maritime 29 CFR 1915.160 Positioning device systems
4. Construction 29 CFR 1926.502 – Fall protection system criteria and practices.

#### E. NNS Pre-approval Process

1. During the NNS pre-approval process each contractor whose employees will erect and work on scaffolding must provide to NNS Environmental, Health and Safety Department a copy of its written program. This document must describe the contractor's program for complying with each element of the applicable OSHA standard(s). The contractor shall provide a copy of any changes to the program on an annual basis, such as at the beginning of each year.
2. The written compliance program shall specifically address the following items in addition to the items already discussed:
  - a. Scaffolding (staging)
    - 1) Training requirements for scaffold erectors/disassembly personnel, user and competent person
    - 2) The responsibility for erection, alteration and dismantling of scaffolding.
    - 3) Scaffolding components: platform, ramps, ladders and stairways.
    - 4) Minimum PPE requirements.
    - 5) Contractors/Vendors shall use the hierarchy below, listed in order of decreasing preference, to determine the access method to elevated working and walking surfaces:
      - a) **Most preferred method** – Stairs.
      - b) Inclined or vertical ladders runs offset by platforms or decks and alternating positions per levels (no straight fall distance).
      - c) Ladders that exceed 20 feet in height only with Contractor Coordinator approval.
      - d) Least preferred method – Ladders that exceed 35 feet in height only with EH&S (O27) approval.
      - e) Swing gates shall be provided at access points to elevated working and walking surfaces.
      - f) Non-skid material shall be present on all Brand-Safeway ladders (system scaffold), and all other metal ladders that are not manufactured with non-skid surface.
  - b. Scaffolding inspection process:
    - 1) State who will be responsible for inspections and the qualifications required to perform inspections.
    - 2) Frequency of scaffold inspection.



- 3) Inspection documentation/tags.
- 4) Process for scaffolding alteration (modification).
- 5) Process for reporting hazards and mishaps.

c. Fall protection:

- 1) Circumstances for which fall protection is required:
- 2) Over a solid surface.
- 3) On roof structures.
- 4) Over water.

**F. NNS best management fall protection practices for work over water and in aerial lifts**

1. Fall protection required on unguarded surfaces above water provided the personal fall protection system will prevent actual entry into the water.
2. Life jacket required on unguarded surfaces less than 15 feet above water.
  - a. In personnel floats (aerial work platforms, skiffs, baskets), provided the personal fall protection system will prevent actual entry into the water if an employee is thrown over the float's guardrails.
3. Life jacket required when less than 15 feet above water riding in personnel float (aerial lifts, skiffs, and basket).