

CS ENERGY PROCEDURE

CONFINED SPACE RECLASSIFICATION CS-PTW-SOP-07

Responsible Officer: CS Energy PTW Administrator
Responsible Manager: Head of Operations Services
Responsible Executive: Executive General Manager Plant Operations

DOCUMENT HISTORY

Key Changes	Prepared By	Checked By	Approved By	Date
Callide Overhaul document	D Hagenbruch	R Kinslow	P Michaud	31/06/2012
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1 PURPOSE

This procedure details the process and criteria to modify the classification of a 'confined space' (under normal conditions) to a reclassified 'non-confined space' or 'work area' whilst unit is offline and isolated during planned overhauls.

It is critical to follow the process and complete criteria checks to ensure the atmospheric and engulfment hazards of a confined space no longer exist.

2 SCOPE

This procedure relates to the management of reclassifying confined spaces under the appropriate conditions. For more information relating to safe work in confined spaces, refer to ["B/D/11/39828"](#) - CS-PTW-HAZ-03 – Working in Confined Spaces.

3 RESPONSIBILITIES AND ACCOUNTABILITIES

3.1 Management

Managers are responsible to:

- Implement this procedure; and
- ensure sufficient resources are provided to effectively implement this procedure.

3.2 Overhaul Superintendent/Manager or Outage Manager

The Overhaul Superintendent/Manager or Outage Manager is responsible to:

- Ensure confined space reclassifications are reviewed and meet the requirements of this procedure; and
- All personnel working on the overhaul are aware of this procedure.

3.3 Officer in Charge (OIC)

The OIC is responsible for ensuring that:

- Whenever there is a change to a Permit, the risk assessment used to determine the reclassified confined space is reviewed and the outcome is communicated to all work party members, Confined Space Coordinator and Overhaul Manager; and
- Any change or potential to change the environment within the confined space brought about due to any work practices is to be risk assessed, covered by the JSEA and communicated to the work party.

3.4 Health and Safety Specialist

The Health and Safety Specialist is responsible for ensuring that:

- All reclassified confined space applications have been reviewed and comply with the requirements within this procedure; and
- Communication of any changes to the reclassified confined space applications where they are reverted back to a normal confined space.

3.5 Permit to Work Officer (PTWO)/Overhaul PTW Coordinator

The PTWO or Overhaul PTW Coordinator is responsible to ensure:

- Applications requesting a confined space to be isolated allowing it to be reclassified to a 'non-confined' space or 'work area' meet the requirements of this procedure;
- Isolation requirements of the confined space energy inputs are considered in the reclassification risk assessment; and
- If liquids, gases or vapours can enter the confined space, the pipe work is to have a positive isolation.

3.6 Employees & Contractors

Employees and Contractors are responsible for ensuring:

- Employees are responsible for ensuring that they understand and comply with the procedure and the Permit to Work (PTW) systems.

4 RRECLASSIFYING A CONFINED SPACE TO NON-CONFINED SPACE

4.1 Steps to reclassify Confined Space

To safely reclassify a confined space, the following steps are to be completed:

1. Identify the confined space that will change (e.g. boxed open or have access doors cut) during overhaul or outage;
2. Locate the confined space in the site confined space register;
3. Risk assess the confined space to determine whether the confined space hazards and associated isolations can be controlled to a low or negligent risk;
4. The Overhaul or Outage team is to review and approve the control measures with advice from the site H&S team as appropriate;
5. Operations to apply a positive isolation to the energy inputs and verify;
6. Operations to ensure all associated PTW's are linked correctly;
7. PTW issued to OIC with a copy of the reclassification risk assessment attached. OIC to manage PTW work;
8. Any changes that have the potential to affect atmosphere or engulfment in the space will require a review of the initial risk assessment and PTW.

If not on the confined space register, contact the site Health and Safety department who will arrange for an assessment to be undertaken.

4.2 Risk Assess Identified Confined Space

Risk assess the confined space to determine opportunity to reclassify the space:

- Where possible the risk assessment shall involve the Quality Inspector/ Area Coordinator or CS Energy equivalent who understands the scope of work to be undertaken in the space, and the PTW Officer to ensure isolation requirements for reclassifying will be suitable for the risk assessment;
- Use the site Confined Space Risk Assessment Template to record this assessment;
- Review and endorsement of the risk assessment by site H&S department;
- The Overhaul Manager or representative and the Health and Safety Business Partner or delegate is to authorise the confined space reclassification;
- All applications should be submitted and authorised prior to the commencement of the overhaul to permit appropriate planning; and
- Applications can be submitted and will be reviewed as a continuous improvement opportunity for future overhauls.

4.3 Isolation Requirements

If liquids, gases or vapours can enter the confined space, apply positive isolation to the energy inputs. Methods of isolation must be in accordance with the Confined Space Procedure.

4.4 Work within a Reclassified Confined Space (Restricted space)

When working in a reclassified confined space, ensure the following:

- Prior to first entry of the work space, an air quality test is to be done to confirm safe atmospheric conditions;
- Existing confined space signs at the entrance to confined space will need to be covered with signs showing they have been reclassified;
- OIC and work party are to control all hazards relating to the work using a JSEA for the job;
- OIC is to ensure work party understand they are working in a reclassified confined space and aware of the confined space risk reclassification assessment and controls in place;
- Use the Work Party Sign on/Sign off sheet to track who is working on the PTW and in the space;
- It is the responsibility of all workers and the OIC to check that every worker is signed on and off the Work Party Sign on/Sign off sheet at the start and end of the shift;
- Any change to the environment within the confined space brought about due to any work practices is to be risk assessed and covered by the JSEA (e.g. introduction of carbon monoxide source from diesel generator sets or mobile plant);
- Any change to the conditions of the reclassified confined space will require a review of the initial confined space risk assessment and PTW; and
- All confined space signs are to be uncovered upon surrendering the PTW with the reclassified confined space risk assessment attached. This returns the space back to confined space status.

Where the space no longer complies, the space is to be reclassified as a confined space and the normal confined space entry conditions are to apply.

4.5 Reclassification of the Confined Space

The process to reclassify or reclassify a Confined Space will be undertaken using the same process described in the PTW Manual to Suspend to Alter Isolation.

At the request of an OIC or PTWO, a Permit can be suspended to Alter Isolation. This allows for altering (adding, restoring or changing) Isolation Points.

4.6 Equipment in a Reclassified Confined Space

Equipment used in a reclassified confined space shall comply with the requirements of ["B/D/11/39828"](#) - **CS-PTW-HAZ-03 – Working in a Confined Space**:- Equipment/Materials Used in Confined Spaces.

4.7 Records

A copy of the confined space risk assessments should be documented with the relevant confined space in the site confined space register.

5 DEFINITIONS

Term	Definition
PTW	Permit to Work
JSEA	Job Safety Environment Analysis
Positive Isolation	Refer to - B/D/11/19579 - CS-PTW-02 - Permit to Work (PTW) Definitions
Confined Space Reclassification	A confined space (under normal conditions) is determined to be a 'non-confined space' or 'work area' whilst unit is offline and isolated during planned overhauls.

6 REFERENCES

Reference No	Reference Title	Author
	Confined Space Code of Practice 2021	Qld Govt
	Work Health and Safety Regulation 2011Qld	Qld Govt
B/D/11/19579	Procedure - CS-PTW-02 - Permit to Work (PTW) Definitions	CS Energy
B/D/11/19582	Procedure - CS-PTW-01 - Permit to Work (PTW) Manual	CS Energy
B/D/11/39828	Procedure - CS-PTW-HAZ-03 - Working in Confined Spaces	CS Energy
	Form – XXXX – Confined Space Reclassification Risk Assessment	CS Energy
C/D/09/1499	CSEP - Confined Space Register Callide A, B and C Station	CS Energy
K/D/11/3538	Register – Confined Space – Kogan Creek Power Station	CS Energy

7 RECORDS MANAGEMENT

In order to maintain continual improvement, suitability, safety and effectiveness of the organisation, registered documents will be reviewed on a two-yearly basis or at intervals specified by legislative or regulatory requirements. Review of registered documents should occur where it has been identified that there are changes in technology, legislation, standards, regulation or where experience identifies the need for alteration to the content. Registered documents should also be reviewed following an incident, change management process, modification or where directed as part of a risk assessment process. A 'review' can simply mean that it has been identified, confirmed and appropriately recorded that no changes are required and that the existing process remains the same.

Government Owned Corporations must ensure that records are retained according to accountability, legal, administrative, financial, commercial and operational requirements and expectations. In compliance with records retention and disposal, all documentation created in relation to business must be retained in line with minimum retention periods as detailed in legal retention and disposal schedules.