

# U.S. Department of Labor

Occupational Safety and Health Administration  
Washington, D.C. 20210



May 28, 1999

Ms. C. Yvonne Horton  
OSHA Program Manager  
Oak Ridge National Laboratory  
P. O. Box 2008  
Oak Ridge, Tennessee 37831-6103

Dear Ms. Horton,

Thank you for your May 6, 1999 letter to the Occupational Safety and Health Administration's (OSHA's) Directorate of Compliance Programs (DCP). You have questions regarding access and working space about electric equipment (600 volts, nominal or less), to permit ready and safe operation of such equipment.

Section 1910.303(g)(1)(i) defines the working clearances that shall be provided and maintained about all electric equipment to permit ready and safe operation and maintenance of such equipment in Table S-1. In addition to the dimensions shown in Table S-1, work space may not be less than 30 inches wide in front of the covered electric equipment.

Section 1910.303(g)(1)(ii) elaborates on the clear spaces requirement for such working spaces. Additionally, the working space clearances required by this subpart may not be used for storage. This access and working space shall be kept clear at all times for operation and maintenance personnel and may not be used for intermittent/incidental storage of nonpermanent equipment or furniture, which could interfere with ready access to the electric equipment in the event of an emergency.

In response to your question (during a telephone conversation with Mr. Mahrok on May 11, 1999) regarding the applicability of these requirements, reference is made to 29 CFR 1910.302(b)(2). It states that every electric utilization system and all utilization equipment installed after March 15, 1972, and every major replacement, modification, repair or rehabilitation after March 15, 1972 of any part of any electric utilization system or utilization equipment installed before March 15, 1972 shall comply with the requirements of Sections 1910.302 through 1910.308.

Major replacements, modifications, repairs or rehabilitations include work similar to that involved when a new building or facility is built, a new wing is added or an entire floor is renovated.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. Please be aware that OSHA's enforcement guidance is subject to periodic review and clarification, amplification, or correction. Such guidance could also be affected by subsequent rulemaking. In the future, should you wish to verify that the guidance provided herein remains current, you may consult OSHA's website at <http://www.osha.gov>. If you have any further questions, please feel free to contact the Office of General Industry Compliance Assistance at (202) 693-1850.

Sincerely,

Richard E. Fairfax, Director  
Directorate of Compliance Programs