

Caldwell, Virginia

Subject: FW: SPAM: Your submission has been received - #070502

-----Original Message-----

From: WorkSafeBC [mailto:prevweb@worksafebc.com]
Sent: Friday, July 06, 2007 3:57 PM
To: russell.storry@brookfieldpower.com
Subject: SPAM: Your submission has been received - #070502

Your submission has been received.

Submission ID: P09.RN6.QT2.7JH

Part 9: Confined Spaces, relating to isolation procedures in confined spaces

1. Name: Russell Storry P. Eng.

(a) Feedback is provided: on behalf of

Organization: Brookfield Power Services Inc Job Title: Operations Manager

(b) Feedback is provided: from an employer's perspective

2. E-mail: russell.storry@brookfieldpower.com

3. Feedback:

Section #:9.18.1 (3)

Comments:

4. Please indicate your level of support of the proposed amendments:generally agree

5. If you agree or disagree with the proposed amendments, please provide reason(s):

Section #: 9.18.1 (3)

Comments:

Conforms with the current approach and oversight used to obtain the approval from Worksafe BC for Alternative Measures required in lieu of 9.18 (4) (double block and bleed) for each planned outage work program that requires entry into a hydroelectric turbine, draft tube, penstock etc.

Would reduce the administrative burden for both the employer/owner/operator and for WorkSafe BC to accomplish approval for often similar Alternative Measures for each specific outage at the same facility, while retaining the controls and oversight the Alternative Measures process provides.

Would allow an employer/owner/operator of a hydro electric facility to responsibly provide planned safe work protection on short notice, without the requirement to obtain Alternative Measures approval before workers can enter into a "dam water passageway" in the event of an unplanned outage.

Would make it clear that the planned maintenance and design of existing and new hydroelectric facilities must include consideration for the protection of workers working inside a "dam water passageway" in order to achieve compliance with the proposed amendment 9.18.1 (3).