



Oregon

Theodore R. Kulongoski, Governor

Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA)

350 Winter Street NE, Room 430

P.O. Box 14480

Salem, OR 97309-0405

Phone: (503) 378-3272

Toll Free: 1-800-922-2689

Fax: (503) 947-7461

www.orosha.org

May 1, 1996

Ken Fonesbeck
Christenson Electric Inc
111 SW Columbia, Suite 480
Portland OR 97201-5886

Dear Mr Fonesbeck:

This is in response to your April 4, 1996 letter on the training requirements for electrical workers as outlined in 1910.332(b)(3). A person completing the state approved journeyman electrical program may not meet all of the training requirements in that the person may not have been trained in the electrical requirements and clearances in table S-5. In addition to their basic electrical apprenticeship training a person must be trained in the electrical requirements and safe work practices within the OSHA electrical standards.

As to the qualifications of a person to do electrical line work after completing an apprenticeship program, OSHA, in it's letter of interpretation to Michael Harbaugh dated March 26, 1996 answers that question as follows:

Question 1: Does an employee have to go through a recognized apprenticeship training program to be considered a qualified employee who is trained in compliance with paragraph 1910.269(a) (2) to perform his job, for example, as a lineman?

No. In paragraph 1910.269(X), a qualified employee is defined as one who is knowledgeable in the construction and operation of the electric power generation, transmission, and distribution equipment involved in his or her job along with the associated hazards. Having power line workers go through an apprenticeship training program may not provide all the training required under paragraph 1910.269(a)(2)(ii). The employer must ensure that the program used includes all applicable training elements required under paragraph 1910.269(a)(2)(ii) and work practices throughout 1910.269.

For example, minimum approach distances covered by the training program must conform to those required under 1910.269 rather than those required under Subpart V of the 29 CFR 1926 Construction Standard. (The Subpart V minimum approach distances have been commonly used in apprenticeship programs over the past 20

years.) Additionally even if the apprenticeship training program generally conforms to paragraph 1910.269(a)(2)(ii)~ the employer must supplement this with instruction in practices which specifically address safety hazards to which employees are potentially exposed in the particular workplace. Most often such training is accomplished on the job.

Question 2: If the answer to Question 1 is no, what training is required to be considered a qualified employee?

The training required depends on what job tasks the (lineman, meter reader, substation technician, serviceman, etc.) employee is required to perform.

All employees must be trained in and familiar with the safety requirements in paragraph 1910.269(a) (2)(I).

Also, qualified employees must be trained and competent in the safety requirements in paragraph 1910.269(a)(2)(ii). The electric power generation standard cannot specify requirements for every hazard the employee faces in performing his or her job. The employer must fill in the gaps by training the employee in hazards anticipated during the course of jobs the employee is expected to perform.

Question 3: An employee has 10-25 years of on-the-job training on which there are no records. In this case, what basis could the employer use to certify that the employee has received training required by paragraph 1910:269(a)(2)?

An acceptable way of certifying training would be for the employer to certify that an employee has completed on-the-job training that complies with the applicable requirements under paragraphs 1910.269(a) (2) (I) and (a)(2)(ii). This certification can only be given when the employee demonstrates proficiency in the work practices; involved.

If we can be of further assistance to you please call Jerry Hoard at (503) 378- 3272.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources Section
Oregon Occupational Safety & Health Division