MINOR

OPERATION AND MAINTENANCE

ACTIVITY PLAN

O&M 19-014 REV. 2

L-Area PIDAS

(Site Index No. 584 "L-Area Operable Unit")

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1. INTRODUCTION

This Operations and Maintenance (O&M) Plan addresses soil disturbing activities necessary to support electrical tie-in for the L-area Perimeter Intrusion Detection Assessment System (PIDAS) enhancements.

Excavation activities are within RCRA/CERCLA Site Index No. 584 "L-Area Operable Unit" of the *Federal Facility Agreement, Appendix C.2* (WSRC-OS-94-42) and are specifically within the 200' buffer area of several site indices included therein and described below in Section 2. The potential area of disturbance is less than 10% of the waste unit area, characterizing it as "minor intrusive" activity. An O&M plan is required per WSRC-RP-96-45, *Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U),* December 15, 1996. An O&M plan provides added protection to human health and the environment and minimizes impact to long-term characterization and remediation efforts.

2. AREA DESCRIPTION AND CONDITIONS

The proposed activity is within RCRA/CERCLA Site Index No. 584 "L-Area Operable Unit". The following site indices are included in this operable unit and are within 200' of the excavation activities.

- SRS Index #1770 "Building 108-4L, Emergency Diesel Generator & Fuel Oil Storage"
- SRS Index #560 "L-Area Process Sewer Lines, as Abandoned"
- SRS Index #479 "L-Area Reactor Cask Car Railroad Tracks, as Abandoned"
- SRS Index #303 "Potential Release from L-Area Disassembly Basin"
- SRS Index #305 "Potential Release from L-Area Reactor Cooling Water System, 186/190-L"

Unit 584 is in the FFA because of potential metals and radionuclide contamination from the various activities associated with the above indices.

3. O&M ACTIVITY

A. <u>O&M ACTIVITY</u>

The former scope of the activity included excavation of soil for a 6" trench the length of the L-Area PIDAS for cable installation.

Revision 1: This revision adds additional scope to the O&M to include small amounts of soil disturbances needed for additional security enhancements in support of Argus implementation.

Revision 2: A new phase of the project is starting that partially is in the SRS Index #479 area. This area is a waste unit, therefore soil management from digging/excavating/boring in the area requires soil re-distribution. Sending the soil out of the area as a waste stream is prohibited.

The scope of this work to be provided by a vendor is to install 3 -2' conduits under the 2 train tracks which enter the east side of L Area. The vendor shall install two (approx.) 3 ft. deep by 2ft. wide duct banks to be trenched from the PIDAS fence to a location approximately 30 ft. west of PIDAS fence for the northern train track and 35 ft. west of PIDAS fence for the southern train track. The vendor-provided duct bank will be trenched on both the north and south sides of each train gate. The 2 duct banks for each train track will be connected via directional boring under each train track, by the vendor at the west end of the duct bank. The 3 -2' conduits will stub up at the PIDAS fence through a concrete pad, provided by the vendor, and the vendor will provide back fill of the duct bank to grade. The remainder of the installation will be above grade work and will be installed by site forces. All specific details of this installation are specified in S-DCF-L-00048.

Duct banks will contain conduit that will house copper wiring, ethernet cable and power lines for connecting the sensors with the field junction boxes and power panels for communication purposes.

B. O&M ACTIVITY SAMPLING AND MONITORING FOR HEALTH AND SAFETY

Unit 584 is in the FFA because of **potential** metals and radiological contamination.

Radiological survey will be required at the excavation site. If radiological contamination is found, Radiological Protection will determine if protective equipment and personnel access restrictions are required.

Worker health and safety will be directed and controlled as required in the Assisted Hazard Analysis (AHA) with approvals from Radiological Protection, Industrial Hygiene, and the Environmental Compliance Authority (ECA).

C. HEALTH AND SAFETY PLAN

The health and safety concerns involve **potential** worker exposure to metals and radionuclide contamination.

Worker safety is covered in the Assisted Hazard Analysis and Work Packages and reviewed in the Pre-job briefing.

D. CHARACTERIZATION AND SAMPLING PLAN FOR THE AFFECTED AREA WITHIN THE UNIT

Unit 584 is in the FFA for potential metals and radiological contamination. Radiological Protection has prepared a sampling plan and conducts surveys for work in this area.

Industrial Hygiene and Radiological Protection will review the work order and Assisted Hazard Analysis (AHA) to determine worker protection requirements.

If unexpected contamination is found, a Time-Out will be called. The ECA will be notified. The ECA will notify the SRNS On-Scene Coordinator (Miran Tyrell), who may request additional work scope and sampling from soil disturbed by the activity.

E. CONTAMINATED MATERIALS MANAGEMENT AND DISPOSAL

The excavated soil will be returned as backfill when the activity is complete. No residuals from the excavation/soil disturbance/boring are to be removed from the immediate area. This is critical for CERCLA compliance purposes.

F. ENVIRONMENTAL PLANS AND PERMIT MODIFICATIONS

This activity is not expected to involve other environmental plans/permits.

4. CONTINGENCY PLAN

During implementation of the activity, if conditions change at any time such that the activity is no longer considered "minor" (as defined in Reference 2) or any other unanticipated event occurs, the project manager, the planner, the Operations Manager or ECA shall:

- Stop work, secure the area, contain and stabilize the area if it is safe to do so.
- Immediately notify the SRNS-OSC and request a path forward. If necessary, the SRNS-OSC will notify the DOE-OSC and receive concurrence on the path forward.
- Make any necessary changes to work authorization documents.

5. DOCUMENTATION AND REPORTING

The facility will transmit the following documentation to the SRNS-OSC within twenty (20) days of the completion of the activity:

- A statement that the activity is complete
- Sampling and characterization data

References

1. WSRC-OS-94-42, *Federal Facility Agreement for the Savannah River Site,* Administrative Document Number 89-05-FF, effective August 16, 1993. (Revision 0, Appendix C for Fiscal Year 2017)

2. WSRC-RP-96-45, *Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U),* December 15, 1996.

3. EEC # OBU-L-2021-0272 Rev. 9

4. *Site Clearance Permit Number* SC-8209.01, 2022

5. *Soil Sampling Plan for Duct Bank Installation* (WO#2047873) (Inclusive of Current Project Scope Sampling Locations)