

1 Q. **Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p. B-12; Vol. II -**
2 **Tab 6**

3 Explain the safety precautions that NLH staff take when individual cells of the motor
4 control center are removed for maintenance purposes.

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6

7 A. When individual cells are removed for maintenance purposes, the work area or
8 location is isolated according to the Work Protection Code. Under the Work
9 Protection Code, the following general procedure is followed:

10 a. A Work Isolation Permit request is submitted to the Controlling Authority, in
11 this case, the plant Control Room Operations Shift Supervisor.

12 b. The Controlling Authority issues an Isolation Permit. The permit identifies
13 the isolation points for the work and the switching orders required for the
14 isolation as well as other details and instructions for the work.

15 c. A Switching Order is executed and the isolation tags and locks are installed
16 at the isolation points.

17 d. The Controlling Authority then issues the Work Permit.

18 e. Maintenance work proceeds.

19 f. A Work Test Permit is submitted to the Controlling Authority.

20 g. A Work Test Permit is issued and equipment testing is completed.

21 h. The Controlling Authority issues a Restore to Service order.

22

23 For each step in this procedure detailed documentation is completed, signed and
24 approved by all stakeholders. All work proceeds following established standardized
25 work methods.

1 Arc flash hazards are defined for all work locations in the plant. So for any piece of
2 work to be done, the staff will identify the arc flash personal protective equipment
3 appropriate for the work.

4

5 If asbestos materials are present, procedures under the Asbestos Management
6 Program must be followed. These procedures are:

- 7 a. An Asbestos Work Permit request is submitted to the Asbestos Program
8 Manager.
- 9 b. The Asbestos Program Manager assesses the work to determine the scope,
10 risk, work methods, hazards, the amount of asbestos and other details of
11 the work.
- 12 c. The Program Manager then issues the Work Permit which includes all details
13 and instructions for the work. At this point, the Program Manager also files a
14 Work Notification with Government Occupational Health and Safety
15 Department. This Work Notification contains all information and details
16 relevant to the work to be performed.
- 17 d. Once the Work Permit is issued, the staff proceeds with the work following
18 the established standardized work methods.
- 19 e. Upon completion of the work, the Asbestos Program Manager conducts a
20 final inspection of the completed work and completes an Asbestos Work
21 Report. This report details how the work was completed relative to the
22 instructions given in the Work Permit.