

PROGRAM DIRECTIVE

Program Directive A-139
Issued March 10, 1983
Revised June 26, 2001

SUBJECT: Guarding: Alternative Abatement Methods for the Oil and Gas Drilling Industry

AFFECTED CODES/

DIRECTIVES: OAR 437-02-1910.212(a)(1) and 1910.212(a)(2)

PURPOSE: This directive provides guidelines for the use of certain monitoring techniques to comply with 1910.212(a)(1) and 1910.212(a)(2) in the oil and gas drilling industry.

BACKGROUND: Due to the difficulty experienced and the hazards created in complying strictly with the physical guarding requirements of 1910.212(a)(1) and 1910.212(a)(2), employers in the oil and gas well drilling industry requested federal OSHA to review the requirements of the standard as they are applied to guarding the exposed portions of the rotary table and kelly bushing on oil and gas well drilling rigs.

- A. As a result of this request, the Secretary authorized an experimental variance to demonstrate or validate new and improved techniques of safeguarding employees working around the rotary table and kelly bushing. The successful completion of the experimental program confirmed that the alternative abatement procedures evaluated meet the intent of the standard.
- B. Therefore, if the procedures set forth in (3) of this directive are complied with, the requirements of 1910.212(a)(1) and 1910.212(a)(2) shall be considered as met.

ACTION: The following alternative techniques shall be considered as meeting the intent of 1910.212(a)(1) and 1910.212(a)(2) for preventing worker contact with rotating kelly bushings and kellys and exposed portions of rotary tables on oil and gas well drilling rigs in lieu of the physical guarding requirements:

- A. The alternative procedures are limited to those rigs utilizing kelly

bushings that are classed as "smooth;" i.e., having no projections of the J-bolt type. Thus, drilling rigs using kelly bushings other than the "smooth" type shall have a substantially constructed kelly bushing/rotary table guard. Rigs using the "smooth" type kelly bushing have the option of using a substantially constructed guard for the rotary equipment or of following the guidelines given in (b) through (i).

- B. All employees shall be trained in safe operating procedures when around the rotary table and kelly bushing.
- C. The employer shall designate the equipment operator and shall ensure that the designated person is trained and competent in the operation of the rotary drilling equipment.
- D. The designated equipment operator shall control the access and activity of all personnel on the drilling floor while equipment is rotating and shall stop such equipment from rotating whenever there is danger to personnel from that equipment.
- E. The equipment operator shall never engage the rotary clutch without first ensuring that no employees are on or in proximity to the rotary table in such a manner that they could be endangered.
- F. At any time an employee's work activities require the handling of materials which can become entangled in the rotary table, the kelly bushing, or the kelly while such equipment is in motion, the designated equipment operator, who is capable of stopping the rotating equipment, shall be at the controls.
- G. No materials which may become entangled in the rotary table, kelly bushing, and/or kelly shall be allowed within six inches of this equipment when it is to be operated.
- H. Wash down hoses shall be of such length or located in such manner that no part of such hoses can be brought to within six inches of the kelly bushing.
- I. Spinning chain shall not be wrapped around the joint of the pipe in the mousehole nor handled on the drilling floor so that any part of the chain is within two feet of the exposed rotating portions of the rotary table, kelly bushing, or kelly.

**EFFECTIVE
DATE:**

This directive is effective immediately and will remain in effect until cancelled or superseded.