



October 28, 2021

Mr. Ari Harding
Electrical Safety Officer
EHS Division
MS: 078-0101J

Subject: Delegation of Electrical Authority Having Jurisdiction (AHJ) for Safe Work Practices and Utilization Electrical Equipment

References: (1) 10 CFR 851

- (2) Letter, P. Golan to M. Witherell dated August 10, 2017 Subject: Delegation of Electrical Authority Having Jurisdiction (AHJ)
- (3) Letter, M. Witherell to M. Brandt dated March 5, 2018 Subject: Delegation of Electrical Authority Having Jurisdiction (AHJ)
- (4) Letter, M. Brandt to J. Salazar dated March 5, 2018 Subject Delegation of Electrical Authority Having Jurisdiction (AHJ)
- (5) Letter, J. Salazar to D. Nielsen dated March 5, 2018 Subject Delegation of Electrical Authority Having Jurisdiction (AHJ) for Safe Installations
- (6) LBNL PUB 3000, Chapter 8, Electrical Safety Program
- (7) LBNL PUB 3000, Chapter 14, Electrical Equipment Safety Program

Dear Mr. Harding,

This letter serves to delegate the Electrical Authority Having Jurisdiction (AHJ) for Safe Work Practices and for Unlisted Electrical Equipment to you as a qualified electrical safety engineer. As the Technical AHJ, you are a crucial element of the overall LBNL management chain to enforce the applicable electrical safety sections of NFPA 70 and NFPA 70E, in accordance with 10 CFR 851 [1]. Together with each of the individuals identified in the delegation letters referenced above – the Laboratory Director (LD) [2], the Deputy Director for Operations (DLD) [3], the EHS Division Director [4], and the Electrical AHJ for Safe Installations [5] – you comprise the overall Electrical AHJ management chain that provides for the full institutional enforcement of those codes by the Laboratory.

As the Technical AHJ, you are delegated the general authority to develop and implement the technical and programmatic elements of the Safe Work Practices and Unlisted Electrical Equipment AHJ program. Specifically, you are delegated the authority to:

- Select and apply the appropriate codes and standards to new procedures and equipment, or modifications to existing procedures or equipment;
- Issue final technical interpretations based on those evaluations to line management;
- Approve alternatives that provide equivalent levels of protection (equivalencies).



- Establish, through the development and administration of the LBNL Electrical Safety Program [6] and the LBNL Electrical Equipment Safety Program [7], the necessary policies, processes and procedures which provide effective assurance of these functions.

Additionally, you are delegated limited authority to compel compliance to the above, specifically in cases where you believe there is an imminent or expected/predictable/anticipated hazard representing unacceptable risk. Final authority and responsibility to compel compliance remains with the EHS Division Director, the Deputy Director for Operations (DLD), and the Laboratory Director (LD).

As a condition of this delegation, you must document and provide to me, the DLD, and the Bay Area Site Office (BASO) all AHJ equivalency approvals within 30 days of such determinations. This includes approvals granted for use of any alternate methods or equivalencies utilizing materials and/or work practices not meeting existing codes, regulations and/or standards. This delegated authority does not extend to exemptions (waivers) to NFPA 70 or NFPA 70E, as these must be submitted through BASO for Department of Energy approval.

I expect that you will continue to consult and collaborate with the Electrical AHJ for Safe Installations. In this, you will ensure that no gaps exist between the programs, and that overlaps and linkages are properly addressed. Also, I expect that you and the Electrical AHJ for Safe Installations will work with line management to develop your peers so that they can act in your place during temporary absences. However, the formal, permanent delegation of Electrical AHJ authority to you may not be further delegated without prior, written approval by the Electrical AHJ management chain.

Sincerely,

Maria G. Nappi

Maria Nappi, EHS Division Director

cc: Mike Witherell, Laboratory Director
Michael Brandt, Deputy Lab Director, Operations
Brent Henderson, Facilities Division Director
Todd Hancock, PIM Division Director
Ken Hoar, Executive Director, Contracts, Business and Finance, UCNL
Joseph Mercedes, Electrical AHJ for Safe Installations
David Sprinkle, Chair, Electrical Safety Committee
Mary Gross, ES&H Division Director, DOE Bay Area Site Office

TITLE	AHJ Designation Letter
FILE NAME	AHJ_Letter_to_Ari...-102821(1)(2).pdf
DOCUMENT ID	36e7d64f6be9b5811c23a02e108ec914f49cf3cc
AUDIT TRAIL DATE FORMAT	MM / DD / YYYY
STATUS	● Completed

Document History



SENT

11 / 02 / 2021
 17:25:28 UTC

Sent for signature to Maria Nappi (mgnappi@lbl.gov) from kmpalkki@lbl.gov
 IP: 98.47.35.81



VIEWED

11 / 02 / 2021
 21:34:07 UTC

Viewed by Maria Nappi (mgnappi@lbl.gov)
 IP: 162.207.205.106



SIGNED

11 / 02 / 2021
 21:34:22 UTC

Signed by Maria Nappi (mgnappi@lbl.gov)
 IP: 162.207.205.106



COMPLETED

11 / 02 / 2021
 21:34:22 UTC

The document has been completed.