



Moab UMTRA Project Coronavirus Mitigation Plan

Revision 1

June 2021



U.S. Department
of Energy

Office of Environmental Management

**Moab UMTRA Project
Coronavirus Mitigation Plan**

Revision 1

Review and Approval

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Revision History

Revision	Date	Description
0	March 2021	Initial issue.
1	June 2021	Updated to reflect change in Federal guidance.

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1.0 Introduction

The U.S. Department of Energy (DOE) Environmental Management (EM) Moab Uranium Mill Tailings Remedial Action (UMTRA) Project's scope is to relocate mill tailings and other contaminated materials from a former uranium ore-processing facility in Moab, Utah, to an engineered disposal cell constructed near Crescent Junction, Utah. The Moab UMTRA Project is committed to remediating the Moab Site to protect the health and safety of the public and environment. Federal and contractor employees support the mission at three locations, the Moab Site, the Crescent Junction Site, and the Grand Junction, Colorado office.

The safety and health of the workforce is leadership's top priority. The Coronavirus (COVID-19) pandemic caused a shift in how the Moab UMTRA Project accomplished work beginning in March 2020. However, the Project's overall mission has been largely unaffected by the virus, with the three locations remaining fully operational. Tailings excavation, shipping, and placement operations continued with incorporated health and safety recommendations. "Boots on the ground" oversight also continued.

Management responded to the rapid changes brought on by the national spread of COVID-19. Protective measures and best practices, that included social distancing, increased personal hygiene, and facility sanitation, were put in place to prevent virus transmission. Visits by the Grand County UMTRA Liaison along with public tours were suspended. Some training was postponed until smaller class sizes or virtual alternatives could be arranged. Information Technology staff purchased equipment and additional licenses for remote users and assisted those transitioning to telework.

2.0 DOE COVID-19 Workplace Safety Plan Introduction

As set forth in Executive Order 13991 "[Protecting the Federal Workforce and Requiring Mask-Wearing](#)," the policy of the Administration is "to halt the spread of coronavirus disease 2019 (COVID-19) by relying on the best available data and science-based public health measures," including taking a science-based and data-driven approach to safety in Federal workplaces. In accordance with the Office of Management and Budget memorandum M-21-15, [COVID-19 Safe Federal Workplace: Agency Model Safety Principles](#), the COVID-19 Workplace Safety Plan (DOE Plan) outlines the principles for the safe accomplishment of the DOE mission in a COVID-19 environment.

3.0 Project Alignment with the DOE Plan

DOE directed sites to update previous COVID-19 plans as appropriate to ensure compliance with the DOE Plan. The Moab Project reviewed its previous Coronavirus Operations Plan and updated it accordingly. The DOE Plan's health and safety requirements and workplace operations are addressed below.

4.0 Health and Safety

4.1 Telework

Operations and technical assistance work has continued through the COVID-19 pandemic. At this time, the Project is maintaining that posture.

The three locations have different scope and varied work environments. At the Grand Junction office, some employees are currently teleworking or alternating their schedule to meet the 25 percent occupancy requirements, when required. At the Moab and Crescent Junction sites, some employees are able to telework at least part time. Those who cannot perform their duties remotely are required to abide by the Centers for Disease Control and Prevention (CDC) guidance and DOE procedures.

Individuals currently teleworking should continue to do so until further notice. Where feasible, a minimum of two weeks advance notice and additional guidance will be provided before returning to the physical workplace.

4.2 Face Masks

In accordance with the CDC's [Interim Public Health Recommendations for Fully Vaccinated People](#), and consistent with guidance from the Safer Federal Workforce Task Force and Executive Order 13991 "[Protecting the Federal Workforce and Requiring Mask-Wearing](#)," fully vaccinated Federal employees, contractors, and visitors entering or working inside or on the grounds of a DOE site/facility are not required to wear masks while in DOE buildings or in DOE leased spaces, except where called for by Federal, state, local, tribal, or territorial laws, rules, and regulations. People are considered fully vaccinated either two weeks after their second dose in a two-dose series (e.g., Pfizer or Moderna vaccines) or two weeks after a single-dose vaccine (e.g., Johnson & Johnson's Janssen vaccine).

People entering or working at a DOE site/facility who are not fully vaccinated (i.e. who are not at least two weeks past their final dose) are required to wear a mask while in DOE buildings and leased space, including all public and work areas within a building (e.g., garages, hallways, cafeterias, elevators, and restrooms). The policy also applies to facilities leased or owned by DOE contractors and in which DOE Federal or contractor employees work. To ensure compliance, extensive signage will be posted throughout all sites, especially entrances, to remind individuals of the requirement.

People who are required to wear a mask must wear a mask that covers the nose and mouth and complies with current CDC guidance.

The CDC recommends the following:

- Non-medical disposable masks, masks that fit properly (snugly around the nose and chin with no large gaps around the sides of the face)
- Masks made with breathable fabric (such as cotton)
- Masks made with tightly woven fabric (i.e., fabrics that do not let light pass through when held up to a light source)

- Masks with two or three layers
- Masks with inner filter pockets

Novelty/non-protective masks, masks with ventilation valves, or face shields are not considered an acceptable substitute for approved masks. To the extent funds are available, DOE or site contractors are encouraged, but not required, to purchase masks for staff and visitors. Both prime contractors have offered masks or face coverings to their employees.

When an individual is required to wear a mask, masks must be worn in any common areas or shared workspaces (e.g., open floorplan office space, cubicle embankments, hallways, garages, conference rooms, or other workspaces) even when physically distant. Masks must also be worn in outdoor shared spaces when physical distancing cannot be maintained. Masks must be worn in all in-person meetings and are required at staffed security checkpoints. Security may direct individuals to lower or temporarily remove their masks to verify identity. Masks are also required inside government-owned vehicles.

Exceptions to wearing a mask may include:

- Mask removal when alone in an office with floor-to-ceiling walls and the door shut
- Intermittent removal when eating/drinking -- masks may be removed for a limited time if one is at least six feet from another individual
- Conducting work utilizing controls and/or personal protective equipment identified in a job hazards analysis or similar evaluation as long as the COVID-19 risk is factored into the analysis and the controls identified as part of that analysis are implemented
- Individuals who have a medical or religious reason why they cannot wear masks
- Individuals who are fully vaccinated

4.3 Contact Tracing

Site contact tracing is done in collaboration with and support of the two local health departments and contractor corporate offices. Once informed of a COVID-19 case, management takes appropriate action to ensure proper notifications and cleaning take place. Disclosures of COVID-19 cases are made to local public health officials as required or necessary in accordance with local public health mandates. To promote transparency and safety, management notifies Project staff about confirmed cases, consistent with local, state, and Federal privacy and confidentiality regulations and laws.

Management also reports confirmed cases (including updates, whether an individual is working on-site or on telework) to the COVID-19 Hotline within one business day. The COVID-19 Hotline can be reached by calling 202-586-2683 or by emailing COVID-19inquiries@hq.doe.gov. Emails with personal information should go through Entrust.

4.4 Travel

Federal and contractor employees should adhere strictly to CDC, state, and local guidelines before, during, and after travel, regardless of whether the travel is personal or for official business.

Private transportation for official travel, when practical, is preferred over the use of public or other communal transportation, in combination with other safety/security guidance. Exceptions are allowed for work related job functions (such as utility specialty trucks).

Official domestic and international travel is limited to mission critical trips and will be conducted in accordance with applicable CDC guidance and the January 21, 2021, Executive Order “[Promoting COVID-19 Safety in Domestic and International Travel](#)”. Utilizing a risk-based, data-driven assessment process, domestic travel must be approved by the Head of the Departmental Element or their designee.

Individuals who are not fully vaccinated may be required to stay home for a period of time after official or personal travel before they are allowed to return to the workplace, as well as follow any applicable testing guidance. Federal employees who are not fully vaccinated will be required to telework upon return from official travel for the duration of the CDC quarantine period. Fully vaccinated Federal employees are not required to get tested before leaving the United States unless required by their destination. After travel, employees should get tested with a viral test 3-5 days after travel, self-monitor for COVID-19 symptoms, and isolate and get tested if symptoms develop. Employees who return from personal travel should telework during any applicable CDC quarantine period. Employees who are not telework eligible must work with their management on an appropriate work status to mitigate impacts to the greatest extent possible.

4.5 Symptom Monitoring

If employees or visitors are not feeling well, they are not to enter the workplace. Individuals are encouraged to monitor themselves for the development of symptoms. Any individual who develops any symptom consistent with COVID-19 during the workday must immediately isolate, notify their supervisor, and promptly leave the workplace.

4.6 Quarantine and Isolation

Any individual with suspected or confirmed COVID-19 will not be allowed on-site and will be advised to isolate, pursuant to CDC guidelines, and in compliance with local laws and regulations. Personnel who are not fully vaccinated and have had close contact in the past seven days with someone who has tested positive for COVID-19 should tell their supervisor and follow CDC and local guidance for quarantine and testing. Fully vaccinated employees are not required to quarantine or be tested following an exposure to someone with suspected or confirmed COVID-19, as long as they have no symptoms. They should still monitor for [symptoms of COVID-19](#) for 14 days following an exposure. If they experience symptoms, they should isolate themselves from others, be clinically evaluated for COVID-19, including SARS-CoV-2 testing, if indicated, and inform their health care provider of their vaccination status. Personnel should refer to the latest CDC guidance (www.cdc.gov/coronavirus) for additional information.

4.7 Confidentiality

All medical information collected, including test results and any other information obtained as a result of testing and symptom monitoring, will be treated confidentially in accordance with

applicable law, and accessible only by those with a need to know in order to protect the health and safety of personnel.

Supervisors may ask an individual who tested positive for COVID-19 for consent to share their identity information with those whom they have been in close contact. Even if an individual consents to such disclosure, identifying information is only to be provided to those who have a need to know.

The COVID-19 Hotline Response Team or the individuals who are performing contact tracing will work with managers and supervisors to verbally notify coworkers who may have been in close contact with an individual diagnosed with COVID-19 to provide these employees more information to help when monitoring themselves for signs or symptoms and quarantining themselves, if appropriate. Again, the information provided about any individual's health should be minimized as much as possible.

4.8 Vaccinations

Vaccines are widely accessible in the U.S. and DOE strongly encourages all Federal and contractor employees to get a COVID-19 vaccine.

There may be circumstances where the Department will inquire or maintain information on employees who have been vaccinated. Also, for contact tracing and exposure purposes, Federal and contractor employees may be asked if they have been vaccinated. Those employees who are reporting on-site due to mission critical work may need to inform their supervisor of their vaccine status when determining quarantining protocols after travel or for contact tracing and exposure purposes. In each of these circumstances, the information on Federal and contractor employee vaccinations shall be kept confidential in accordance with applicable law, and accessible only by those with a need to know.

5.0 Workplace Operations

5.1 Occupancy

The Project will continue to utilize telework and staggered schedules during widespread community transmission. ("High community prevalence or transmission" is defined as a disease incidence case rate greater than 100 new cases per 100,000 population in the past two weeks using a 7-day rolling average for each day or greater than 200 new cases per 100,000 population in two weeks using a 7-day rolling average for each day in communities surrounding sites that have demonstrated adequate COVID-19 mitigation controls.) The Project's goal is to operate at 25 percent of normal occupancy.

Not all work can be performed remotely, such as environmental remediation or oversight. When the 25 percent goal cannot be met due to mission critical activities, alternative approaches will be developed. Management will focus on telework for employees who can work remotely, staggering shifts, increased engineering controls, and limiting shared spaces.

The site plans should include a staffing plan that outlines required employee staffing levels (full-time on-site, occasionally on-site, or fully remote) given local conditions and authorized work to ensure that the on-site presence is understood.

At this time, work activities are divided into three categories:

- Site Critical: Key duties must be performed on-site (e.g., regular access to classified information, site safety and security activities).
- Site Flexible: Some key duties or work activities are required to be performed on-site (e.g., Project oversight, on-site inspections).
- Site Optional: Most or all key duties can be performed remotely. Includes several Grand Junction office personnel.

5.2 Physical Distancing

In accordance with the CDC's [Interim Public Health Recommendations for Fully Vaccinated People](#), and consistent with guidance from the Safer Federal Workforce Task Force, fully vaccinated Federal employees, contractors, and visitors entering or working inside or on the grounds of a DOE site/facility are not required to physically distance in DOE buildings or in DOE leased spaces, except where called for by Federal, State, local, tribal, or territorial laws, rules, and regulations. People entering or working at a DOE site/facility who are not fully vaccinated are required to maintain a distance of at least six feet from others, including in offices, conference rooms, and all other indoor communal areas and workspaces. This is in addition to wearing a mask, where required. If work is being conducted outside, personnel can be closer than six feet if all personnel required to wear masks are wearing masks or if personnel are in respiratory protection equipment (e.g., respirator, air-feed hood).

5.3 Environmental Cleaning

Enhanced cleaning in common use/high touch/high density spaces, such as lobbies, restrooms, elevators, and stairwells will continue to be performed. Occupied office space will be cleaned regularly, and in accordance with CDC guidelines. Wipes and disinfectants will continue to be made available for individuals to wipe down their workstation and personal property. Gloves will be available upon request. Physical barriers such as plexiglass shields have been installed in administrative areas.

In accordance with CDC and General Services Administration guidelines, enhanced cleaning in an office space is required when it has been seven days or less since a person who is identified as a suspected or confirmed case of COVID-19 has been in the building. Judgement should be used in identifying the appropriate scope for cleaning industrial and radiological work areas. Site plans must ensure procedures and processes are in place that determine the scope of any workplace or area closures related to cleaning and disinfecting requirements.

Shared tools and equipment must be disinfected by users anytime the equipment is used by or transferred to a new person. Disinfectant wipes are provided. This includes phones, computers, kitchen implements, and other office equipment. Refrigerators, water coolers, and coffee brewers with disposable cups (or a personal re-usable cup/container) and single serve condiments may be used with proper hand hygiene.

5.4 Hygiene

Hand sanitizer stations will continue to be available throughout workspaces. Personnel are encouraged to wash their hands with soap and water or use hand sanitizer or alcohol-based hand rubs frequently. To reinforce the importance of hygiene, signage has been posted. Each site has procedures and processes for disinfecting shared tools, equipment, and common work surfaces (e.g., workbenches, laboratory spaces, desks). Disinfectant wipes will continue to be provided.

5.5 Visitors

Visitors have been minimized and efforts have been made to conduct visits and tours virtually. Any visitor should be screened and wear a mask if required. Sites should ensure procedures and processes are in place to implement any required visitor controls.

5.6 Shared Spaces

Assessments will continue to be performed to determine the safe occupancy level of shared spaces and that requirements are posted. Furniture from common areas has been reorganized or removed.

Current shared vehicle procedures are as follows:

- Allow for the fewest vehicle occupants as possible.
- Occupants must wear masks if they are not vaccinated.
- The driver of the vehicle shall ensure that at a minimum the steering wheel, door handles, and other common use areas are disinfected whenever there's a change in occupancy.
- Adequate cleaning supplies will be available to ensure passengers have the opportunity to perform any desired cleaning prior to entry or during use.

5.7 Elevators

There is one elevator at the Grand Junction office. Individuals who are required to wear masks must wear masks when using the elevator. The use of stairs by those who are physically able is strongly encouraged.

6.0 Conclusion

Project leadership continues to monitor local case counts, restrictions, and recommendations in both Utah and Colorado, in addition to current CDC guidance. Open dialogue between the two area health departments was established early on and local media is monitored for changing circumstances.

Employees are encouraged to go to their supervisor to report concerns or issues. The Project's Federal Cleanup Director and both senior managers for each prime contractor have an open door policy so employees can feel safe raising questions, concerns, or issues regarding all aspects of Moab UMTRA Project operations.

Since the start of the pandemic, management has incorporated new protocols into integrated work plans and job safety analyses. Most in-person meetings have converted into virtual or phone discussions.

Operations have not been affected by a shortage or absence of personal protective equipment. The Project works to maintain a month's supply of inventory of cleaning supplies. Staff diligently checks local vendors to maintain specific inventory. Further supply chain management is handled by subcontractors that provide necessary supplies. To date, there have not been issues obtaining supplies to continue work.

Employee-confirmed case counts currently stand below 10 percent. Contact tracing has indicated that virus transmission has not occurred at work. Management pledges to track and assess local conditions and adjust operations and procedures as needed moving forward.