



Moab UMTRA Project Coronavirus Mitigation Plan

Revision 3

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**Moab UMTRA Project
Coronavirus Mitigation Plan**

Revision 3

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.
2	August 2021	Updated section 4.2 Face Masks to reflect change in Federal requirements
3	December 2021	Updated to align with the DOE COVID-19 Workplace Safety and Reentry Framework, dated December 15, 2021.

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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 the January 20, 2021, Executive Order 13991 "[Protecting the Federal Workforce and Requiring Mask-Wearing](#)," and the September 9, 2021, Executive Order 14043 "[Requiring Coronavirus Disease 2019 Vaccination for Federal Employees](#)" 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". This Framework has been developed in accordance with relevant orders and guidance, including: the Office of Management and Budget (OMB) memorandum [M-21-15](#), COVID-19 Safe Federal Workplace: Agency Model Safety Principles, issued January 24, 2021; [M-21-25](#), Integrating Planning for a Safe Increased Return of Federal Employees and Contractors to Physical Workplaces with Post-Reentry Personnel Policies and Work Environment, issued June 10, 2021; [Safer Federal Workforce Task Force COVID-19 Workplace Safety: Agency Model Safety Principles](#), updated September 13, 2021; Executive Order 14042, [Ensuring Adequate COVID Safety Protocols for Federal Contractors](#), signed on September 9, 2021, and relevant court orders; guidance from the Safer Federal Workforce Task Force; updated U.S. Centers for Disease Control and Prevention (CDC) guidance; Occupational Safety and Health Administration (OSHA) guidelines; and other federal guidance. This Plan outlines the requirements to protect the health and safety of the workforce and facilitates safe accomplishment of the DOE mission in a COVID-19 environment. The Plan is a living document that will be updated as needed to account for changing COVID-19 conditions, Safer Federal Workforce Task Force guidance, and CDC guidelines.

The reentry schedule for Federal employees will be implemented in accordance with the EMCBC Reentry Plan. The contractor employee reentry process and schedule will be addressed in a subsequent revision of this plan or developed as a stand-alone document.

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 current plan was updated to align with the [DOE COVID-19 Workplace Safety and Reentry Framework](#), dated December 15, 2021. 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 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 Levels of Community Transmission

In applying COVID-19 workplace safety protocols connected to levels of community transmission in a given area, the Project should reference the [CDC COVID-19 Data Tracker County View](#). The Project may use discretion in determining the counties relevant to the determination of the level of community transmission in a given area. (e.g., consider the county in which a DOE site is located, the transmission levels of surrounding local counties from which employees and visitors travel to the site, and transmission levels in counties through which employees regularly travel over the course of their work in the field and between various work sites).

The Project should assess transmission rates in a given area at least weekly to determine proper mask wearing requirements. When the level of transmission related to a Project site increases from "low" or "moderate" to "substantial" or "high", the Project should put in place more protective safety protocols (described below), which are consistent with CDC guidelines and guidance from the Safer Federal Workforce Task Force as soon as operationally feasible. However, when the level of transmission related to a Project site is reduced from high or

substantial to moderate or low, the level of transmission must remain at that lower level for at least two consecutive weeks before the Project utilizes those protocols recommended for areas of moderate or low transmission by CDC guidelines and guidance from the Safer Federal Workforce Task Force.

Where a locality imposes more protective pandemic-related safety requirements, those requirements are followed in DOE buildings, in DOE controlled indoor worksites, and on DOE lands within that locality.

4.3 Face Masks

In areas where the CDC has classified the COVID-19 transmission as “substantial” or “high”, all Federal workers, contractors, and visitors, regardless of vaccination status, will be required to wear a face mask indoors.

In areas where the CDC has classified the COVID-19 transmission as “low” or “moderate” and 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 at the Project’s sites are not required to wear masks, except where called for by Federal, State, local, Tribal, or territorial laws, rules, and regulations.

Regardless of the transmission levels, any individual entering or working at the Project sites who is not fully vaccinated (i.e., who are not at least 2 weeks past their final dose) or who declines to provide vaccination information when requested is required to wear a mask while in DOE buildings and in leased space, including all public and work areas within a building (e.g., hallways, break rooms, elevators, and restrooms). To ensure compliance, signage will be posted throughout all sites, especially entrances, to remind individuals of the requirement.

Individuals who are required to wear a mask must wear a mask that covers the nose and mouth and is in accordance with current [CDC](#) and [OSHA](#) 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 washable and 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, and masks with a nose wire to prevent air from leaking out of the top of the mask. Novelty/non-protective masks, masks with ventilation valves, or face shields are not considered an acceptable substitute for masks.

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 outdoors in crowded settings or during outdoor activities that involve sustained close contact with other people who are not fully vaccinated. When required to be worn, masks must be worn in all in-person meetings. Guards may direct individuals to lower or temporarily remove their masks to verify identity. Masks, when required, must be worn inside government-owned vehicles.

When required, exceptions to wearing a mask include:

- 1) When alone in an office with floor-to-ceiling walls and the door is shut;
 - 2) When the sole occupant in a government-owned vehicle;
 - 3) Intermittent removal when eating/drinking -- masks may be removed for a limited time if one is at least six feet from another individual;
 - 4) 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;
 - 5) Conducting work where the hazards associated with wearing the mask (e.g., straps getting caught in machinery, heat stroke, etc.) are greater than the risks with not wearing a mask as long as the COVID-19 risk is factored into the job hazards analysis and the controls identified as part of that analysis are implemented; and,
 - 6) Individuals who have a medical or religious reason why they cannot wear masks.
- Exemptions to the face mask policy will be considered in accordance with existing Equal Employment Opportunity Commission (EEOC) guidance. Federal employees will be required to go through the Department's/Contractor's Reasonable Accommodation process in order to seek an exemption.

The FCD or the Field/Site Manager or their designee will approve exemptions for visitors. For the contractor workforce, approval will be provided consistent with the terms and conditions of the contract.

4.4 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.

4.5 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.

4.6 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.

4.7 Quarantine and Isolation

Any individual with a suspected or confirmed COVID-19 case will not be allowed onsite and will be advised to isolate, pursuant to [CDC guidelines](#), and in compliance with local laws and regulations. Individuals should contact their health care provider and follow their instructions. Unless advised otherwise by a health care provider, health department official, or site occupational medical official, a person with suspected or confirmed COVID-19 may return to work after:

- 10 days after symptoms first appeared, and
- Fever-free for 24 hours without the use of fever-reducing medications, and
- Other symptoms (not including loss of taste or smell) are improving

If an employee is subject to isolation due to being infected with COVID-19 and is unable to telework, the employee may request sick leave, as weather and safety leave would be unavailable. Employees may also request accrued annual leave and other forms of paid or unpaid leave in this situation as appropriate (See OPM CPM 2020-02, February 7, 2020).

Personnel who are not fully vaccinated and who have had close contact (within 6 feet of someone who has COVID-19 for a cumulative total of 15 minutes over a 24-hour period) in the past 14 days with someone who is suspected of having COVID-19 or who has tested positive for COVID-19 must follow CDC and local guidance for quarantine and testing. Unless advised otherwise by a health department official or site occupational medical official, a person may end quarantine:

- 10 days from the date of last exposure if they do not have any symptoms, or

- 7 days from the date of last exposure if they do not have symptoms, were tested after day 5, and the test result is negative.

The individual should continue to wear a mask and monitor their symptoms for the full 14 days from the date of last exposure.

Fully vaccinated employees who have had close contact with someone suspected of or confirmed to have COVID-19 are not required to [quarantine, but should get](#) tested 5 to 7 days after exposure, even if they do not have symptoms. They should also wear a mask indoors or in public for 14 days following exposure or until their test result is negative. If their test result is positive, or they develop symptoms, they should isolate for 10 days and contact their physician.

Personnel should refer to the latest [CDC guidance on quarantine and isolation](#) for additional information

4.8 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.

4.9 Vaccinations

Vaccinations are the most effective tool we possess to protect public health, the health of our workforce, and DOE's ability to accomplish its critical work during this pandemic. To promote the safety of the workforce, in accordance with applicable law and collective bargaining obligations, DOE will require employees, as well as contractor employees covered by a contractual requirement pursuant to Executive Order 14042, to be fully vaccinated to conduct work or business at a Federal site unless a specific legal exception applies. In implementing Executive Order 14042, the Department will comply with all relevant court orders, including following relevant OMB and Safer Federal Workforce Task Force guidance. Specific protocols regarding vaccinations should be incorporated in specific site/facility plans, including, for example, protocols covering visitors to Federal sites and individuals using DOE's scientific facilities.

Covered Contractor and Subcontractor Employees

In compliance with Executive Order 14042, [Ensuring Adequate COVID Safety Protocols for Federal Contractors](#), signed on September 9, 2021, DOE will ensure that newly awarded (awarded, option exercised, renewed) contracts and contract-like instruments covered by the Executive Order include a clause requiring the contractor – and their subcontractors at any tier – comply with [all guidance for contractor or subcontractor workplace locations issued by the Safer Federal Workforce Task Force](#). This includes requirements that covered contractor and subcontractor employees be fully vaccinated consistent with the Task Force’s guidance; all individuals follow masking and physical distancing protocols while in covered contractor workplaces; and contractors designate a person or persons as COVID-19 workplace safety coordinator. DOE is also working to incorporate the clause into many of its existing contracts that are not covered by EO 14042. In implementing Executive Order 14042, the Department will comply with all relevant court orders, including following relevant OMB and Safer Federal Workforce Task Force guidance. Contractors whose contracts have not yet been modified to include the vaccination mandate and other COVID-19 workplace safety protocols will be required to have contractor employees attest to their vaccination status and, if not fully vaccinated or if the employee refuses to identify whether they are fully vaccinated, shall require proof of a negative COVID-19 test before working onsite. The COVID viral test must have been administered (taken) within the prior 3 days to arrival onsite to a DOE facility and must be an FDA authorized test.

Vaccination Status

For purposes of its safety protocols and in accordance with CDC guidance, the Department considers Federal employees, contractor employees, and visitors fully vaccinated for COVID-19 two weeks after they have received the requisite number of doses of a COVID-19 vaccine approved or authorized for emergency use by the U.S. Food and Drug Administration or that has been listed for emergency use by the World Health Organization. For Pfizer-BioNTech, Moderna, or AstraZeneca/Oxford, Novavax fully vaccinated is 2 weeks after an employee has received the second dose in a 2-dose series. For Johnson and Johnson (J&J)/Janssen, fully vaccinated is 2 weeks after an employee has received a single-dose.

When an employee discloses that they are not fully vaccinated, or until the vaccination status of an employee is known, the employee will the protocols for an individual who is not fully vaccinated, pending any appropriate disciplinary action if the employee has not requested an accommodation and does not have an accommodation request under consideration by the deadline for vaccination. When an onsite contractor employee or visitor discloses that they are unvaccinated or declines to provide their vaccination information, the Project will treat that individual as not fully vaccinated for purposes of implementing safety measures, including with respect to mask wearing, physical distancing, testing, travel, and quarantine.

5.0 Workplace Operations

5.1 Occupancy

The Project may establish occupancy limits for specific workplaces as a means of facilitating physical distancing. Note that by reducing the number of people in a space, occupancy limits also increase the heating, ventilation, and air conditioning delivery of outdoor air per person. The

Project will continue to utilize telework and staggered schedules during widespread community transmission. 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.

Approach to Reentry

Federal employees will follow the current EMCBC Reentry Plan. The contractor employee reentry process will be addressed in a subsequent revision of this plan or developed as a standalone document and will be aligned with the principles and requirements of the [DOE COVID-19 Workplace Safety and Reentry Framework](#).

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.