

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

Safety Alert No. 194 April 30, 2001 Contact: Frank Pausina 504-736-2560

## Guardrails

Safety Alert No. 189, issued on July 19, 2000, referenced offshore accidents involving guardrails. The Safety Alert 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.

The Safety Alert also recommended in part 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 or 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.

MMS recently concluded its investigation of one of the above-referenced guardrail accidents. The accident involved the use of a guardrail as an anchor point for a come-along. The employee using the come-along fell to his death. Safety Alert No. 189 was issued in part as a result of that accident and was also issued prior to the conclusion of the official report, because of MMS's concern regarding the potential for similar occurrences.

While MMS considers the above recommendations as still being appropriate, it is further recommended, as a result of our investigation of the accident, that:

- 1. Designated Operators and their contractors review the need for a second JSA for any activity (a) for which an initial JSA was performed and (b) whose steps have been modified since the initial JSA had been performed.
- 2. Designated Operators instruct both their onsite operator representatives and contractors to communicate regarding any change in the steps of an activity to be performed, especially when a JSA had been performed prior to the change.

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