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Wind Turbine Safety Rules - Support Procedure P5

Wind Turbine Safety Rules Procedure
Temporary Application of an Alternative Safe Systems of Work

4th Edition

Version 2



In partnership with



SUPPORT PROCEDURE P5
WIND TURBINE SAFETY RULES PROCEDURE
TEMPORARY APPLICATION OF AN ALTERNATIVE SAFE SYSTEM OF WORK

4th edition

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FORWORD

It is recognised that due to organisational structures, efficiencies and resource reasons, it may be necessary to 'contract' in persons or other companies to carry out works on wind turbine generators (WTG).

In such cases, Company 'A' Wind Turbine Safety Rules (WTSR) may be temporarily replaced to enable works to proceed under an agreed alternative set of Wind Turbine Safety Rules, or an alternative safe system of work (SSoW), approved for use at the wind farm location.

This Temporary Application of an Alternative Safe System of Work (TAAS) Support Procedure P5 can only be initiated by Company 'A', currently named on the Safety Rules Inclusion Certificate (SRIC), when every opportunity to carry out work under the Company 'A' Wind Turbine Safety Rules has been exhausted.

This procedure details the process to temporarily apply a 'contractor' alternative safe system of work to a specified WTG. Company 'A' shall detail the implementation of the TAAS process within a Management Instruction relevant to their wind farm location.

Company 'A' Wind Turbine Safety Rules

Support Procedure P5

The Temporary Application of an Alternative Safe System of Work

CHANGE LOG

Rev	Modification	Issue Date	Page
1	New document following OSRG Review	2020	All
2	Renaming to WTSR 4 th Edition 2021	Jan 2021	All
3	2024 updates	February 2025	All

1 SCOPE

This procedure shall be followed to formally notify all parties/stakeholders of the temporary application of an alternative Safe System of Work (SSOW) to replace Company 'A' WTSR on a specified WTG.

This procedure does not apply to the permanent removal of WTG or plant/low voltage (LV) apparatus from the system, nor will it apply to a permanent contract change of responsibility at the wind farm location. For these scenarios see WTSR Support Procedure P4.

2 DEFINITIONS AND ABBREVIATIONS

For the purposes of this procedure:

- 2.1 'Company 'A'' means the entity that has control of the Wind Turbine Safety Rules and enforces the SRIC.
- 2.2 The 'Responsible Manager' or nominee means the person who will have responsibility for the implementation and management of the Company 'A' Wind Turbine Safety Rules at the wind farm location and is responsible for organising and initiating the TAAS on the WTG.
- 2.3 The 'Person Responsible for Work' is a *responsible representative acting on behalf of the Lead Contractor/Company*
- 2.4 'Lead Contractor/Company' means the entity responsible for carrying out the works on a specified WTG when it is under an alternative SSOW.
- 2.5 'Safe System of Work' (SSOW), means a formal procedure which results from risk assessment of a task to identify all hazards associated with the work. A SSOW will define safe methods to ensure hazards or risks are eliminated or minimised for all persons to ensure work can be undertaken safely. A SSOW will be documented, reviewed and approved for use at the wind farm location.

2.6 Abbreviations

Abbreviation	Description
LV	low voltage
SLD	single line diagram
SRIC	Safety Rules Inclusion Certificate
SSoW	safe system of work
TAAS	Temporary Application of an Alternative Safe System of Work
WTG	Wind Turbine Generator
WTSR	Wind Turbine Safety Rules

3 REQUIREMENTS BEFORE THE ISSUE OF A TAAS

When every opportunity to carry out work under the Company 'A' Wind Turbine Safety Rules has been exhausted, and the TAAS process is to be enacted, the following points below shall be considered, before the TAAS process is initiated.

The Person Responsible for the Work is responsible for ensuring that the proposed alternative SSOW is suitable and meets with legislative requirements. Company 'A' reserves the right to comment on the alternative SSOW and provide feedback if any concerns are identified.

As part of the process, the following elements should be agreed with the Lead Contractor/Company and relevant stakeholders. This is not an exhaustive list but should form part of the assessment to help Company 'A' understand how the work will be managed safely and what the responsibilities will be of the Lead Contractor/Company providing the alternative SSOW.

- 3.1** When the alternative SSOW is another set of WTSR
 - 3.1.1** Confirmation that the Lead Contractor/Company has a recognised set of WTSR.
 - 3.1.2** Confirmation that the Lead Contractor/Company has a record of training and authorisations to cover scope of works.
 - 3.1.3** Confirmation that the Lead Contractor/Company has knowledge of the assets to be put under rules (this may require site familiarisation).
 - 3.1.4** Confirmation that the Lead Contractor/Company has recognised the following:
 - The boundaries established by Company 'A', as specified in the existing SRIC.
 - The need to notify all the parties/stakeholders affected by the implementation of the TAAS.
 - 3.1.5** Confirmation of how Transfer of Control of the WTG shall be achieved.
- 3.2** When the alternative safe system of work is not another set of WTSR
 - 3.2.1** Confirmation that the Lead Contractor/Company has a process for identifying hazards and a means of removing the hazards and/or controlling them to as low as reasonably practicable to meet with legislative requirements.
 - 3.2.2** Confirmation that the Lead Contractor/Company has a record of training and authorisations to cover scope of works.
 - 3.2.3** Confirmation that the Lead Contractor/Company has knowledge of the WTG to be put under their SSOW (may require site familiarisation).
 - 3.2.4** Confirmation that the Lead Contractor/Company has process to formally implement their SSOW.
 - 3.2.5** Confirmation of how safe access and egress of the WTG shall be achieved, and what records are maintained.
- 3.3** Access and management of the WTG during the TAAS
 - 3.3.1** Confirmation that the Lead Contractor/Company has a process for managing safe access and egress to the WTG.
 - 3.3.2** Confirmation that the Lead Contractor/Company has considered and addressed any site requirements for emergency response and notification procedures.
 - 3.3.3** Confirmation that the WTG will be secured during periods where work is not underway, as per site requirements.

- 3.3.4** Confirmation that the Lead Contractor/Company has a process for providing access under their SSOW to third parties, e.g. for operational reset of alarms, if required.
- 3.4** Responsibilities of the Operational Controller
 - 3.4.1** Confirmation of how safe access and egress of the WTG shall be achieved. This may be done by utilising the existing Operational Controller facilities already established by Company 'A'. In these cases, the Lead Contractor/ Company shall agree a process with Company 'A', e.g. daily turbine status report.
 - 3.4.2** Where the Lead Contractor/Company will apply their own central control for access and egress to the WTG, then consideration shall be given as to how information is communicated and recorded. This may include the need to communicate information to site and third parties, including adherence to site emergency response and notification procedures.
- 3.5** Condition of the WTG before issue and after cancellation of the TAAS document
 - 3.5.1** Prior to the release of the WTG under the TAAS, Company 'A' shall communicate to the Lead Contractor/Company, any limitations/restrictions on the wind turbine, or any deviation from normal running/operating condition or residual hazards that could give rise to danger.
 - 3.5.2** Prior to the agreed return of the WTG under the TAAS process, the Lead Contractor/Company shall communicate to Company 'A', any limitations/restrictions on the wind turbine, or any deviation from normal running/operating condition or residual hazards that could give rise to danger.
- 3.6** Emergency response management during the TAAS period
 - 3.6.1** Confirmation that the Lead Contractor/Company has a process for dealing with emergency events whilst their SSOW is in force. This shall include any additional existing site requirements/ protocols for emergency response and notification procedures.
- 3.7** Audit, inspection and reporting
 - 3.7.1** Confirmation that the Lead Contractor/Company has a process for audit and inspection of their SSOW. This may include provision for the wind farm owner to undertake monitoring/ inspections to ensure compliance with the agreed SSOW.
 - 3.7.2** Confirmation that the Lead Contractor/Company has a process for reporting near miss events or breaches of the SSOW.
 - 3.7.3** Other audits and inspection requirements can be implemented by the Lead Contractor/ Company and agreed with the wind farm owner as required.
- 3.8** Record Keeping
 - 3.8.1** Confirmation that the Lead Contractor/Company has a process for retaining records commensurate with the SSOW, e.g. training and authorisation records, setting to work, completed safety documents, toolbox talks, establishing a safe place of work, near miss reporting, etc.

4 INTENDED USE OF A TEMPORARY APPLICATION OF ALTERNATIVE SAFE SYSTEM OF WORK (TAAS)

The WTG plant/LV apparatus shall already be subject to the Company 'A' Wind Turbine Safety Rules. This shall be clearly defined in a SRIC for the wind farm location.

A TAAS form shall be used by Company 'A' to formally notify all parties/stakeholders of the temporary application of an alternative SSOW to the specified WTG, up to the agreed boundary detailed in the SRIC.

By default, all work detailed in the TAAS form will not be subject to the Company 'A' Wind Turbine Safety Rules for the duration specified.

The Company 'A' Wind Turbine Safety Rules SRIC shall remain unchanged due to the TAAS procedure being a temporary measure. No work can be undertaken on the WTG, detailed within the TAAS, unless it is carried out under the agreed alternative SSOW. When agreement has been reached between the Responsible Manager for Company 'A' and the Person Responsible for the Work that work under the TAAS is completed, the WTG will return under the jurisdiction of the SRIC and the Company 'A' Wind Turbine Safety Rules shall be adhered to.

Due to the increased complexities of managing a wind farm location with multiple SSOW in force, a Management Instructions document should detail how this will be controlled.

All TAAS forms must have a designated start date and end date, as this process is for a temporary application of SSOW. Any subsequent change to the end date shall be recorded in Part 4 of the TAAS form, confirmed by formal approval, and communicated to the persons who may be affected.

5 PROCEDURE FOR THE USE AND COMPLETION OF A TAAS

- 5.1** Part 1 shall be completed by the Responsible Manager for Company 'A'.
- 5.1.1** Each TAAS shall be uniquely numbered from a register maintained by Company 'A'. The wind farm location and the Lead Contractor/Company shall be clearly identified.
- 5.1.2** The 'Reason for alternative SSOW' section shall be completed to ensure all parties are aware of the requirement for the TAAS.
- 5.1.3** Each TAAS shall specify the start time/date and end time/date from which the WTG will be subject to the alternative SSOW. This shall be agreed with the Lead Contractor/Company.
- 5.1.4** The Responsible Manager for Company 'A' shall provide an exact description of the WTG to which the TAAS applies, including boundary points. Drawing numbers shall be added, where applicable, to aid identification and ease of understanding. All WTG plant/LV apparatus within these boundary points shall be subject to the alternative SSOW stated on the TAAS. By default, all WTGs not subject to the TAAS, shall remain under Company 'A' Wind Turbine Safety Rules, as stated under the SRIC. Existing limitations and/or restrictions on the WTG, deviations from 'normal running / operating condition' or residual hazards that could give rise to danger shall be stated.
- 5.1.5** The Responsible Manager for Company 'A' shall sign and date the checkbox at the end of Part 1.
- 5.2** For Part 2, the Responsible Manager for Company 'A' shall ensure that all relevant persons who could be affected at the wind farm location are notified. Part 2 shall be completed as confirmation of notification.
- 5.2.1** The Responsible Manager for Company 'A' shall complete the signature check box at the end of Part 2 when all other signatures are present.
- 5.3** Part 3 shall be completed by both the 'Person Responsible for Work', representing the Lead Contractor/Company, and the Responsible Manager for Company 'A', confirming that all parties agree that the work can proceed.
- 5.3.1** The Responsible Manager for Company 'A' shall send a copy of the completed TAAS, with all signatures present, to all parties who have acknowledged the TAAS in Part 2.
- 5.4** Part 4 of the TAAS form. 'notification of change to scope and/or end date' shall be completed if required, see 6.3 below.
- 5.5** Part 5 shall be completed in line with 6.4 and 6.5, upon completion of the agreed works.
- 5.6** The 'Responsible Manager' shall manage the storage and archiving of all expired TAAS forms.

6 RESPONSIBILITIES FOR MAINTAINING SAFETY FROM THE SYSTEM

- 6.1** From the start time/date to the end time/date stated on the TAAS form, the Lead Contractor/ Company shall be responsible for Safety from the System, applicable to the TAAS. The process for Transfer of Control from Company 'A' Operational Controllers to the Lead Contractor/ Company shall be clearly defined in the Lead Contractor/Company work documentation. The process of Transfer of Control shall be clearly understood and accepted by all parties before the TAAS is in force.
- 6.2** There may be times when, prior to the issue of a TAAS, the WTG plant/LV apparatus is not in its normal running arrangement due to failure or fault finding works. Therefore, the status of the system including any abnormal or additional dangers shall be fully explained to the Lead Contractor/Company by the Responsible Manager prior to the implementation of a TAAS.
- 6.3** If complications arise and the work package will extend past the end time/date identified in the TAAS form, all work must temporarily stop. A review of process and procedure may be required by the Lead Contractor/ Company to extend the end time/date. Part 4, notification of change of scope and/or end date, shall be completed by the Person Responsible for Work and agreed by the Responsible Manager for Company 'A'. Following completion of Part 4, the amended TAAS shall be sent to all persons identified in Part 2 by the Responsible Manger with a request to confirm their acknowledgement of the changes. Once the acknowledgement of all persons listed in Part 4 has been obtained, the work can resume.
- 6.4** When the work is complete, the Person Responsible for the Work shall complete Part 5 of the TAAS form to inform the Responsible Manager for Company 'A', in writing, regarding the status of the work package and the system. This shall include any deviations from normal running arrangement and any exceptions, limitations or restrictions that have occurred during the work package that may affect the safe operation of the wind turbine.
- 6.5** When the Responsible Manager for Company 'A' is satisfied that work is complete, and has received written confirmation from the contractor, Part 5 of the TAAS form can be completed. The TAAS form will then be archived.

APPENDIX A COMPANY 'A' WIND TURBINE SAFETY RULES

EXAMPLE – SP 5 TEMPORARY APPLICATION OF AN ALTERNATIVE SLOW (TAAS)

PART 1 – NOTICE

TAAS Number:	
Wind Farm Location:	
Wind Turbine Reference:	
Lead Contractor / Company:	

Reason for alternative SLOW and the description of the work to be carried out under this TAAS form:

TAAS Start Time / Date:	TAAS End Time / Date:
Exact Description of WTG to which this TAAS applies, including boundary points with other SLOW: (as per Company 'A' SRIC & SLD to ensure accuracy and no crossover with existing agreed boundaries)	
Drawing reference numbers (if applicable)	

State any existing limitations and/or restrictions on the wind turbine; deviation from 'Normal running / operating condition'; or residual hazards that could give rise to danger (Record N/A if none)

WE GIVE NOTICE that the WTG identified above is being temporarily placed under an alternative SLOW, other than that defined in the current SRIC for the wind farm location.

As from the start time/date defined above until the end time/date defined above, the WTG identified will no longer be subject to Company 'A' Wind Turbine Safety Rules.

No further work or testing shall be carried out on the WTG plant/LV apparatus during this time and date unless the work or testing is being carried out in accordance with the 'Lead Contractor/Company' alternative SSOW.

By default, all WTGs not identified on this TAAS shall remain under the current SRIC for the wind farm location. The status of the system, including residual dangers or abnormal running arrangements, for which the 'Lead Contractor/Company' will have responsibility for, has been fully explained by the Responsible Manager for Company 'A' and is understood.

For and on behalf of Company 'A' Wind Turbine Safety Rules.

Responsible Manager Company 'A':	Date of Approval:	Signature:

PART 2 – ACKNOWLEDGEMENT AND ACCEPTANCE

All persons relevant to operations and works at the wind farm location shall be notified as below.

We, the undersigned, acknowledge receipt of Part 1 and confirm that all persons in our charge have been duly warned of the changes to be applied to the identified WTG up to the identified boundaries for the duration specified above.

Acknowledged by (Name):	Signature:	Time / Date:	of (Company/Department):

For and on behalf of Company 'A' Wind Turbine Safety Rules.

Responsible Manager Company 'A':	Date of Approval:	Signature:

PART 3 – CONFIRMATION TO PROCEED

We confirm that all persons in Part 2 have acknowledged receipt and that it is agreed by all to proceed with this TAAS.

Person Responsible for the Work 'Lead Contractor/Company':	Date of Approval:	Signature:
Responsible Manager Company 'A':	Date of Approval:	Signature:

PART 4 – NOTIFICATION OF CHANGE TO SCOPE AND/OR END DATE (IF REQUIRED)

The following changes and/or new end time/date need approval. TAAS has changed due to following reason(s):		
Reason for Change:		
New End Time / Date:		
Person Responsible for the Work 'Lead Contractor/Company':	Date of Approval:	Signature:
Responsible Manager Company 'A':	Date of Approval:	Signature:

We, the undersigned, acknowledge receipt of Part 4 and confirm that all persons in our charge have been duly warned of the changes to be applied to the identified WTG up to the identified boundaries for the duration specified in Part 4 above.

Acknowledged by (Name):	Signature:	Time / Date:	of (Company/Department):

For and on behalf of Company 'A' Wind Turbine Safety Rules.

Responsible Manager Company 'A':	Date of Approval:	Signature:

PART 5 – COMPLETION OF WORKS

We confirm that all persons and equipment have been removed from the WTG identified in this TAAS, and all work is completed.

State any existing limitations and/or restrictions on the wind turbine; deviation from 'Normal running / operating condition'; or residual hazards that could give rise to danger (Record N/A if none)		
Person Responsible for the Work 'Lead Contractor/Company':	Proposed 'Completion of Works' Time / Date:	Signature:
Responsible Manager Company 'A':	Agreed 'Completion of Works' Time / Date:	Signature:

END OF TAAS



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