



Department of Energy

Washington, DC 20585

January 10, 1995

Mr. Joseph J. Holonich, Chief
High-Level Waste and Uranium
Recovery Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Holonich:

Enclosed is the Yucca Mountain Site Characterization Office's (YMSCO) policy for Exploratory Studies Facility tunnel access as requested during the Exploratory Studies Facility technical meeting in Las Vegas, Nevada, on November 7, 1994. The tunnel access policy ensures a safe working environment for all project personnel, oversight personnel, and visitors to the Exploratory Studies Facility.

Individuals with a legitimate need to enter the Exploratory Studies Facility will be able to do so. Parties of four or more people representing the U.S. Nuclear Regulatory Commission, State of Nevada, or other oversight agencies are asked to first contact their usual Yucca Mountain Site Characterization Office points-of-contact; the Department of Energy Construction Manager, Thomas I. Fortner; or the Civilian Radioactive Waste Management System Management and Operating Contractor Construction Manager, Richard C. McDonald, for escort arrangements. Smaller parties can either call ahead to these contacts or may choose to arrive unannounced. Upon arrival at the site, individuals should meet, as arranged, either the Department of Energy or the Civilian Radioactive Waste Management System construction manager, designated on-shift manager, or an escort. Individuals then present evidence of current training and proper Personnel Protection Equipment to the Portal Access Controller. If individuals arrive without prior notification, an escort will be provided in a timely manner.

With respect to the number of people permitted underground at any one time, the project has trained and equipped a second mine rescue team, eliminating the restriction of 25 or fewer people in the tunnel.

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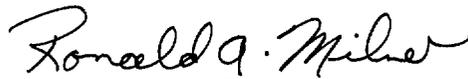
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If you require a particular individual or area of expertise during your visit, please contact your Yucca Mountain Site Characterization Office or Civilian Radioactive Waste Management System Management and Operating Contractor contacts in advance so proper arrangements can be made. Visits by groups of more than four individuals should also be arranged in advance.

Similar letters have been sent to the Nuclear Waste Technical Review Board, the State of Nevada, and the affected units of local government.

If you have any questions, or wish to have further clarification on the policy, please contact Christian Einberg at (202) 586-8869 or Thomas I. Fortner at (702) 794-7576.

Sincerely,



Ronald A. Milner, Director
Office of Program Management and
Integration
Office of Civilian Radioactive
Waste Management

Enclosures:

1. ESF Tunnel Access Policy
2. REECO ESF Tunnel Access Control
Procedure TC-580-SP-0001
3. 29 CFR 1926.800(g)(5)
4. Appendix 7, Yucca Mountain
Site-Specific Agreement

cc:

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T.J. Hickey, NV Legislative Committee
J. Meder, NV Legislative Counsel Bureau
M. Murphy, Nye County, NV
D. Bechtel, Clark County, NV
P. Niedzielski-Eichner, Nye County, NV
B. Mettam, Inyo County, NV
V. Poe, Mineral County, NV
F. Mariani, White Pine County, NV
R. Williams, Lander County, NV
L. Fiorenzi, Eureka County, NV
J. Hoffman, Esmeralda County, NV
C. Schank, Churchill County, NV
L. Bradshaw, Nye County, NV
W. Barnard, NWTRB
E. Lowry, NV Indian Environmental Coalition
R. Holden, National Congress of American Indians
S. Brocoum, YMSCO

EXPLORATORY STUDIES FACILITY TUNNEL ACCESS POLICY

POLICY

It is a goal of the Yucca Mountain Site Characterization Office to provide a safe working environment for all project personnel and to ensure the safety of all visitors to the Exploratory Studies Facility (ESF). To achieve this goal, it is necessary to regulate access to the ESF in order to assure that all workers and visitors who enter the tunnel are aware of and protected from hazards. Also, all personnel and visitors are required to complete training and utilize Personal Protection Equipment (PPE).

BACKGROUND

Differences exist between surface and underground construction. In addition to the risk associated with ground-support/ ground-fall issues, the primary differences between surface and underground construction is the lack of a "buffer zone" around the work. When a work activity is taking place during surface construction, only those workers necessary for that activity are in the immediate area. Workers not associated with the activity can avoid the area, leaving a safe "buffer zone" around the activity.

When a work activity is taking place in the ESF, it must occur within the confines of the tunnel, which is also the only available travel way. Because the work place and travel way are the same, the ability to provide a "buffer zone" around the work is restricted. Numerous support activities are taking place along its length and behind the Tunnel Boring Machine (TBM) as it advances. These activities can start, stop, and change within any given shift depending on the TBM's advance rate and support requirements. Therefore personnel and visitors who do not work in the tunnel as part of the daily work force must be escorted by a member of the regular work force while work is in progress in the tunnel.

TRAINING REQUIREMENTS

Visitors, are all those who visit the ESF tunnel on an infrequent basis. Visitors are required to report to the Field Operations Center for a visitors briefing by the CRWMS M&O training department. Upon completion of the training, visitors will receive a white visitors access card. This card permits access for three days and allows the visitor escorted tunnel access when properly equipped with PPE. Visitors must be continuously escorted while work activity is in progress in the tunnel.

Professionals, are all those who have a reoccurring need to visit the ESF as part of their regular duties, but are not a part of the regular daily work force during tunnel construction. Professionals are required to receive General Underground Training (GUT), first aid, adult CPR, and maintain up-to-date training in these subjects. Upon completion of the training, professionals will be issued a yellow card that will allow escorted access for one-year or temporary unescorted access if approved by the Construction Manager (as described in YAP 39.30) and if they are identified on the Portal Access Controller's unescorted access list. All professionals must be properly equipped with PPE.

Underground workers, are all contractor employees, engineers, inspectors, and supervisors who are required as part of their regular duties to be in the tunnel on a daily basis and are part of the normal tunnel work force. Underground workers are required to receive underground worker training from the excavation contractor and are issued a green card. The Construction Manager determines which, other than the excavation contractor personnel, workers may be included in this group. The underground workers have unescorted access to the tunnel.

PROCEDURES

Two procedures pertain to access to the ESF:

YAP-30.39 *ESF Tunnel Access Approval Process*, describes the steps necessary to be placed on the unescorted tunnel access list and how to gain access to the tunnel if not on the unescorted list.

REECO Procedure TC-580-SP-0001 *ESF Tunnel Access Control*, describes how REECO and subcontractor Kiewitt/Parsons Brinkerhoff administer access to the tunnel.

Escorted Access

Project personnel that are not a part of the daily work force in the tunnel and who have an occasional need to be in the tunnel should contact their counterpart in the tunnel work force to make arrangements for an escort. Scientific program personnel should request access/escort through the ESF Test Coordination Office. Upon arrival at the North Portal pad, oversight personnel and regulators (NRC, State, county, etc.) should contact the DOE or CRWMS M&O Construction Manager of their designee for escort arrangements. If the construction manager or designee cannot be located, the individual(s) should proceed to the portal and contact the Portal Access Controller. The Portal Access Controller will then contact the ranking contractor supervisor who will arrange for an escort.

Unescorted Access List

Individuals who require unescorted access should contact the DOE or CRWMS M&O Construction Manager and discuss their requirements. Scientific program personnel should make application through the ESF Test Coordination Office. When YAP 39.30 is issued, individuals should apply according to the procedure.

Equal Access Policy

This policy is not intended to deny access or unduly restrict access of any individual into the ESF. It is intended to assure the safety of all personnel and visitors into the tunnel. Delays involved in gaining access will likely be in the time it will take an escort to travel to the portal from an underground location or from one of the offices at the North Portal Pad.