

## **Department of Energy**

Oak Ridge Operations P.O. Box 2001 Oak Ridge, Tennessee 37831-8723

May 15, 1996

Mr. Robert Geller Missouri Department of Natural Resources Division of Environmental Quality P.O. Box 176 Jefferson City, Missouri 65102-0176

Dear Mr. Geller:

## UNESCORTED ACCESS REQUIREMENTS FOR FORMERLY UTILIZED SITES REMEDIAL ACTION PROGRAM (FUSRAP) SITES

In response to Larry Erikson's request of early May, the following information is being provided to outline the FUSRAP requirements for unescorted access to our sites. The following documents should be submitted to the FUSRAP Site Safety and Health Representative (SSHR) at the DOE Information Center prior to entry:

- 1. A letter from the department which indicates that the individual has received training in accordance with the requirements of 29 CFR 1926.65 for Hazardous Waste Workers and providing the date of the training.
- 2. A letter from the department's medical provider indicating that the individual is enrolled in a medical surveillance program which meets the requirements of 29 CFR 1926.65 for Hazardous Waste Workers, has completed a recent medical (within the last 6 months), provides the date of the medical, indicates that the person is medically qualified to work at a hazardous waste site, indicates restrictions if applicable (such as no exposure to hepatatoxins) and indicates that the individual is qualified to wear respiratory protection.
- 3. If the department chooses not to use its own dosimetry and FUSRAP will be responsible for issuing dosinnetry, then a Site Worker form must be completed and returned to the SSHR. This form requires information which is necessary to provide to the individual with a record of the radiation exposure received while at the FUSRAP site. An example form is enclosed.
- 4. Unescorted access also requires Radiation Worker Training which meets the requirements of 10 CFR 835. If your organization has individuals who have completed the core academic portion on the DOE program, a copy of the certificate should be submitted and the individual would need to complete a site specific (approximately 1 hour) radiation worker training. If the individual has not had radiation worker training at another DOE facility, FUSRAP can provide this training (four hours to complete the classroom work and a practical factors exam which takes approximately 1 hour). Please be aware that completion of this training will take special scheduling to make an approved, certified trainer available.

- 5. Individuals will have to complete site specific training for the site hazards to facilitate compliance with the training requirements of 29 CFR 1926.65 and hazardous communication training associated with the site to facilitate compliance with 29 CFR 1926.59. This training averages approximately 3 hours.
- 6. For sites where access to some areas requires donning respiratory protection, individuals will have to complete a respiratory protection fit test for the type of respirators used at the site. This fit test takes approximately 30 minutes to complete. We have however, at other FUSRAP sites, allowed state and local government officials bring respiratory protection equipment for which they have already been fit tested if they also provide a copy of the fit test card. We respectfully request that if respiratory protection is provided by your organization that it be a full-face respirator.

We would be happy to assist you in completing these requirements for access to our sites. Please contact Bob Atkin (423/576-1826) or Wayne Johnson (423/576-5165) if you have additional questions or concerns regarding access to our sites.

Sincerely

David G. Adler, Site Manager Former Sites Restoration Division

Enclosure

CC: L. Erikson, MDNR

2

LS U2 9709101051 External (FUSRAP to Outside Recipient) 142204 51-819

Formerly Utilized Sites Remedial Action Program (FUSRAP)

## ADMINISTRATIVE RECORD

## for the St. Louis Site, Missouri



U.S. Department of Energy

Property of ST LOUIS FUSRAP LIBRARY