



Basin Electric Power Cooperative

Program No. SAF270	Revision No. 1	Page 1	Of 9
Originator Safety Department	Final Approver HDQ  Miles McGraw (Jun 17, 2025 06:59 CDT)		Date 06/17/2025
Subject	Life Critical Rules and Accountability		

1.0 PURPOSE / SCOPE

- 1.1 The purpose of this standard practice is to establish Life Critical Rules (LCRs) and Critical Controls, employee and contractor responsibilities, and accountability for complying with the LCRs and Critical Controls for Basin Electric Power Cooperative (BEPC) facilities and subsidiaries.
- 1.2 Because of the potential consequences of not complying with these LCRs and Critical Controls, Senior Leadership has placed special emphasis on LCRs and Critical Controls and will hold employees to a high standard of performance.
- 1.3 A violation, one in which an employee or contract employee failed to comply with an LCR, Critical Control or acted with plain indifference to employee or contract employee safety, may be subject to disciplinary action, up to and including termination. BEPC and subsidiaries have zero tolerance for violation of Critical Controls. BEPC will conduct a fact-finding to determine if corrective actions are required.
- 1.4 It is intended to ensure that employees and contractors understand and are held accountable for complying with LCRs and Critical Controls which include the following for each facility:
 - 1.4.1 Hot Work (AVS, DFS, DGF, LOS, and LRS)
 - 1.4.2 Control of Hazardous Energy (AVS, DFS, DGF, HDQ, LOS, and LRS)
 - 1.4.3 Confined Space Entry (AVS, DFS, DGF, HDQ, LOS, LRS, and TSM)
 - 1.4.4 Working at Heights (AVS, DFS, DGF, HDQ, LOS, LRS, and TSM)
 - 1.4.5 Mechanical Lifting (AVS, DFS, DGF, LOS, LRS, and TSM)
 - 1.4.6 Electrical Safe Work Practices (AVS, DFS, DGF, HDQ, LOS, LRS, and TSM)

2.0 DEFINITIONS OF TERMS

- 2.1 Confined Space – Space that is large enough and so configured that a person can bodily enter and perform assigned work but has limited or restricted means for entry/exit and is not designed for continuous human occupancy.
- 2.2 Control of Hazardous Energy - Includes facility Clearance and Lockout/Tagout (LOTO) procedure requirements and energy verification.



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2.3 **Critical Control** – Specific control measure that is considered crucial to preventing a major unwanted event or significantly mitigating its consequences, meaning if this control fails, it could lead to a substantially increased risk.

- 2.3.1 Identified for each LCR and are listed in bold font within this procedure.
- 2.3.2 Critical Controls help in the prevention of events that have severe consequences and provide means to fail safely.

2.4 **Facility** – Any BEPC site or subsidiary.

2.5 **Life Critical Rule (LCR)** – Rules designed to prevent serious injuries or fatalities. These rules focus on high-risk activities where failure to follow protocols can lead to severe consequences. LCRs are non-negotiable and may result in serious disciplinary action.

2.6 **On-Site Coordinator** – BEPC on-site employee that interfaces with contractors.

2.7 **Owning Department** – Department that owns and operates process, process-related and/or utility equipment, machinery, building, and/or systems.

2.8 **Permit Required Confined Space** – Confined space that has one or more of the following characteristics:

- 2.8.1 Contains or has the potential to contain a hazardous atmosphere, contains material that has the potential to engulf an entrant, has walls that converge inward or floors that slope downward and taper into a smaller area which could trap or asphyxiate entrant, or contains any other recognized safety or health hazard immediately dangerous to life and health, such as unguarded machinery, exposed live wires, or heat stress.

2.9 **Valid** – Before performing any tasks that necessitates a permit, the permit must identify potential hazards and requirements for the task, be properly completed, current, and authorization obtained before starting the work task.

3.0 APPLICABILITY/RESPONSIBILITY

3.1 **Applicability**

This procedure applies to all employees and contractors that work at BEPC facilities and subsidiaries.

3.2 **Responsibility**

- 3.2.1 BEPC Senior Leadership, Plant Managers and the Safety Department are responsible for:



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- 3.2.1.1 Establishing the LCRs and Critical Controls.
- 3.2.1.2 Notifying employees and contractors of LCRs and Critical Controls and the consequences of not adhering to LCRs and Critical Controls.
- 3.2.2 BEPC facilities and subsidiaries are responsible for:
 - 3.2.2.1 Adopting the established LCRs and Critical Controls developed by BEPC.
 - 3.2.2.2 Modifying existing safety procedures to comply with the LCRs and Critical Controls.
 - 3.2.2.3 Notifying employees and contractors of LCRs and Critical Controls and consequences of not adhering to LCRs and Critical Controls.
- 3.2.3 Supervisors are responsible for:
 - 3.2.3.1 Following and adhering to LCRs and Critical Controls.
 - 3.2.3.2 Reporting LCR and/or Critical Control violations and following incident reporting guidelines.
- 3.2.4 Employees are responsible for:
 - 3.2.4.1 Following and adhering to LCRs and Critical Controls.
- 3.2.5 Contractors are responsible for:
 - 3.2.4.2 Following and adhering to LCRs and Critical Controls.
 - 3.2.4.3 Reporting violations to the immediate supervisor and On-Site Coordinator.
- 3.2.5 On-Site Coordinators are responsible for:
 - 3.2.5.1 Notifying contractors of LCRs and Critical Controls requirements.
 - 3.2.4.2 Reporting violations to the immediate supervisor.
- 3.2.6 Safety Department is responsible for:
 - 3.2.6.1 Following and adhering to LCRs and Critical Controls.
 - 3.2.6.2 Updating the Contractor Site Access Webpage.
 - 3.2.6.3 Review and revise the procedure as required.



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4.0 GUIDELINES

4.1 General Requirements

- 4.1.1 The following general requirements apply to all LCRs and Critical Controls.
- 4.1.2 Multiple LCRs and Critical Controls may apply to an activity or work task.

4.2 Changes in Work Scope and/or Conditions

For any changes in work scope and/or condition:

- 4.2.1 Suspend the work.
- 4.2.2 Reassess the hazards.
- 4.2.3 Verify effectiveness of existing and/or new controls prior to resuming work.

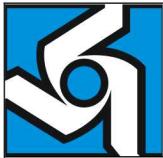
4.3 Suspend Work Obligation

- 4.3.1 If an employee reasonably believes a task or condition is unsafe, employees have the right and obligation to:
 - 4.3.1.1 Immediately suspend work if a hazard is identified or perceived that could cause harm.
 - 4.3.1.2 Report the concern to the immediate supervisor for prompt investigation and resolution.
 - 4.3.1.3 Resume work only after the hazard has been properly addressed.

5.0 LIFE CRITICAL RULES

5.1 Hot Work (AVS, DFS, DGF, LOS, and LRS)

- 5.1.1 Each facility has established a comprehensive Hot Work procedure.
- 5.1.2 The Hot Work procedure establishes control over work that requires the use of open flame, is spark producing, or may provide an ignition source. Flammable or combustible materials must be absent, isolated, protected or removed from work sites requiring the use of tools or equipment that may provide an ignition source.
- 5.1.3 Employees and contractors performing Hot Work are expected to comply with the Critical Controls.
- 5.1.4 *Critical Controls*



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5.1.4.1 **Work with a valid permit when required.**

5.1.4.2 **Identify and control flammables and ignition sources.**

5.1.4.2.1 Identifying and controlling flammables/combustibles and ignition sources when required by the Hot Work precautionary checklist. This includes air monitoring per facility requirements.

5.2 Control of Hazardous Energy (AVS, DFS, DGF, HDQ, LOS, and LRS)

5.2.1 Each facility has established a Control of Hazardous Energy procedure. Strict adherence to the facility Control of Hazardous Energy procedure is required.

5.2.2 Control of Hazardous Energy is utilized to establish a positive control over stored energy sources. The process prevents the unexpected release of stored energy, starting of process equipment, unexpected movement of mechanical devices, and unplanned operation of valves.

5.2.3 BEPC Facilities have the responsibility to ensure that the equipment has been isolated from all energy sources. This is demonstrated through the execution of the Clearance, Do Not Operate tags, and locks. Verification of positive isolation per BEPC Facility Energy Verification procedures prior to authorizing work is conducted jointly by affected personnel.

5.2.4 Personnel working under the clearance have the obligation to communicate the scope of work to operations, communicate if conditions or deviations from the scope of work occur, perform the work properly, and clearly communicate completion of work and/or next steps.

5.2.5 Personnel shall comply with the Control of Hazardous Energy procedure by ensuring that all energy sources have been identified, isolated, deenergized, and locked out and tagged when required, prior to opening equipment or performing servicing or maintenance activities.

5.2.6 *Critical Controls*

5.2.6.1 **Verify isolation and positive control over stored energy sources.**

5.2.6.2 **Properly signing on a clearance per BEPC Facilities policy or procedure.**

5.2.6.2.1 Additional resources: BEPC Facilities Line Breaking procedure and Energy Verification procedure.

5.3 Confined Space Entry (AVS, DFS, DGF, HDQ, LOS, LRS, and TSM)



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- 5.3.1 Each facility has established a comprehensive Confined Space procedure. Strict adherence to the facility Confined Space procedure is required.
- 5.3.2 A Confined Space Entry Permit is a formal check of a confined space to establish positive controls and minimize risks associated with entry into confined spaces. It details the specific work to be conducted in confined spaces, outlines safety measures, and is issued to authorized personnel after a thorough review and approval process.
- 5.3.3 The purpose of the Entry Permit is to communicate to employees or contractors the hazards that have been identified and the controls that are in place, before any employee/contractor enters the confined space or performs related work with respect to the confined space.
- 5.3.4 *Critical Control*
 - 5.3.4.1 **Obtain authorization and work under a valid permit before entering a confined space.**
- 5.4 Working at Heights (AVS, DFS, DGF, HDQ, LOS, LRS, and TSM)
 - 5.4.1 Each facility has established a comprehensive Working at Heights or Fall Protection procedure. Strict adherence to the facility Working at Heights or Fall Protection procedure is required.
 - 5.4.2 Falls from even short distance can cause serious injuries. All employees and contractors must use an approved form of fall protection when exposed to falls.
 - 5.4.3 Every employee that utilizes fall protection must know how to select, wear, and properly adjust the fall protection that is chosen.
 - 5.4.4 If utilizing fall protection, ensure that the equipment and anchorage points are inspected and suitable prior to use.
 - 5.4.5 It is the obligation of every employee to use approved fall protection wherever and whenever required.
 - 5.4.6 *Critical Control*
 - 5.4.6.1 **Protect against a fall when working at heights.**
- 5.5 Mechanical Lifting (AVS, DFS, DGF, LOS, LRS, and TSM)
 - 5.5.1 Each facility has established comprehensive Mechanical Lifting procedures. Strict adherence to the facility Mechanical Lifting procedures is required. Mechanical Lifting procedures may include but are not limited to mobile Crane, Overhead Crane, Rigging, Signaling, Hoisting, etc. procedures.



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- 5.5.2 Lifting operations pose special risks to personnel and equipment.
- 5.5.3 The primary purpose of Mechanical Lifting safety is to prevent incidents, injuries, and fatalities by mitigating risks associated with Mechanical Lifting and ensuring a safe working environment.
- 5.5.4 *Critical Control*
 - 5.5.4.1 **Plan Mechanical Lifting operations and control the area.**
- 5.6 Electrical Safe Work Practices (AVS, DFS, DGF, HDQ, LOS, LRS, and TSM)
 - 5.6.1 Each facility has established comprehensive Electrical Safe Work Practices. Strict adherence to the facility Electrical Safe Work Practices is required. Electrical Safe Work Practices may include but are not limited to Arc Flash, Protective Grounds, Energized Electrical Work, Clearance/LOTO, etc. procedures.
 - 5.6.2 Electricity is recognized as a serious workplace hazard. Electrical Safe Work Practices are designed to protect employees exposed to dangers such as electrical shock, arc flash, arc blast, and explosions.
 - 5.6.3 *Critical Controls*
 - 5.6.3.1 **Installation or repair of any electrical equipment shall be performed by an electrically qualified person only.**
 - 5.6.3.2 **Adhere to and follow approach distances to energized electrical equipment.**
 - 5.6.3.3 **Adhere to and follow Arc Flash PPE requirements.**
 - 5.6.4 The primary purpose of high voltage switching safety is to protect personnel and equipment from the inherent hazards of high voltage electricity, by ensuring safe operation, maintenance, and repair of electrical systems.
 - 5.6.5 *Critical Controls (TSM)*
 - 5.6.5.1 No work shall be performed on transmission lines or high voltage substation equipment, operated and/or maintained by BEPC until all operating criteria established by the transmission operator, such as the Western Area Power Administration's (WAPA), "Power System Clearance Procedure, Chapter 1", and specific written procedures developed by the area and/or operating dispatch office have been satisfied and implemented. Refer to the substation operating



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manual in each Basin Substation for proper switching and clearance procedures.

5.6.5.2 All switching operations shall be guided and tested by the fundamental principles, "Start with the correct procedure and follow it exactly". This shall be accomplished by the following:

- 5.6.5.2.1 **Carry the switching program with you while switching.**
- 5.6.5.2.2 **Touch or point to the device identification name plate to verify and ensure the correct location.**
- 5.6.5.2.3 **Recheck the switching program for correct location and correct sequence.**
- 5.6.5.2.4 **Verify anticipated device position.**
- 5.6.5.2.5 **Perform requested action on the device.**
- 5.6.5.2.6 **Verify desired device position.**

6.0 Training

6.1 All BEPC Facility employees must complete LCRs and Critical Controls web-based training module every 3 years.

6.1.1 This course familiarizes employees with LCRs and Critical Controls.

6.1.2 LCRs and Critical Rules must be included in New Hire Orientation.

6.1.3 LCRs and Critical Controls must be included on the Contractor Site Access Webpage.

7.0 REVISION HISTORY

Revision No.	Description of Change	Author	Approved By	Revision Date
1	<ol style="list-style-type: none">1. Establish Critical Controls to be more consistent on what a LCR violation is vs. facility safety procedure.2. Align all BEPC Facilities to have the same procedure.3. Added "Contractors" to training section	Ryan Fisk	Miles McGrew	6/16/2025

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Final Audit Report

2025-06-17

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