

EXHIBIT F
TO
MULTIPURPOSE MAINTENANCE, MODIFICATION AND CONSTRUCTION
STAND-ALONE CONTRACT

ENERGY CONTRACTOR SAFETY STANDARD
TABLE OF CONTENTS

1.0	Purpose.....	1
2.0	Deliverables.....	1
2.1	Contractor Safety Management Plan	
2.2	Human Performance Program – Behavior Based Training (Error Prevention Program)	
2.3	Contractor – Subcontractor Plan	
2.4	Accident Investigation and Reporting	
2.5	Operational Risk Review	
3.0	Contractor Safety Representative Requirements.....	7
3.1	Requirements	
3.2	Qualifications	
4.0	Safety Expectations/Requirements.....	8
4.1	Relevant Training	
4.2	Job Hazard Analysis	
4.3	Contractor Health and Safety Management – Performance	
4.4	Owner Observations and Investigations	
4.5	Corrective Actions and Stop Work Authority	
4.6	Injury Illness/Case Management	
4.7	Traffic Controls	
4.8	Work Schedules	
4.9	Spotters	
4.10	Other Special Precautions	
4.11	UAS – Unmanned Aerial System (Drones)	

1.0 Purpose

- 1.1 The purpose of this document is to define standard health and safety requirements for Entergy's contractor partners and subcontractors with respect to performing work or construction activities on the Entergy System. These requirements are in addition to the applicable Entergy Business Unit Safety Manual and are used to set expectations for the delivery of a Safety Management Plan required prior to contractor mobilization to perform work on the Entergy System.
- 1.2 A Risk Based approach, with emphasis on medium and high risk work activities, will define the extent of the Safety Management Plan. This contract standard is to be worked closely in conjunction with ESP-06, Contractor Safety Management Procedure. Each business unit may use specific risk analysis tools to determine the level of risk for the activity or work on the Entergy System.
- 1.3 This standard is NOT intended to replace contractor's or its subcontractor's safety manual, safety procedures, processes or standards. Nor is it required to replace any existing OSHA/EPA regulations and guidelines. It is only meant to establish Entergy's expectations for a contractor/subcontractor Entergy System Safety Management Plan to be approved by the Owner and in place prior to mobilization to perform work.
- 1.4 The "Owner" is defined as Entergy or any future named successor or subsidiary.

2.0 Deliverables

The following is a list five deliverables that are to be developed and submitted by the contractor and its subcontractors prior to mobilization:

2.1 Contractor Safety Management Plan

- 2.1.1 Contractor shall submit a draft specific Safety Plan for performing work on the Entergy System with respect to this Standard and their own internal safety program.
- 2.1.2 After award, but prior to mobilization of contractor or subcontractor personnel, contractor and Owner Management teams shall meet to review in detail and agree upon the contractor and subcontractor Safety Management Plans to ensure they are in accordance with outlined expectations.

2.1.3 Entergy Specific Safety Plan

The Entergy Specific Safety Plan will be specific for each contractor and the work scope to be performed. For example, in Project space, a substation work site may require a Specific Safety Plan as well as work for the Transmission Line. Additionally, Transmission ROW clearing would require a specific safety plan. For Base Load contractors that support the Entergy System, a system wide, state, jurisdiction or regional plan shall be developed that addresses how the defined scope of work is going to be safely accomplished. It is the Entergy Business Unit's responsibility to determine the level of detail required for each contractor Safety Management Plan with respect to the scope of work.

2.1.4 **Emergency Action Plan (EAP)**

Contractor shall have in place for each work location an Emergency “Response” Action Plan and shall communicate this plan at each specific location and to those associated with the work. The contractor shall provide this plan to the Owner for review and comment before the start of any construction activities. The plan shall include the following as a minimum:

- a. 911 address, GPS coordinates
- b. Process for reporting medical emergencies, fire emergencies, inclement weather, rescue plans, terroristic threats and other emergent situations.
- c. Muster points, evacuation routes, rescue from heights, bomb threats, active shooter plan, reporting medical and fire emergencies and other emergent situations.
- d. EAP to include contact information for all key personnel on location as well as Entergy Environmental, Project Management and Business Unit Management. Telephone numbers and locations for hospitals, medical clinics, fire, police, emergency medical services and other local facilities or organizations shall be included in the EAP.
- e. In the case of an emergency, the person in charge of a crew, project or scope of work shall be responsible for making the determination of the severity of the incident and make the appropriate call to 911, or determination of transportation to the closest facility to provide care, taking into consideration location and impact to Power Generation and other Entergy facilities to be notified.
- f. Contractor shall develop an inclement weather plan that includes lightning and extreme weather conditions. Weather conditions should be monitored continuously, and the affected employees should be notified of the weather conditions and the measures put in place to protect employees from inclement weather.

2.1.5 **Safety Observation Program**

2.1.5.1 A Safety Observation Program can proactively prevent events and injuries through engagement, trending and addressing safe versus unsafe behaviors in the field. Owner, contractors and subcontractors must effectively communicate and work together to address unsafe behaviors for an effective program as well as recognize safe behaviors.

2.1.5.2 The Safety Observation Program shall include at a minimum a report provided to the Owner outlining or summarizing safety observations including coaching opportunities, strengths, action plans to eliminate weaknesses, pictures, leading trends and other safety analysis gleaned from the data. The report should also include the number of personnel working on-site, man-hours worked, all incidents, close calls, good catches, property damage and first aids. Reports shall be sent via email to the Owner contract

manager or owner representative on a monthly basis. Contractor shall provide a sample copy of the safety observation report to Owner for review.

2.1.5.3 The contractor Safety Representatives and Field Supervision will be required to perform at a minimum ONE safety observation per week in the field. The safety observation should be informative to the Owner, providing details on the strengths and opportunities coached on weekly. Contractor Safety Representative will identify best practices, trends and action plans implemented with crew members to eliminate weaknesses.

2.1.5.4 Safety and Field Supervision is expected to visit work locations daily to review safety with crews including JHA's, hazard recognition coaching, strengths, opportunities to improve and corrective actions needed to enhance safety awareness for everyone associated with work in the field.

2.1.5.5 Contractor Management (Company Owner) is required to observe and coach leadership personnel on a monthly basis to assess the effectiveness of its company safety leadership.

2.1.6 **Entergy System Security**

2.1.6.1 Contractor shall be responsible for tracking the presence of all site personnel and visitors on each job location.

2.1.6.2 Contractor shall work to prevent unauthorized access to the jobsite by any vehicle or personnel. When not in use, all doors and gates shall be locked and secured.

2.1.6.3 For larger scopes of work in the field, and as requested by the Owner, the contractor shall submit a security plan to Owner for review. It may be recommended that contractor provide 24-hour security to the work site and any other off-site storage facilities.

2.2 **Human Performance Program – Behavior Based Training (Error Prevention Program)**

2.2.1 Bidder to include in their proposal an overview of their Human Performance Program.

2.2.2 Contractor shall have in place a behavior based Human Performance Program. The program shall focus on Human Performance based tools and traps to assist all employees with eliminating human errors that lead to injuries or unplanned outcomes.

2.3 **Contractor – Subcontractor Plan**

2.3.1 Bidder to include in their proposal a list of potential subcontractors and a management plan for subcontractors as they support Entergy System work.

2.3.2 Contractor shall identify all subcontractors that will be mobilized on the Entergy System. All subcontractors shall be approved in advance by Owner's Safety and Business Units. All subcontractors must be identified, reviewed and approved prior

to executing a contract. Any subcontractor changes after contract execution must be approved by Owner's Contract Manager.

- 2.3.3 All contractors and subcontractors shall be validated through AVETTA. Exceptions must be approved by Owner, in writing, before contract execution. Any changes post contract execution shall be submitted by contractor to Owner for review and written approval.
- 2.3.4 If prior to or during the execution of this contract any contractor or subcontractor experiences a fatality, OSHA Willful Citation or OSHA Serious Citation ON or OFF the Owner's System, the Contract Manager shall be notified.
- 2.3.5 Owner has the right to reject any and all subcontractors.
- 2.3.6 All craft personnel at a minimum shall have completed OSHA 10-hour training as applicable for Construction (29 CFR 1926) or General Industry (29 CFR 1910). All Foremen or Supervisors at a minimum shall have completed OSHA 30-hour training as applicable for Construction (29 CFR 1926) or General Industry (29 CFR 1910). For Nuclear the applicable qualifications for General Employee Training (GET), Plant Access, and Rad Worker Training may be substituted.
- 2.3.7 The contractor shall review specific JHAs to ensure compliance with all state, federal and Entergy safety manual requirements, procedures and processes as well as the requirements in this document.
- 2.3.8 The ratio of Journeyman Craft positions to Apprentice shall be no less than 1:4 per crew. If this expectation cannot be met, then approval from the Owner's Contract Manager is required.
- 2.3.9 Prior to performing any work on the project, all contractor and subcontractor employees will be required to attend the contractor's site-specific environmental and safety orientation along with the Owner's site-specific environmental and safety orientation. These orientations may occur at the same time.
- 2.3.10 Contractor shall maintain a training matrix defining all training requirements for all crew members. The matrix shall include names of all employees verifying completed training as required per employee working on the project.
- 2.3.11 Contractor shall maintain a list of training completed and certifications for all contractor and subcontractor site personnel.
- 2.3.12 Contractor shall provide Owner list of all competent and certified personnel. Examples include, but are not limited to, scaffolding, rigging, spotters, excavating, confined space, crane operators and forklift operators.
- 2.3.13 The Owner may request, depending on circumstances, specific safety stand downs be conducted by the contractor determined by safety events, safety alerts and other general safety matters. Additionally, recovery plans may be requested by the Owner to address specific safety concerns. Contractor shall adhere to any change in safety policy associated with such determined events and/or general safety matters.

- 2.3.14 It is incumbent upon the contractor and all subcontractors to perform all tasks with safety as its highest priority. To this end, when non-English speaking personnel are employed or present on-site, it is the contractor's obligation and responsibility to ensure that all personnel understand all work area signage, emergency announcements via public address systems, user radios, cell and land-based phones and computer and personal communications.
- 2.3.14.1 Should there be multiple non-English speaking crews, a translator is required for each crew.
- 2.3.14.2 In the event the translator leaves a work site where the work is being performed by non-English speaking personnel, the work being performed shall stop and the non-English speaking personnel shall vacate the work site areas until they have a translator.

2.4 **Accident Investigation and Reporting**

- 2.4.1 Contractor shall submit its Accident Investigation and Reporting Process that aligns with this section and Entergy's Enterprise Safety Event Reporting Guidelines as referenced: Safety Event Process Requirements (ESP-13), Safety Event Reporting and Documentation (ESP-14) and Safety Event Analysis and Learning Study (ESP-15).
- 2.4.2 All incidents, accidents, close calls, good catches, first aids and property damage experienced shall be reported, investigated and analyzed by qualified personnel. Significant incidents, injuries (SIF/PSIF) and close calls shall receive a root cause analysis and causal determination report. Corrective actions will be developed, implemented and monitored to determine the effectiveness in preventing re-occurrence. Owner may request a root cause/causal determination for any event it deems requires further analysis to prevent reoccurrence.
- 2.4.3 In the event of a significant or serious accident, the accident scene shall not be disturbed until the Owner has an opportunity to review the scene with the contractor. The exception to this requirement is for circumstances or conditions where imminent danger exists to those providing emergency services at the scene of the incident.
- 2.4.4 As soon as any injured employees are out of harm's way and receiving medical care (if needed), contractor shall notify the Owner within two hours with preliminary accident information. The Owner's oversight personnel assigned to the project should be contacted first. The contact needs to be a verbal conversation. A voice mail, text message or email is not acceptable as an initial means of communicating incidents, accidents or close calls. An initial report (including possible photographs) of any injuries or significant events is required within 24 hours of the incident identifying causes and corrective actions. A root cause/causal determination of the incident shall be provided to the Owner within five business days from the event.

2.5 **Operational Risk Review**

- 2.5.1 Where it applies (Transmission/Nuclear/Power Generation), the contractor shall be required to review, understand and submit the applicable Operational Risk Review to

the Owner in accordance with procedure time lines prior to the associated work to commence.

- 2.5.2 At a minimum, an Operational Risk discussion should take place and be documented on the JHA that includes potential unforced outages with possible impacts on power generation and nuclear generation facilities and industrial customers including commercial and residential customers that might have their service impacted.
- 2.5.3 For Medium and High Risk Activities, the contractor or subcontractor shall provide written detailed work plans to be approved by the Owner or Contract Manager. The appropriate controls must then be implemented to reduce the level of risk determined. Specific oversight may be required as an appropriate control method. Examples that might require a detailed written work plan include transmission conductor wire pulled across a major highway, pole erection near an energized circuit and explosives used in demolition of facilities.

3.0 Contractor Safety Representative Requirements

3.1 Requirements

Contractor is required to have a dedicated company safety representative on the Entergy System full time for the duration of the project or to support baseload crews. A minimum of 1 safety representative is required per 25 personnel assigned to the Entergy System. A deviation from this requirement may be granted with the approval of the Entergy Contract Manager but must be in writing. The duties of the contractor safety representative are to assure full compliance to Owner, OSHA, contractor (and/or its subcontractors) safety plans, manuals, procedures, standards and processes for the prevention of incidents, accidents and injuries as well as identifying and eliminating unsafe behaviors on the work site. Contractor's dedicated safety representative shall have no other duties or responsibilities other than safety.

3.2. Qualifications

- 3.2.1 The contractor safety representative must have a minimum of three (3) years in construction safety, hazard recognition, accident investigation and root cause analysis. Additionally, the candidate should have relevant experience, education and certifications commensurate with the Business Unit's function that they are supporting with respect to the scope of work being performed.
- 3.2.2 Contractor Safety Representatives must possess a recognized safety designation from the following list including, but not limited to, CUSP, CSST, OHST or COSS. Proficiency and proof of completion of OSHA 510 and/or OSHA 511 courses may serve as a substitute to required designation if approved by Owner. The safety representative(s) shall be required to understand and comply with Owner's safety rules and OSHA's safety rules/processes. The Safety Representative shall be unwavering in the degree to which they coach and reinforce those guidelines and processes in the field. The Safety Representative(s) shall possess excellent interpersonal skills and strong written and verbal communication skills. These qualifications should be submitted as part of the bid submission. Owner expects to receive and review resumes for all safety professionals assigned to any Owner project and has the right to disapprove contractor's selection. Any exceptions to these

requirements for contractor's on-site full-time safety representative to be approved by Owner.

4.0 Safety Expectations/Requirements

4.1 Relevant Training

- 4.1.1 Contractor and subcontractor employees working on Owner's property shall have completed the appropriate Business Unit's training awareness modules (e.g., PowerSafe) relevant to the work and/or as directed by Owner's Contract Manager prior to mobilization to the jobsite. Training courses shall consist of discipline-specific modules which will be required of contractor/subcontractor employees as assigned by the Owner's Contract Manager depending on the job classification and job assignment. This requirement can be waived by written approval of the Owner's Contract Manager.
- 4.1.2 While on the Owner's property, all contractor and subcontractor personnel must have a photo ID. Proof of completion of the appropriate assigned training courses successfully completed (e.g., PowerSafe) and maintained on file.
- 4.1.3 Visitors require an escort 100% of time inside the substation, jobsite or construction work area unless visitor has taken appropriate training courses.

4.2 Job Hazard Analysis

- 4.2.1 A Job Hazard Analysis (JHA) must be performed by contractor personnel and subcontractors daily in order to seek ways to eliminate hazards through engineering or administrative controls. All crew members must participate and be actively engaged in the JHA development. The Job Hazard Analysis shall be explained to and signed by all employees on the jobsite. Should additional persons come onto the jobsite, they are to be briefed and must sign the job briefing. The job briefing shall cover at a minimum the following areas:
 - a. Work Procedures – scope of work for the day
 - b. Energy Source Controls (if applicable)
 - c. The task steps, the hazard and the elimination or mitigation (if elimination cannot be achieved)
 - d. Personal Protective Equipment (PPE)
 - e. Emergency Procedures – a specific site Emergency Action Plan (EAP) is required for all job locations – separate from the JHA but attached to the JHAf. A review of the Entergy safety manual referencing applicable sections pertaining to the task at hand
 - g. Operational Risk Review or Potential Customer impacts
- 4.2.2 Job Scope Change – Anytime the work scope changes, the Job Hazard Analysis shall be updated and reviewed by the entire crew. The Job Hazard Analysis, including

hazards and mitigations associated with the job scope change, shall be discussed and understood by all employees at the location.

- 4.2.3 A documented review of the JHA shall be performed by all employees at the location after returning from their lunch break.

4.3 **Contractor Health and Safety Management – Performance**

- 4.3.1 Owner has the right to the following actions in the event the contractor experiences continued health and safety violations:

- 4.3.1.1 Contractor to submit a recovery plan to Owner detailing what actions and improvements will be implemented with a specific time line for execution.

- 4.3.1.2 Owner may require a leadership change or additional safety professionals from the contractor to turn the project's safety performance around in a positive direction.

- 4.3.1.3 Owner reserves the right to shut down work for any health and/or safety violations caused by contractor or its subcontractors.

4.4 **Owner Observations and Investigations**

- 4.4.1 Owner reserves the right to participate and engage in any safety, environmental or health-related investigation performed by the contractor or any of its subcontractors.

- 4.4.2 Owner reserves the right to initiate, as deemed necessary, an accident investigation.

- 4.4.3 Contractor shall be responsible to correct any unsafe or environmentally hazardous condition(s) caused by contractor. Owner reserves the right and obligation to have the condition corrected by others.

4.5 **Corrective Actions and Stop Work Authority**

- 4.5.1. Anyone associated with the project has the right to STOP work for any safety or potential safety concerns at any time.

- 4.5.2 Owner has the right to ensure the contractor addresses any and all conditions that create unsafe or environmentally unfriendly conditions.

- 4.5.3 Owner has the right to direct the contractor to immediately stop work or cease any action if the Owner deems a condition creates an unsafe environment that could result in injury to personnel or result in property damage.

- 4.5.4 Owner has the right to direct any work stoppage until the Owner is satisfied the hazardous or unsafe condition no longer exists.

- 4.5.5 Owner reserves the right to shut down work for any health and/or safety violations caused by contractor or its subcontractors.

4.6 **Injury Illness/Case Management**

- 4.6.1 Contractor shall provide means to transport work-related injuries or ill employees to and from medical facilities and assign someone at the management level to remain with the injured or ill employee throughout this period. An exception to this is when an ambulance or air evacuation transport is required.
- 4.6.2 At a minimum, foremen and above shall be certified in CPR/FA/AED and be available to administer CPR. While it is recommended that all personnel be CPR certified, it is mandatory that each specific work location have multiple individuals certified and capable of administering CPR. At no time shall any specific work site not have designated personnel assigned to administer CPR.

4.7 **Traffic Controls**

- 4.7.1 Proper traffic control must be in place when transporting materials, offloading materials near roadways and accessing/egressing roadways as well as when occupying areas adjacent to traffic lanes. All federal, state and local DOT requirements shall strictly be adhered to.
- 4.7.2 It shall be the responsibility of the contractor to directly coordinate traffic control plan development and implementation. The Owner requires trained and qualified flaggers or professional third-party contractors for development and implementation of the Traffic Control Plan for all road and lane closures and other traffic control plans.

4.8 **Work Schedules**

- 4.8.1 Observing and managing fatigue and the health and welfare of employees is of the utmost importance. Contractor shall set a working schedule for all crew members. At no time shall crew members work more than 14 consecutive days without a minimum one-day break, without Owner's approval. Crew schedules to be reviewed by Owner prior to the start of construction. Business Unit specific Fatigue Rules shall apply.
- 4.8.2 Business Units shall ensure that Owners third-party event reporting system is utilized to upload Contractor Safety Events and work hours.
 - 4.8.2.1 Note that work hours for each month are due by the 8th working day of the following month.
 - 4.8.2.2 Also note that the hours placed into the system should reflect only those hours worked on an Entergy Site.

4.9 **Spotters**

- 4.9.1 Trained designated spotters are required. Exceptions to the below conditions to be approved by the Owners Contract Manager.

- 4.9.1.1 While operating machinery near existing power lines, bus work, foundations, equipment, steel, buildings, pipe racks, process equipment and in congested areas.
- 4.9.1.2 When entering or moving a vehicle or machinery in a congested area.
- 4.9.1.3 When there is poor visibility (night, steam in area, poor lighting, blind corners, etc.)
- 4.9.1.4 When pedestrians/co-workers or other personnel are in close proximity to motor vehicles or machinery.
- 4.9.1.5 When operating machinery around excavations, water or canals.
- 4.9.1.6 When equipment is moving within a substation and/or on the T-Line ROW.

4.10 **Other Special Precautions**

- 4.10.1 For construction work requiring entry to Entergy sites or property, the Transmission/Distribution Control Center or appropriate Facility Control Room shall be contacted prior to entry. Further, if the facility is Critical Infrastructure, the contractor/subcontractor must comply with Entergy Procedures and Policy with respect to Reliability Standards to safeguard the Bulk Electric System (BES).
- 4.10.2 A preliminary grounding plan shall be submitted prior to the associated work taking place and reviewed by the appropriate contractor/subcontractor and Entergy oversight in the field. For high risk evolutions or infrequently performed activities with complex grounding schemes, a written, detailed grounding plan must be submitted and approved before any clearances are to be taken. Plan should include, but is not limited to, ground placement locations, sizes, clearance points, outage zones, clearance holders, daily verifications by the entire crew and other items as required.
- 4.10.3 Foreman and above classification shall not be allowed to operate any major equipment while they are responsible for overseeing a task while they are a dedicated qualified observer. They are also not allowed to perform hands-on work while they are responsible for overseeing a task. If this person is needed to perform a task, then a person of equal or greater classification will need to formally assume the position and the JHA documented as such.

4.11 **UAS – Unmanned Aerial System (Drones)**

All UAS operation on Entergy’s System shall comply with the regulations detailed in 14 CFR Part 107 – “Small Unmanned Aircraft Systems,” and/or Entergy System Policies & Procedures Aircraft Governance Policy – which establishes minimum standards for all employees, contractors and subcontractors who engage in Aircraft Operations on behalf of Entergy around or near Entergy facilities, rights-of-way or property. Check with the applicable Business Unit for UAS (Drones) specific requirements before operating on the Entergy System.