



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE SAFETY CENTER

MEMORANDUM FOR SEE DISTRUBTION

22 FEB 2002

FROM: HQ AFSC/SEG
9700 Avenue G SE
Kirtland AFB, NM 87117

SUBJECT: Clarification of AFOSH Standard, 91-100, Paragraph 8.2.5.1.3., Fall Protection

The Air Force Safety Center's intent when providing guidance on an AFOSH Standard is to provide a basic document which all personnel are able to understand, interpret and apply without confusion. Within the past year numerous inquires have been posed to the Safety Center related to fall protection and aircraft. Our intent with this letter is to provide clarification on fall protection when applied to aircraft.

AFOSH Standard 91-100, paragraph 8.2.5.1.3, states: *Personnel will be provided and will use appropriate fall protection. NOTE: When maintenance or inspections will be performed totally within the TO-specified designated safe walkways on the surface of large frame aircraft, fall protection is not required when tasks are performed according to specified TO procedures and conditions. This method will be used only after appropriate risk management measures have been completed. In all other activities where work will be performed outside these walkways, appropriate protection will be provided to prevent falls from 10 feet.*

Personnel must utilize some form of fall protection regardless of the task performed anytime there is a potential to fall 10 feet or more to the ground or next lower level. The most preferred method is fall restraint which is the use of mobile platforms or stationary platforms (B-4 stand or Hi-lift), second is the use of fall arrest system (Personal Fall Arrest System). The least preferred method is the procedural control, which is developed and implemented through the application of operational risk management. This method is used only when both fall restraint and fall arrest methods are impractical. An example would be a preflight of an aircraft wing on the flightline where work stands or overhead tie off points are not available. Using procedural controls, fall protection is achieved through very aggressive risk management procedures that minimize the risk of falling. An example would be a designated area in the center of the wing of a large framed aircraft where the distance to the wing edge is great enough that the risk of falling to the next lower level is unlikely. This theory is based upon the fact that if the worker fell it would most likely be to the same level.

Technical Order designated walkways are designed for the protection of the aircraft and are not necessarily areas that, by virtue of location, provide a minimal risk of falling to the next lower level. Some T.O. designated walkways may be suitable locations for utilizing procedural controls as the method of providing fall protection. However, for tasks to be performed within the T.O. walkways certain actions must be performed prior to allowing personnel within these areas without fall restraint or fall arrest protection. The following actions should take place prior to utilizing procedural control method for fall prevention:

a. Conduct an Operational Risk Assessment which includes at least the following:

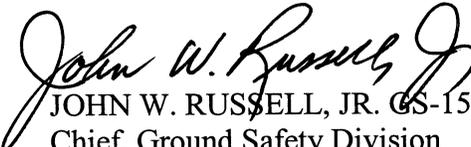
- (1). Environmental conditions for example, rain, snow, etc.
- (2). Condition of surface area for example, wet/slippery/dry, etc.
- (3). Task to be performed to include duration.
- (4). Review the T.O. to ensure task assigned is authorized within this location.
- (5). Equipment carried to perform task.
- (6). Type of foot wear utilized by the worker.
- (7). Physical ability of the employee.
- (8). Worker actions, for example, jumping from one surface to another or over-extending themselves by leaning too close to an edge.
- (9). Height from working level to the next lower level.
- (10). Operational urgency.

Once the risk assessment has been conducted and appropriate controls addressed, the decision making authority in conjunction with the worker should decide if procedural controls are appropriate. If so, they must be documented and communicated to the worker through appropriate training. If for any reason, the appropriate risk assessment measures will not meet the intent of the standard, mobile platforms or fall arrest systems must be utilized.

Our intent of the paragraph 8.2.5.1.3 is to allow the maximum flexibility for operational maintenance while still providing fall protection for the worker. The use of procedural control is not an open door to disregard other fall prevention measures but a control when applied appropriately will/can meet mission requirements. Procedural control is the least preferred method and should only be considered when other fall protection methods are impractical or ineffective.

The application of procedural control fall protection is designed for an operational aircraft under going maintenance during pre-flight, post flight and minor maintenance etc. The use of procedural control during phase operations, depot level maintenance or other long term maintenance is unacceptable when the aircraft has been schedule for long term down time maintenance. The only exception to the above mentioned operations is pre-inspection and post-inspection of aircraft before and after long term maintenance has been completed.

Hopefully with this clarification you are able to implement fall protection measures to the greatest extend of the standard for maximum protection of the employee. For an additional interpretation and clarification please contact Mr. J. Vigil at DSN 246-0826.


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