# Minor
# OPERATION AND MAINTENANCE
# Activity Plan

## Inspection and Treatment of Power and Steam Poles within L-Area Operable Unit 584

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## 1. INTRODUCTON

The Operation and Maintenance (O&M) Plan for the Inspection and Treatment of Power and Steam Poles in L-Area will provide a means by which soil / media disturbance can commence within RCRA/CERCLA Units or Site Evaluation Areas (SEA) within L-Area.

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

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 Description</u>

The planned soil disturbing activity involves poles within the L-Area outer fence that are maintained for power and steam line supports. The soil disturbance is specifically the removal of up to 12 inches of soil immediately around the base of the power / steam poles, the treating of the poles to 12" below the surface level, and backfilling the excavation with the removed materials.

ALL EXCAVATED SOILS WILL BE RETURNED TO THE ORIGINAL LOCATION OF SOIL DISTURBANCE. THE DISPOSAL OF ANY SOIL WILL BE PER THE ENVIRONMENTAL COMPLIANCE AUTHORITY (ECA) AND RADIOLOGICAL PROTECTION (RP) DIRECTION.

If the work scope requires change for any reason, contact the Environmental Compliance Authority (ECA). The ECA will determine if modifications to the O&M Plan are required.

**B. O&M Activity Sampling and Monitoring for Health and Safety**

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

Worker health and safety will be described and controlled as required in the Assisted Hazards Analysis (AHA) with approvals and direction from RP and Industrial Hygiene (IH).

**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 Order 0162277-01 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 will prepare a sampling plan and conduct surveys for work in this area.

IH and RP will review the work order and AHA to determine worker protection requirements.

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

**E. Contaminated Materials Management and/or Disposal**

All excavated soils will be returned to its point of origin. The disposal of any soil will be per ECA and RP direction.

**F. Environmental Plans and Permit Modification Requests**

This activity is not expected to involve other environmental plans / permits, required maintenance and inspections, or erosion control practices.

## 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 & 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

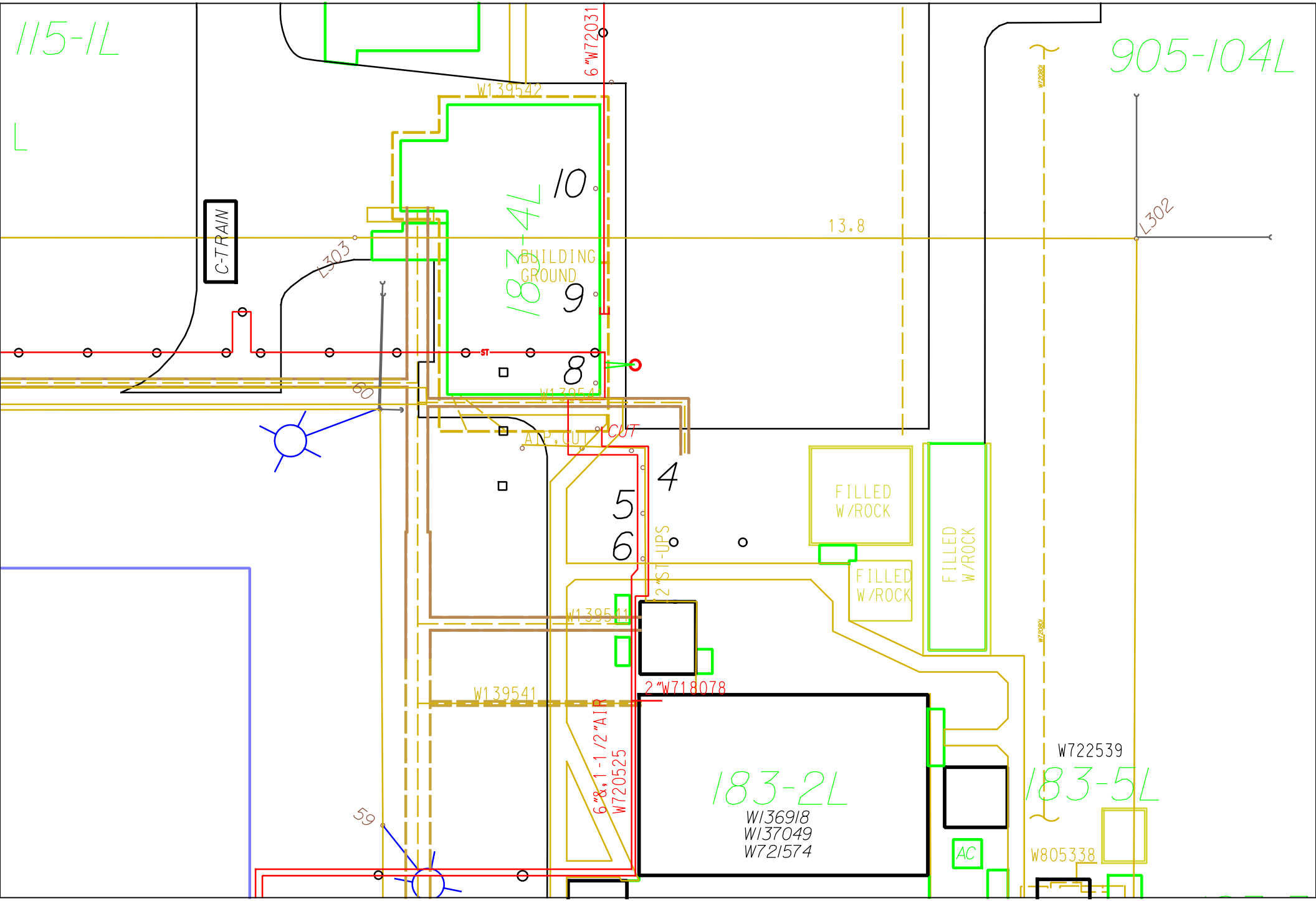
## 6. SUPPORTING DOCUMENTATION

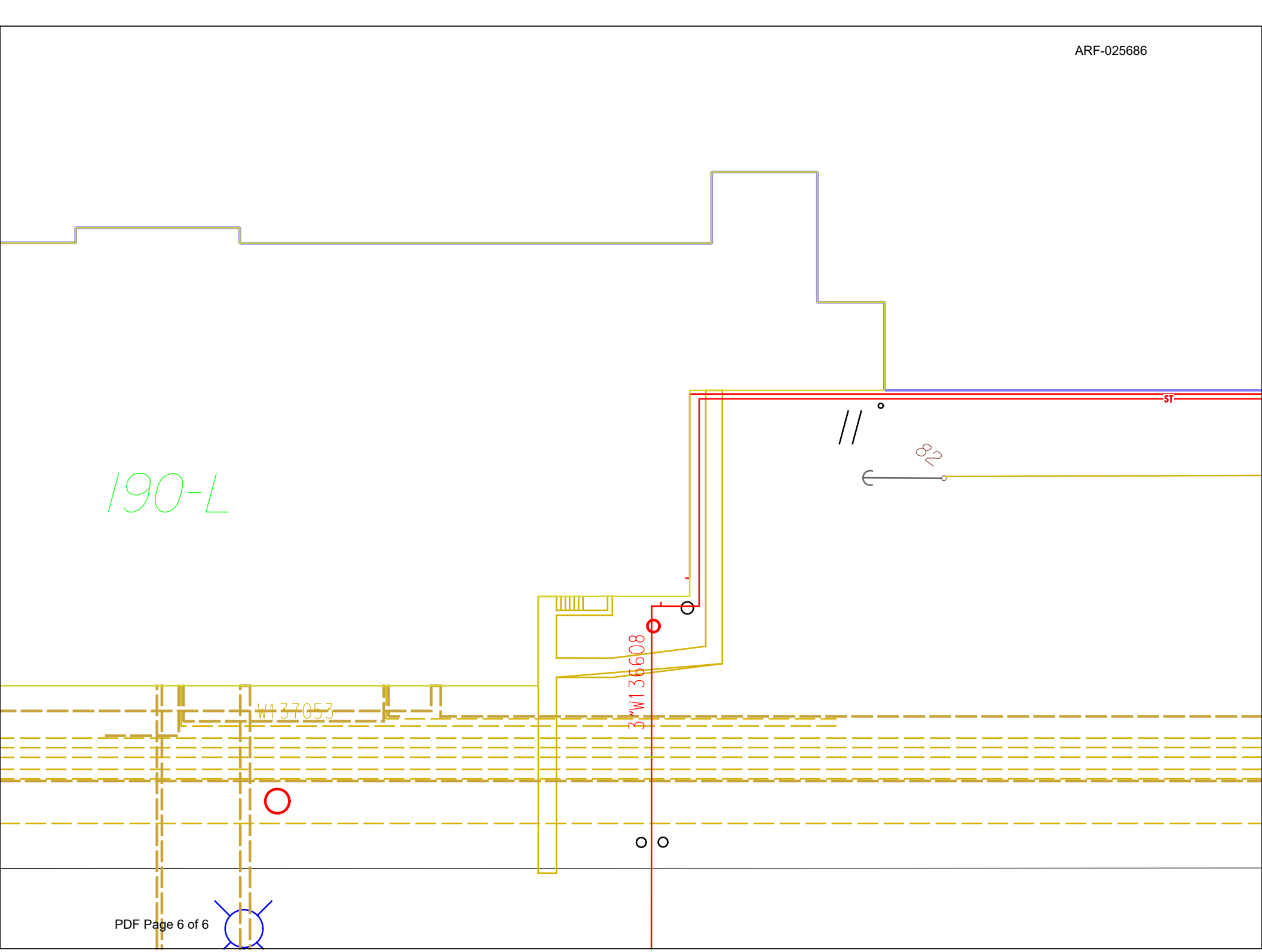
1. WSRC-OS-94-42, *Federal Facility Agreement for the Savannah River Site,* Administrative Document Number 89-05-FF, effective August 16, 1993. (Revision 0, Appendix C for Fiscal Year 2017)

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. Work Order 0162277-01 (AHA included)

4. Maps of pole locations (ATTACHED)


115-1L
905-104L
6"W72031
W139542
10
184-4L
BUILDING
GROUND
9
8
C-TRAIN
L303
13.8
L302
ST
60
W139541
AIR CUT
4
5
6
FILLED W/ROCK
FILLED W/ROCK
FILLED W/ROCK
2"ST-UPS
W139541
2"W718078
W139541
6"&1-1/2"AIR
W720525
183-2L
W136918
W137049
W721574
W722539
183-5L
AC
W805338
59


190-L
ST
W137053
3"W136608