

U.S. Department of the Interior Minerals Management Service Gulf of Mexico OCS Region

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Guardrails

Recent offshore accidents, including one fatality, occurred as a result of guardrail failures. In one case, a guardrail failed during its use as a support for a lifting device. In another case, a guardrail failure occurred as a result of an operator leaning on the guardrail. Investigations after these failures indicated severe corrosion and improper welding at guardrail post base welds.

In view of the above, it is recommended that operators (a) review the design specifications and criteria under which guardrails on their existing facilities were installed and (b) determine if existing guardrails meet those specifications and criteria.

If any questions exist as to the effectiveness of those specifications and criteria, your attention is directed to the appropriate standards contained in OSHA regulation 29 CFR 1926.500 subpart M (Fall Protection) and 1978 publication "Guide to Safe Stairways, Walkways, and Railings," published by the Petroleum Extension Service, The University of Texas at Austin in cooperation with the International Association of Drilling Contractors. Guardrails, as described in the above-referenced documents, are intended solely for the purpose of preventing personnel from falling to lower levels.

It is therefore recommended that operators

- 1. Formulate a procedure for periodically and safely inspecting the structural integrity of guardrails.
- 2. Formulate a policy on the proper use and maintenance of guardrails. The policy should include but not be limited to the following directives:
- Never use the guardrail as an anchor point for lifting/supporting a load or as an anchor point for fall
 protection gear. (Light lifesaving devices such as buoys and floats as well as ESD stations may be
 mounted to guardrails),
- Never lean equipment against a guardrail,
- Always use personal fall protection equipment when replacing guardrails, and
- When replacing guardrails, always securely rope or chain off the unguarded area in accordance with the provisions of the aforementioned regulation.

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