



PEND OREILLE COUNTY PUD

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1 Overview

1.1 Introduction

The Pend Oreille Public Utility District (“District”) has highlighted safety and health as one of the six core values of its Strategic Plan. Through the Board of Commissioners’ adoption of the District’s *Safety Policy*, the Commission has publicly committed to protecting the safety and health of the District’s customers, employees, and contractors. The District believes in a personal and professional commitment to protect the safety and health of the customers, employees and contractors is necessary to ensure a reliable workforce and an educated community.¹

This core value commitment is not enough. The [Washington State Department of Labor and Industries](#) (L&I) has adopted [General Safety and Health Standards WAC 296-24](#), Safety Requirements for [Electric Power Generation, Transmission, and Distribution WAC 296-45](#), [Signaling and Flaggers WAC 296-155](#), [Recordkeeping and Recording WAC 296-27](#) and [Safety and Health Core Rules WAC 296-800](#). L&I is responsible for the administration and interpretation of these Chapters and for the [Washington Industrial Safety and Health Act](#) (WISHA) of 1973. L&I believes that the majority of injuries and deaths are preventable, and the workplace should be free of recognized hazards as reasonably as possible.

The District’s *Accident Prevention Program* (“APP”) consists of multiple documents that work in concert to emphasize safety from a governance level through the task level. The basis for the Program is the District’s Core Value of safety and health, and the Commission approved *Safety Policy* that sets the executive level commitment to safety. The *Safety Policy* requires the APP to ensure policy implementation. Guidelines, procedures, and controls support the APP. The resulting collection of documents reflects the District’s overall Safety Program.

Due to the complexity and varied working conditions throughout the District, it is not practicable to build a single safety manual. The District has chosen to use a layered approach of policy, plans and procedures that allow for audience specific detail, better document maintenance, and control development and improvement.

1.2 Organization

The District is a Public Utility established in 1936 and commenced operations in 1948. The District is a state municipal corporation that operates under the direction of a publicly elected three-member Board of Commissioners. Our mission statement is “Quality Service at Low Cost”. The District’s main offices are located at 130 North Washington Avenue in Newport Washington, and Box Canyon Dam located 55 miles north at 7492 Highway 31 in Ione, Washington.

The District’s service area encompasses a footprint of approximately 1,400 square miles. There is roughly 1,081 circuit miles of Transmission and Distribution lines, and approximately 91 MWs of

¹ Pend Oreille County PUD Strategic Plan Outline 2017-2022

generation nameplate capacity at the Box Canyon Dam and Cusick Power Plant. The District is located in the northeast corner of Washington State, adjacent to Idaho and the Canadian border. The current population of Pend Oreille County is approximately 13,000.

1.3 Program Description

The Board of Commissioners have approved a *Safety Policy* establishing a Safety Steering Committee made up of District management and IBEW Local 77 members. The Safety Steering Committee is responsible to set the direction of the Safety Department for providing awareness, training, and monitoring of safety throughout the District. The Steering Committee is responsible to review all safety related issues, incident reports and monitoring activities by the Safety Manager. The Steering Committee is mandated to meet at least monthly.

The Safety Manager is responsible to communicate the Safety Policy and APP regularly to all District employees through a series of monthly safety meetings. District Contractors will require a safety component to their regular status meetings, or may have scheduled safety meetings with the Safety Manager. The safety meetings will proactively reinforce the principles a sound safety culture and keep safety as a primary focus in every task.

The APP seeks to minimize the risk of a workplace injury or illness and to identify potential safety risks prior to them becoming a safety incident. It maintains a strong emphasis on integrating safety within the normal work tasks to strengthen the culture of safety within the organization. The APP includes roles and responsibilities, and specific measures for the governance and management of the safety program. This approach is consistent with the requirements and recommendations of The Washington State Department of Labor & Industries chapters. Attachments to the APP include discussions of supporting plans, processes, and procedures used to address specific requirements in the L&I chapters to accomplish the implementation of the AAP.

1.4 Program Governance

The governance structure of District includes a Board of Commissioners that establishes the “tone at the top.” The mission statement and core values align with the strategic plan². These goals and core values support the District’s commitment to a culture of safety and health for the employees and the public.

The APP depends on direct participation of senior management and the IBEW through participation on the Safety Steering Committee. The Safety Steering Committee exercises reasonable oversight with respect to the implementation and effectiveness of the APP. This includes reviewing investigation reports, participating in safety meetings, and communicating the importance of safety to employees on a regular basis. A charter defines the Steering Committee's responsibilities. The APP addresses the organizational structure, governance, key roles and responsibilities between the Steering Committee, Safety Manager and senior management.

² DISTRICT Strategic Plan Outline 2017 – 2022

The District has dedicated resources (staff and budget) to support the APP on a year-round basis. A Chief Safety Officer (Chief Compliance, Engineering and Technology Officer) oversees the Safety Manager and the implementation of the APP. The APP budget is set yearly by the Chief Safety Officer, and includes funding for the Safety Manager, the various safety initiatives, dues to professional organizations, professional services, travel, training, education, and office supplies. The Chief Safety Officer reports directly to the General Manager, maintains independent access to the Board of Directors³. The Safety Manager has responsibility and accountability for the APP administration and oversight. The District ensures independence of the Safety Manager through oversight by the Safety Steering Committee, which manages any appearances of a conflict of interest. The District structure and resource limitations, allow the Chief Safety Officer to oversee other activities, which may, or may not, relate to safety practices.

1.5 Roles and Responsibilities

1.5.1 Board of Commissioners

The Board of Commissioners are responsible to set the policy expectations of the District's safety program through the adoption of the Safety Policy and through approved budgeting for the Safety Program.

1.5.2 General Manager

The General Manager reports to the Board of Commissioners. The General Manager has the authority to assign a Chief Safety Officer and to delegate safety tasks under the Safety Policy.

The General Manager is responsible for the day-to-day administration of the Safety Program as a whole. The General Manager may delegate all, or some, safety program administration to a Chief Safety Officer, or other delegate. Program oversight, senior level administration, reporting and budgeting will be the primary responsibilities.

1.5.3 Chief Safety Officer

If appointed by the General Manager, the Chief Safety Officer takes on the day-to-day responsibilities of administering the Safety Program within the defined budgets. The Chief Safety Officer reports to the General Manager, but has the authority to bring specific safety concerns directly to the Board of Commissioners.

1.5.4 Safety Steering Committee

The Safety Steering Committee consists of District supervision and the IBEW Local 77 Unit 148 Union Leadership. The membership will include, but not be limited to:

- Safety Manager
- HR Manager

³ DISTRICT Safety Policy

- The Director of Operations/Superintendent
- The Power Production Manager
- Water Systems Manager
- IBEW Local 77 Unit 148 Representative Line Foreman – Union Appointed
- IBEW Local 77 Unit 148 Representative Line Foreman – Union Appointed
- IBEW Local 77 Unit 148 Representative Line Foreman – Union Appointed
- IBEW Local 77 Unit 148 Representative from CNS – Union Appointed
- IBEW Local 77 Unit 148 Representative from Box Canyon – Union Appointed

The Safety Steering Committee is responsible to direct the Safety Program in accordance to the adopted Safety Policy and the APP. The Steering Committee helps identify and set the priorities of the Safety Manager. The Chairperson of the committee can bring specific safety concerns to the Chief Safety Officer and/or the General Manager.

The Steering Committee must meet at least monthly. The primary purposes of the committee is to review safety and health inspection reports to help correct safety hazards, evaluate the accident investigations conducted since the last meeting to determine if the causes of the unsafe situation was identified and corrected, and to evaluate the APP and discuss recommendations for improvements.⁴ The Committee is also tasked with setting Safety Meeting agendas, scheduling specific training opportunities, investigating accidents, setting tracked metrics for program improvement, and conducting safety audits.

1.5.5 Safety Manager

The Safety Manager is responsible for implementation of the Safety program as directed by the Safety Steering Committee, within the applicable L&I safety standards, and according to good utility practices. This position performs as the Chair of the Safety Steering Committee. The Safety Manager is responsible to bring issues that cannot be resolved at the Steering Committee level to the Chief Safety Officer and/or the General Manager. The Safety Manager has the authority to bring specific safety concerns directly to the Board of Commissioners, and may be required to provide safety topics at the scheduled Commission meetings.

1.5.6 District Employees and Contractors

District Employees and Contractors are responsible to participate in the safety programs implemented by the Safety Manager and conduct their work activities in a safe manner. Employees and Contractors should always be on their guard for safety risks and dangers. Workplace safety risks, injuries, illnesses and dangers shall be promptly reported to the Safety Manager, Director of Safety, General Manager or representatives of the Safety Steering Committee, no matter how small. The mitigation of risks should be prompt, with immediate action taken by the person identifying the concern, when possible. Employees and Contractors have the authority and responsibility to halt the work when there is a serious safety concern.

⁴ Chapter 296-800-13020 WAC Safety and Health Core Rules

2 Communications

2.1 District Safety Meetings

The Safety Manager shall implement a safety communication process to communicate the importance of safety throughout the organization, including contractors and the public. The process shall include communicating employee safety guidelines, policies, plans, processes, procedures and schedule monthly safety meetings. The purpose is to prevent employees, contractors, and the public from incurring on the job injuries, occupational illnesses, near misses, and accidents.

The Safety Manager is a District management representative and shall assist individual departments to ensure Safety Meetings are communicated, conducted and accessible to all district staff. In addition to departmental safety meetings the Safety Manager will hold a monthly Open Safety Meeting which is open to all staff. The Open Safety Meeting shall serve in place of departmental safety meetings for departments where it is not effective or efficient to conduct separate meetings, or for those individuals who missed their department's safety meeting. Safety Meetings may be conducted more frequently to discuss safety issues as they come up. When shift workers cannot attend the Safety Meeting due to their schedule, the Safety Manager will be responsible for ensuring communication of safety meeting information by conducting special meetings, using email, or person-to-person contact. The Safety Manager shall develop a communication procedure specific to District shift workers. The Safety Manager will aid in the safety meetings of contractors where appropriate. All Contractors working with and for the District are responsible to ensure they hold or attend safety meetings as required.

Safety Meetings shall be organized and conducted to ensure⁵:

- Safety and health inspection reports are reviewed to help correct safety hazards.
- Accident investigations conducted since the last meeting are evaluated to determine if the cause of the unsafe situation was identified and corrected.
- The APP is discussed and recommendations of improvement are evaluated.
- Attendance is documented.
- Minutes are kept.

2.2 Communications and Senior Management Engagement

The commitment to safety begins at the top of the organization. Strong communications reinforce the key message and reinforce the "safety culture". The APP requires a communications and coordination process to ensure support for the Safety Policy and implementation of the APP with engagement at the senior management level.

The Safety Manager and the Chief Safety Officer are the primary contacts for District safety regulatory matters with the State L&I officials. The Safety Manager must plan the details of how to

⁵ Chapter 296-800-13025 WAC Safety and Health Core Rules

monitor external outreach, communicate workplace accidents and illnesses issues, opportunities and successes internally to all affected District employees and contractors.

The District Board of Commissioners maintains a ‘Safety Spotlight’ standing agenda item in their regular meetings. This agenda item is for the Safety Manager to communicate and review the key safety items with the Commission, the public and the District’s senior management. The Safety Manager should present a short prepared report that includes:

- A review of new safety and health inspection reports
- Accident investigations conducted since the last report
- Changes to the APP
- Metrics
- Safety topics relevant to the Commission, the public and senior management

2.3 Contractors

Contractors shall be welcome at all District Safety Meetings. The Safety Manager shall create a communication process to ensure the contractors are aware of the District Safety Policy, supporting plans, identified hazards, and safety protocols. The process will include how contractors will report identified hazards to the District, and how District staff will be aware of unique hazards of the contracting crew.

Contractors have the responsibility to follow all applicable safety requirements related to the work they do. All contractors are required to provide written explanation of their safety program if requested by the Safety Steering Committee or Safety Manager. The Safety Manager will request safety documentation as deemed necessary.

2.4 Awareness and Training

The communication of the APP to all employees, contractors, and third parties is required. The APP must be widely disseminated by the Safety Manager using appropriate methods. Safety meetings and presentations to the Board of Commissioners, the Steering Committee, senior leadership, and staff help to communicate risks and mitigations, but there is need for further training relative to specific jobs. The Safety Manager must have a process for awareness and training specific to the unique risks experienced by employees while carrying out their job tasks. The Safety Manager should occasionally participate in departmental meetings, and meet individually with staff to address specific topics. Ad hoc working groups can identify specific training issues.

The APP requires the Safety Manager to provide the additional training for staff, including contractors, for specific identified work hazards. As an example, field testing high voltage gloves prior to use. Each high-risk area of the District needs have a specific awareness and training program.

3 General Employee Safety Guidelines

General Employee Safety Guidelines refers to the classification of safety rules and guidance affecting every employee and contractor at the District regardless of their job duties, physical work location, or job responsibilities. Rules and guidance in this category are good safety practices adopted by the District for the general wellbeing of the workforce. The Safety Manager shall ensure rules and guidance inform and protect each employee, and that occasional safety audits identify areas for additional focus.

All employees and contractors are required to have access to the general safety guidelines. The documentation will be electronically available on the Safety SharePoint site where all employees and contractors with administrative permissions can access the information.

Some specific subjects may also appear under other subject areas of the APP. This is an effort to reinforce general safety practices relevant to more specific safety concerns. The Safety Manager will be responsible to create and maintain documented general safety topics that include, but are not limited to:

- **Lifting** – The proper lifting techniques.
- **Housekeeping** – The importance of keeping work areas clean and clutter free.
- **Drug and Alcohol Awareness** – The impacts of drugs and alcohol on the ability to perform safe work tasks.
- **Work conduct and behavior** – What constitutes appropriate and professional work conduct and behavior in and around the work areas.
- **Fall Protection** – The proper use of ladders, step stools and the need to prevent falls by using the proper equipment.
- **Cell Phone Usage** – The avoidance of accidents caused by distractions caused by cell phone use when walking or in vehicles.
- **Emergency Equipment** – The proper use of fire extinguishers, first aid kits, and other emergency equipment, and the proper storage and maintenance of this equipment.
- **Space Heaters and Fans** – The appropriate use of space heaters and fans, how these should be connected to the building electric sources, and the proper clearances that must be maintained.
- **Electrical Cords, Extension and Power Strips** – The appropriate use of this equipment, and the dangers they may present.
- **Hearing Loss Prevention Program** – The Hearing Loss Prevention Program is designed to protect employees from the effects of exposure to excessive noise within the District.
- **Personal Hygiene and Attire** – The need to groom and dress appropriately for the work to prevent accidents or illnesses. A focus should include how some coworkers could be sensitive to fragrances, lotions and other common personal hygiene products.
- **Office Ergonomics** – The need to have well designed workspaces, furniture and office tools to reduce fatigue, physical pain, and provide a more productive environment.

- **Fire Prevention and Control** – The proper storage of chemicals and cleaners, protection of flammable materials, maintaining proper clearances around heat sources, and responding to fires.
- **Hazardous Chemical Communication** – How to navigate MSDS Online and on SharePoint, with Asbestos awareness.
- **Working Alone** – The protocols for individuals working alone, after hours or on weekends.
- **Workplace Inspections** – The need for occasional workplace assessments to prevent complacency and overlooked risks.
- **Emergency Evacuations and Mustering** – Planning and drills to ensure a safe workspace evacuation during fires and other emergencies.
- **First Aid, CPR and AED** – General first aid, CPR and instructions on first aid kit and AED (Automated External Defibrillators) locations and usage.
- **Bloodborne Pathogen Exposure Control Plan** – The purpose of this control plan is to eliminate or minimize employee occupational exposure to blood or other potentially infectious materials.
- **Exposed Energized Work Procedure** – Any work conducted on exposed energized parts of 50 volts or more
- **Hurt-man Rescue** – Annual training to show proficiency in emergency rescues of an injured worker.

3.1 Personal Protection Equipment

Many jobs around the District require special equipment to protect the employees from job hazards. In some cases, the protection equipment will be limited to leather gloves, in other cases full fresh air hoods and environmental suits. Each job has its unique concerns, and the Safety Manager shall implement a plan or plans that address the use of Personal Protection Equipment (“PPE”) at the District. The District will supply specific items directly, as well as through a stipend for employee PPE purchases of certain items such as fire retardant clothing. Employees may supply and use their own equipment, at their own cost, if they prefer different brands or styles other than what is provided by the District, so long as it meets the minimum standards required.

PPE requirements are regulated by the L&I and published in the *Electric Power Generation, Transmission, and Distribution WAC 296-45-255 through 67545*, *General Safety and Health Standards WAC 296-24 Section L (980)*, *Safety Standards for Telecommunications WAC 296-32*, and *Safety and Health Core Rules WAC 296-800*. At a minimum, the Safety Manager shall maintain a written plan or plans for the administration and proper use of PPE to ensure all employees have PPE available to conduct their jobs in a safe manner and that⁶:

- Would not reasonably or normally be worn away from the workplace, such as single use or disposable PPE.

⁶ Chapter 296-800-16020 WAC Safety and Health Core Rules

- Is required to comply with safety and health standards to protect employees where hazards exist from:
 - Processes;
 - Environmental hazards;
 - Electrical Arc Flash;
 - Physical, chemical or radiological hazards; or
 - Mechanical, Physical, chemical irritants that could cause injury or impairment to the function of any body part through absorption, inhalation, or physical contact.

PPE protections use the following classifications:

- Head
- Eye and Face
- Ear
- Hand and Arm
- Foot
- Other

3.2 Equipment Safety

The multiple missions of the District require the use of many common and specialized tools. Employees should not use equipment they are not trained on or uncomfortable with. Specialty tools continue to change with technology. Lead personnel and first line supervision shall be responsible for monitoring the work area and worksites and determine the need for training on specific tools. Request for training shall be coordinated with the Safety Manager to assure a record is maintained for all safety training.

The Safety Manager shall have processes and procedures developed for specific safety equipment usage such as, but not limited to:

- Lock-Out-Tag-Out and equipment clearances
- Energy control and management
- Equipment safety zones
- Confined spaces
- Respirator usage
- Ladders and scaffolding
- Cutting and welding
- Fall restraints and harnesses
- Man-lifting
- Life preservers
- Shop bench equipment and specialty tools
- Forklifts
- Automotive lifts

- Crane critical lifts
- Small cranes, hoists and Jibs

3.3 Heavy Equipment Safety

The District uses an array of heavy equipment including cranes, specialty trucks, and backhoes. Each type of equipment has its own safety hazards and only qualified individuals should be operating or performing maintenance on this equipment. Lead personnel and first line supervision are responsible to ensure operators and maintenance staff are trained and qualified. Training on all heavy equipment shall be coordinated with the Safety Manager to ensure a training record is maintained.

The Safety Manager shall assess hazards and document processes and protocols used when operating and working in and around heavy equipment. These processes and protocols shall ensure the safety of everyone involved when using the equipment, including flaggers, observers, signalmen, riggers and operators. Lifting of personnel shall be specifically addressed in the procedures, and only permitted with the proper equipment and as allowed by safety rules and regulations.

3.4 Hazardous Materials

Hazardous materials include common cleaners, paints, solvents, as well as various chemicals used at the District. Compounds such as window cleaners and battery acid represent some risk in their use and storage. The Safety Manager is responsible to manage the Safety Data Sheet (SDS) and hazardous material storage plans. The plans shall include how employees can protect themselves from the hazards, and should require periodic audits to ensure the use and storage is consistent with the plans. The District utilizes SDS Online for the maintenance and organization of all SDS materials.

All new employees at the District as well as summer students are required to take Hazardous Communication Training when initially assigned. Hazard Communication Training is also conducted when new hazardous substances are introduced in the work place or in processes, this training is conducted for the specific chemical introduced and is conducted by the supervisor who may coordinate with the Safety Manager to conduct this training.

3.5 Vehicle Safety

All employees are likely to operate District vehicles at one time or another. District pickup trucks, SUVs, and cars are used for most transportation needs. District heavy trucks and specialty vehicles need special training and may have specific licensing requirements. In addition, the District may operate or use other vehicles that include, but are not limited to:

- Boats, barges, and Milfoil Harvesters
- All-Terrain Vehicles (ATV) and Utility Task Vehicle (UTV)

- Snow Cats
- Motorcycles
- Fixed wing and rotary wing aircraft

The Safety Manager shall develop safety rules and protocols to protect all operators and passengers during the operations or use of these vehicles. Rules shall address appropriate behaviors while operating the vehicles, specialty equipment while using the vehicles, and unique safety practices.

Personal vehicles are commonly used for District business and travel. The safe operations of personal vehicles while conducting business falls under the District's safety policies much like District owned vehicles. Vehicle Safety rules and protocols will extend to personal vehicle usage while on District business.

3.6 Traffic Control and Operations

Traffic Control and Operations refers to the District's responsibility to mark-off work zones where there is vehicle and pedestrian traffic, or reroute traffic around work areas. As part of the responsibility, flaggers may be required to safely manage the traffic. The Safety Manager is responsible to administrate a plan to train flaggers and crews on proper traffic control.

The plan must consider that when flaggers are used, the District will implement the requirements of WAC 296-155-305 and supplement them with the requirements and guidance in the published by the Federal Highway Administration (FHWA)⁷ Manual of Uniform Traffic Control Devices (MUTCD). If there is a conflict between the two, the plan will require the WAC is followed. For all traffic control issues not addressed by the WISHA rule, whether or not a flagger is present, the plan will require the work zone is set up according to the requirements in the MUTCD. The plan will have a provision to allow for Short Duration Work Zones. Employees participating in flagging activities are required to have valid flagger cards issued by the State of Washington or another state which is recognized by the state of Washington. Flagger certification is coordinated by the Safety Manager and supported by department managerial and director staff.

3.7 Pre-work Safety Review

When working on or near electric lines or equipment, all safety related conditions must be evaluated to ensure workers' safety. "Tailgate" or "Tailboard" meetings are required for all crews who work under these conditions regardless of the routine or emergency nature of the work. These meetings shall address the identified hazards, safety equipment and reinforce communications during the job.

The Safety Manager shall develop a written process and check-off to be used by line crews and other District work crews. The process should document the hazards, identify needed safety gear and address any other concerns and mitigations. The check-off will assure the minimum

⁷ Authority under 23 Code of Federal Regulations (CFR), Part 655, Subpart F

information was addressed and may be written or documented using other technologies. The process will designate a location where completed Tailgate Meetings are to be filed for investigative and audit purposes.

Staff performing non-routine tasks benefit from pre-work safety meetings. When non-routine and/or high-risk work is performed, supervisory staff shall ensure pre-work safety meetings are held. The Safety Manager shall be forwarded all documentation from these meetings.

3.8 Drones or UAVs

Unmanned Aerial Vehicles (UAV), commonly referred to “drones,” is a new technology used in utility operations. The District does not currently own or operate UAVs, but has been involved with third parties that have. As the use of UAVs increases at the District, the Safety Manager is responsible to create a set of safety rules and protocols. This includes the qualifications to pilot these devices consistent with the FAA, and general safety protocols to protect employees and the public consistent with new WAC requirements.

3.9 District Facility Safety, Disasters, and Emergencies

The various District facilities each present unique risks. The Safety Manager is responsible to conduct safety assessments of each facility and maintain facility specific Emergency Action Plans. These will include fire protocols, mustering, hazard identification, and unique safety equipment requirements. Safety plans should highlight specific hazards for the locations and facilities that present unique safety concerns. Employees should be aware of specific hazards when visiting unfamiliar work areas, such as substations, dams, generation facilities, and reservoirs.

A major safety control is physical security. The Safety Manager shall coordinate physical security with the facility owners, the CIP senior Manager and the Chief Compliance, Engineering and Technology Officer. Physical security controls shall consider the safety of the employees, contractor and public, as well as the security and protection of the equipment and facilities.

Major Disaster Planning at Box Canyon Dam and Sullivan Dam are part of the Dam Safety Plan and the licensing requirements for these facilities. The Safety Manager and Dam Safety Officer shall coordinate all Dam Safety tasks and exercises. The Safety Manager, CIP Senior Manager, and Chief of Compliance, Engineering and Technology shall coordinate all Bulk Electric System disaster planning and exercises affecting the System Dispatching and Information Technology Departments.

The Safety Manager’s Emergency Action Plans shall include regular safety drills such as fire, disaster and emergency drills. A yearly fire drill is required. Drills will be as realistic as possible. Essential operating staff may be excused from these drills if participation negatively affects the District’s mission. Where operating staff is excused from an actual drill, they shall be debriefed using a table top drill.

4 Incident Reporting

A critical component of any APP is incident reporting. Reporting helps the program and the individuals in several ways:

- Protects the reporting individual by assuring workplace accidents are covered under the L&I insurance;
- Ensures the District is aware of all incidents, can take immediate steps to protect the injured employee, and can swiftly investigate and conduct a root cause analysis to prevent the same or similar incidents; and
- Provides a means to track the efficacy of the APP.

The goal of the program is to prevent all reportable workplace accidents or illnesses, and encouraging incident reporting seems contrary to the goal. Without actively encouraging reporting, the APP could appear to be a sham and discouraging the correct behavior. The Safety Manager must track Incident Reports and seek to trend these down over a defined length of time. The less frequent reported incident occur, the longer the defined length of time should be to provide meaningful metrics. As an example, several one-year periods can be tracked with no reported incidents; or the incidents can be tracked by incidents reports per ten-year period.

The Safety Manager must develop an Incident Reporting process that is clear, unambiguous, and convenient for all employees to follow. The process should collect required information necessary for an L&I claim, but not so onerous that it causes delay, frustration or otherwise discourages the employee making a timely report. The process should encourage the reporting of near misses and incidents as minor as a paper cut, and be as streamlined as possible for a major injury. Auto populated forms are encouraged, but a backup paper process should be in place for those who are in the field and lack access to a computerized form.

4.1 Root Cause Investigation

A root cause investigation process is used for all accidents, injuries and near misses of a serious nature to prevent reoccurrence, and to foster a “Culture of Safety” within the District. When accidents, injuries, illnesses and near misses occur on the job, the District must quickly respond to these to prevent reoccurrence and use the event as a learning opportunity. Depending on the severity of the incidents, a root cause analysis is necessary to help identify the contributing factors and learn from the event. The Safety Manager shall ensure every reportable near miss, incident or illness is reviewed, and a root cause analysis is completed where necessary. The final root cause analysis reports shall be reviewed by the Safety Steering Committee, and the report results discussed at each safety meeting.

The Safety Manager shall document a detailed root cause analysis process that uses the most common methods of root cause analysis. Technical expertise, including engineering evaluations should include the District’s engineering department or outside consulting expertise. Every opportunity should be made to include IBEW representation on the investigation team.

4.2 Reporting Safety violations and Making Safety Suggestions

The Safety Manager is responsible to administrate a safety suggestion process that allows employees to report safety risks, violations, and suggest mitigations. This plan shall allow for the anonymous submission of suggestions should an employee fear retribution for reporting an issue of safety violation. The process should allow multiple avenues to report safety violations and make safety suggestions. It would be permissible for this program to leverage similar reporting for District human resource complaints and compliance complaints.

5 Promoting Compliance through Employee Incentives

5.1 Recognition

The recognition of positive contributions by individuals and groups demonstrating exceptional efforts in accident prevention helps to reinforce a “safety culture.” Letters of recognition by the Safety Steering Committee, General Manager, and the Board of Commissioners should acknowledge positive performance. Core Value Awards presented at the annual employee event are an excellent opportunity to recognize an employee’s efforts.

District publications, such as the Employee Connect, allow featured articles recognizing employees for positive safety contributions. The Safety Manager has great latitude in incenting positive safety performance.

The Safety Manager shall administrate a written Employee Safety Recognition Program. This program will dedicate a yearly budget amount for the purchase and distribution of safety related items, or gift cards up to a nominal value. The program must clearly outline the criteria to earn and award such as extraordinary participate in safety programs, taking actions to prevent an injury, and improving programs and processes to improve safety.

6 Enforcement

The Safety Policy requires the APP to addresses disciplinary action for employees involved in willful neglect or malicious behavior that leads to a safety incident. The Human Resources discipline procedures dictate the steps for accountability. The process for willful violations of safety rules and requirements includes termination in severe cases. Managers found to have willfully violated, or encouraged the violation of safety rules and regulations are prohibited from participating on the Safety Steering Committee.

6.1 Self-Audit

The APP cannot be effective without the checks and balances of processes and validations. The Safety Manager shall have a defined self-audit process that regularly verifies that District safety policies, procedures, processes and plans are implemented. Self-auditing may include spot checks, designed audits, and occasional walk-throughs of work areas. The Safety Manager should not always announce the audits to prevent behavior changes by the work crews.

District processes should be designed to prevent accidents and safety violations. Processes to monitor and evaluate safety will also evaluate the effectiveness of controls. Monitoring uses a “Three Lines of Defense” model, consisting of a combination of business unit monitoring, safety department monitoring, and periodic assessments by the Safety Steering Committee.

After any audit, a written summary report shall be prepared and discussed at the next Safety Steering Committee. The report should include the scope of the audit, the observations and findings, and recommendations for improvement. Recommendations will not be binding until approved by the committee. Actionable items are tracked until completed.

Corrective action plans result from identified deficiencies or recommendations. Assigned responsibilities and targeted completion dates establish accountability in implementing the corrective action plans. The Safety Manager must use a Safety Action Items Log, or field inspection sheet to track responsibilities, follow-up activities from findings, mitigations and deficiencies. The Safety Steering Committee reviews the Log during each meeting. The Safety Manager will validate completion of all corrective actions and report the completion to the Safety Steering Committee.

6.2 Risk Assessments

Front line supervision, lead workers, the Safety Manager, and the Safety Steering Committee are responsible to conduct safety risk assessments as part of the APP. Formal processes to assess risks employ various analysis methods throughout the organization. The assessments help to achieve the District’s overall safety objectives by prioritizing work efforts and evaluating the effectiveness of risk mitigations. The Safety Manager and the Safety Steering Committee are responsible to review risk assessment results at each Safety Steering Committee Meeting.

From a corporate level, the District assesses safety risks through the Safety Steering Committee. This includes examining corporate-wide strengths, weakness, opportunities, and threats. The Steering Committee sets parameters and expectations for acceptable risk tolerance. Through the budget process, this risk tolerance is reevaluated at the senior management level. Through continuous reassessments, the District identifies emerging risks.

6.3 Internal Controls

Internal controls are a key tool to manage safety risk. Internal controls prevent, detect and/or correct possible safety risks, promote efficient operations, and support continuous performance improvement. The APP discusses processes to create, implement, and assess the efficacy of functionally focused internal controls. The Safety Manager and Safety Steering Committee assessment results improve or identify additional internal controls and further mitigate risk.

There are three categories of internal controls:

1. Technological,
2. Procedural, and

3. Administrative.

Business unit policies and procedures represent the bulk of the documented controls. Technological controls refer to the use of tools and software to help manage risk through automation, and by reducing human error. Procedural controls refer to specific plans, processes and procedures that the worker must follow to complete an activity. Administrative controls refer to reviews, approvals, or reports that help to assure there is oversight of the process and that the outcome is acceptable.

Front line supervision, lead workers, the Steering Committee and the Safety Manager have the responsibility for identifying the need for, and implementation of, internal controls. Processes, plans and procedures identify specific roles and document the assignment of responsibility of tasks.

6.4 Measurable Performance Targets

The District measures effectiveness of its safety strategies using measurable safety performance targets. The targets are outcome-based or results-oriented measures used to assess the adequacy and effectiveness of the internal controls and the performance of the APP. The Safety Manager with direction from the Safety Steering Committee are to identify and track performance metrics. The Safety Manager shall have documented process for performance targets and metrics.

6.5 Program Evaluation, Audit and Review

The Safety Policy and the APP are required to be reviewed annually (not to exceed 15 calendar months). The review purpose is to evaluate program efficacy, changing organizational structure, and updated regulations. The Board of Commissioners will approve the annual revision of the Safety Policy to reaffirm the importance of its focus. The APP is reviewed by the Safety Manager and the Steering Committee in conjunction with the annual IRCP review. The Director of Safety will approve the APP. Program documents, are annually reviewed and approved by the Safety Manager annually, or as needed. The Safety Manager maintains a document library using public side of the Safety SharePoint library.

Following the identification of any possible safety concern the Safety Manager will review the Safety Policy, APP and supporting processes for improvements.

Assessment results, investigations and other Safety monitoring activities are stored in Safety Team Site SharePoint libraries. The District's Document Management Plan defines the structure and responsibilities for maintaining safety documentation consistent with the State of Washington and L&I. Information shall be maintained and updated, as needed, to ensure that the District is "audit ready". This enables the Safety Manager to minimize the effort required to prepare for L&I investigations and audits.

6.6 Change Management

The Safety Manager will track new or changing regulations, and communicate these changes to responsible affected employees and contractors. Following the approval of a new or revised L&I requirement, the Safety Manager will develop an action plan. The Safety Steering Committee will monitor the implementation of the action plans, and validate the completion prior to the scheduled Standard enforcement date.

The Safety Manager should develop a requirements change impact plan to detail the change management process.

6.7 External Outreach

The Safety Manager will participate in various L&I and industry outreach activities, and share safety program activities with other entities. The Safety Manager shall identify all external outreach that is relevant; have a plan to participate remotely and in person; and, maintain notes and information from these activities.

7 Document Management

7.1 Record Keeping

For regulatory compliance, administrative recordkeeping of the implementation of the Safety Policy and APP is very important. The Safety Manager must maintain up to date processes and procedures, show implementation, and provide training records upon request. The records must be available for quick access when requested for audit. Recordkeeping and reporting process shall include tracking for work related injuries or illnesses resulting in death; inpatient hospitalization; amputations or eye loss involving any employees⁸.

The Safety Manager shall detail recordkeeping processes and use Microsoft SharePoint, and TargetSolutions for all recordkeeping. The Safety Manager must implement processes to manage and maintain the documentation necessary to support and demonstrate regulatory compliance. SharePoint is the District's primary repository for compliance documentation.

7.2 Records retention

Retention of documentation is in accordance with the Washington State Office of the Secretary of State Local Government Common Records Retention Schedule (CORE), unless L&I regulations require longer retention periods. Information considered sensitive is protected in coordination with the Human Resources department. Records shall be managed consistent with District records retention policies and L&I requirements, whichever is more strict.

7.3 Review period

⁸ See (Chapter 296-27 WAC).

This program will be reviewed at least annually, not to exceed once every 15 months.

8 References

- Washington State Department of Labor & Industries
- General Safety and Health Standards WAC 296-24
- Signaling and Flagging WAC 296-155
- Recordkeeping and Recording WAC 296-27
- Safety Requirements for Electric Power Generation, Transmission, and Distribution WAC 296-45
- Safety and Health Core Rules WAC 296-800
- Washington Industrial Safety and Health Act (WISHA)
- Secretary of State Washington State Archives, Local Government Common Records Retention Schedule (CORE)
- Pend Oreille County PUD Strategic Plan Outline 2017-2022
- Federal Highway Administration (FHWA) Manual of Uniform Traffic Control Devices

9 Revision History

Rev	Date:	Change:	Approved By:
0	9/20/2019	Initial document	K. Conway
1	11/17/2020	Annual Review	A. Wiltse