

Control of Work (CoW)

BP WIND ENERGY POLICIES AND PROCEDURES

Control of Work (CoW)

[Document Control Details](#)

Control of Work (CoW)

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Control of Work (CoW)

1.0 Purpose

The BP Wind “Control of Work” policy provides an overview of the systematic control of work standards, systems, processes and procedures. The objective of the Control of Work policy is to provide a consistent safe system of work with respect to operations, maintenance, and engineering activities throughout BP-managed Wind operations.

2.0 Reference

- BP Group Control of Work Standard
- BP Integrity Management Standard
- BP Wind Energy SIMOPS Standard
- BP Wind Energy Lockout / Tagout Procedure
- BP Wind Energy Confined Space Procedure
- BP Wind Energy Ground Disturbance Procedure
- BP Wind Energy Lifting Procedure
- BP Wind Energy Working at Heights Procedure
- BP Wind Energy Hot Work Procedure
- BP Wind Energy Energized Electrical Work Procedure
- BP Wind Energy Permit to Work Procedure

3.0 Scope

This Standard covers the means of safely controlling operating tasks, maintenance, demolition, remediation, and similar work activities and applies to the workforce and BP Wind Energy premises.

Applicability

For the purpose of this Standard, the workforce comprises BP employees and every employee of any other company or other legal entity that has been engaged to perform work on BP Premises.

Subject to the Standard’s intent and subject to existing contractual constraints (to the extent that they cannot be renegotiated), this Standard shall be applied to all contractors and their associated subcontractors who perform work on BP Wind Premises.

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4.0 Roles and Responsibilities (See Attachment A)

[Link to Attachment A](#)

5.0 Definitions (See Attachment B)

[Link to Attachment B](#)

6.0 Procedure

6.1 Written Policy

[A written BP Wind policy shall exist describing the CoW process](#)

Document Control Management System (DCMS)

- This Control of Work policy and associated documents will be registered and classified as controlled documents, all with an identifiable policy revision date.
- This Control of Work policy will be managed within the BP Wind HSSE Policy document control system.
- All changes to this policy and associated documents will require a change management review/check and authorization from the BU SPA.

Single Point of Accountability (SPA)

- The position of “VP of Operations and Asset Management” has been appointed by the BUL as the CoW SPA for governance of this CoW policy and systems.
- The role of the SPA is to maintain and continuously improve the CoW process and associated procedures. Responsibilities include:
 1. Authorize and approve changes to the CoW policy and associated procedures.
 2. Facilitate decisions to resolve issues caused by ambiguity and conflict.
 3. Verify that document control processes are applied to the CoW policy and associated documents.

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Control of Work Policy and Associated Procedures

This policy describes how control of work is applied at BP Wind facilities. This policy and associated forms provide a detailed explanation on the:

- Standards for Permits
- Risk Assessment
- SIMOPS
- Level of Accountability and authority
- Roles and responsibility
- Competency and training standards
- Auditing and performance measurement

6.2 Defined Accountability

All identified roles within the CoW Policy and associated procedures shall have defined accountabilities. The levels of authority for approval to proceed with work shall be commensurate with the level of risk.

BP and Contractor employees working on BP Premises will:

- Comply with the Policy.
- Stop the job if it appears potentially unsafe.
- Attend training on the Policy and associated practices/procedures, as appropriate.
- Demonstrate understanding and acceptance of their accountabilities under the Policy.
- Participate in/review Risk Assessments upon request.
- Conduct a site (work area) inspection prior to commencing work.
- Assist in the identification of deficiencies in the work process and help identify possible improvements.
- Actively monitor the worksite and surroundings for changes that might impact the performance of the task or affect the safety of those involved in the task.
- Be aware of Emergency Response Plans.
- Report all allegations/occurrences of unsafe work.
- Participate in incident investigations if requested.

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Business Unit Leader will:

- Designate the SPA for the Control of Work Policy, and provide the resources necessary to support the implementation of this policy.

BU Management:

- Provide resources necessary to support the implementation of this Policy within their areas of responsibilities.
- Confirm the implementation is completed in their area of responsibility.

Single Point of Accountability (SPA) person for the Control of Work Policy will:

- The VP of Operations and Asset Management have been appointed by the BUL as the CoW SPA for governance of this CoW policy and systems.
- Ensure that CoW is implemented in compliance with BP and regulatory requirements via procedures and standards.
- Ensure compliance audits of the operation of CoW are carried out to ensure systematic compliance across all sites.
- Ensure continuous improvement via internal and external Lessons Learned.
- Have ultimate responsibility and accountability for overall performance and content of the Control of Work Policy and associated practices/procedures.
- Be responsible for authorizing and approving changes to the Policy and associated practices/procedures.
- Access knowledgeable experts within the company as required.
- Have the skills to make decisions in areas of ambiguity and conflict, while maintaining conformance to BP's Core Values.
- Verify that document control processes are applied to the PTW Policy and procedures.

Facility Managers / Project Managers will:

- Appoint and maintain an accurate list of Area Authorities (AA), Issuing Authorities (IA) and Performing Authorities (PA).
- Provide the resources necessary to implement and operate under the Policy.
- Establish a process that clearly communicates what procedures and policies will be followed for the transfer of Control of Work within work groups (e.g. a board or electronic system showing all work activity for the day).
- Establish a process for identifying a Person in Charge (PIC) of each worksite subject to this Policy.

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- Enable the required training and assessments of the AA, IA and PA.
- Be familiar with the intent of the provisions of the Control of Work Policy.
- Confirm processes are in place to provide sufficient resources to carry out the intended scope of work.
- Confirm processes are in place to conduct suitable and sufficient assessment of risk with regard to the health and safety of all involved personnel.
- Be responsible for raising proposed MOC requests and for confirming that monitoring and auditing of Policy compliance is occurring as required by the Standard and Policy.
- Be competent in Job Safety Environmental Analysis (JSEA), Risk Assessment, MOC, BPWE's Golden Rules of Safety, and all associated permit practices.
- Confirm that personnel receive the necessary training and are assessed as competent, and that the Control of Work register is updated as needed.
- Confirm that appropriate lessons learned are captured, incorporated and shared with appropriate BU personnel (BP and Contractors).

Area Authority (AA) This role is typically filled by the Site Manager, Site Deputy Manager, or the Site Manager's designee.

The AA will:

- Authorize all work activities within their designated area of responsibility.
- Confirms work activities are consistent with the CoW Policy.
- Obtain higher levels of approval as needed.
- Ensure appropriate permits are issued, closed, and filed per local operating requirements.
- Confirm work is appropriately planned and scheduled
- Identify a Person in Charge (PIC) for each worksite prior to commencement of activity and approve any replacements.
- Confirm competency of the Issuing Authority (IA) and workforce involved in a task consistent with the planned scope of work.
- Confirm with the IA that all appropriate control measures have been, or will be, put in place prior to commencement of activity.
- Confirms with the IA (and personally on higher risk work) that the PA and work crew fully understands the scope of the task and the hazards involved.
- Require that the IA and site work group perform a Risk Assessment and agree that needed risk mitigation has occurred and that the work can proceed safely.

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- Participates in and reviews CoW audits.
- Contribute to lessons learned where appropriate to support improvement in the work process or in hazard assessment.

The Issuing Authority (IA) *The IA is the person appointed by the AA for issuing permits consistent with all associated practice and permit requirements.*

The IA will:

- Be responsible for the issuance and closure of permits in their area of competency, e.g., hot work, confined space entry, ground disturbance, lifting, and energy isolation work permits.
- Coordinate with the PIC and maintain full knowledge of all work in progress in the area concerned, including any work on the site that is under someone else's authority/control, e.g., SIMOPS.
- Communicate with the AA about the issuance and closure of permits.
- Confirm that all site personnel involved in a work activity are competent and correctly outfitted for the work they will perform.
- Confirm that workers have clear understanding of the scope of work, hazards, controls and mitigations.
- Confirm that the correct tools and equipment are available and appropriate certifications and/or inspections are reviewed or made as appropriate.
- Confirm that required permits are in place and that work undertaken on site is consistent with, and confined to, the original scope of work.
- Routinely monitors the work area.
- Stops work if conditions vary from requirements.
- Prepare lessons learned where appropriate to support continuous improvement efforts and share these with the AA and other personnel as they deem appropriate.

The Performing Authority (PA) *The PA is the person who has been assigned by the AA to be responsible for activities carried out on the work site under the Control of Work Policy and is accountable to the AA/IA for the safe delivery of all work activities. The PA may be performing a task or may be supervising a group that is performing a task.*

- Personally responsible for executing the task, or is responsible for the team executing the task at the work site.
- Confirm that non-essential personnel are kept a safe distance from the work activity.
- Accept and sign authorized permits for work activity being performed.
- Participate in the Risk Assessment for the planned activity.

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- Confirm, by including in the JSEA discussion, that all persons involved in the task fully understand the scope of the work and the hazards and controls for the job.
- Confirm that all members of the work party sign the permit(s).
- Stops work if work conditions/methods or scope change and contacts the IA or AA for resolution.
- Verifies only work covered by the permit takes place.
- Confirm that the worksite is kept in a clean and safe condition both during and upon completion of the job.
- Observe work activities and if an individual feels that he/she cannot safely manage more than one concurrent task, stop the appropriate portions of assigned work and request assistance from the IA/AA.
- Confirm that appropriate lessons learned from the job are captured, incorporated and shared.
- Confirm all workers involved in the permitted work activity sign JSEA and permit(s) acknowledging their understanding and agreement. In the event that there is more than one work team, there will be representation from each team during the Risk Assessment.
- Ensures worksite is left in a safe condition upon work completion.

The Person in Charge (PIC) The PIC is appointed by the AA to be responsible for coordinating among multiple PA's and IA's working at one site to confirm safe delivery of all work activities. The PIC is an onsite individual that has working knowledge of all work activities being performed by all groups/personnel working on location. The PIC can be the AA, IA, or one of the PA's.

The PIC will:

- Function as a liaison between all personnel and groups on location.
- Coordinate any issues that could result in a change in work scope with the AA.
- Confirm that all people working on site have reviewed and signed the JSEA(s) and verified that the appropriate permits have been completed.
- Remain on site until work activities have stopped, permits are closed, and appropriate equipment has been secured for the shift.

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6.3 CoW Training

All persons involved in the CoW process shall be appropriately trained and competent to carry out their roles.

Intent: To provide assurance that everyone involved with the Control of Work process has the required training and has reached the level of competence required to ensure correct application of the process.

Competency and Documentation

- All personnel involved in work covered by this Policy will be trained to the appropriate level.
- The “Roles and Responsibility Table” defines the required competencies for each CoW role. See Attachment A.
- The Facility Manager is responsible for appointing and maintaining an accurate list of Area Authorities (AA), Issuing Authorities (IA), and Performing Authorities (PA).
- For major projects, the Project Manager will be responsible for appointing and maintaining an accurate list of Area Authorities (AA), Issuing Authorities (IA), and Performing Authorities (PA).
- The Facility Manager will be accountable to verify that individual’s with assigned roles within the CoW process have achieved the minimum competencies to perform their duties in the CoW process. Assessments will be carried out prior to appointment to the roles and periodic assessments at least every 3 years.
- The Facility Manager will verify that initial and refresher training along with competency records are kept current, documented and accessible.
- All CoW training and competency assessments for BP personnel shall be formally recorded via VTA.
- Training and competency records for on-site contractors will be kept locally at each site and easily accessible in order to verify personnel are competent in their CoW roles.
- Site Leadership will be accountable for routine auditing per the CoW Auditing protocol.

Training Program

- Everyone designated a CoW role or responsibility will receive the appropriate training related to the position. Minimum standards of competencies must be achieved and maintained.
- Training of contract employees is primarily the responsibility of the contractor. BP Wind specific CoW training materials may be provided by BP.
- Contractor competencies and training requirements for Performing

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Authorities (permit receivers) and work crew members are defined in Roles and Accountability Attachment A.

- Contracts will reflect the CoW competencies and minimum training, and will be audited as part of the contract audit process.

6.4 Task Identification and Interaction

Planning and scheduling of work will consider time and resource requirements for hazard identification, risk assessment, preparation and planning.

Planning/Scheduling Process

Planning and scheduling process must ensure all work schedules allow time for the following CoW requirements:

- A well defined work scope developed for every permitted activity. This includes the identification of competent personnel and suitable equipment required for safe execution.
- To apply the site risk assessment process to identify and eliminate/mitigate hazards.
- Simultaneous and concurrent work activities are documented and managed, including potential impact to/from adjacent unit's activities.
- Involve technical authorities for advice and approval as needed.
- Comply with all approval and authority levels.

SIMOPS

- All Simultaneous Operations (SIMOPS) or concurrent work activities will be evaluated and captured through the permit issuing process.
- It will be the responsibility of the IA with support of the AA to resolve SIMOPS conflicts before permit issue.

6.5 Risk Assessment of Tasks

Tasks shall not be conducted without being risk assessed

Risk Assessment

- The risk assessment process for work activities has been embedded in the Control of Work permitting process at all BP Wind Energy facilities.
- Completion of the JSEA embedded in the Permitting process involves identifying the task steps, hazards, and controls to ensure the work is completed safely by the work crew.

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Risk Assessment Process

- Risk assessment is a systematic process of:
 1. Identifying hazards,
 2. Controlling risk by applying controls in the following sequence:
 - a. Elimination
 - b. Substitution
 - c. Control, or
 - d. Mitigation of the hazards.
 3. Evaluating acceptability of residual risk,
 4. Documenting the hazards and controls
 5. Communicating to those potentially affected.

- There are two types of Risk Assessments defined within this process:

Type 1 is a broad overview of the task by a competent person(s), typically the PA and AA, to identify any significant hazards involved and appropriate control measures which are required to be in place to allow the job to proceed. This will be accomplished using the JSEA process.

Type 2 requires additional assessment, which is initiated when the competent person(s) judges that there are greater hazards or complexities associated with the task which require a more rigorous level of assessment (e.g., permit required activity, working at heights, handling hazardous chemicals, etc.).

Risk Assessment Process Requirements

The risk assessment process requires:

- A member of the work crew performing the task shall participate in the Risk Assessment, which shall be communicated in writing and signed off by all involved in the task.
- Selection of the correct controls based on the task hazards (Cold Work, Hot Work Spark Potential, Breaking Containment, Hot Work Open Flame, or Energized Electrical).
- The identified hazards and associated controls will be agreed upon by the IA and PA, which will be documented on the risk assessment.
- The PA and IA will review the hazards identified during permit development, and ensure all identified controls are in place prior to starting work.
- In all circumstances, during Permit creation, the performing authority and work crew must complete a JSEA for the work activity to be performed.

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Pre-job JSEA Requirements

The pre-job JSEA requirements are:

- The JSEA will cover the activities for a specified job.
- The JSEA will be broken down into individual activity task steps.
- Controls relating to job safety will be identified by the team and documented.
- On completion of the JSEA, the IA is contacted for final review at the work site.

Authorization and Approval

By approval the authorized person(s) is making a judgment that the work is safe to go ahead based on the risks and control measures identified and verifying at a minimum the following is captured in the Permit, JSEA and/or accompanying documents:

- The correct site policies and procedures have been documented and are to be followed:
- Competent people have been involved in the risk assessment process.
- Any technical authority reviews required, have been completed.
- Verifying any alternative lower risk options have been considered.
- Adequate resources are in place to support and monitor the work activities.
- Residual risks are acceptable.

Emergency Response Plans/Communication

- Based on the risk assessment findings, the AA will ensure emergency response plans are adequate and all measures are in place before work commences.
- The AA will ensure that all applicable emergency response plans are communicated during permit handover by the IA. The IA informs personnel involved in the work of the control measures that are in place and the actions required of them in an emergency.

6.6 Permit Requirement:

Before conducting work that involves confined space entry, work on energy systems, ground disturbances, hot work or other hazardous activities, a permit shall be obtained.

Permitting Process

The purpose of the permitting process is to facilitate and document formal communication between the Issuing Authorities and the Performing

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Authorities.

The following essential areas are covered:

- The scope, tools and work methods,
- Work location and equipment to be worked on
- Hazards and controls which allow the work to be safely completed
- Timing and planned work duration.
- Any specific additional hazards, e.g., SIMOPS.
- Any remaining inherent hazards associated with the activity

Communication Requirements at Permit Issue

- Permit handover occurs face to face between the IA and the PA involved in the work activity, and depending on hazard level between the IA and the entire work crew.
- All controls and equipment preparations required by the permit are confirmed in place by both parties.
- The parties agree on the actions to take place to ensure safe execution.
- All agree to stop work if scope or conditions deviate from the requirements of the permit until the IA is notified and the deviation resolved.

Isolation

Work involving isolation requires the use of an approved Isolation List:

- A copy of the completed isolation list will be kept with the isolation lock box.
- The completed isolation list and lock box number will be referenced on each permit associated with work requiring the isolation.
- All work permits must be verified closed prior to the isolation being removed.
- All work permits must be closed or suspended prior to interim removal of the isolation, i.e., interim testing.
- For additional specific guidance on Energy Isolation please refer to the BP Wind Energy Lockout /Tagout procedure.

Confined Space

Entry into a Confined Space requires a CSE permit which covers the hazards of entering the confined space:

- All confined space entries require a single CSE permit, entry log, and standby attendant(s) for entry. The standby attendant(s) must be competent for this role.
- Routine monitoring by the IA will be performed including gas tests or continuous monitoring as required.

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- CSE permit defines the hazards and controls required for entry to the space.
- Each individual work activity occurring inside the space requires an individual Permit.
- Prior to removal of a CSE permit, all permits associated with work inside the CSE must be verified as closed.
- For additional specific guidance on Confined Space Entry, please refer to the BP Wind Energy Confined Space Entry procedure.

Ground Disturbance

Hazards associated with Ground Disturbance include:

- Contamination from the soil can create exposure to hazardous materials and/or atmosphere. Controls include proper soil sampling and periodic or continuous air monitoring and use of appropriate PPE.
- Underground pipelines, electrical, sewer, and soil contamination can impact the safety of the work. Controls include obtaining underground drawings, probing, and/or contacting “One-Call.”
- Soil shift cave-in. Controls include proper shoring or adequate sloping.
- For additional specific guidance on Ground Disturbance, please refer to the BP Wind Energy Ground Disturbance Procedure.

Lifting

A Lifting Permit shall be completed prior to operations using a mobile crane (excluding forklifts and auto cranes) or any lift determined to be a critical lift.

- Critical lifts are defined as any lifts that will involve:
 1. the weight of the item to be lifted exceeds 50,000 pounds,
 2. The lift is within an operating facility and the weight of the item to be lifted exceeds 20,000 pounds,
 3. The total load to be lifted exceeds 75% of the chart for the lift configuration of the crane,
 4. All multi pick loads,
 5. Lifting where the equipment operator cannot see the load and/or signal person,
 6. Lifting directly over energized or pressurized or occupied equipment,
 7. Lifting where energized electrical power lines are within twice the maximum swing radius of the crane, plus the required clearance,
 8. Lifting of personnel,
 9. Any other lift that is deemed as a “critical lift” by BP Wind Energy that may impact plant operability, environmental compliance, start-up, or reputation.
- All lifts shall have a JSEA. One JSEA may cover multiple similar lifts.

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- For additional specific guidance on Lifting, please refer to the BP Wind Energy Lifting procedure.

Working at Heights

Working at heights hazards include:

- Personnel fall from heights.
- Dropped objects.
- For additional specific guidance on Working at Heights, please refer to the BP Wind Energy Working at Heights procedure.

Hot Work

A Hot Work permit is required for any work that involves burning, welding, using fire or spark producing tools, or that produces a source of ignition.

- Open Flame is defined as any work that has a continuous/uncontrolled heat source capable of igniting flammable materials (e.g.) welding, burning, grinding or similar activities.
- Spark Potential is defined as any work that has the potential to generate sufficient heat to ignite flammable materials (e.g. non-intrinsically safe devices, motor driven equipment, buffing, or use of tools with the potential to generate sparks).
- For additional specific guidance on Hot Work activities, please refer to the BP Wind Energy Hot Work procedure.

6.7 Scope, Hazard Controls, and Mitigations Communication

The scope, hazards controls, and mitigations shall be communicated in writing and signed off by all involved in the task.

Permit Handover

- Permits will be issued in the field with face to face communication between the IA (Issuing Authority) and the PA (Performing Authority).
- The person responsible for issuing the permit shall confirm that the person accepting the permit fully understands its contents. This process will involve review of all hazards and controls, reviewing adjacent activities, location of emergency equipment, and a discussion of actions to take place in the event of an emergency, etc.
- The IA will verify understanding by “echo back” or other questioning techniques of the PA and or work crew depending on handover requirements.
- Upon completion of the JSEA and Permit, both parties will sign the permit to designate handover has been successfully completed.
- Persons performing work at remote locations shall:

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1. Have the skills and competency to identify the required work scope, hazards, controls and mitigation measures,
2. Establish and maintain regular communication,
3. Validate the permit requirements with another competent person.

Potential Changes in Work Environment

- During permit handover, viable scenarios for hazards and worksite changes will be communicated.
- The IA will clearly communicate that work is to stop if conditions change in a way that makes the work unsafe.

6.8 Permit Monitoring and Managing

All ongoing work requiring a permit shall be regularly monitored and managed by a responsible person.

Monitoring of Worksite by IA

- The IA will periodically visit the site to confirm that conditions detailed on the Permit have not been compromised and work is continuing in a safe manner.
- Any monitoring (gas testing) completed will be recorded on the appropriate permit.
- Any/all employees are required to stop work until any discrepancies are resolved to the satisfaction of all parties.
- The area authority (AA) will have final determination of the frequency of monitoring and job site visits and note the requirement in the controls section of the permit based on the hazards identified during the risk assessment.

Breaks in Activity

- Upon emergency evacuations or breaks of more than one hour, work will not re-start without re-validation of permit conditions and controls by the IA.
- The IA must pull permits from the field until it is confirmed conditions allow restart of work.

Work Methods or Scope Changes

- The responsible person charged with monitoring the ongoing work shall
 1. Identify when the site conditions have changed,
 2. Assess when the original permit no longer accurately covers the

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task, stop the job if necessary and request re-assessment.

- If this cannot be achieved, work will stop until conditions are deemed safe or a new permit has been issued defining revised control methods to make the work safe.

Stopping Unsafe Work

- The site must systematically communicate to all site personnel including contractors and visitors through the site orientation and other site training/communication that all site personnel have the authority in stopping unsafe work.
- The Permit form contains a statement to that effect.
- In the case of conflict regarding safe conditions for work between Issuing Authorities and the person(s) that initiated work stoppage, the work will be stopped until next line of Supervision and or the HSSE Department are engaged for resolution.

6.9 Worksite Condition

The worksite shall be left in a safe condition on completion or interruption of work.

- The status of permits (including a register of associated inhibits/overrides/isolations) shall be accurate, up to date and available at a designated location.
- The work site shall be inspected and confirmed as being in a safe condition on completion or interruption of work (except where the interruption is an emergency in which case it should be undertaken after the emergency has been cleared).
- Upon completion of the work, the permit shall be closed by signature from the appropriate authority.

6.10 CoW Process Auditing

The CoW process shall be subject to a program of regular auditing.

CoW Process Auditing – Audit results shall be recorded, analyzed and used to improve the management and quality of the CoW process:

- Site Management is accountable for ensuring CoW audits are carried out quarterly in their areas which include personal participation and use of technical authorities when necessary.
- Planned CoW Audits shall be scheduled and carried out by assigned competent people.
- The audits shall be carried out using a CoW audit protocol and will be

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- documented and signed off by the audit team.
- The audit findings will be retained for a minimum of 12 months.

Auditing CoW Documentation Process

- Audits shall review and assess the CoW documentation processes and procedures as well as their correct use and application on live and completed permits.
- Audits will require review of permits in progress, including interview of those involved with the work to ensure intent of the CoW process is being carried out as required.
- The site will have a standard audit form to provide consistency of auditing standards.

Audit Results

- On completion of CoW audits the audit findings shall be communicated immediately to the person audited and site management.
- Where there are significant findings and actions required, the Facility Manager will hold those that are assigned action items accountable for completion of the actions. These actions will be tracked in Traction.
- The Facility Manager will monitor timely close out of these actions.

6.11 Lessons Learned

Internal and external lessons learned that impact the CoW process shall be captured, incorporated, and shared.

Intent: To ensure that any learning's on how to improve the Control of work process and the safe means of carrying out work are made available to and used by all facilities across the BP Group.

- Significant Control of Work incidents will be investigated and a "Lessons Learned" will be created and communicated in accordance with the BP Wind Incident/Accident Notification and Tracking procedure.
- Traction will be utilized to report any CoW near miss incidents regarding safety.
- The HSSE Department will review external incidents for potential applicable CoW lessons learned and communicate to the sites.

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6.12 Obligation and Authority to Stop Unsafe Work

The CoW policy and associated procedures shall make it clear to everyone that they have the obligation and authority to stop unsafe work.

Intent: To stop the continuation of potentially unsafe work at the earliest stage possible by making every member of the workforce responsible for its prevention.

- All personnel must be made aware (e.g., orientation, JSEA, hazard recognition training, etc.) of their obligation to stop work that they consider unsafe.
- All reports from personnel that the work is unsafe must be respected, recorded, properly investigated and if warranted, communicated throughout the workforce.

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Attachment A

Control of Work Roles and Responsibilities+

CoW Role	Facility Site Role	Accountability/Responsibilities	Competency
Cow SPA	VP of Operations and Asset Mgmt.	<ul style="list-style-type: none"> • The position of VP of Operations and Asset Management has been appointed by the BUL as the CoW SPA for governance of this CoW policy and systems. • Ensure that CoW is implemented in compliance with BP and regulatory requirements via procedures and standards. • Ensure compliance audits of the operation of CoW are carried out to ensure systematic compliance across all sites. • Ensure continuous improvement via internal and external Lessons Learned. • Have ultimate responsibility and accountability for overall performance and content of the Control of Work Policy and associated practices/procedures. • Be responsible for authorizing and approving changes to the Policy and associated practices/procedures. • Access knowledgeable experts within the company as required. • Have the skills to make decisions in areas of ambiguity and conflict, while maintaining conformance to BP's Core Values. • Verify that document control processes are applied to the PTW Policy and procedures. 	<ul style="list-style-type: none"> • Understanding of all Group\SPU Requirements and informed of all regulatory requirements associated with work control • Competent in Risk Assessment and MOC process • Trained in CoW policies
Area Authority - AA	Facility Manager, Deputy Facility Manager, or designee	<ul style="list-style-type: none"> • Authorize all work activities within their designated area of responsibility. • Confirms work activities are consistent with the CoW Policy. • Obtain higher levels of approval as needed. • Ensure appropriate permits are issued, closed, and filed per local operating requirements. • Confirm work is appropriately planned and scheduled • Identify a Person in Charge (PIC) for each worksite prior to commencement of activity and approve any replacements. • Confirm competency of the Issuing Authority (IA) and 	<ul style="list-style-type: none"> • Trained in CoW process, • Field verified competent in CoW.

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		<p>workforce involved in a task consistent with the planned scope of work.</p> <ul style="list-style-type: none"> • Confirm with the IA that all appropriate control measures have been, or will be, put in place prior to commencement of activity. • Confirms with the IA (and personally on higher risk work) that the PA and work crew fully understands the scope of the task and the hazards involved. • Require that the IA and site work group perform a Risk Assessment and agree that needed risk mitigation has occurred and that the work can proceed safely. • Participates in and reviews CoW audits. • Contribute to lessons learned where appropriate to support improvement in the work process or in hazard assessment. 	
Issuing Authority IA	Lead Tech / O&M Manager	<ul style="list-style-type: none"> • Be responsible for the issuance and closure of permits in their area of competency, e.g., hot work, confined space entry, ground disturbance, lifting, and energy isolation work permits. • Coordinate with the PIC and maintain full knowledge of all work in progress in the area concerned, including any work on the site that is under someone else's authority/control, e.g., SIMOPS. • Communicate with the AA about the issuance and closure of permits. • Confirm that all site personnel involved in a work activity are competent and correctly outfitted for the work they will perform. • Confirm that workers have clear understanding of the scope of work, hazards, controls and mitigations. • Confirm that the correct tools and equipment are available and appropriate certifications and/or inspections are reviewed or made as appropriate. • Confirm that required permits are in place and that work undertaken on site is consistent with, and confined to, the original scope of work. • Routinely monitors the work area. • Stops work if conditions vary from requirements. • Ensures work site is left in a safe condition upon work completion. • Prepare lessons learned where appropriate to support continuous improvement efforts and share these with the AA and other personnel as they deem appropriate. 	<ul style="list-style-type: none"> • Trained in CoW policies • Field verified competent in CoW
Performing Authority		<ul style="list-style-type: none"> • Personally responsible for executing the task, or is 	<ul style="list-style-type: none"> • Qualified in

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PA		<p>responsible for the team executing the task at the work site.</p> <ul style="list-style-type: none"> • Confirm that non-essential personnel are kept a safe distance from the work activity. • Accept and sign authorized permits for work activity being performed. • Participate in the Risk Assessment for the planned activity. • Confirm, by including in the JSEA discussion, that all persons involved in the task fully understand the scope of the work and the hazards and controls for the job. • Confirm that all members of the work party sign the permit(s). • Stops work if work conditions/methods or scope change and contacts the IA or AA for resolution. • Verifies only work covered by the permit takes place. • Confirm that the worksite is kept in a clean and safe condition both during and upon completion of the job. • Observe work activities and if an individual feels that he/she cannot safely manage more than one concurrent task, stop the appropriate portions of assigned work and request assistance from the IA/AA. • Confirm that appropriate lessons learned from the job are captured, incorporated and shared. • Confirm all workers involved in the permitted work activity sign JSEA and permit(s) acknowledging their understanding and agreement. In the event that there is more than one work team, there will be representation from each team during the Risk Assessment. 	<p>performance of work activities associated with the job</p> <ul style="list-style-type: none"> • Trained in CoW policies
Work Crew Members		<ul style="list-style-type: none"> • Participate in the review of the work permit and JSEA. • Verify understanding and agreement via signing the work permit and JSEA. • Perform work within the bounds of the work permit. • If work is in conjunction of an isolation, review Isolation procedure and install personal lock prior to work start. • If work involved confined space entry, review of Confined Space Entry permit and log sign in prior to entering the space. • Keep work site clean and safe. • Stop work if conditions, scope, or work methods change until resolved by PA and IA. • Stop any unsafe work. 	<ul style="list-style-type: none"> • Knowledgeable of CoW requirements

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Attachment B

Definitions

Area Authority (AA) – The Facility/Site Manager, or person(s) appointed by the Facility/Site Manager for confirming that all work activities conducted are consistent with the CoW Policy and associated practices and permit requirements.

Auditing – A formal or official examination and verification. The audit process should include monitoring, review, and reporting of the outcome of the audit to those people who can implement any changes needed.

Authorized Person – The person approved or assigned by the employer to perform a specific type of duty or duties or to be at a specific location or locations at the jobsite.

Authority –

- a) Official permission.
- b) A position that has the power to make a judgment; an individual cited or appealed to as an expert.
- c) The power to influence or command.

BP Company – A company in the BP Group, or a company or other legal entity where BP has operational control, is responsible for HSSE and has the right to impose this Standard.

BP Employee – A person employed by a BP Company.

BP Operations – Refers to BP Business Units, projects, facilities sites and operations.

BP Premises – Refers to any site or location that is owned or operated by or for a BP Company.

Competency – The ability to perform a task in the correct manner with the correct understanding and reasoning behind the task.

Competent Person – A person who has demonstrated that they have the knowledge, training and experience required to perform the defined role to the standard required.

Confined Space – A confined space is one that is large enough for personnel to enter, has limited or restricted means of entry, and is not designed for normal or continuous occupancy. It can be any enclosed or partially enclosed space where there is a risk of death or serious injury from hazardous substances or dangerous conditions (e.g. lack of oxygen).

Contractor Employees – Members of the workforce employed by and working on behalf of a Contractor.

Contractors – Members of the work force who are not directly employed by BP.

Control –

- a) A mechanism used to regulate a physical process or activity.
- b) An action to mitigate risk.
- c) The power to direct (usually through authority).

Control of Work (CoW) – Is a formal approach to manage work risk with a procedural form of control. CoW uses processes and systems to regulate work activities (i.e., the power to direct).

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CoW Daily Meeting – Is an informal daily meeting (POD) that reviews and validates work activities for that day. Area Authorities are expected to attend these daily meetings. Permitted activities should be reported to the appropriate personnel and listed on the CoW Register.

CoW Register – A work activity log (or system, permit map, etc.) that is used to document and verify that personnel involved with the CoW process have the required training and have reached the level of competence required to ensure correct application of the process.

Document Control Management System (DCMS) – An established means of controlling the issue, use and updating of documents used in the management of a site. A full DCMS will include reference numbers on documents, means of tracking changes and updates and regular audits of the system to confirm compliance.

Emergency Response – Guidelines for initial responses to an incident that are based on the type of activity or product involved in an incident.

Energy Systems – Systems which by their nature contain energy, e.g., hydraulic, mechanical, electrical, chemical, thermal, potential and pneumatic.

Ground Disturbance – Refers to work that involves a man-made cut, cavity, trench or depression formed by earth removal, or driving piles into the earth surface.

Hazards – Equipment, materials, activities, or conditions that have a significant potential to cause injury.

Hot Work – Work which involves either the use or the possible creation of a flame, spark or high energy discharge that could act as the ignition source for a fire or explosion.

Interruption – The actual definition of work interruption may be different at each site, but could include coffee, smoke breaks and lunch breaks, fire alarms, suspension of work overnight, emergency situations and shift changes.

Issuing Authority (IA) – A Competent Person appointed by the AA and/or BOP Contractor/Turbine Vendor or applicable sub-contractor for issuing permits consistent with all associated practices and permit requirements.

JSEA –

Management of Change – An established means of managing and controlling changes within an organization.

Mitigation – An action or event which prevents or minimizes the effects of an incident or condition.

Monitoring – The routine function of regular inspection carried out by a responsible and competent person.

Non-Essential Personnel – Are those who do not have an active role in accomplishing the task or activity at hand. (Examples included; employees who are not Essential Personnel, land owners, third parties, visitors and delivery drivers).

Performing Authority (PA) – The person or persons responsible for activities carried out on the work site under the CoW Practice and is accountable to the IA/AA for safe delivery of all work activities. The PA may be performing a task or may be supervision a group performing a task.

Permit – A formal and detailed document containing location, time, equipment to be worked on, Hazard identification, mitigation/precaution measure used, naming those authorizing the work and those performing the work.

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Person in Charge (PIC) – The person appointed by the AA or IA to be responsible for coordinating among multiple PA's and IA's working at one site to confirm safe delivery of all work activities.

Planning and Scheduling – A systematic process of identifying and listing work and determining when such work will be carried out.

Plan: The function of task (work) identification, interaction and sequencing including, preparation and completion requirements, to achieve an outcome.

POD – Plan of the Day

Policy – Plan of action pursued by the Company (BP) with which all personnel must comply.

Practice – A technical document on a high risk activity that states minimum expectations and operating requirements for a specified activity or task. A Practice provides practical guidance on ways to control and achieve a reduction or elimination of a health and/or safety risk.

Procedure – A detailed document either in paper or electronic form which sets out sequential or parallel actions which shall be followed by those engaged in carrying out an activity.

Responsible Person – Refers to a suitably trained and experienced individual who has been formally assessed as competent and has been given specific actions or areas of responsibility by an accountable person.

Requirements – The activities, tasks or deliverables that must be completed to comply with the Mandatory Requirements

Risk – Possibility of loss, injury, damage, or exposure to hazard or danger.

Risk Assessment – The process of hazard identification and the assessment of the potential for identified hazards to be realized in any given activity.

Routine Job/Work Activity – An activity that does not vary greatly in its execution such as a set of customary and often mechanically performed procedures and activities.

Simultaneous Operations (SIMOPS) – Separate activities or works, taking place at the same time with the potential to impact on each other.

Single Point Accountable: The person in the organization (site/Business Unit) who has been appointed as being accountable for the delivery and performance of an activity.

Virtual Training Assistant (VTA) – A computer based training management tool that lists, tracks and delivers training to individuals.

Workforce – BP employees and every employee of any other company or other legal entity that has been engaged to perform work on BP Premises.

Worksite – The location of the activity, work or tasks.

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