OPERATION AND MAINTENANCE ACTIVITY PLAN

Install Fiber Optic Cable from 702-2A to Barricade 9

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Environmental Compliance Authority

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1. INTRODUCTION

The Operation and Maintenance (O&M) Plan for the will provide a means by which activities can commence within the planned fiber optic route, while protecting human health and the environment, and minimizing the impact to long term characterization and remediation efforts. The excavation site for the fiber optic cable is near Waste Unit ID# 562.

This O&M Activity Plan is defined as a "minor intrusive activity" based on the soil excavation meeting the definition of both "minor" and "intrusive" as defined in the SRS Operations and Maintenance Plan (RCRA/CERCLA), WSRC-RP-93-904.

2. AREA DESCRIPTION AND CONDITIONS

The work area is the planned fiber optic route from 702-2A to Barricade 9 located south of 773-A.

Contaminants of interest near the work area include:

Unit 562 "A-Area Process Sewer Lines As Abandoned, NBN". The A-Area Process Sewer Lines conveyed wastewater potentially contaminated with low level radionuclides and metals from Savannah River Technology Center (SRTC) laborites from 1954 until 1982. The basins received no waste from 1982 until present and are currently inactive.

3. O & M ACTIVITY

A. O&M Activity Description

The O&M activity involves:

"Install fiber optic cable from 702-2A to Barricade 9 as directed by Team Lead and scope of work.

ALL EXCAVATED SOIL IS TO BE RETURNED TO ITS ORIGINAL LOCATION UPON TASK COMPLETION.

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

The work area will be barricaded with rope or rigid handrail to ensure that access is controlled for personnel safety around the work area.

Worker health and safety will be directed and controlled as required in the work package and Assisted hazard Analysis.

C. Health and Safety Plan

The health and safety concerns involve worker exposure to contaminants of interest listed in Section 2 above. The work will be completed in accordance with the requirements stated in the AHA. The safety requirements and personal protective equipment described in the AHA are appropriate for the potential hazards of the waste unit.

D. Characterization and Sampling Plan for the Affected Area within the Unit

No formal sampling plan will be utilized for work in these areas. Material removed as part of the excavation will be returned as backfill when the job is completed.

Additional work scope and sampling from the soil disturbance areas will be addressed per SRNS-OSC guidance, should contamination be found present.

E. Contaminated Materials Management and/or Disposal

Any waste materials generated during this activity will be disposed of as appropriate. If media (pipe and other waste materials) is determined to be "clean," normal work practices would occur. This waste will be managed as appropriate per facility Waste Management and ECA guidance and handled in accordance with existing SRNS waste guidance procedures. Clean soil can be put back in place once the job is complete.

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

If at any time during the implementation of the activity, the conditions change, such that the activity is no longer considered "minor" (greater than 10% of a waste unit area impacted or disturbed), the Shift Operations Manager (SOM) shall be notified and the Facility Manager (or designee) or the ECA shall:

- Immediately notify the SRNS-OSC. The SRNS-OSC will notify the DOE-OSC

- Contain and stabilize the area, investigate as necessary to determine the necessary change in the activity plan, secure the area, and stop work.

- Update the SRNS-OSC as to the findings and the requested path forward. The SRNS-OSC will communicate the information to the DOE-OSC and obtain concurrence on the path forward.

5. DOCUMENTATION & REPORTING

The Project Manager will transmit the following documentation to the SRNS-OSC by the 20th day of the month the activity was completed:

- the signed O&M plan
- Any sampling and characterization data collected,
- The quantity of contaminated materials, if generated.
- Treatment, storage, and disposal location of contaminated material, if generated.

References

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

2. AHA # INF-46029 R0: Vendor to install fiber from 702-2A to Barricade 9.

3. WO# 1998068: "Barricade 9 Install fiber and copper cable".