





Accident Prevention Manual Update

June 2024





Introduction

Updates to the Digital APM will be released on or around June 18, 2024. We will send notifications out when the new version is available to view and download.

The following are the changes, additions and updates to the APS Accident Prevention Manual.

You may refer to page xi of the new APM to see a list of the latest revised sections which are included in this presentation.



Introduction

The changes are based upon employee and leader comments and recommendations, OSHA regulation changes, and identified inconsistencies or inaccuracies.

The APM changes in this guide are presented in a markup format. New language is shown in red, while deleted language is shown in ~~red~~ and crossed out.

We recommend that when reviewing this guide, you have your existing 2023 printed or digital version of the APM available for comparison.

Don't forget to download the latest version if you have saved the electronic copy to your mobile device.

Introduction

Leader Responsibilities:

- Review and understand all changes and additions
- Communicate changes to employees by June 18th
- Provide feedback when there are questions or concerns

Employee Responsibilities:

- Review and understand all changes
- Ask questions of your leader or business unit safety professionals if the rules are not clear



Chapter 4

Personal Protective Equipment (PPE)

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4-2(A)(2) Hard Hat Safety Requirements

2. All hard hats used at the Company shall meet American National Standards Institute (ANSI) Standard Z89.1-1997 (or later), Type 1 or 2, Class E, and be approved by the Safety Department.

Basis for Change: OSHA allows for hard hats meeting ANSI Z89.1-1997 or later. Most hard hats on the market today are designed to meet the most current standard. In addition, APS utilizes type 2 hard hats in Forestry, tower climbing, etc.



Chapter 5

Hazardous Materials

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5-7(A)(5) Flammable and Combustible Liquid Requirements

5. Doors shall be well fitted, self-closing, and equipped with a three-point latch.

Basis for Change: Updating to comply with NFPA 30 Section 9.5.3(2)



Chapter 10

Mobile Equipment, Fleet and Shop

Safety

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10-2 Cell Phones, Smart Phones, and Other Mobile Devices Requirements

1. Electronic devices, ~~both hand held and hands-free, that which~~ can cause a visual, cognitive, or manual distraction, such as cell phones, smart phones, laptops, tablets, smart watches, MP3 devices, ~~headphones~~, etc. ~~(whether reading, typing, talking or listening)~~ shall not be used to read, write or send a message, review documents, engage meeting content, scroll through social media, watch videos, record videos, or any other use of the device that causes a distraction and requires use of your body while operating (i) a Company Vehicle at any time while in motion; or (ii) a personal vehicle for a Company purpose, while the vehicle is in motion. ~~This includes personal Bluetooth and vehicle integrated Bluetooth technologies. GPS devices may be used to aid in navigation, but only if the route/destination is programmed before the vehicle is in motion and requires no further user interaction before reaching the destination.~~

Basis for This change is being made to align with current company State of Arizona requirements.

10-2 Cell Phones, Smart Phones, and Other Mobile Devices Requirements Continued

- a. Hands free vehicle integrated technologies can be used if voice activated or are “one touch” and do not cause a visual or cognitive distraction. The technology must remain hands free and not provide a visual distraction.
 - b. Cell phone can be used if initiated before the vehicle is in motion and you do not actively operate, hold or support the device with your body. This includes, but is not limited to, in your hands and perched on your shoulder.
 - c. The use of two-way radios in moving vehicles is allowed but should be minimized where practical in non-emergent or outage situations.
2. Any use of cell phones, tablets and other mobile devices is prohibited, including hands free, in class 13 or higher trucks while in motion.

10-2 Cell Phones, Smart Phones, and Other Mobile Devices Requirements Continued

3. This applies to personally-owned vehicles used for transportation between APS facilities, between an APS facility and job site, between an APS facility and another location for a business purpose, or on company property, including parking lots/garages, while the vehicle is in motion. This does not apply during an employee's ordinary commute to and from home or during driving that is not work-related, although APS encourages its employees to use safe driving practices at all times.
4. This section is not intended to supersede federal nuclear regulations governing the need to establish and maintain continuous communication capability, such as those requirements under 10 CFR 73.55, Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage.



10-2 Cell Phones, Smart Phones, and Other Mobile Devices Requirements Continued

5. This section does not apply to security and emergency response teams that must remain in constant communications while responding to a fire alarm, fire, radiological event, security event, medical event, or other emergency.

~~A. Cell Phones, Smart Phones, and Other Mobile Devices Guidelines~~

- ~~1. Minimize the use of two way radios in moving vehicles where practical in non-emergency or outage situations.~~



Chapter 12

Transmission & Distribution Clearance Procedure and Switching Orders

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12-4(B) Shared Clearance Tagging Requirements

B. Shared Clearance Tagging Requirements

1. Transmission Operations—Identifies Energy Control Center (ECC) as the Controlling System Operator.
 - a. When establishing a shared clearance point, install a second Danger Tag AND a Caution Tag for a visual indication of this unique condition.

Basis for Change: The system's dependence on a single operator in ECC to ensure a proper clearance is in place for two crews working on the opposite ends of the same device for energy isolation. The additional barrier is to require the addition of a second Transmission Operations Danger Tag (ECC Tag) and a Caution Tag when a shared clearance point is established.



12-4(B) Shared Clearance Tagging Requirements Continued

- b. A shared clearance point is required when one job is performed on the one side of the isolation device and simultaneously a different job is performed on the other side of that same device, meaning this clearance point is shared by two different jobs, each one on opposite sides of the isolation device at the same time.
- c. Whichever job completes first, follow standard procedure to release its associated clearance and remove one Danger Tag and the Caution Tag. This will leave one Danger Tag installed for the crew still conducting work.



12-5(B)(2) Automatic or Power Operated Disconnect Switch Requirements

2. Check locked open in the coupled position automatic or power operated disconnect switches.
 - a. At the request of an Outside Entity's Recognized System Operator (RSO), switch shall be open and locked; switch shall be left either coupled or uncoupled, at the RSO's request.

Basis for Change: Most companies that APS exchanges Inter-Company Clearances with, do not leave these switches in the coupled position. Making this issue even more problematic is the fact that SRP is in the process of replacing the MOD's at Palo Verde and the switching is written and the clearances issued to the Plant on these MOD's. Switching always has the instructions written as "Open and Locked in the Coupled Position" but these new MOD's cannot be operated this way. They have to be "Open and Locked in the De-Coupled Position".



Chapter 15

Fall Protection

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15-1(A)(1) Fall Protection Safety Requirements

1. Except as allowed under 15-1(A)(2) below, a Fall Protection System is required any time the unprotected working height is equal to or greater than four feet above the surrounding areas, including when performing work from bucket trucks, aerial lifts or on top of electrical equipment.
 - a. A personal fall arrest system shall be used when working from a scissor lift if it is recommended by the manufacturer and the lift is provided with an approved anchor point. Do not tie off directly to the guardrail system.

Basis for Change: Many manufacturers of scissor lifts recommend the use of a personal fall arrest system and provide an anchor point for the fall arrest system when working from the lift. In these cases, a fall arrest system should be used. This is not required when an appropriate anchor point is not provided.



15-5 Roof Work Requirements

A. Low Slope Roof Requirements

1. Employees working from low-slope roofs (having a slope less than or equal to four inches vertical, 12 inches horizontal) with unprotected sides and edges four feet or more above lower levels will be protected by personal Fall Arrest Systems except where the work is to be performed at a distance of 15 feet or more from the edge.
- ~~2. On low slope roofs where work is performed at a distance of less than 15 feet from the leading edge, the use of a safety observer is permitted in lieu of a personal fall arrest system.~~

Basis for Change: Current language does not meet OSHA requirement to have a written fall protection plan while working from a roof.

15-5 Roof Work Requirements Continued

2. On low slope roofs where work is performed at less than 15ft from the leading edge, a written fall protection plan can be used. This written plan can be recorded in several different ways. Employees working alone can use the “notes” field of the ADMS ticket or written on the service request. Crews performing this work this information can be captured in the Pre-Job Brief. The fall protection plan can consist of several different options to use as “soft controls”. The following “soft controls” can be utilized.

- Utilizing a pole climbing skid/safety strap as a positioning belt tethered to the weather head. (This allows you to move freely around the connection point without allowing you to get near the edge)
- Placing a high visibility cone or flag at each of the leading edges to alert you to your position on the roof.
- Call for a second person to be a safety observer to ensure you know your position on the roof.



15-5 Roof Work Requirements Continued

- a. The safety observer shall be competent to recognize fall hazards;
- b. The safety observer shall warn employees when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner;
- c. The safety observer shall have visual sighting of the employee being monitored;
- d. The safety observer shall be close enough to communicate orally;
- e. The safety observer shall not have other responsibilities which could take the observer's attention from the monitoring function.

15-5 Roof Work Requirements Continued

B. Steep Roof Requirements

1. Steep roofs (having a slope greater than four inches vertical, 12 inches horizontal) with unprotected sides and edges four feet or more above lower levels will be protected by personal Fall Arrest Systems.
- ~~2. Rope lifelines 1/2" dia. with rope grabs are required for each person.
 - a. These types of lifelines can also be used to provide fall restraint where tie off points are limited.
 - b. Rope lifelines must be anchored independent of other systems.
 - c. Softeners shall be used where lifelines contact sharp edges.
 - d. Sliding rope grabs approved for the size rope used are the only method for securing a safety lanyard to a vertical lifeline.
 - e. Lanyards shall not be attached to lifelines by means of knots or loops.~~
2. Utilize Buck KIT191 - Buckingham Modified Roof Top Kit (APN 00165714) or equivalent kit approved by the PPE Review Team.

Final Thoughts

- Our knowledge of the requirements and guidelines in the APM can help us avoid an accident or injury to ourselves, co-workers and the public.
- If you have any questions, contact your site's safety representative or Chuck Thomack at 623-229-5023.

