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Confined Space Policy Changes Supervisor Talking Points 2013

As part of the fatality prevention process small teams of subject matter experts from across FCX are being formed to review the global significant risks. The purpose is to evaluate existing guidelines and policies (or create new ones where one does not already exist) to update as needed as well as identify areas of potential concern with existing practices.

These talking points will serve as a supplement to the training previously received to inform you of any changes to current practice. Issues or concerns brought up by SMEs will also be listed so that you can review your procedures and ensure proper practices are being followed.

Changes to Confined Space

- This was previously a guideline but is now a FCX Policy
- Atmospheric testing
 - All spaces permit and non-permit must be monitored before entry (this is to ensure a condition hasn't changed that could causing an atmospheric change that may require it to be a permit-required space)
 - Permit-required still requires continuous monitoring
- The entry supervisor can be the attendant but may NOT be an entrant – this is to ensure that the person supervising the entry is able to check on all aspects of the confined space; being inside the space does not allow checks of the attendant and other work in the area that could affect the space
- Clarification was made to some sections without change of requirements
- An exemption process was added so that when any part of the policy can't be followed an exemption must reviewed by an engineer or qualified individual and be approved by a manager

Areas of Potential Concern with Confined Space

During the review potential gaps in the application of confined space were identified. Each employee should ensure the following (don't assume it is being done – verify it):

- That all confined spaces are isolated appropriately prior to entry (breaking lines, blinding, or double blocking and bleeding) – in some cases full isolation may not be used and could lead to serious injury or death to those in the space
- That confined space rescue personnel understand the hazards, have necessary equipment in place and have practiced rescue
- That proper ventilation is utilized when atmospheric hazards exist – natural ventilation is not always sufficient

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A Significant Risk Task with Critical Controls has also been issued with this Policy revision and should be utilized for pre-task reviews, new employee training and refresher.