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LANL COVID-19 Risk and Exposure Control Measures for On-Site Work Activities

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# LANL COVID-19 Risk and Exposure Control Measures for On-Site Work Activities

## 1.0 PURPOSE

Los Alamos National Laboratory (LANL or the Laboratory) has implemented risk evaluation and control measures designed to ensure safe performance of all on-site work activities during the COVID-19 pandemic. This document provides the framework to enable managers and staff to jointly evaluate risks and hazards to conduct on-site work activities in accordance with COVID-19 Safety Protocols and consistent with LANL policies and procedures. The Laboratory's goal is to minimize both risk to the individual worker, work teams, and others as a result of COVID-19.

Throughout this document, the use of "shall" or "must" denotes a Laboratory requirement and is mandatory while the use of "should" or "recommended" is guidance.

## 2.0 AUTHORITY AND APPLICABILITY

### 2.1 Authority

- Issuing Authority (IA): Laboratory Director (DIR)
- Responsible Office (RO): Laboratory Director's Office (LDO)

### 2.2 Applicability

This document applies to all Laboratory workers, including on-site subcontractor employees and lower-tier subcontractor personnel in accordance with their subcontract Exhibit F. It also applies to all guests and visitors who come on-site.

## 3.0 STRATEGY – PHASED APPROACH

The emergence and spread of COVID-19 has driven the need to apply specific COVID-19 safety protocols for on-site work and for many activities at the Laboratory to be done remotely. This shift has impacted progress on meeting mission and science, technology, and engineering (ST&E) deliverables. As federal, state, and local authorities continue to respond to the COVID-19 threat, Laboratory sponsors have identified the mission essential activities that must, to the maximum extent possible, be maintained to support the Nation's security. Over time, the Laboratory will continue to add tasks in a phased and controlled approach to normal operational status. The various stages of this approach are shown in the following figure with the operational status terms defined below.

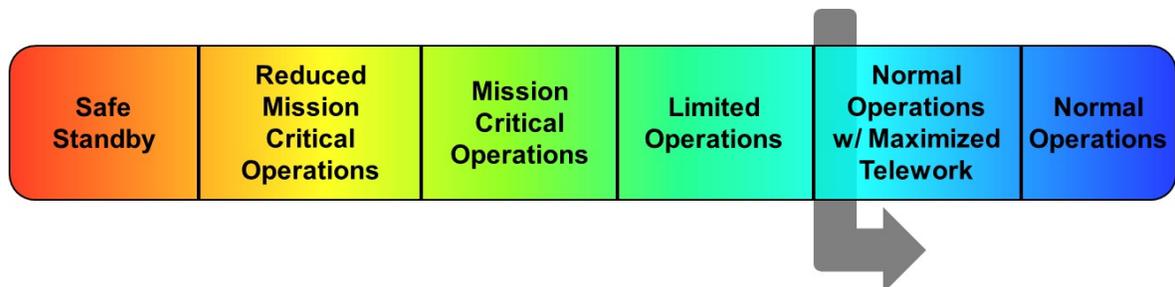


Fig. 1. Operational Status Phased Approach

- **Safe Standby:** The safety/security posture at the site has degraded to a point where only actions to protect the site are occurring.

- **Reduced Mission-Critical Operations:** Adjustments to the safety/security posture at the site to optimize workforce health during this period still enables meeting identified highest priority primary mission essential functions (PMEFs) and mission essential functions (MEFs).
- **Mission-Critical Operations:** Operations that ensure DOE's PMEFs, MEFs, and essential supporting activities (ESAs).
- **Limited Operations:** The site has curtailed some normal operations – whether to proactively preserve resources for essential functions, or in recognition that it is difficult to back away from certain operations quickly or safely if the situation rapidly changes.
- **Normal Operations with Maximized Telework:** The site is still meeting all mission deliverables (with a balance of on-site and offsite work).
- **Normal Operations:** The site is meeting all mission deliverables without the need for maximized telework

As of September 22, 2020, the Laboratory's operational status is "Normal Operations with Maximized Telework" and approximately 60% of the Laboratory workforce is teleworking and 40% is supporting work on-site. In accordance with NNSA guidelines, the Laboratory is accomplishing significant work across all mission, ST&E, and operational areas, and all facilities are being maintained. Additional operations continue to be phased in carefully.

### 3.1 Critical Factors

The Laboratory's phased approach is dependent upon a number of critical factors that include:

- Sufficient testing capacity, both frequently for personnel whose roles and responsibilities require more regular contact with the workforce (such as protective force and occupational medicine), and occasional/surge for all employees.
- Contact tracing and case isolation capability is available and effective;
- Self-monitoring practices are established and implemented for all on-site employees;
- Institution-wide policies and training implemented and monitored to ensure on-site activities can be performed in accordance with COVID-19 health and control measures;
- An appropriate supply of PPE, face coverings/masks, and cleaning supplies are available;
- Laboratory modeling forecasts and projections do not indicate significant increased risk to employee health

Based on these, and other, critical factors, the Laboratory Director, in consultation with the Laboratory's Leadership Team, will coordinate with and obtain approval, as necessary, from DOE/NNSA on decisions regarding when to change operational status, how many employees may be collectively working on-site at any given location or time, and how well the Laboratory can effectively function in accordance with COVID-19 Safety Protocols. It will take an extended period for the Laboratory to gradually and carefully progress to Normal Operations status. Consequently, Laboratory requirements and policy for performing on-site work will be adjusted as the situation continues to evolve.

### 3.2 Determining On-Site Functions and Activities

Guidance from DOE and NNSA leadership and other Laboratory sponsors serves as the primary basis for determining what activities should be performed on-site (i.e., mission essential functions). The Deputy Laboratory Directors (DLDs) are responsible for accepting the aggregate risk of work performed on-site, and must have knowledge of and accept the risk for on-site activities for their respective principal program sponsors. The DLDs also evaluate, prioritize, and integrate cross-organizational and institutional resource needs.

The Associate Laboratory Directors (ALDs) are responsible for developing a process to be implemented in their respective organizations in alignment with this policy that defines proper: hazard identification, analysis, control, execution; resource identification (i.e., support personnel, personal protective equipment [PPE], facility and infrastructure support), implementation of COVID-19 Safety Protocols, and oversight requirements for activities in their organization. This includes evaluating and mitigating as necessary, potential cross-organizational issues and/or co-located hazards associated with performing work in and across Laboratory facilities and organizations.

- ALDs shall work with their qualified Industrial Hygienist (IH) or LANL's Biological Safety Officer (BSO) regarding the development of work procedures that require specific COVID-19 mitigations where the standard COVID-19 Safety Protocols cannot be effectively followed.
- If a concern with any particular work procedure or area arises, the IH or the BSO shall present this concern to the ALD for review and resolution.
- In addition, if either the IH, the BSO or an ALD determines that approved work cannot be accomplished with appropriate COVID-19 mitigations, the work will be paused and the ALD shall report that determination back to the risk accepting DLD for review and resolution.

The Executive Officers (XOs) develop processes to evaluate cross-organizational and institutional resource needs and work to develop processes and recommendations to meet those needs, as warranted. This is done in conjunction with the Leadership Team and Chief Operating Officers (COOs) to ensure simultaneous excellence in meeting mission, ST&E, and operations deliverables.

As time progresses, and using a risk-based and graded approach, the Laboratory Leadership Team will evaluate how well Laboratory on-site work activities can be performed in accordance with COVID-19 Safety Protocols with the goal of gradually scaling up on-site work activities. However, based on the evolving COVID-19 situation, the operational status and associated work activities on-site can be scaled either up or down, as necessary. Further, the Laboratory will continue to encourage telework when work scope can be accomplished effectively.

### **3.3 Requirements for Reporting to Work On-Site and for Performing Screening Checks**

LANL employees who are fit for duty and assigned by their managers to work on-site are expected to report on-site to perform approved work. Where employees have concerns about returning on-site, managers will work with the employee to determine if there are telework alternatives to performing the work on-site or an alternate work scope. If such alternatives cannot be identified, employees will be required to charge vacation or leave without pay, in accordance with [P761](#), *Work Schedules*.

The Laboratory has developed [Verbal Screening and Temperature Check Protocols](#) (screening checks) for planned on-site work activities where social distancing of six (6) feet cannot be maintained between workers (see Section 4.2 below). These mandatory screening checks are critically important to protect the workforce during the pandemic and employees must fully cooperate. Any employee refusing to cooperate with the screening checks will be sent home, required to take leave without pay, and be referred to Laboratory Employee Relations (non-craft) or Labor Relations (craft).

### **4.0 SPECIAL COVID-19 SAFETY PROTOCOLS – EXPECTATIONS FOR ON-SITE WORK**

In accordance with federal and state health and safety authorities, the Laboratory has implemented COVID-19 prevention/control, containment, and response actions, measures, and

protocols (COVID-19 Safety Protocols) to reduce the risk of COVID-19 spread during on-site work activities. In concert with the evidence-based recommendations from federal and state authorities, the Laboratory follows the concept of ensuring risk is “As Low As Reasonably Achievable” (ALARA) by implementing COVID-19 Safety Protocols, which are summarized below.

As a pre-requisite to performing work or coming on-site, all employees, including on-site subcontractors, guests, and visitors, must complete required training, “Working Safely at LANL during the COVID-19 Pandemic”, [Course #49476](#). Completion of the course will be tracked via UTrain and ExTrain as appropriate.

**Note:** All employees, including subcontractor employees, that continued to perform on-site work activities while the Laboratory was in Mission-Critical Operations status, must also complete the required training as well as adhere to all COVID-19 Safety Protocols contained in this policy.

#### **4.1 Before Coming On-Site**

As the Laboratory continues to develop plans for releasing work to be performed on-site, line management will be asking a gradually increasing number of workers to transition from teleworking to working on-site. In preparation for on-site work, line management and employees will be evaluating work activities per [P300, Integrated Work Management, P300-1, Integrated Work Management for R&D](#), and the COVID-19 Safety Protocols in this document to develop necessary controls. New on-site work may not proceed before activities have been reviewed and released by line management, with input from employees, in accordance with this policy.

When employees are requested to work on-site, before coming on-site each day, all workers must perform a [daily self-assessment](#) to determine their susceptibility/exposure to COVID-19. The Laboratory’s goal is to minimize both risk to the individual worker and risk to others. Therefore, all individuals are urged to be honest in completing the self-assessment. Employees, subcontractors, and visitors must complete the [daily self-assessment](#) and must not come to work if feeling sick, regardless of their personal assessment of the likelihood that they may have COVID-19.

##### **4.1.1 Visitors and Guests Coming On-site**

All visitors and guests that will be coming on-site are required to follow the requirements of this policy. Before visitors or guests come on-site, sponsoring LANL employees will brief the visitors and guests on the COVID-19 Safety Protocols to ensure the safety of the visitor, guest and LANL staff. The sponsor will also provide the visitor or guest with externally accessible links to enable pre-on-site review of COVID-19 Safety Protocols, including this policy, the [daily self-assessment](#), and required training. The Laboratory requires visitors and guests to coordinate with LANL sponsors to complete review of the COVID-19 Safety Protocols and required training before coming on-site. Appointments to visit the Badge Office must be made prior to arriving on-site.

##### **4.1.2 Answers on the Self-Assessment**

If an on-site worker, subcontractor, or visitor self-responds “YES,” or is unsure how to respond to any of the questions in the attached self-assessment, then before coming on-site, the worker must contact the LANL COVID-19 hotline (505-606-2667) for guidance. An Occupational Medicine (Occ-Med) Healthcare Professional will provide direction on whether the worker may safely return to the worksite. In some cases, the Occ-Med Healthcare Professional may also provide the worker and their manager or visit sponsor with a duty disposition letter (DDL) with the worker’s return-to-worksite recommendations and/or requirements and a follow-up date for reassessment of the worker’s fitness for duty. Workers that self-respond YES, or are unsure of how to respond: DO NOT come on-site until they have contacted the COVID-19 hotline for guidance.

If a worker self-responds “NO” to ALL questions in the attached self-assessment, the worker will report to the scheduled work site. The worker could still be directed to work remotely.

Workers DO NOT need to share their completed self-assessment or health history details with their managers or other coworkers. Occ-Med Healthcare Professionals who are staffing the COVID-19 hotline will protect the individual’s personal health information.

**Note:** Because of the dynamic nature of the COVID-19 pandemic, it is possible that a worker’s answers to the self-assessment questions may change over time. If the answers to self-assessment questions change during the COVID-19 pandemic, the worker must contact the COVID-19 hotline immediately before coming on-site. You will have to call the COVID-19 Hotline only when you first plan to come on-site, and subsequently only if your condition changes.

## 4.2 While Working or On-site

All employees, subcontractors, visitors, and guests must:

- Immediately isolate from others, contact their supervisor, Subcontract Technical Representative (STR), sponsor, or host, and call the COVID-19 Hotline if they begin to feel ill while on-site. DO NOT VISIT the Occ-Med facility unless directed to do so by the LANL COVID-19 Hotline.
- Maintain social distancing and minimize time in close contact, which means maintain a distance of at least six feet from others whenever possible.
  - If one must be within six feet of other people due to safety or job requirements, the following must be observed:
    - Pre-plan the work to minimize the time and the interactions within six feet.
    - Pre-plan the work to minimize the number of necessary personnel.
    - Perform the mandatory pre-job screening and temperature check protocol per the requirements in Quick Take Guide, [Quick Take Guide, “Verbal Screening and Temperature Check Protocols”, OSH-ISH-QTG-030.](#)
    - Use a buddy system to minimize exposure risk, and to hold each other accountable for staying healthy.
    - Follow the controls in [Quick Take Guide, “COVID-19 Control Strategies”, OSH-ISH-QTG-029.](#)
    - Keep as far apart as possible, unless other safety or health hazards require otherwise.

**Note:** Individuals can be within six feet of each other in a transient situation, for example to ride an elevator or enter a facility through security turnstiles, if all individuals are properly wearing face mask/coverings and the duration of the transient situation is less than 10 minutes.

- Wear face masks/coverings at all times while on-site, including while exercising. The only exceptions to this face mask/covering requirement are:
  - When an individual is alone in an individual office or vehicle
  - While eating, employees must ensure they maintain at least six feet of distancing at all times.
  - When a physical barrier, such as a cubicle wall or plexiglass shield, that is approved by the BSO or deployed IH/S professional, is installed for work spaces where individuals are sitting/standing in that work space and are below the height of that physical barrier. Six feet

of distancing is required to be maintained for these work spaces and employees may still be asked to self-isolate as a result of contact tracing.

All employees will be provided a face mask/covering for use on-site. Employees may also choose to wear their own face mask/covering. If an employee chooses to wear their own face mask/covering, the following standards must be observed:

- Masks with exhalation valves (e.g., N95s with exhalation valves or commercial face masks/coverings with valves) must not be worn.
- Acceptable masks are disposable surgical masks, KN95s, and cloth face coverings as described below.
  - Cloth face coverings must cover the nose, mouth, and chin, be secured with elastic loops or ties, and be washable and reusable.
  - Cloth face coverings containing a combination of materials including cotton and chiffon, cotton and flannel, cotton and silk with at least two layers of material are acceptable.

Face masks/coverings are available through the TA-60 warehouse between 8 a.m. and noon Monday–Friday, and will be distributed to each ALD by their cognizant FOD.

Necessary respiratory protection for other hazards associated with the work will be identified by your IH and health physicist in work control documents. For additional guidance see the High Demand PPE Process and the Laboratory's internal website, "[Resources for On-site Work](#)" in the [COVID-19 Information Page](#). Also see the website for additional guidance on face coverings.

**Note:** Individuals must remove their face mask/covering temporarily if a Laboratory Security Officer requests them to do so. When removing the face mask/covering, be sure to observe social distancing of at least six feet.

*Through the formal evaluation of a deployed industrial hygienist, face masks/coverings may be eliminated for outdoor work when heat stress is a potential hazard, as long as workers maintain a minimum distance of six feet apart and observe the following guidelines:*

- Wash hands often with soap and water for at least 20 seconds. Wash your hands when you get to work, before eating or drinking, after using the bathroom, and before leaving the job site. Wash your hands before you don protective gloves and other PPE (if required for the activity). Wash your hands after removing PPE. If soap and water are not available, use a hand sanitizer with at least 60% alcohol, and wash your hands as soon as possible.
- Do not touch your face. If you must touch your face to don personal protective equipment (PPE), wash your hands first. Ensure that your PPE that touches your face (safety glasses, respirator) has been sanitized with soap and water or disinfectant before you don the PPE.
- Use your own tools as much as possible. If you must use shared tools, wipe them down with approved disinfectant, or soap and water (any consumer soap product is fine), before and after use.
- Clean shared surfaces routinely with soap and water, or disinfectant. For detailed requirements for cleaning and disinfection, see the [Quick Take Guide, "Cleaning and Disinfection of Work Areas, PPE, Face Masks/Coverings, and Respirators"](#), OSH-ISH-QTG-028.
- Conduct meetings remotely and avoid gathering for meetings in groups as much as possible. If in-person meetings or gatherings must be held, then face masks/coverings must be worn and gatherings should be kept to 10 people or fewer, or in the case of auditoriums, a

maximum of 10% capacity with at least six feet between individuals (ALDs have the discretion for a given meeting to increase the auditorium occupancy above 10% provided social distancing is maintained). Exceptions to the occupancy limits must be reviewed by RLMs/FODs with ESH professionals to ensure observing COVID-19 Safety Protocols and must be approved by the cognizant ALD.

For detailed requirements on COVID-19 Safety Protocols, see the [Quick Take Guide, "COVID-19 Control Strategies", OSH-ISH-QTG-029](#).

### **4.3 Travel Requirements**

#### **4.3.1 Approved Work-Related Travel outside New Mexico**

All domestic work-related travel outside of New Mexico requires approval by line management and the cognizant ALD. Employees traveling outside of New Mexico on approved domestic work-related travel may return to work on-site upon their return to NM without having to observe the 14-day self-isolation period and will be required to follow the Laboratory's COVID-19 Safety Protocols at all times while on-site.

International work-related travel also requires approval by line management and the LDO and requires additional approvals by DOE/NNSA. Return to New Mexico from international work-related travel requires self-isolation for 14 days.

**Note:** When new hires arrive in New Mexico from out of state to begin work with the Laboratory, they are expected to self-isolate for 14 days upon their arrival to the state. If the new hire is required by their particular assignment to work on-site beginning on their pre-arranged start-date, the RLM must arrange for the new hire to have arrived in New Mexico 14 days before their start date to ensure sufficient time for self-isolation. If the new hire is not required to work on-site on their pre-arranged start date, the RLM must arrange for the new hire to effectively telework for at least the 14-day self-isolation period after their start date.

#### **4.3.2 Out of State Subcontractors, Visitors and Guests coming to the Laboratory**

Subcontractors, visitors, and guests coming to the Laboratory on domestic travel from out of state to conduct work on-site or that are on official business are not required to self-isolate but are required to follow the Laboratory's COVID-19 Safety Protocols at all times while on-site.

Subcontractors, visitors, and guests coming to the Laboratory on international travel to conduct work on-site or that are on official business are required to self-isolate for 14 days upon arrival in New Mexico. Upon arrival in New Mexico and before coming on-site, employees, subcontractors, visitors, and guests (through their LANL sponsor) must contact the COVID-19 Hotline and their line manager to report their self-isolation and coordinate their coming on-site.

#### **4.3.3 Personal Travel outside New Mexico via Personal or Public Transportation and Returning to Work at LANL**

Employees, subcontractors, visitors, and guests on personal travel who travel outside New Mexico, regardless of transportation mode, are required to self-isolate for 14 days upon return to the state. Upon arrival/return to New Mexico, and before coming on-site, employees, subcontractors, visitors and guests will contact their RLM or host to coordinate their return to work before coming on-site. Hosts who are not RLMs should contact their RLM. To minimize mission impact and the potential for employees to have to use leave, employees should discuss their out-of-state travel plans with their RLMs **before** leaving for out-of-state personal travel to pre-determine a return to work plan.

On a case-by-case basis, RLMs can evaluate risk factors along with the essential nature of the employee's work to determine if the employee can return to work on-site, in lieu of self-isolation. The RLM evaluation should take into account the current State of New Mexico travel restrictions that are identified in the most recent State of New Mexico Executive Order and State of New Mexico Public Health Order. The RLM may authorize teleworking for workers self-isolating, if possible. If teleworking is not possible, the employee may take vacation, or leave without pay.

Employees that have approval from their RLM to return to work on-site must complete the [daily self-assessment](#) before coming on-site.

Employees who have an agreement from their RLM to self-isolate for 14 days must call the COVID-19 Hotline to report their self-isolation start date.

#### **4.3.4 Employees and Subcontractors Experiencing COVID-19 Symptoms While on Travel**

Employees and subcontractors who experience COVID-19 symptoms while on travel outside New Mexico must contact the COVID-19 Hotline and self-isolate. If COVID-19 symptoms worsen, employees and subcontractors should seek guidance from a local urgent care facility and try to get tested. When the employee or subcontractor returns to New Mexico, their return to work on-site must be coordinated through their line manager and Occupational Medicine via the COVID-19 Hotline. For further guidance on what to do if experiencing COVID-19 symptoms while on travel, see the Laboratory's internal website, "[Resources for On-Site Work](#)" in the [COVID-19 Information Page](#).

## **5.0 RESPONSE TO CONFIRMED COVID-19 CASE**

The Laboratory has provided detailed guidance to all managers on how to handle a positive COVID-19 case. The guidance provides details for a number of topical areas, including:

- What a manager should do if an employee tells them that they have tested positive for COVID-19
- What an infected employee should do and what managers should tell other employees
- What a manager should do if an employee has had a COVID-19 test and the results are pending
- How workspaces will be sanitized after infected employees are sent home
- What to tell an employee who has been in isolation and will be returning to work

The detailed guidance for these, and [additional topical areas](#) are available on the Laboratory's internal website, "[Resources for On-Site Work](#)" in the [COVID-19 Information Page](#).

The COVID-19 hotline specialists will work with the presumptive positive or confirmed positive employee for contact tracing purposes on LANL property. The hotline will determine if other LANL workers, subcontractors, or guests have been in close contact (less than six feet or direct contact with mucus or secretions) with the presumptive positive, or positive employee for a duration longer than 10 minutes, even if face coverings have been worn. If close contacts are identified, the COVID hotline specialists will notify these employees that they need to self isolate for 14 days or until negative test results determine that the isolation is no longer required. COVID-19 hotline specialists will also contact RLMs for the close contacts. Managers must not ask additional personnel to self-isolate without coordination with the COVID-19 hotline specialists, or overrule instructions to self-isolate from the COVID-19 hotline due to a positive or presumptive positive COVID-19 case.

The Emergency Management Division, in consultation with the LANL Medical Director and the BSO, has also established cleaning protocols in the event an individual who has worked on-site is confirmed positive with COVID-19. There may also be other unique COVID-19-related circumstances or risks that warrant cleaning and disinfecting of affected areas.

## 6.0 CLEANING SUPPLIES AND PERSONAL PROTECTIVE EQUIPMENT (PPE)

RLMs will plan accordingly and ensure employees are equipped with the cleaning supplies and PPE necessary to execute approved work.

### 6.1 Cleaning and Disinfecting Supplies

Cleaning and disinfecting supplies include soap, water, paper towels, hand sanitizer, disinfectant, and other necessary materials to regularly wipe-down and disinfect surfaces that are contacted during the course of work. Work may not be performed unless appropriate supplies are provided and readily available during the performance of work. Cleaning materials and disinfectants may be obtained from TA-60 or by working through the FOD.

### 6.2 Personal Protective Equipment

The Laboratory is encountering delays in consistently being able to fill orders of PPE and disinfectant products from local and national sources. Some items in high demand include disposable coveralls (i.e., Tyvek), nitrile gloves, N95 masks, hand sanitizer, and disinfectants. Other items of potential concern include face shields, safety glasses, and goggles.

To ensure that the Laboratory has enough supplies to meet critical needs, the Laboratory's limited stores of high demand/low supply PPE and cleaning supplies will be distributed on a priority basis to those performing critical ALD approved functions on-site. The primary distribution center for all areas except TA-55 is the TA-60 warehouse.

As a part of the work planning and control process, RLMs will identify PPE requirements. After receiving approval for their assigned activity, RLMs can obtain PPE through the normal distribution process. If Tyvek, Nitrile Gloves, N95 masks, or thermometers are needed, RLMs can contact the TA-60 distribution center for supplies.

**Note:** requests for Tyvek, Nitrile Gloves, or N95 masks require a Hazard Analysis form to be completed by your Deployed ESH Team.

For those who have excess PPE that can be sent to the TA-60 warehouse, fill out an Intake Form documenting the type, size, and quantity of PPE. Either deliver the supplies to the TA-60 warehouse or contact the Deployed ESH Manager within the respective FOD to coordinate a pickup. Only send unopened and non-expired PPE. The materials may not be received without the Intake Form.

For questions on obtaining or returning PPE, contact [highdemanppe@lanl.gov](mailto:highdemanppe@lanl.gov). [Additional guidance and forms](#) are available on the Laboratory's internal website, "[Resources for On-Site Work](#)" in the COVID-19 Information Page.

## 7.0 OTHER ACTIVITIES – SIGNS, MARKINGS, EATING ON-SITE, AND RLM GUIDANCE MATERIALS

The Laboratory provides templates for warning signs and markings to RLMs to reinforce awareness among workers and to avoid undue COVID-19 exposures. The Institutional Worker Environment, Safety, and Security Teams (IWESST) and the Associate Laboratory Directorate for Facilities and Operations (ALDFO) developed the signs and markings and promulgates them as

necessary to all organizations via their respective WESST. Templates are also available on the Laboratory's internal website, ["Resources for On-Site Work" in the COVID-19 Information Page.](#)

Signage will be posted in conference rooms and common areas to limit the number of occupants. It is vitally important that everyone maintain a distance of at least six feet from one another and wear face masks/coverings. The Laboratory requires maintaining social distancing while eating, and encourages eating alone.

In addition to the required training for all employees, the Laboratory provides guidance materials to RLMS to help prepare supervisors and staff to safely perform on-site work activities in accordance with LANL's COVID-19 Safety Protocols. The guidance materials are available on the Laboratory's internal website, ["Resources for On-Site Work" in the COVID-19 Information Page.](#)

## 8.0 EXCEPTIONS OR DEVIATIONS TO CONTROLS OR REQUIREMENTS

The Laboratory Leadership Team is responsible for reviewing all work activities and controls to ensure that activities can be safely and effectively performed in accordance with COVID-19 Safety Protocols. This includes reviewing associated requirements to identify conflicts between or among policies or where implementing a requirement could have a significant negative impact on the Laboratory's ability to safely perform on-site work activities. The same consideration must be given to COVID-19 Safety Protocols. Examples where an exception or deviation might be needed include having a security entry requirement that is not compatible with adherence to COVID-19 Safety Protocols due to social distancing restrictions or a travel restriction that prevents performing a mission critical activity.

If current requirements preclude or negatively impact the ability to safely and effectively perform on-site work activities during the COVID-19 crisis, the Leadership Team must propose, and the LDO must approve, an exemption or variance to existing requirements and controls that provides substantially equivalent interim compensatory measures in order for the work to continue. The exemption/deviation and compensatory actions may not introduce an unacceptable increase in environment, safety, health or safeguards and security risk associated with the activity. The Leadership Team will formally document any approved exceptions or variances from requirements, and obtain formal approval as necessary from DOE/NNSA.

## 9.0 WORK PLANNING AND CONTROL FOR PERFORMING ON-SITE WORK ACTIVITIES

In concert with the *LANL Integrated Work Management (P300) and Integrated Work Management for R&D (P300-1)*, the Laboratory requires a deliberate work planning and control-based approach for the performance and oversight of all on-site work activities under COVID-19 Safety Protocols. In accordance with Laboratory Integrated Work Management requirements, RLMS have the responsibility, authority, and accountability to plan, validate, coordinate, approve, execute and close out on-site work activities performed in accordance with COVID-19 Safety Protocols. Work Supervisors and Persons-in-Charge (PIC) are responsible for facilitating the release of the work within facility-specific and COVID-19 Safety Protocols.

The Laboratory's deliberate work planning and control-based approach for the performing work on-site under COVID-19 Safety Protocols includes:

- Application of the hierarchy of controls when addressing hazards
- Required daily Pre-Job Briefings
- Adherence to work planning and control procedures
- Continual operational awareness of conditions and equipment
- Open communications

- Routine management and supervisory engagement
- End-of-day reviews
- Review and incorporation of lessons learned

**Note:** Until the Laboratory returns to Normal Operations status, all employees continue to telework to the maximum extent possible. Consistent with a graded approach, the RLM, in consultation with the ALD, has the discretion in authorizing low hazard incidental work or site access. Incidental work, or incidental site access, is defined as low hazard work where COVID-19 Safety Protocols can be met, such as an office setting. In the case of incidental work, employees are required to complete required training, obtain approval from their RLM, complete the self-assessment required in section 4.1, and abide by the COVID-19 Safety Protocols provided in section 4.2 of this document. Employees shall pause work when COVID-19 Safety Protocols cannot be met and immediately notify their supervisor.

The following provides the requirements for performing all non-incident on-site work activities in accordance with COVID-19 Safety Protocols. Additional site or work-activity specific requirements may also be implemented by RLMs. For on-site activities that continued to be performed while the Laboratory was in Mission-Critical Operations status (i.e., craft or construction subcontract work), the Responsible Line Manager (RLM) for that work activity must re-review work with input from supervision and employees and follow the deliberate approach shown in Section 9 of this policy.

## 9.1 Pre-Activity Preparation

Before an activity begins on-site, RLMs will coordinate with their respective division and directorate management to identify and obtain approval for the activity to be performed, identifying the necessary staff, including all supporting personnel, and the proposed duration. Supporting personnel to consider for the activity include environment, safety, health, quality, and safeguards and security, facilities (i.e., maintenance and infrastructure), custodial, craft, business and administrative, and subcontractors. The RLM will also inform the associated FOD of the intent to perform an on-site work activity and engage the FOD as necessary in pre-activity preparations. For detailed requirements for facility occupancy and co-located work, see "[COVID-19 Facility Level Occupancy and Co-Located Work Coordination Instruction.](#)"

**Note:** In performing the activity review, managers need to consider the potential risk and impacts to the activity should employees test positive for COVID-19 during the course of the work, including the need for resiliency in staffing. If appropriate, work schedules must be adjusted (i.e., staggered schedules) to minimize the impact of this high probability risk.

In preparing for the on-site activity, RLMs must, as applicable:

- Ensure the COVID-19 Safety Protocols can be applied, PPE is defined, and management and supervision engagement and oversight expectations are available for the specific activity. COVID-19 Safety Protocols cannot be by-passed, disregarded, or overridden for the sake of programmatic or operational need. *If an activity is not compatible with COVID-19 Safety Protocols as initially planned, it may not be performed until additional controls can be developed and implemented.*
- Ensure adequate supplies and determine staging locations for PPE and cleaning/disinfectant supplies. If adequate and reasonably sustainable supplies and materials cannot be obtained or ensured for the proposed duration of the activity, then the activity may not be performed.
- Evaluate all applicable activity IWDs, hazard analyses, work plans, work procedures and packages, etc. for compatibility with COVID-19 Safety Protocols. RLMs, supervision, and staff work together to prepare/adjust hazard analyses and associated work planning and control

documentation (IWDs, etc.) to ensure the activity can be sustainably performed safely in accordance with COVID-19 Safety Protocols. This review must include potential maintenance activities as well as safe shutdown procedures in the event of an emergency.

**Note:** During this joint review, it is important to be mindful to cultivate a questioning attitude to anticipate what might go wrong. Identify the potential impediments to safely performing all aspects of the work in accordance with COVID-19 Safety Protocols.

- Define expected status/conditions for each activity, equipment and systems, including all programmatic and facility safety systems and include in pre-job briefs, as appropriate. *Note that the Laboratory's transition to reduced on-site operational status occurred in a short period of time with minimal documentation of status and that conditions may have changed.* It is important to define what to expect and then systematically validate the expected conditions.
- Obtain and post standard signage and implement markings where useful (i.e., safe social distancing spacing floor markings) to support and reinforce COVID-19 Safety Protocols.
- Ensure workers have completed the COVID-19 required training. Management and supervision needs to ensure all involved with an on-site work activity are familiar with all relevant controls, potential impediments, and mitigations.
- Setup/stage PPE, cleaning/disinfectant supplies, and establish locations for pre-job briefings and end of day briefs.
- Determine the best method to conduct a pre-job briefing and end-of-day review with supervisors and staff. This could be done remotely, or in small teams, or outdoors on-site to maintain social distancing as much as possible.

## 9.2 On-Site Work Activities (First time for a given activity)

Before reporting to work each day on-site, all workers must complete the [daily self-assessment](#).

RLMs must:

- Conduct a pre-job briefing that includes COVID-19 Safety Protocols and other work planning and control changes/adjustments. The RLM and work supervisor/PIC must participate in the pre-job briefing. During the briefing, the RLM, with necessary assistance from the work supervisor/PIC, asks each team member to confirm that they have completed the [daily self-assessment](#).
- If required, determine a stop time or point in the work plan for the day. All workers will suspend the activity for the day at the determined stop time or point and place activity in safe configuration.
- Following the pre-job briefing, perform any final activities and a work-site walk-through. During the walk-through, the RLM and work supervisor/PIC jointly validates the expected condition assessment of equipment and systems. Ensure the activity can be performed in accordance with work planning and control and COVID-19 Safety Protocols. If the validation shows the work cannot be accomplished within controls as expected, PAUSE, and reevaluate and adjust as appropriate. If the activity cannot be performed within controls as expected, the activity may not be performed
- If the activity walk-through and condition validation demonstrates work can be performed safely within all controls, work may then proceed and the RLM informs the FOD of the start of activities.
- The RLM, with the assistance of work supervisor/PIC, monitors work activities to ensure that work is routinely being performed in accordance with all work planning and controls, including

COVID-19 Safety Protocols. If work cannot be performed within controls, work must be PAUSED, reevaluated, and adjusted as appropriate. All involved personnel must be informed of any adjustments before work may proceed. If the RLM or work supervisor/PICs determine the activity cannot be performed within controls as expected, then the activity may not be performed.

- At the pre-determined work stop time or point, RLM, work supervisor/PIC, and workers will conduct an End-of-Day briefing/feedback session. Lessons learned will be reviewed for incorporation into continuing work the following day.

### 9.3 Continuing On-Site Work Activities

Before reporting to work each day on-site, all workers must complete the [daily self-assessment](#).

The RLM or designee (i.e., the work supervisor/PIC) conducts a Pre-Job Briefing/Tailgate every day to discuss lessons learned from the previous day, work scope for the day, and controls and COVID-19 Safety Protocols. The pre-job should include discussion of contingencies should unexpected situations arise or changes occur in supplies/materials.

The RLM or designee must regularly monitor work activities to ensure that work is routinely being performed in accordance with all work planning and control and COVID-19 Safety Protocols. If work cannot be performed within controls, work must be PAUSED, reevaluated, and adjusted as appropriate. All involved personnel must be informed of any adjustments before work may proceed. If the RLM or work supervisor/PIC determines the activity cannot be performed within controls as expected, then the activity may not be performed.

Each day ends at the pre-determined stop time or point and by placing work in safe configuration. At pre-determined work stop time or point, an End-of-Day briefing/feedback session will be conducted. All lessons learned will be reviewed for incorporation into continuing work the following day.

RLMs are expected to use the Management Observation and Verification (MOV) system to document their regular oversight activities. At least weekly, the RLM reviews status of activity, ability to sustainably meet mission deliverables, and the continued availability of supplies and materials to maintain all COVID-19 Safety Protocols. If supplies and materials cannot be sustainably maintained, the activity must be suspended until sustainability can be ensured. If the COVID-19 Safety Protocols are proving to be too much of an obstacle to safely and successfully meeting mission objectives, then the RLM and directorate management must re-evaluate if the work should continue to be performed.

Through regular monitoring of on-going work activities, the RLM or designee may ascertain that the activity has reached a sustainable stage where all work can be successfully, consistently, and sustainably accomplished in accordance with all established COVID-19 Safety Protocols. When a work activity reaches this sustainable stage, the RLM may reduce the requirements for daily Pre-Job Briefings/Tailgates and End-of-Day briefings/feedback sessions to a frequency that continues to ensure sustainable accomplishment of work in accordance with COVID-19 Safety Protocols and continuing incorporation of lessons learned. When the RLM determines the activity has reached this sustainable stage, all workers that will be accessing the site must continue to complete the [daily self-assessment](#) before reporting to work each day and adhere to all COVID-19 Safety Protocols.

### 10.0 SUSPENDING OR TERMINATING THIS DOCUMENT

The cadence of work as described in this document continues until the Laboratory Director, in necessary consultation and approval from DOE/NNSA, formally declares that the Laboratory has

progressed to Normal Operations status or until this document is amended at the direction of the Laboratory Director. When the Director makes this declaration, then all work activities may return to being performed in accordance with standard Laboratory work planning and control requirements that were in place before the COVID-19 crisis and before this document was implemented. Continue to implement any work planning and control improvements that were made before transitioning to Normal Operations status.

## **11.0 RESPONSIBILITIES**

### **11.1 Laboratory Director**

- Establishes this document and holds the Laboratory Leadership Team accountable for implementation.
- Works with DOE/NNSA as appropriate to declare changes in overall Laboratory operational status.

### **11.2 Laboratory Directors Office (LDO)**

- Using guidance and requirements provided by DOE/NNSA sponsors and oversight, determines overall mission critical and limited operations functions.
- Serves as the work risk-acceptance body on behalf of the Laboratory.
- Coordinates identification and management of cross-organization needs and resources.
- Approves temporary deviations from or exemptions to existing requirements and controls.

### **11.3 Associate Laboratory Directors (ALDs)**

- Ensure that management, supervisors, and staff within their directorates are aware of, and adhere to, this document.
- In addition to the minimum requirements within this document, establish site and organizational specific methods and approaches for releasing and performing work activities in consideration of the nature of the work, COVID-19 risk factors and Safety Protocols, PPE requirements, institutional, site, and community conditions, and evolving employee return to work procedures.
- Using a graded approach, review and approve work activities to be performed in accordance with this document.
- Identify and obtain necessary approval from the LDO and DOE/NNSA for temporary deviations from or exemptions to existing requirements and controls and provide substantially equivalent interim compensatory measures to ensure safe and effective performance of work activities in accordance with COVID-19 Safety Protocols.

### **11.4 Medical Director**

- Serves as the public health officer for the Laboratory.
- Serves as the medical subject matter expert for all Laboratory stakeholders.
- Provides medical oversight for employee fitness for duty procedures, including COVID-19 testing procedures.
- Provides medical consultation to the Laboratory Leadership Team on the safety of resumption of operations based on the pandemic case incidence curve and pandemic modeling.

- Provides medical consultation on lab-wide work practice safety requirements for the minimizing spread of exposure.
- Provides medical oversight for response to confirmed COVID-19 cases in the workplace.

### 11.5 Biological Safety Officer

- Provides evaluations of work practices where a concern for COVID-19 exists.
- Conducts workplace walk-downs of work activities, as required, when the COVID-19 Safety Protocols cannot be implemented.
- Provides oversight and guidance to Industrial Hygienists that evaluate work practices and conduct workplace walk-downs where concerns for COVID-19 exists.

### 11.6 Emergency Management Division

- Provides all hazards incident management and coordination at the Laboratory to include the overall response to COVID-19 related incidents in accordance with EMD-PLAN-100, LANL All-Hazards Emergency Management Plan; EMD-PLAN-600, Los Alamos Continuity of Operations Plan; and SEO-COOP-001, LANL/NA-LA Infectious Disease/Pandemic Plan.
- Manages and staffs the LANL COVID-19 Hotline in collaboration with Occupational Medicine.

### 11.7 Responsible Line Managers

- Rigorously performs all preparations and oversight for work activities included in this document implementing the requirements in [P300/300-1](#) and utilizing the hierarchy of controls.
- Ensure all work activities can be performed safely in accordance with COVID-19 Safety Protocols and that required cleaning supplies and PPE are available.

### 11.8 Facility Operations Directors

- Coordinate custodial support.
- Provide any required EOSC notifications of work on-site.
- Provide support to RLMs for SME support and site walk downs.

### 11.9 LANL Workers, Subcontractors, Guests, and Visitors

- Adhere to all COVID-19 Safety Protocols and requirements of this policy in the performance of on-site work activities.

## 12.0 IMPLEMENTATION

The requirements in this document are effective on the effective date.

## 13.0 HISTORY

Revision History		
04/30/20	POL1201-6, Rev. 0	Initial Issue.
05/08/20	POL1201-6, Rev. 0 Admin. Chg. 1	Section 4.4.1: Added clarifying language for calling into COVID-19 Hotline. Attachment A: Added clarifying language for calling into COVID-19 Hotline.

<b>Revision History</b>		
05/14/20	POL1201-6, Rev. 1	<p>Section 3.0 and 3.1: Clarified critical factors.</p> <p>Section 3.2: Clarified that DLDs prioritize resource needs.</p> <p>Section 4.1: Clarified that visitors and guests must wear face coverings on-site.</p> <p>Section 4.2: Clarified face covering requirements for employees on-site.</p> <p>Section 7.0: Clarified rules for eating on-site.</p> <p>Other minor edits.</p>
05/22/20	POL1201-6, Rev. 2	<p>Section 4.3 Travel Requirements: Added section to clarify travel requirements.</p>
06/08/20	POL1201-6, Rev. 3	<p>Section 4.2, Stipulated that maximum occupancy limit for auditoriums is 10% capacity while maintaining six feet between individuals.</p> <p>Updated requirements for individuals in a transient situation, (e.g., in an elevator or in a security turnstile). They can be within six feet of each other in a transient situation provided they wear face coverings and the duration is less than 10 minutes.</p> <p>Section 4.3 <i>Travel Requirements</i>: Updated travel requirements regarding travel outside of New Mexico.</p> <p>Updated Attachment A, <i>Return-to-Worksite Screening Daily Self-Assessment</i>.</p>
06/17/20	POL1201-6, Rev.4	<p>Section 4.1.2: Clarified requirement to call the COVID-19 hotline.</p> <p>Revised language in daily Self-Assessment form for clarity.</p>
06/18/20	POL1201-6, Rev.4 Admin. Chg. 1	Updated hyperlinks.
06/24/20	POL1201-6, Rev.5	<p>Section 3.0: Added the following to the last paragraph: "As of May 15, 2020".</p> <p>Section 3.0: Adjusted percentages, i.e., "70% of the Laboratory workforce is teleworking and 30% is supporting work on-site".</p> <p>Section 4.2: Replaced "All Employees" with "All employees, subcontractors, visitors, and guests".</p> <p>Sections 4.3.2 and 4.3.4: Removed option for COVID-19 elective testing at NMDOH.</p>
07/06/20	POL1201-6, Rev.6	<p>Section 4.3.3: Updated requirements for self-isolating when traveling outside of New Mexico: "regardless of transportation mode".</p> <p>Updated Daily Self-Assessment Checklist.</p>

<b>Revision History</b>		
07/13/20	POL1201-6, Rev.7	Section 3.0: Updated date that the Laboratory began an operational status of Limited Operations to July 9, 2020. Also, updated the percentage of employees working on-site as compared with employees teleworking. Section 4.3.3: Updated requirements for out-of-state travel.
07/21/20	POL1201-6, Rev.8	Section 4.2: Expanded face covering requirements while on-site. Added requirement to immediately isolate and call COVID-19 Hotline. Section 7.0: Added that sign templates are available on LANL's internal website. Section 9.1: Specified that COVID-19 safety protocols may not be disregarded for the sake of programmatic or operational need. Attachment A: Removed COVID-19 Hotline hours of operation.
08/05/20	POL1201-6, Rev.9	Section 4.3.1: Added a note requiring new hires arriving from out of state to self-isolate for 14 days before coming on-site.
09/24/20	POL1201-6, Rev.10	Added clarifying language throughout document. Section 3.0: Updated Laboratory's operational status. Section 4.1: Deleted note. Section 4.2: Added additional information on types of masks/coverings that are allowed. Section 4.3.3: Added direction that RLM should consider current State of New Mexico travel restrictions when evaluating risk factors for employees returning to work after personal travel. Section 9.3: Added paragraph on sustainable activity. Attachment A: Checklist updated.
09/28/20	POL1201-6, Rev.10, Admin. Chg. 1	Corrected Question 2 on Self-Assessment to refer to Question 4 rather than Question 5.

#### 14.0 ATTACHMENTS

Attachment A. *Return-to-Worksite Screening* [daily self-assessment](#)

#### 15.0 CONTACT

Office of Mission Assurance and Prime Contract  
Telephone: (505) 606-2222

**No: POL1201-6 LANL COVID-19 Risk and Exposure Control Measures for On-Site Work Activities  
Attachment A Return-to-Worksite Screening Daily Self-Assessment**

**RETURN-TO-WORKSITE SCREENING DAILY SELF-ASSESSMENT**

**Worker Instructions:** Each day before going to your worksite, please use the following Self-Assessment to help determine the risk of exposure to COVID-19 to yourself and to others. Also review the Personal Travel Instruction at the end of the assessment.

If you answer **YES, or are unsure how to respond** to questions 1–5, contact the LANL COVID-19 Hotline at 505-606-2667 before coming on-site. **DO NOT** come on-site until you have contacted the COVID-19 Hotline for guidance. If you answer **NO** to questions 1–5, report to your RLM that you have completed the Self-Assessment and are fit to come on-site.

**Managers must not allow** an employee to work on-site until the employee verifies that they have completed the Self-Assessment for that day.

**Note:** Once you have completed your initial return to work on-site, you do not need to call the COVID-19 Hotline with responses to Question 5 unless your condition changes.

Employee Daily Self-Assessment		Yes	No
1.	In the past 14 days have you been within six feet of a person with a lab-confirmed case of COVID-19 for 10 minutes or longer, or had direct contact with their mucus or saliva?		
2.	In the past 14 days have you spent 10 minutes or longer within 6 feet of a person who is exhibiting any of the COVID-19 recognized symptoms listed in question 4, or has a COVID-19 test pending?		
3.	Do you have a COVID-19 test pending that was collected because you have symptoms or a suspected exposure risk?		
4.	In the last 48 hours have you experienced any of the following <b>NEW</b> symptoms?		
	Fever of 100 F or 37.8 C or above?		
	Felt feverish, sweating, chills, or repeated shaking?		
	Cough?		
	Shortness of breath or difficulty breathing?		
	Sore Throat?		
	Nausea, vomiting, or diarrhea?		
	Muscle or body aches not related to physical activity?		
	Fatigue that is not chronic or related to sleep disturbance?		
	Headache that is not chronic?		
	Loss of taste or smell?		
	Congestion or runny nose?		
5.	Do any of the following apply to you that you have not already reported to the LANL COVID-19 Hotline?		
	Age 65 or over?		
	Chronic lung disease including chronic obstructive pulmonary disease (COPD), moderate to severe asthma, pulmonary fibrosis, or cystic fibrosis?		
	Serious heart condition?		
	Immunocompromised state (weakened immune system) from organ transplantation; HIV; use of corticosteroids or other immune weakening medications?		
	Obesity (BMI > 30)?		
	Uncontrolled diabetes?		
	Uncontrolled hypertension?		
	Cerebrovascular disease?		
	Kidney failure requiring dialysis?		
	Sickle Cell disease?		
	Pregnancy		

**Personal Travel Instruction**

In the past 14 days, if you have traveled for personal reasons outside of the state of New Mexico (including domestic and international travel), contact your supervisor or manager to discuss whether you will need to quarantine or whether you will be allowed to come on-site. If your manager requires you to quarantine, call the COVID hotline to report your isolation. If your manager allows you to work on-site, you do not need to contact the COVID hotline.