



Date: May 5, 2012  
Memo to: Ms. Catherine Franz, OHSE Consultant  
From: Mr. William Ertle, Chair TSC-4 (Control Measures and Training)  
Subject: Clarification: Activation Warning System

### Question:

In regards to 4.3.10.2.2 Entryway Controls – it is my understanding that for a Class 4 laser we need to incorporate either a non-defeatable, defeatable, or procedural area safety control. If we choose to incorporate procedural area controls – does that imply that we incorporate (a), (b) and (c)?

Incorporating (a) seems obvious – all individuals will be adequately trained and adequate PPE provided upon entry. From (b) we have an entryway screen, as well as curtains around the laser area. The question arises with (c), there are several lasers on campus that essentially run continuously, and the Faculty seems to think it is redundant to have signage at the door, a screened entry and an activation warning system indicating that the laser is energized and operating at Class 4 levels. My question is, and perhaps the answer is obvious, but do we need to have the activation warning system with the other measures in place? If so, just to clarify this is referring to something such as a red light above the entryway door?

### Explanation:

You asked whether or not an activation warning system is required when using procedural Class 4 LCA entryway controls. Such a warning system is clearly required by Section 4.3.10.2.2(3)(c) of the standard, which reads:

***(c) At the entryway there shall be an activation warning system indicating that the laser is energized and operating at Class 4 levels (see 4.3.9.4).***

Furthermore, it seems you are specifically asking about one or more laboratory rooms, each with its own door and then a screened area just inside that door. Based on that understanding, the activation warning system could be placed either outside the door to the room or within the screened entryway. The standard provides guidance regarding the format of this activation warning system in Section 4.3.9.4. A single red light or lighted laser warning sign are suggested formats.

Of course, Section 4.2 of the standard permits the LSO to substitute alternative control measures, should you decide you do not want to use an activation warning system. Other requirements, specified in Section 4.2, would have to be met in that case.

