




SOUTHERN COMPANY SERVICES (SCS)

SCS-SH-0100

CONFINED SPACES AND ENCLOSED SPACES

<i>Revision</i>	<i>Approval Date</i>	<i>Approved By</i>	<i>Title</i>
0	02/03/2025		Executive Vice President- Operations

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1.0 PURPOSE AND SCOPE

1.1 Purpose

This procedure describes the requirements for workers to safely enter and work in confined spaces and enclosed spaces and identify potential hazards in those spaces. This procedure also establishes methods for implementing proper controls, training, and periodic reviews of confined spaces and enclosed spaces.

1.2 Scope

This procedure applies to all work in confined spaces and enclosed spaces that is either performed, managed, or coordinated by Southern Company Services (SCS).

NOTE

In this procedure, the acronym “SCS” refers to Southern Company Services and includes Operations, Southern Power, the Technology Organization (TO), and Research and Development.

NOTE

In this procedure, the word “worker” is used to refer to both Southern Company FTE employees and contingent workers.

2.0 TRAINING

Workers at a site that contains a confined space or an enclosed space shall have participated in Confined Spaces and Enclosed Spaces Training prior to working in or near a confined space or an enclosed space. After initial training, workers shall participate in refresher training annually thereafter. For course titles and numbers in LearningSource, see Frequently Asked Questions (FAQ), SCS-SH-0100, Confined Spaces and Enclosed Spaces.

2.1 Awareness Training

All SCS employees and contractors working as Southern Company contingent workers working near a confined space or an enclosed space shall be trained for general awareness of the hazards associated with confined spaces and enclosed spaces.

2.2 Confined Space and Enclosed Space Entry Training

Prior to entering a confined space or an enclosed space, a worker who enters a confined space or enclosed space or will coordinate or manage work in a confined space or an enclosed space shall be initially trained in the hazards associated with confined spaces and enclosed spaces. The training will include a knowledge check to determine the worker’s proficiency in the duties required in this procedure.

2.3 Contractor Training

Each contractor shall maintain a confined space and enclosed space training matrix that lists employees' names, training types, dates of training, instructors, and other pertinent information. The matrix shall be available for review by the facility management or designee upon request.

3.0 RESPONSIBILITIES

3.1 Management

In this procedure, local management has the responsibility to:

- Assign appropriate persons and resources to ensure compliance with procedure requirements.
- Develop and incorporate site-specific instructions (see 4.1.4, Develop and Maintain Site-Specific Instructions) for confined space or enclosed space work, as necessary, that supplements but does not replace this procedure.
- Evaluate and select rescue and emergency services; provide access for annual simulated rescue practice.
- Ensure an annual review of site-specific instructions (see 4.1.4, Develop and Maintain Site-Specific Instructions) and periodic reviews (see 4.1.7, Procedure Assessments) of confined space records are complete.
- Ensure workers have received confined space awareness training for workers who work near confined spaces or enclosed spaces but whose work assignment does not require them to enter confined spaces or enclosed spaces.
- Ensure workers have received confined space or enclosed space entry training to SCS employees and contractors working as Southern Company contingent workers who perform, manage, or coordinate work in a confined space or enclosed space to ensure the purpose and function of this procedure are understood and the knowledge and skills required for its safe application have been acquired.
- Maintain a list of confined spaces and make it available to workers and contractors.
- Document newly identified confined spaces or enclosed spaces.
- Develop and approve standards for each confined space using the information documented on the associated confined space hazard evaluation form. See Confined Space Hazard Evaluation Form.
- Update the confined space hazard evaluation form and associated standard when notified of changes in a confined space.
- Verify a contractor(s) has a compliant confined space or enclosed space entry program that meets or exceeds the requirements in SCS-SH-0100, Confined Spaces and Enclosed Spaces. See 4.1.6, Determine the Confined Space Procedure to Follow.
- For each confined space or enclosed space to be entered, ensure the contractor role(s) is identified and communicated to the contractor. See 4.1.5, Determine Roles.

3.2 Host Employer

The host employer may be SCS or an outside entity; however, there can be only one host employer.

When SCS is the host employer, in this procedure SCS has the responsibility to:

- Post danger signs or other equally effective means to inform workers of a confined space, PRCS, or enclosed space.
- In a method other than posting, provide the following information to the controlling entity and/or entry employer prior to entry activity:
 - The location of each known confined space, PRCS, or enclosed space at the facility.
 - The hazards or potential hazards in each confined space, PRCS, or enclosed space at the facility.
 - Any precautions implemented for the protection of workers prior to entering the confined space, PRCS, or enclosed space.
- Ensure all controlling entities have a compliant written confined space and enclosed space entry program that meets or exceeds the requirements of SCS-SH-0100, Confined Spaces and Enclosed Spaces.

NOTE

Unless general management of the property has been turned over to a contractor, the SCS subsidiary controlling the facility will serve as the host employer.

3.3 Controlling Entity

The controlling entity may be SCS or an outside entity; there can be multiple controlling entities at a facility. A controlling entity that assumes the responsibilities below is a controlling contractor as defined in 29 CFR 1926.1202, Confined spaces in construction, Definitions.

When SCS is the controlling entity, in this procedure SCS has the responsibility to:

- Serve as the primary point of contact for information gathering and communications concerning confined space, PRCS, or enclosed space entry.
- Review the confined space, PRCS, or enclosed space evaluations of each entry employer to ensure all entry employers agree on a classification.
- Coordinate with entry employer(s) to ensure the activities of one employer do not create a hazard for other employers performing work:
 - In the same space.
 - Elsewhere on the worksite that could affect work in the confined space, PRCS, or enclosed space entered.

- If the confined space, PRCS, or enclosed space is expected to be simultaneously occupied by more than one entry employer, each entry employer must agree on the classification of the space. If all entry employers cannot agree on the classification, the controlling entity will coordinate entry and allow entry for only one classification at a time.
- Debrief the entry employer(s) at the conclusion of the entry activity regarding the confined space program used and any serious hazards confronted or created in the space.

3.4 Entry Employer

In this procedure, the entry employer has the responsibility to:

- Inform the controlling entity which compliant confined space or enclosed space entry program they will use to enter the space.
- Obtain all the controlling entity's information regarding confined space or enclosed space hazards and entry activity.
- Inform the controlling entity of any potential hazards likely to be confronted or created in the confined space or enclosed space.
- Inform the controlling entity/entry supervisor of any scope change that may impact the classification of a confined space or an enclosed space.

3.5 Authorized Entrant(s) (PRCS)

In this procedure, the authorized entrant(s) has the responsibility to:

- Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure.
- Properly use equipment as required:
 - Testing and monitoring equipment.
 - Ventilating equipment.
 - Communications equipment.
 - Personal protective equipment (PPE).
 - Lighting equipment.
 - Hazardous energy control procedures such as lockout/tagout (LOTO).
 - Barriers and shields.
 - Equipment, such as ladders, needed for safe ingress and egress.
 - Equipment needed to summon rescue and emergency services.
 - Any other equipment necessary for safe entry into and rescue from a PRCS.
- Communicate with the attendant to enable the attendant to monitor entrant status and alert entrants of the need to evacuate the space.
- Alert the attendant when:
 - Any warning sign or symptom of exposure to a dangerous situation is recognized.
 - A prohibited condition is detected.

- Exit a PRCS as quickly as possible when:
 - An order to evacuate is given by the attendant or the entry supervisor.
 - Any warning sign or symptom of exposure to a dangerous situation is recognized.
 - A prohibited condition is detected.
 - An evacuation alarm is activated.

3.6 Attendant (PRCS)

In this procedure, the attendant has the responsibility to:

- Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure.
- Be aware of possible behavioral effects of hazard exposure in authorized entrants.
- Continuously maintain an accurate count of authorized entrants in the PRCS; ensure the means used to identify authorized entrants accurately identifies who is in the PRCS. If more space is needed on the permit to log attendants or entrants, use the Confined Space Attendant/Entrant Roster Addendum.
- Remain outside the PRCS during entry activity until relieved by another attendant.
- Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the PRCS.
- Monitor activities inside and outside the PRCS to determine if it is safe for entrants to remain inside the space. Order the authorized entrants to evacuate immediately under any of the following conditions:
 - A prohibited condition is detected.
 - Behavioral effects of hazard exposure are detected in an authorized entrant.
 - A situation outside the PRCS that could endanger the authorized entrants is detected.
 - The required duties of the attendant cannot be effectively and safely performed.
- Summon rescue and emergency services immediately if it is determined authorized entrants need assistance to evacuate the PRCS.
- Take the following actions when unauthorized persons approach or enter a PRCS while entry is underway:
 - Warn that they must stay away from the PRCS.
 - If they have entered the PRCS, advise that they must exit immediately.
 - If unauthorized persons enter the PRCS, inform the authorized entrants and the entry supervisor.
- Perform non-entry emergency retrieval as specified by the rescue plan. See 4.2.5, Non-Entry Emergency Retrieval.
- Perform no duties that might interfere with the attendant's primary duty to monitor and protect authorized entrants.

NOTE

An attendant may monitor multiple PRCS entries in close proximity and the spaces are in full view of the attendant. If an emergency occurs in any space monitored by the attendant, all spaces shall be evacuated until the emergency condition is resolved.

3.7 Entry Supervisor

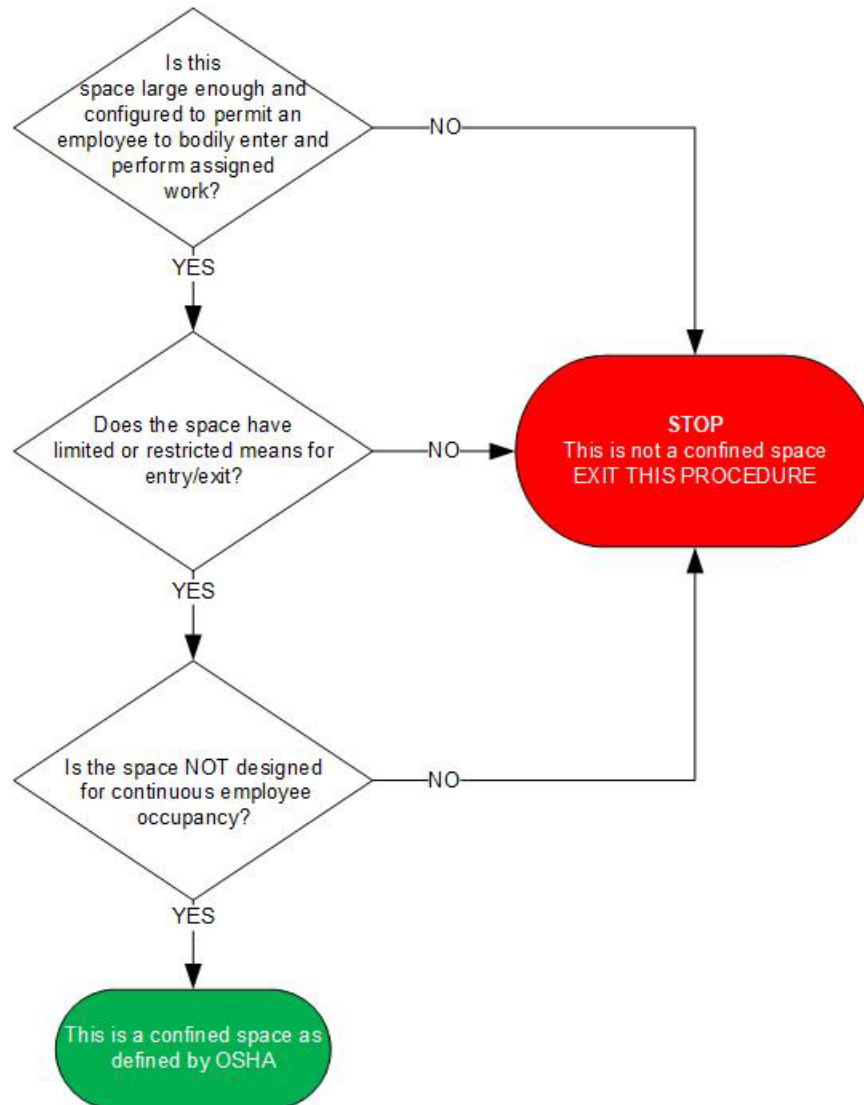
The entry supervisor will have the training and experience to meet the requirements of a competent person, and has the responsibility to:

- Evaluate the space to identify existing and predictable hazards in the space, surroundings, or working conditions that may be unsanitary, hazardous, or dangerous to workers.
- Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure.
- Authorize prompt corrective measures to eliminate hazards.
- Understand when conditions have been met that allow reclassifying a PRCS as a non-permit-required confined space and reclassify appropriately. See 4.2.6, Reclassified/Non-Permit-Required Confined Space.
- Reevaluate a confined space as necessary if changes in the use or configuration of the space might increase the hazards to entrants, or if there is an indication that the initial evaluation of the space may not have been adequate.
- Initiate, review, and sign the Confined Space Entry Permit/Reclassification Form and allow entry after verifying information has been properly recorded. See 4.2, Confined Space Entry (PRCS and Non-PRCS).
- Reevaluate the permitted confined space every 24 hours to ensure there have been no changes to the atmosphere and no serious safety hazards have been introduced in the confined space. See 4.2.4.2, Reevaluating a Permit-Required Confined Space.
- Terminate the entry and complete the Entry Permit/Reclassification Form as required. See 4.2.4.3, PRCS Entry Complete.
- For PRCS entry, verify rescue and emergency services are available, and the means for summoning them are operable. See 4.2.4.1, PRCS Entry.
- Order the evacuation of the PRCS if the rescue and emergency service becomes unavailable.
- At intervals dictated by the hazards and work performed within the space, ensure entry activity remains consistent with terms of the Entry Permit/Reclassification Form and acceptable entry conditions are maintained.
- Ensure the cancelled Confined Space Entry Permit/Reclassification Form(s) are sent to the location where cancelled confined space documents are maintained.
- Ensure required early warning systems are operable, when applicable.

4.0 PROCEDURE

4.1 Management of Confined Spaces

4.1.1 Identify Confined Spaces



IF the space is large enough and so configured a worker can bodily enter (A), **AND** the space has limited or restricted means (B) of entry or exit, **AND** the space is not designed for continuous occupancy (C), **THEN**

COMPLY with the content of this procedure.

A. *Bodily* enter means:

- The entrant can fit his or her entire body through the opening and into the space.
- Entry occurs when **ANY** part of the body crosses the plane of the opening into the space.

B. Has *limited or restricted means of entry*. Examples include:

- You must contort your body or use your hands for entry and exit.
- Contains an obstruction between the entrance and the work area that impedes egress or rescue from the space.
- A single ladder (fixed or portable), a spiral staircase, or temporary moveable stairs are the sole means for entry or exit.

C. Is not designed for continuous worker occupancy. Examples include:

- The space is not designed such that a person can enter and perform work under normal operating conditions. Examples of locations include vessels, tanks, or boilers.
- Ventilation and lighting are typically not permanently installed.
- No walking or working surfaces.
- No guarding of hazards such as with electrical components and mechanical machine guarding.
- No permanently installed means of access to the area.

IF the area does not meet all defining criteria of a confined space as stated above, the area is not a confined space.

4.1.2 Survey and Evaluate Confined Spaces

Local management shall ensure the following:

- **SURVEY** the entire site or facility for spaces that meet the criteria for a confined space in accordance with 4.2.3, Evaluate Space.
- **LIST** the confined spaces on an inventory list.
- **PLACE** proper signage to inform workers of the existence of the confined space.
- **EVALUATE** all confined spaces before workers enter.

4.1.3 Deploy Signs and Barricades

ENSURE danger signs are posted at all confined space points of entry.

LOCATE signs as close as safely possible to the entry point, in a position that makes it apparent to anyone attempting to enter the space.

The preferred verbiage for signs is “DANGER - Follow Confined Space Entry Procedure Before Entering.”



BARRICADE any entrance to a confined space that is open but not intended to be used as a point of entry.

4.1.4 Develop and Maintain Site-Specific Instructions

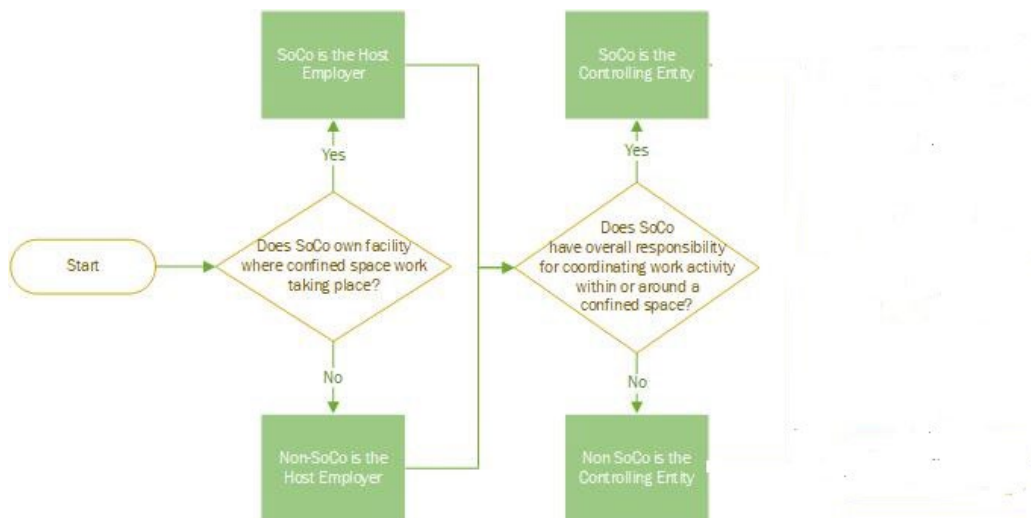
Facility management shall ensure the development of site-specific instructions that supplement but do not replace this procedure. Site-specific instructions shall be updated as needed to be kept current. Each facility shall document the following:

- **MAINTAIN** a list of all known confined spaces at the facility.
- **IDENTIFY** who is responsible for attaching and removing entry point securement device(s).
- **IDENTIFY** who can be an entry supervisor, attendant, and authorized entrant.
- **IDENTIFY** who can conduct atmospheric testing and monitoring.
- **IDENTIFY** the location where cancelled confined space documents will be maintained.
- **STATE** whether the facility will allow an SCS worker to enter a confined space under a contractor's compliant confined space program and how training will be tracked.
- **INCLUDE** other information concerning confined spaces at the facility as deemed necessary and appropriate.

The facility may use the Confined Space Site-Specific Instructions Form.

4.1.5 Determine Roles

Each facility or business unit shall identify who fills the roles of the host employer, controlling entity, and entry employer(s) for each specific entry.



Determine roles using the following process:

1. Does SCS own or manage the facility where the confined space work activity is taking place?

If yes, SCS is the host employer.

If no, a company other than SCS will be designated the host employer.

2. Does SCS have overall responsibility for coordinating work activity within or near a confined space that could affect the safety of the entrants?

If yes, SCS is the controlling entity.

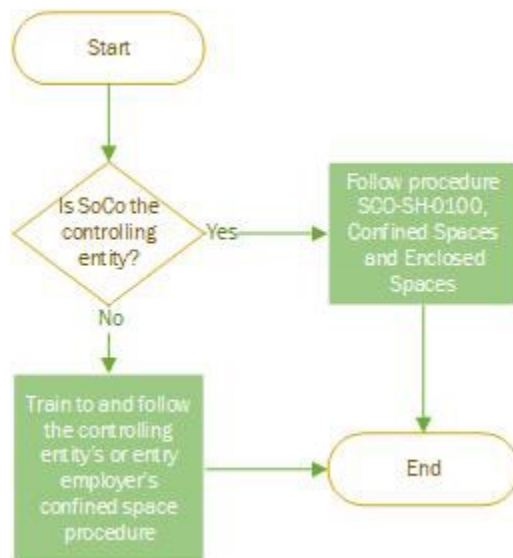
If no, a company other than SCS will be designated the controlling entity.

4.1.6 Determine the Confined Space Procedure to Follow

When SCS is the controlling entity, **FOLLOW** this procedure (SCS-SH-0100, Confined Spaces and Enclosed Spaces) to classify and work in the confined space.

When SCS is not the controlling entity, **TRAIN** to and **FOLLOW** the controlling entity or entry employer's confined space and enclosed space program.

If a contractor does not have a compliant confined space and enclosed space program, the contractor's personnel may enter a confined space or an enclosed space under SCS Safety and Health procedure SCS-SH-0100, Confined Spaces and Enclosed Spaces, after the contractor provides training on SCS-SH-0100 to his or her personnel.



NOTE

SCS workers may enter a confined space under a contractor's confined space program and/or permit provided they have received training on the contractor's program, locked on to the appropriate LOTO lockbox, verified proper calibration for the air monitor used to test the atmosphere, reviewed the completed confined space permit or entry evaluation, and have signed all required documentation.

All entering entities shall follow the controlling entity's confined space program.

4.1.7 Assess Procedure Effectiveness

CONDUCT an inspection of confined space records at least annually or more frequently if desired. **DOCUMENT** inspections using the Confined Space Periodic Inspection Record. The **INSPECTION** of confined space records includes all PRCS entries and one record from each system, at a minimum:

- **GROUP** each system by equipment (for example, system B, boiler).
- **INCLUDE** the cancelled Confined Space Entry Permit/Reclassification Form (entry complete) and the corresponding confined space standard.
- **RETAIN** a copy of the Confined Space Periodic Inspection Record. See 5.1, Records Retention.
- **IDENTIFY** inadequacies and **DEVELOP** corrective actions to address them.

If significant inadequacies are discovered:

- **REVIEW** an additional record within the same system, at a minimum. If no other record within the same system is available, review a record from another system.

- **ADDRESS** responsibilities when the periodic inspection reveals any inadequacies in worker knowledge.
- **RETRAIN** workers that have significant inadequacies. See 2.0, Training.

4.2 Confined Space Entry (PRCS and Non-PRCS)

The entry supervisor is the individual responsible for evaluating and classifying a confined space.

4.2.1 Issue Confined Space Permits

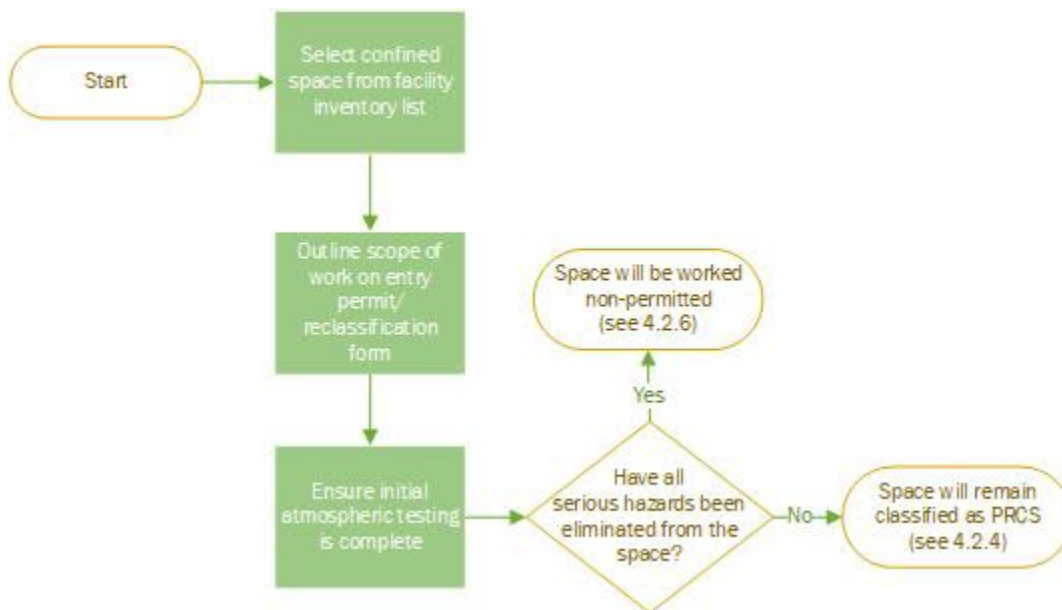
If implemented at the facility, confined space entry permits shall be created and issued via the approved software. In the event of an unscheduled software outage, see 4.2.2, Issue Confined Space Permits (Manual Process).

4.2.2 Issue Confined Space Permits (Manual Process)

In the event of an unscheduled software outage or if the approved software has not been implemented at the site, manually **CREATE** and **ISSUE** the Confined Space Entry Permit/Reclassification Form. Record the entry on the Confined Space Entry Index.

4.2.3 Evaluate Space

EVALUATE the confined space to identify the known and potential hazards of the space to be entered and to determine the classification of the evaluated space. The Confined Space Hazard Evaluation Form can be used in the evaluation process.



FOLLOW the steps below to confirm the space as a PRCS or reclassify the space as non-permit-required:

1. **SELECT** the identified confined space to be entered from the facility inventory list. This list is in the site-specific instructions and, where the approved software has been implemented, in the software database.
2. **OUTLINE** the scope of work on the Confined Space Entry Permit/Reclassification Form.
3. **ENSURE** initial atmospheric testing is performed. See 4.2.3.1, Atmospheric Testing.
4. Have all serious hazards been eliminated in the space? At a minimum, include LOTO, engineering controls, and/or ventilation. Other means of hazard elimination may be required.

*If **yes**, the space will be worked as a non-permit-required confined space. Proceed to 4.2.6, Reclassified/Non-Permit-Required Confined Space.*

*If **no**, the space will remain classified as a permit-required confined space. Proceed to 4.2.4, Permit-Required Confined Space (PRCS).*

4.2.3.1 Atmospheric Testing

Atmospheric testing, the process of testing and monitoring the atmospheric hazards in a confined space, includes initial, continuous, and periodic testing. Prior to atmospheric testing, all monitors shall be current on their full calibration check and/or bump-tested according to the equipment manufacturer's recommendation.

NOTE

Workers performing atmospheric testing should be aware of interferences specific to the make or model of the air monitoring equipment. See additional information on the Frequently Asked Questions (FAQ) under 4.2.3.1, Atmospheric Testing.

1. **TRAIN** appropriate personnel to perform atmospheric testing using the gas monitoring instruments provided by the facility. Personnel trained in atmospheric testing and monitoring shall be listed in the facility's site-specific instructions; see 4.1.4, Develop and Maintain Site-Specific Instructions.
2. **OPEN** the confined space and **VENTILATE/PURGE**, as necessary. **STOP** any portable forced ventilation of the confined space prior to performing initial atmospheric testing.
3. Prior to entry into a confined space and without the testing personnel entering the space, **TEST** the atmosphere through any opening in the space (such as a boiler door and observation doors). The test equipment shall consist of direct reading gas

monitoring instruments. Depending on the activities or conditions in a confined space, additional atmospheric testing may be required.

Any worker authorized to enter a space, or a worker's authorized representative, shall be provided the opportunity to observe any atmospheric testing done for the space in which they are entering.

4. **CONDUCT** atmospheric tests in the following order. Any substance with a reading outside its acceptable condition limits contributes to a hazardous atmosphere:

Substance	Acceptable Condition Limits
Oxygen (O ₂) concentration	Between 19.5 percent and 23.5 percent. Entry into the space is not permitted if the O ₂ level is less than 19.5 percent or greater than 23.5 percent.
Flammable gas, vapor, or mist	< 10 percent of LFL
Potential toxic air contaminants Examples include:	Appropriate levels for each contaminant being tested
Carbon monoxide	< 35 ppm
Hydrogen sulfide	< 10 ppm
Sulfur dioxide	< 2 ppm
Ammonia	< 50 ppm
Airborne combustible dust	≤ LFL (concentration may be approximated when dust obscures vision at a distance of 5 ft or less)
Any substance that makes atmosphere condition immediately dangerous to life or health (IDLH)	None
Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in 29 CFR 1926 subpart D, subpart Z, or in 29 CFR 1910 subpart Z	Exceeds dose or permissible exposure limit (PEL)

5. After atmospheric testing is complete, **DOCUMENT** the test readings and other required information on the Confined Space Entry Permit/Reclassification Form. If the mobile version of the approved software is available, the data may be entered directly into the database.
6. If additional monitoring is required, use the Confined Space Atmospheric Monitoring Data Addendum and attach it to the appropriate Confined Space Entry Permit/Reclassification Form.

4.2.4 Permit-Required Confined Space (PRCS)

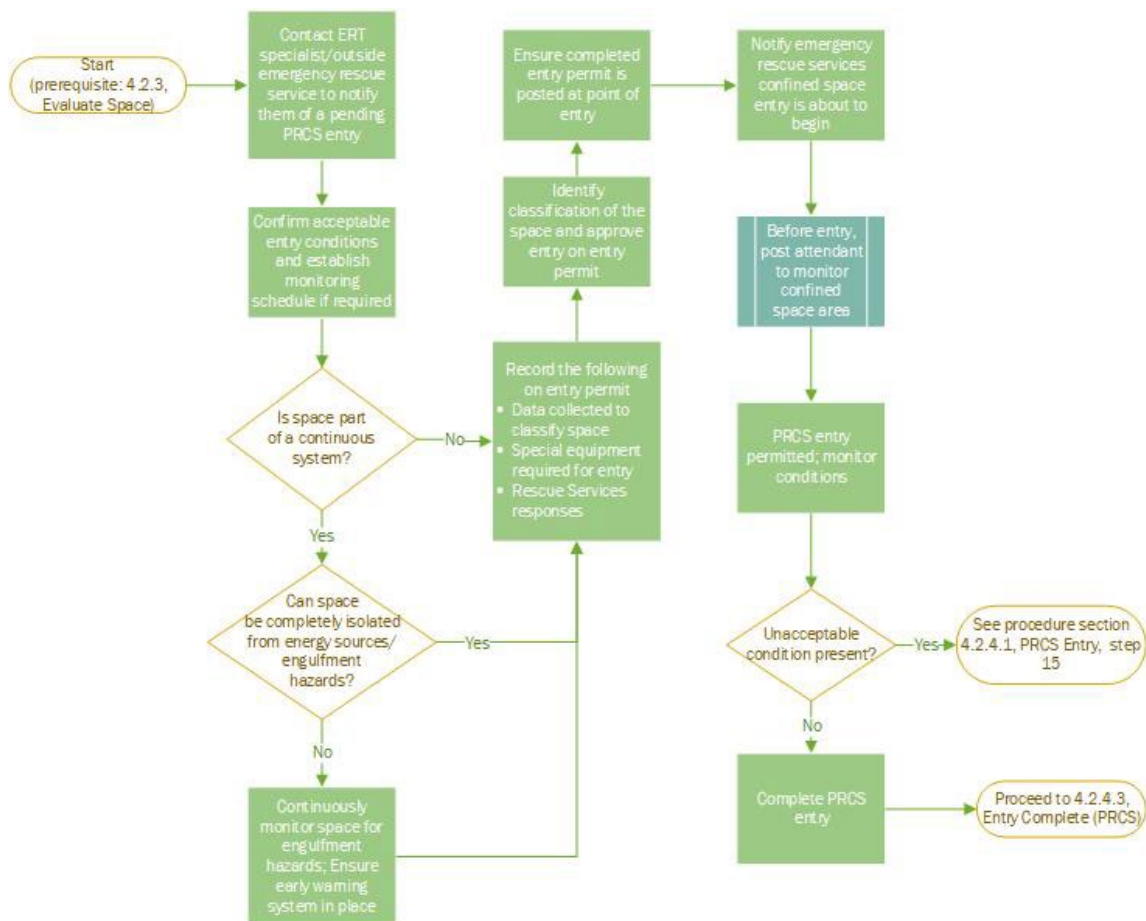
CONSIDER each confined space a PRCS, unless an entry supervisor evaluates the space (see 4.2.3, Evaluate Space) and reclassifies it (see 4.2.6, Reclassified/Non-Permit-Required Confined Space). A confined space where all known or potential serious hazards have not been eliminated shall remain classified as a PRCS.

NOTE

Spaces that do not meet the requirements of a PRCS may be worked as a PRCS with local management approval, depending on available resources.

4.2.4.1 PRCS Entry

A current issued permit for confined space entry may be left open until the work is completed.



The entry supervisor shall **FOLLOW** the steps below to authorize entrants to enter and work in a PRCS:

1. **CONTACT** the emergency response team (ERT) specialist, rescue team member in charge (RTMIC), or outside rescue and emergency service to **INFORM** them of the pending entry into a PRCS and provide the details of the work scope.
 - The ERT specialist, RTMIC, or outside rescue and emergency service will **ASSEMBLE** a team of qualified rescue members and **DEVELOP** a rescue plan for the space to be entered.
 - After the plan and rescue team and any necessary equipment are assembled, the ERT specialist, RTMIC, or outside rescue and emergency service will **NOTIFY** the entry supervisor.

NOTE

If the rescue and emergency service should become unavailable, they agree to notify the entry supervisor immediately.

2. **CONFIRM** acceptable entry conditions and **ESTABLISH** a monitoring schedule, if required.
3. Is the space part of a continuous system, such as a sewer, sump, or tunnel?
 - If yes, proceed to step 4.*
 - If no, proceed to step 5.*
4. Can the space be completely isolated from all energy sources and engulfment hazards?
 - If yes, proceed to step 6.*
 - If no, proceed to step 5.*
5. Continuously **MONITOR** the space for engulfment hazards where authorized entrants are working. **ENSURE** an early warning system is in place to alert the authorized entrants in sufficient time for them to safely exit the space.
6. **RECORD** the following information on the Confined Space Entry Permit/Reclassification Form, or the approved software if implemented at the site:
 - Any information, such as air monitoring data, that has been collected to classify the space.
 - Any special equipment required for entry.
 - Responses to the questions in the Rescue Services section of the permit.
7. **IDENTIFY** the classification of the space and **APPROVE** entry on the Confined Space Entry Permit/Reclassification Form.

8. **ENSURE** the completed and signed Confined Space Entry Permit/Reclassification Form is **POSTED** at the point of entry.
9. **NOTIFY** emergency rescue services that confined space entry is about to begin.
10. **POST** an attendant prior to allowing entry into the space. **ENSURE** the attendant is aware of and able to perform his or her duties. See 3.6, Attendant (PRCS).
11. **ENSURE** each opened portal used for personnel access is **SECURED**. If the hazard of the door closing is present, secure the entry point with an entry point securement device. The securement device is intended to prevent the portal from latching closed.
12. After all the above steps have been completed, authorized entrants can enter the PRCS and begin work.
13. Where possible, entrants will use non-entry emergency retrieval systems or methods when entering a PRCS. See 4.2.5, Non-Entry Emergency Retrieval.
14. If an unacceptable condition occurs:
 - Each authorized entrant shall **LEAVE** the space immediately.
 - The permit will be **CANCELLED** until the entry supervisor **REEVALUATES** the space to determine how the unacceptable condition developed.
 - The entry supervisor shall **TAKE ACTION** to protect workers from the unacceptable condition before starting a new permit and any subsequent entry takes place.
15. When it is necessary to **TRANSFER** responsibility for a PRCS, the new entry supervisor **SIGNIFIES** the acceptance of these responsibilities by placing his or her signature, time, and date on the Confined Space Entry Permit/Reclassification Form.
16. If the work continues more than 24 hours, **REEVALUATE** the permitted confined space every 24 hours. See 4.2.4.2, Reevaluating a Permitted Confined Space.
17. When the designated work is **COMPLETE**, proceed to 4.2.4.3, PRCS Entry Complete.

4.2.4.2 *Reevaluating a Permitted Confined Space*

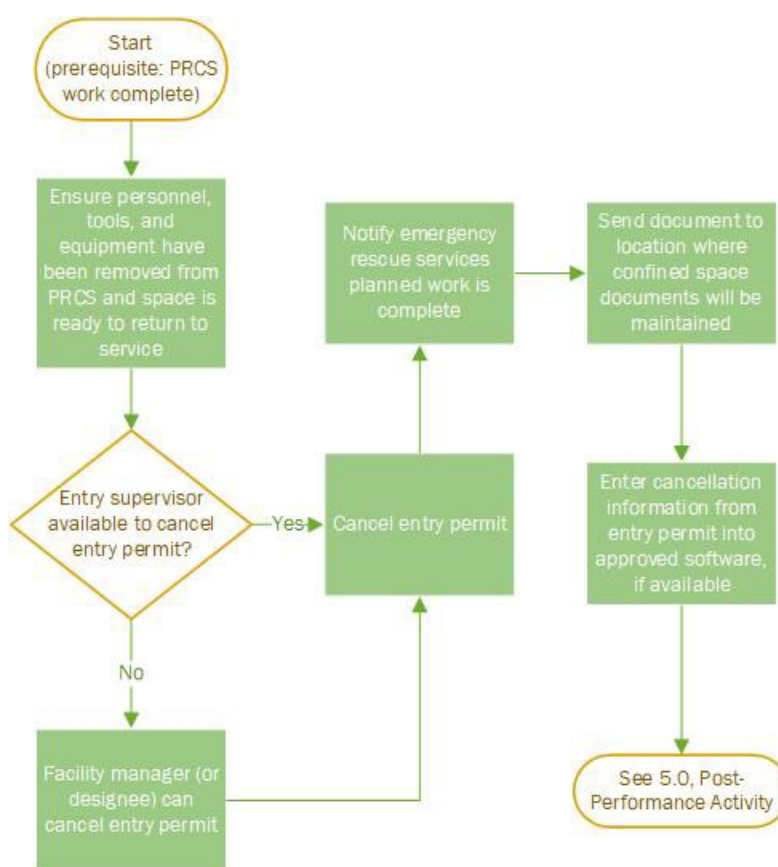
A current issued permit for confined space entry may be left open until the work is completed. The confined space must be reevaluated every 24 hours to ensure there have been no changes to the atmosphere and no serious safety hazards have been introduced in the confined space. See Permitted Confined Space Reevaluation Form.

To reevaluate the permit, the entry supervisor must:

- **VERIFY** the atmospheric conditions have not changed.

- **VERIFY** all serious safety hazards remain eliminated.
- **VERIFY** rescue and emergency services are available and update any information related to rescue team communication such as RTMIC name and contact information.
- **DOCUMENT** all information related to the permitted confined space on the Permitted Confined Space Reevaluation Form or in the approved software.
- **SIGN AND DATE** the reevaluation form prior to entry into the permitted space and attach it to the appropriate Confined Space Entry Permit/Reevaluation Form.
- **CANCEL** any permit that has gone beyond 24 hours since last being evaluated.

4.2.4.3 PRCS Entry Complete



After work in the confined space is complete, the entry supervisor shall **RETURN** the space to normal service, following the steps below:

1. **ENSURE** all personnel, tools, and equipment have been **REMOVED** from the space, and the space is **READY** to bring back into service.
2. **REMOVE** entry point securement device(s) and associated permit.

3. Is the entry supervisor available to complete the Confined Space Entry/Reclassification Permit, cancelling it?

If yes, complete the Confined Space Entry/Reclassification Permit.

If no, local management can perform this action.

4. **ENSURE** the ERT specialist, RTMIC, or outside rescue and emergency service is **NOTIFIED** the planned work is complete and their services are no longer needed.
5. Enter completed information from the Confined Space Entry/Reclassification Permit into the approved software database, if available.
6. Send paper forms to the location where cancelled confined space documents will be maintained. See 5.1, Records Retention.

4.2.5 Non-Entry Emergency Retrieval

To facilitate non-entry emergency retrieval, an authorized entrant shall **USE** retrieval systems or methods when entering a PRCS or an enclosed space, unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant.

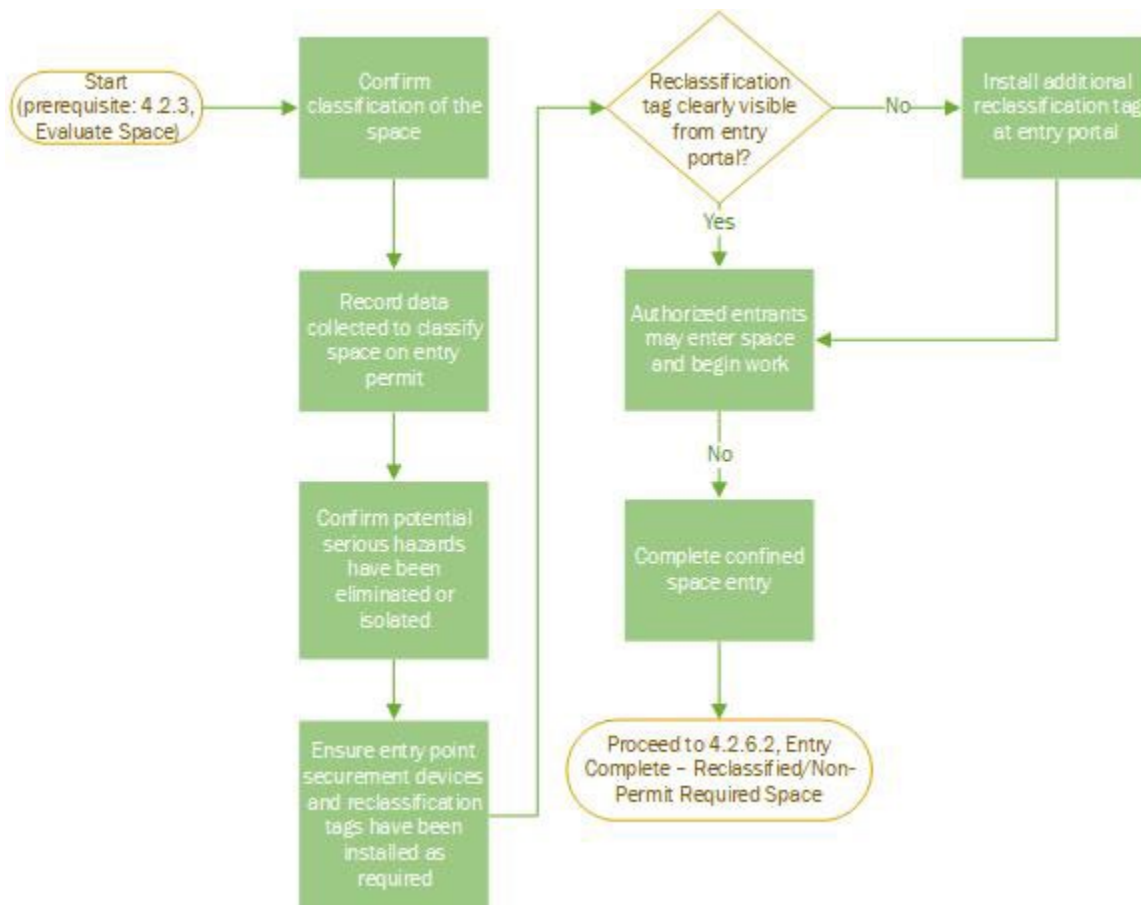
Retrieval systems shall meet the following requirements:

- Each authorized entrant shall use a chest or full-body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, above the entrant's head, or at another approved lifting point on the harness that the employer can establish. The profile of the harness when in place on an entrant's body must be small enough for removal of the entrant from the space.
- The rescuer's end of the retrieval line shall be attached to a mechanical device or fixed point outside the PRCS or the enclosed space in such a manner that rescue can begin immediately. For a PRCS or an enclosed space with a vertical drop of 5 ft or more, a mechanical device shall be available to retrieve personnel.

4.2.6 Reclassified/Non-Permit-Required Confined Space

If the entry supervisor has evaluated the confined space and all known or potential serious hazards have been eliminated or isolated, the space may be reclassified as a non-permit-required confined space.

4.2.6.1 Reclassified/Non-Permit-Required Space Entry



The entry supervisor shall **FOLLOW** the steps below to allow entrants to work in a non-permit-required space.

1. **ENSURE** the following:

- All necessary testing and monitoring are **COMPLETE** and **ACCEPTABLE**. See 4.2.3.1, Atmospheric Testing.
- The Atmospheric Monitoring Data section of the Confined Space Entry Permit/Reclassification Form is **COMPLETE**.
- All actual or potential serious hazards have been **ELIMINATED** or **ISOLATED**, thereby rendering the space a non-permit-required confined space.

2. **RECORD** the following information on the Confined Space Entry Permit/Reclassification Form or in the approved software database, if available:

- Any information, such as air monitoring data and LOTO, that has been collected to classify the space.

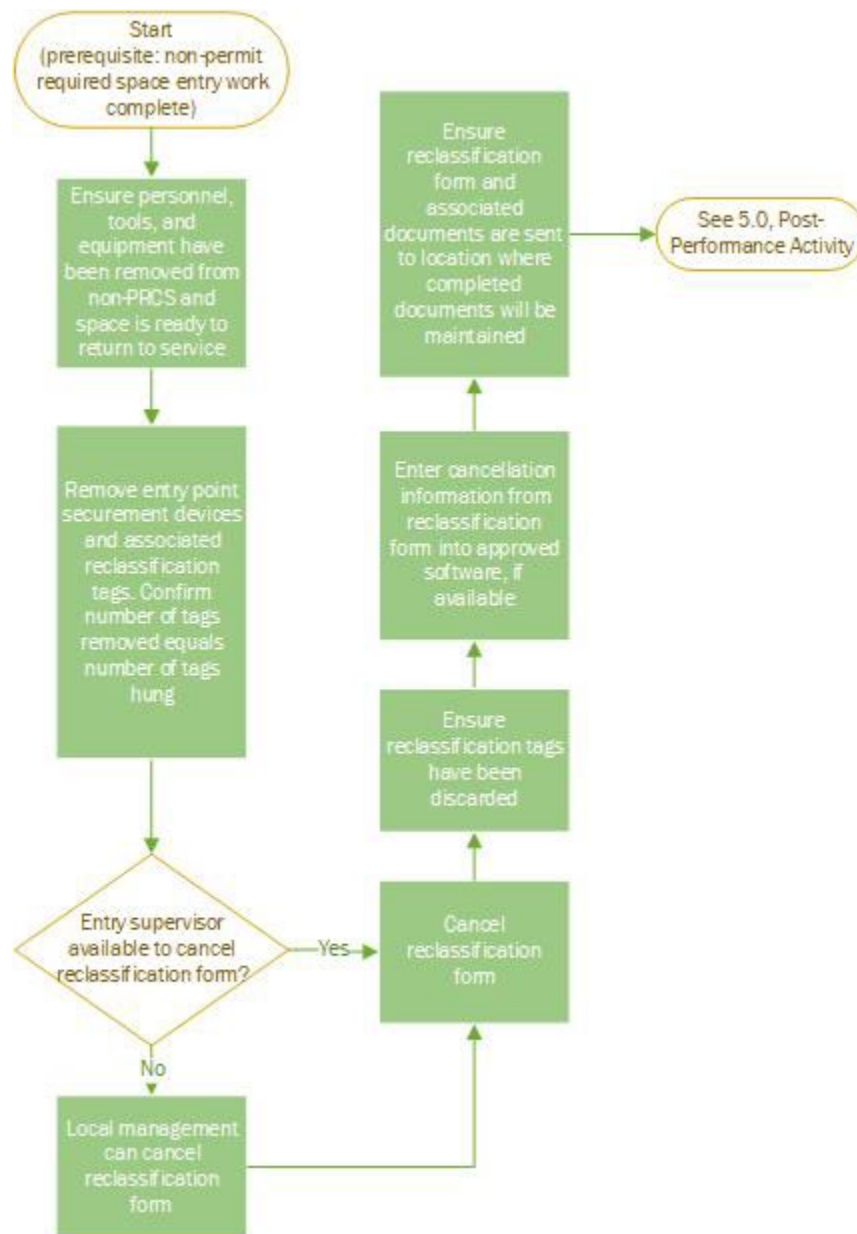
3. **IDENTIFY** the classification of the space and **APPROVE** entry on the Confined Space Entry Permit/Reclassification Form.

NOTE

If hazardous changes to a reclassified non-permit-required confined space occur that could endanger the entrants, the confined space shall be evacuated immediately and reevaluated to determine whether it should be classified as PRCS.

4. **ENSURE** each opened portal used for personnel access is **SECURED**. If the hazard of the door closing is present, secure the entry point with an entry point securement device. The securement device is intended to prevent the portal from latching closed. Ensure green reclassification tags have been **POSTED** on each entry point and on the securement device if used.
5. Authorized entrants may enter the space and begin work.
6. At the completion of the planned work, **PROCEED** to 4.2.6.2, Entry Complete – Reclassified/Non-Permit-Required Confined Space.

4.2.6.2 Reclassified/Non-Permit-Required Space Entry Complete



After work in the confined space is complete, the entry supervisor shall **RETURN** the space to normal service by following the steps below:

1. **ENSURE** all personnel, tools, and equipment have been **REMOVED** from the space, and the space is **READY** to bring back into service.
2. **REMOVE** entry point securement device(s) and associated reclassification tags. Confirm the number of tags removed matches the number of tags applied. A

confined space entrance door cannot be closed until the reclassification tags and entry point securement device(s) have been removed.

3. Is the entry supervisor available to **CANCEL** the Confined Space Entry/Reclassification Form?

If yes, complete and cancel the Reclassification Form.

If no, the facility manager or designee can perform this action.

4. Ensure all reclassification tags have been **DISCARDED**.
5. **ENTER** completed information from the Entry Permit into the approved software database, if implemented at the facility. Otherwise, send the paper forms to the location where cancelled confined space documents are maintained.

4.3 Enclosed Spaces (for Southern Power, Southern Linc, and Southern Telecom use only)

- If the facility's site-specific instructions allow, enclosed spaces may be managed and worked as confined spaces per 29 CFR 1910.146, Permit-required confined spaces.
- If serious hazards arise and ventilation fails to clear or control the hazard, the enclosed space shall be worked as a PRCS.
- Enclosed spaces should be listed separately from confined spaces and discussed in the Confined Space and Enclosed Space Entry training, if they are to be worked under 1910.269 rules.
- If permanent (designed) ventilation can be verified as functional prior to entry, the enclosed space is exempt from OSHA enclosed space and confined space rules and this procedure.
- If electrical conductors energized greater than 12 kV are present, only qualified electrical workers per 29 CFR 1910.269(a)(2)(ii) may enter the enclosed space.
- Before removing a manhole cover, check the air beneath the cover to ensure it is safe to remove the cover. If necessary, remove debris and mud to clear ventilation holes and allow lighter-than-air gases to escape.
- If applicable, the opening of the enclosed space must be barricaded to prevent workers from falling into the enclosed space.
- Air monitoring shall be performed prior to entry and, at a minimum, hourly.
- Ventilate the enclosed space as needed when air contaminants are detected. Forced air ventilation is required for work with an open flame.
- The air supply for the enclosed space shall be from a clean source and may not increase the hazards in the space.
- An attendant trained in first aid shall be present outside the enclosed space during entry.
- Means for rescue retrieval from the enclosed space must be readily available. See 4.2.5, Non-Entry Emergency Retrieval.
- For the purpose of inspection, housekeeping, taking readings, or similar work and if work methods or PPE are in place to protect the worker from all electrical hazards, a worker working alone may enter, for brief periods of time, a manhole where energized cables or equipment are in service.

- Provided worker health and safety is maintained, business units with nontraditional enclosed spaces including, but not limited to, wind turbine hubs may adjust the requirements for attendants and rescue.

5.0 POST-PERFORMANCE ACTIVITY

5.1 Records Retention

In the location identified in the facility's site-specific instructions, **RETAIN** the following corporate records for completion of work plus 1 year (see record series for Confined Space/Enclosed Space Permits on the Southern Company Records Retention Schedule):

- Cancelled Confined Space Entry Permit/Reclassification Form and attachments when used for PRCS entry.
- Confined Space Atmospheric Monitoring Data Addendum when attached to a cancelled Confined Space Entry Permit/Reclassification Form.
- Confined Space Attendant/Entrant Roster Addendum when attached to a cancelled Confined Space Entry Permit/Reclassification Form.
- Permitted Confined Space Reevaluation Form when attached to a cancelled Confined Space Entry Permit/Reclassification Form.

Reclassification tags are excluded from the record retention requirement.

5.2 Communication

COMMUNICATE any hazards or special experience encountered while entering the permit-required confined space to management or designee/system owner/contract administrator so the Confined Space hazard evaluation and Standard can be updated in accordance with 4.2.3, Evaluate Space. Facilities may choose to use the Confined Space Inventory/Hazard Evaluation as a model.

6.0 KEY CONTACT

For questions regarding the content and implementation of this procedure, contact the site's SCS management (see 3.1, Management) or SCS Safety and Health.

7.0 REFERENCES

Documents listed below are referenced in the procedure or provide the basis for which content was included.

7.1 Federal Regulations

- 29 CFR 1910.146, Permit-required confined spaces
- 29 CFR 1910.146, Permit-required confined spaces, Appendix F, Rescue team or rescue service evaluation criteria
- 29 CFR 1926 Subpart AA, Confined spaces in construction

- 29 CFR 1910.269, Electric power generation, transmission, and distribution

7.2 Documentation Internal to Southern Company

- Frequently Asked Questions (FAQ), SCS-SH-0100, Confined Spaces and Enclosed Spaces
- SCG-SH-0201, Lockout/Tagout (LOTO) Procedure

7.3 Forms

- Confined Space Entry Permit/Reclassification Form
- Confined Space Atmospheric Monitoring Data Addendum
- Confined Space Site-Specific Instructions Template
- Confined Space Reclassification Tag/Non-Permit Required Confined Space
- Confined Space Entry Index
- Confined Space Hazard Evaluation Form
- Confined Space Periodic Inspection Record
- Confined Space Attendant/Entrant Roster Addendum
- Confined Space Inventory/Hazard Evaluation
- Permitted Confined Space Reevaluation Form

8.0 GLOSSARY

acceptable entry condition – The environment that must exist to allow entry and ensure workers involved with a permit-required confined space (PRCS) can safely enter into and work within the space.

atmospheric test readings – Evaluation of a PRCS using equipment of sufficient sensitivity and specificity to measure air content to assist with determining acceptable entry conditions, in the following order:

- Oxygen content (between 19.5 and 23.5 percent).
- Flammable gases and vapors (<10 percent of the lower flammable limit (LFL)).
- Potential toxic air contaminants (refer to appropriate levels for the potential contaminant being tested for).

attendant – An individual stationed outside one or more PRCS who monitors the authorized entrants and performs duties as assigned in the employer's permit space program.

authorized entrant – A person who is approved by the entry supervisor to enter a PRCS.

bump test (also called “function check”) – A qualitative performance assessment where a challenge gas is passed over the gas-monitoring instrument sensor(s) at a concentration and exposure time sufficient to activate all alarm indicators to trigger at least their lower alarm setting. This check confirms gas can get to the

sensor(s) and all the alarms present are functional. A bump test of portable gas monitors is conducted in accordance with the manufacturer's instructions. Portable gas monitors that fail a bump test are adjusted according to the manufacturer's full calibration instructions before further use, or it is removed from service.

competent person – One who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to workers, and who has authorization to take prompt corrective measures to eliminate them.

confined space – A space meeting all of the following criteria:

- Large enough and configured so a person can bodily enter.
- Limited or restricted means for entry or exit.
- Not designed for continuous human occupancy.

Confined Space Hazard Evaluation Form – The SCS facility document that identifies the known or potential hazards of a facility's PRCS, and the steps the facility can take to eliminate or control the identified hazards. Each form corresponds to an identified confined space of that facility.

control – The action taken to reduce the level of confined space hazards using engineering methods (for example, by ventilation), and subsequently maintaining the reduced hazard level. Control also refers to the engineering methods used for this purpose. Personal protective equipment (PPE) is not a control.

controlling entity – With respect to a specific confined space entry, the employer with overall responsibility for coordinating work activities within or near a confined space, which could affect the safety of the entrant(s) (SCS or other entity).

early warning system – The method used to alert authorized entrants and attendants that an engulfment hazard may be developing. Examples of early-warning systems include, but are not limited to, alarms activated by remote sensors, and lookouts with equipment that can immediately communicate with the authorized entrants and attendants.

enclosed space – An electrical working space, such as a manhole, vault, tunnel, or pit, that has a limited space of entry or egress, that is designed for periodic worker entry under normal operating conditions, and that under normal conditions does not contain a hazardous atmosphere, but that may contain a hazardous atmosphere under abnormal conditions.

entry – The action by which an individual passes through an opening into a confined space. Entry includes activities in that space and occurs as soon as any part of the entrant's body breaks the plane of an opening into the space.

entry employer – Any employer who decides a worker he or she directs will enter a confined space.

entry permit – The written or printed document to allow and control entry into a PRCS that is provided by the employer who designated the space a PRCS.

NOTE

For purposes of this procedure, the Confined Space Entry Permit/Reclassification Form will serve as the entry permit.

entry point securement device – A safeguard, such as a cable, hasp, wedge, or clamp, that prevents a door from being fully closed and latched in a way that could prevent occupants from exiting a confined space.

entry rescue – The act of a rescue service entering a PRCS to extricate one or more entrants.

entry supervisor – The person (such as the employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at a confined space where entry is planned, for authorizing entry and overseeing entry activity, and for terminating entry as required.

full calibration check – A quantitative test using a known traceable concentration of test gas to demonstrate the gas monitoring instrument sensor(s) and alarms respond to the gas within manufacturer's acceptable limits. A full calibration adjusts the sensor(s) response to match the desired value, compared to a known traceable concentration of test gas. Full calibration checks are done in accordance with the manufacturer's instructions and conducted at regular intervals in accordance with instructions specified by the instrument's manufacturer. A portable gas monitor that fails a calibration check shall be adjusted by means of the manufacturer's full calibration instructions before further use or removed from service.

host employer – The employer that owns or manages the property where confined space work activity is taking place (Southern Company or other entity).

inventory list – A compiled register (list or database) that catalogs all known confined spaces at an SCS facility. Each SCS facility with a confined space shall develop and maintain an inventory list and note the location of this list in the facility's site-specific instructions.

isolate or isolation – The process by which entrants in a confined space are completely protected against the release of energy and/or material into the space, and contact with a physical hazard, by such means as blanking or blinding; misaligning or removing sections of lines, pipes, or ducts; a double block-and-bleed system; lockout or tagout of all sources of energy; blocking or disconnecting all mechanical linkages; or placement of barriers.

limited or restricted means for entry or exit – A condition with potential to impede an entrant's movement into or out of a confined space. Such conditions include, but

are not limited to, trip hazards, poor illumination, slippery floors, inclining surfaces, and ladders.

lower flammable limit (LFL) (also known as “**lower explosive limit (LEL)**”) – The minimum concentration of a substance in air needed for an ignition source to cause a flame or explosion.

monitor or **monitoring** – The process used to identify and evaluate the hazards after an authorized entrant enters the PRCS. The process of checking for changes is performed in a periodic or continuous manner, after the completion of the initial testing or evaluation of that space.

non-entry emergency retrieval – When a rescue service, usually the attendant, retrieves an entrant from a PRCS or enclosed space without entering the PRCS or enclosed space.

non-permit-required confined space – A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain, any hazard capable of causing death or serious physical harm.

permit-required confined space (PRCS) – A confined space that has one or more of the following hazardous characteristics:

- Contains or has the potential to contain a hazardous atmosphere.
- Contains a material with the potential for engulfing an entrant.
- Has an internal configuration where an entrant may become entrapped or asphyxiated by inwardly converging walls or by a floor sloping downward and tapering to a smaller cross-section.
- Contains any other recognized serious safety or health hazard.

permit-required confined space program (PRCS program) – The employer's overall program for controlling, and, where appropriate, for protecting entrants from, permit space hazards and for regulating entry into a PRCS.

prohibited condition – Any condition in a PRCS that is not allowed by the permit during the period when entry is authorized. A hazardous atmosphere is a prohibited condition unless the employer provides and can demonstrate that PPE will ensure effective protection for each entrant in the PRCS.

reclassification tag – A tag used to indicate a PRCS has been reclassified to non-permit-required confined space. Information required on a reclassification tag includes entry number, entry supervisor name, date the tag was hung, and the associated LOTO numbers. See an example of a reclassification tag.

representative permit space – A mock-up that provides a physical simulation of a confined space, with entrance openings similar to, and of similar size, configuration, and accessibility to, the PRCS that authorized entrants enter.

rescue service – The personnel designated to rescue entrants from a PRCS.

retrieval system – The equipment (including a retrieval line, chest or full-body harness, wristlets or anklets, if appropriate, and a lifting device or anchor) used for non-entry retrieval of persons from a PRCS.

standards – Confined space records (evaluations), grouped by equipment, developed, approved, and saved for recurring maintenance activities. These records document existing or predetermined hazards in each confined space and the actions needed to isolate these hazards. Standards for each facility shall be approved by management or designee at that facility and shall be kept up to date.

Southern Company Services (SCS) employee – A person who works directly for Southern Company Services. This designation includes Operations, Southern Power, the Technology Organization (TO), and Research and Development.

Southern Company Services (SCS) facility – Assets that are managed, operated, or maintained by Southern Company Services.

testing – The process by which the hazards that may confront entrants of a PRCS are identified and evaluated. Testing includes specifying the tests that are to be performed in the PRCS.

9.0 ACRONYMS AND INITIALISMS

CFR	Code of Federal Regulations
ERT	emergency response team
FAQ	frequently asked questions
IDLH	immediately dangerous to life or health
LFL	lower flammability limit
PEL	permissible exposure limit
PRCS	permit-required confined space
RTMIC	rescue team member in charge
SCS	Southern Company Services
TO	Technology Organization

10.0 ATTACHMENTS

Attachment 1, Summary of Changes

Attachment 1, Summary of Changes

Rev. 0
02/03/2025

Approved by Stan Connolly
Reviewed by Alan Kilgore

Remarks:

None.
