Minor
OPERATION AND MAINTENANCE
Activity Plan

EXCAVATE AND REPAIR UNDERGROUND WELL WATER LEAK NEAR 241-84H

Prepared by: Charles A. Bishop Jr. 2/12/24
C.A. Bishop Jr. Date
Environmental Compliance Authority

Approved by: James L. Hines 02/13/2014
James Hines Date
Work Planner
SRNS-Infrastructure Services

1. INTRODUCTION

The Purpose of this Operation and Maintenance (O&M) Plan is to provide guidance for activities associated with the repair of underground well water leak near 241-84H. The excavation site for the water line is near the following Waste Units

(Site Index #'s) :

ID: 262
NAME: COMBINED SPILLS FROM 241-H, NBN
PHASE: ASSESSMENT PHASE
ID: 298
NAME: H-AREA TANK FARM, 241-H
PHASE: ASSESSMENT PHASE
ID: 261
NAME: COMBINED SPILLS FROM 241-84H, NBN
PHASE: ASSESSMENT PHASE

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

Contaminants of interest near the work area include:

H-Area Tank Farm, 241-H, including: H-Area Tank Farm, 241-H [H-Area Tank Farm Groundwater Operable Unit; Tank 37 Steam Line Contamination Area; Tank 37 to HDB-6 Capped Transfer Line; Concentrate Transfer System Contamination Area; 242-H Evaporator Contamination Area; Rock Bank Contamination Area; Diversion Box 5 Contamination Area; Tanks 9-12 Contamination Area; Tanks 13-16 Contamination Area; Pump Pits 5 and 6 Contamination Area]; Combined Spills from 241-H, NBN [Spill on 12/29/83 Piping Leak Top of Tank 13; Spill on 09/13/91 of Chromated Water from Underground Line; Spill on 01/06/81 of 10 gal Water from Cesium Removal Column]; Combined Spills from 242-H, NBN [Spill on 06/14/82 of 600-800 gal from Evaporator; Spill on 07/14/82 of 600-800 gal from Evaporator Overhead; Spill from Tank 13 Leak Detection Box; Spill on 02/01/69 of Unknown Waste Tank Spill, NBN]; Diversion Box - Rad from 907-1H, NBN; Spill on 01/19/80 of Unknown of Chromated Water from H-Area Pump House, NBN; Spill on 11/10/81 of 500 gal of Chromated Water from 243-H, NBN; Spill on 04/18/80 of Unknown of Chromated Water from Valve

House 3, NBN; Spill on 03/28/87 of <15,000 gal Chromated Water from 241-24H, NBN; Spill on 05/02/85 of 10 gal Cooling Water from Tank Farm, NBN

3. O&M ACTIVITY

A. O&M Activity Description

Site Infrastructure is tasked with the repair of underground well water leak near 241-84H. The water line is located near old spills and now are RCRA/CERCLA Units. An excavation of approximately 4 ft. in depth will be necessary to expose the repair site.

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 RP DIRECTION.

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

The identified units are in the FFA because of possible radiological contamination from past releases from H-Area operations.

Radiological surveys will be required at the excavation site. If radiological contamination is encountered, RP will determine if protective equipment and personnel access restrictions are required.

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 Assisted Hazard Analysis.

C. Health and Safety Plan

Based on Radcon walkdown of the area, health and safety concerns should not involve worker exposure to potential radiological contamination.

The work will be completed in accordance with the requirements stated in the Assisted Hazards Analysis. The safety requirements and personal protective equipment described in the AHA are appropriate for the potential hazards of the RCRA/CERCLA Unit.

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

RP will prepare a sampling plan for work in this area and will conduct sampling of the soil excavated during this activity. If unexpected contamination is found, the SRNS On-Scene Coordinator (OSC) may request additional work scope and sampling from soil disturbed by the activity. Material removed as part of the excavation will be returned as backfill when the activity is completed.

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 leak repair 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 or designee will transmit the following documentation to the SRNS-OSC by the 20th day of the month following the month that the land disturbing activity was completed:

- The signed O&M Plan

- Any sampling and characterization data that was collected.
- The quantity of contaminated materials, if generated.
- The disposal location of any 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# SUD-22478
3. WO# 2072533 Excavate/Correct the underground well water leak near 241-84H.