



# Oregon

Kate Brown, Governor

Department of Consumer and Business Services  
Oregon Occupational Safety & Health Division (Oregon  
OSHA)

350 Winter Street NE

PO Box 14480

Salem, OR 97309-0405

Phone: 503-378-3272

Toll Free: 1-800-922-2689

Fax: 503-947-7461

[osha.oregon.gov](http://osha.oregon.gov)

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

Dear Mr Fannesbeck:

This is in response to your April 4, 1996 letter on the training requirements for electrical workers as outlined in 1910.332(b)(3) of Division 2, Subdivision S, Electrical. 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 of 1910.333. In addition to their basic electrical apprenticeship training a person must be trained in the electrical requirements and safe work practices within the Oregon OSHA electrical standards.

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

**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 OAR 437-002-2300(2) within Division 2, Subdivision RR, Electrical Power Generation, Transmission, and Distribution to perform his job, for example, as a lineman?

No. Within the definitions (OAR 437-002-2324) of Division 2, Subdivision RR, Electrical Power Generation, Transmission, and Distribution, a qualified employee is defined as:

*An employee (person) knowledgeable in the construction and operation of the electric power generation, transmission, and distribution equipment involved, along with the associated hazards.*

Having power line workers go through an apprenticeship training program may not provide all the training required under OAR 437-002-2300(2)(b) within Division 2, Subdivision RR, Electrical Power Generation, Transmission, and Distribution.

The employer must ensure that the program includes all applicable training elements required under OAR 437-002-2300(2)(b) and work practices throughout Division 2, Subdivision RR.

For example, minimum approach distances covered by the training program must conform to those required under Division 2, Subdivision RR. Additionally, even if the apprenticeship training program generally conforms to OAR 437-002-2300(2)(b), 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 OAR 437-002-2300 (2)(a).

Also, qualified employees must be trained and competent in the safety requirements in OAR 437-002-2300(2)(b). 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 OAR 437-002-2300(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 OAR 437-002-2300(2)(a) and (2)(b). This certification can only be given when the employee demonstrates proficiency in the work practices involved.

If we can be of further assistance, call Oregon OSHA's Technical Section at 503-378-3272.

Sincerely,

Peggy Munsell, Standards & Appeals Manager  
Oregon Occupational Safety & Health Division