



GSFC Waiver Request

Refer to GPR 1400.1, Waiver Process
See form completion instructions on page 2.

1a) Initiator Name: Melonie Scofield	1b) Signature: <i>Melonie Scofield</i>	1c) Code: 500	1d) Telephone: 301-286-1035	2) Date of Request: 3/29/2013
3a) Requirement Document Title: Fall Protection Requirements for GSFC	3b) Requirement Document # and Revision: GPR 8715.8 - basic		3c) Section/Paragraph/Page Reference: Section 6.	
3d) Requirement to be waived: <i>Personal arrest MGS 3/27/13</i> Request the requirement to use fall protection (harnesses and lanyards) in scissor lifts that have attach points be waived. See attached GPR 8715.8, Section 6.0 for GPR wording.				
4a) Site/Facility: GSFC	4b) Operation/Activity/Organization: All <u>(INDOOR LIFTS ONLY)</u> JMS 4/2/13		4c) Duration: Permanent	
Waiver Request Justification				
5a) Purpose/Rationale: <i>The intent of the GSFC GPR requirement MGS 3/29/13</i> To be consistent with OSHA and scissor manufacture requirements, the GSFC requirement to use fall protection in scissor lifts with attach points should be waived <i>when handrails are in place MGS 3/29/13</i>				
5b) Will Requirement Application Conflict With Another Requirement? No. Removing this requirement will make it consistent with OSHA and the equipment manufacturer. <i>and intent of GPR 8715.8 MGS 3/29/15</i>				
5c) Does Application of the Requirement Fail to Achieve, or is Not Necessary to Achieve, the Underlying Purpose of the Requirement? Waiving this requirement does not affect achievement or underlying purpose of the GSFC Safety Program requirement.				
5d) Other Pertinent Data or Information Related to the Request: See attached OSHA Letter and copies of statements from manufacturer's manuals.				
5e) Additional Risk Acceptance Identification and Justification Incurred if the Waiver is Granted: There is no additional risk by granting this waiver.				
Additional Justification for Environment, Safety, Health or Security Requirement Waiver Request				
6a) Special Circumstances Warranting a Granting of the Waiver (<i>see form instructions</i>): Waiving this requirement brings consistency with OSHA and the equipment manufacturer. <i>and intent of GPR 3/29/15</i>				
6b) Alternative or Mitigating Actions (<i>see form instructions</i>): No additional actions are needed. <i>Operator briefs all passengers of warnings about climbing outside handrails MGS 3/29/15</i>				
GSFC Routing				
7a) Project Manager (sign/date): <input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove <i>W.D. Pierson 3-29-13</i>		7b) Director of (sign/date): <input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove <i>Deon J. R...</i>		
7c) GSFC OIC (sign/date): <input checked="" type="checkbox"/> Approve <input type="checkbox"/> Disapprove <i>Touff...</i> 4/2/13		8) Waiver Request Number:		
9) Approval/Disapproval Comment:				
Routing for waiver of Agency requirement only				
10) OIC of NASA HQ (sign/date): Approve <input type="checkbox"/> Disapprove <input type="checkbox"/>		Directorate:		
10a) Approval/Disapproval Comment:				

Use of Personal Fall Arresting Protection

GPR 8715.8, Para. 6

Requests partial relief from GPR requirement for personal fall arrest equipment with scissor lifts

The present GPR wording does not fully reflect the intent of the requirement with respect to preventing or arresting falls from scissor lifts, and this waiver clarifies the requirement. As written, regardless of whether there are OSHA-approved handrails, the GPR would require use of a full body harness and lanyard for scissor lifts where the manufacturer has provided a certified attach point. This waiver clarifies the requirement to essentially allow either use of a full body harness and lanyard or use of OSHA-approved handrails. Personnel training requirements for scissor lifts remain in place and the waiver has been annotated to also require that operators brief any passengers concerning fall protection.

As waived, the GPR will still be in full compliance with OSHA requirements but will have redundant fall protection requirements (i.e., harnesses) eliminated when appropriate hand rails are in place. The GPR will also no longer have an obvious inconsistency with respect to our practices on scissor lifts which do or do not have certified attach points. The justification for this waiver centers on potential difficulties and risks associated with use of personal fall arresting gear in an environment where flight hardware is being integrated and tested. The use of full body harnesses and lanyards is, in some cases, difficult when cleanroom gear must also be worn and, again in some cases, may present a risk to the flight hardware which is being worked on. That said, where practical, use of full body harnesses/lanyards for fall arresting is desirable and should be encouraged even when handrails are present.

The Code 300 subject matter expert (Pat Hancock) concurs with this interpretation/clarification of the GPR for application inside facilities where there is flat, solid flooring. I agree that the waiver is appropriate under those circumstances only (i.e., it would not be applicable to lifts made outdoors).



Joe Wonsever

4/2/13