Minor
OPERATION AND MAINTENANCE
Activity Plan

Replace Steam Line Support Poles H47 and H48 near 281-21H - Site Indices 262, 294, 295, 298, 344, 391, 549, and 591

Prepared by: Miran Tyrrell — 12/10/19
Miran Tyrrell
Environmental Compliance Authority
Outside Facilities – H Area
Date

Approved by: Brad Harbuck — 12/10/19
Brad Harbuck
Site Services Planner
Utilities and Operating Services
Date

Approved by: Cecil Copeland — 12/10/19
Cecil Copeland
OF-H Shift Operations Manager
H Canyon
Date

Approved by: Jewel Lenderman — 12-10-19
Jewel Lenderman
OF-H Radiological Protection
H Canyon
Date

Approved by: Thelesia Oliver — 12.10.2019
Thelesia Oliver
ECA Manager
EC&ACP
Date

1. INTRODUCTION

This Operations and Maintenance (O&M) Plan is for the removal and replacement of the steam line support poles H47 and H48 near 281-21H. The work will replace the two support poles while protecting human health and the environment and minimizing the impact to long term characterization and remediation efforts. This activity is within Site Index (SI) 549 (General Separations Area Eastern Groundwater Operable Unit, No Building Number (NBN)) of the Federal Facility Agreement (FFA, Reference 1). It is also within 200 feet of SIs 262 (Combined Spills from 241-H, NBN), 294 (H-Area Retention Basin, 281-1H, Process Cooling Water Delaying Basin), 295 (H-Area Retention Basin, 281-2H, Cooling Water Pump Basin), 298 (H-Area Tank Farm, 241-H), 344 (Sandblast Area CMH-001, NBN), 391 (Spill on 2/1/83 of 50 Gal of Oil-Rad, NBN), and 591 (H Area Process Sewer Lines as Abandoned, NBN). SIs are also called RCRA/CERCLA Units.

This plan is characterized as "minor intrusive activity" based on the soil excavation meeting the definition of both "minor" and "intrusive" as defined in Reference 2.

2. AREA DESCRIPTION AND CONDITIONS

The area in which the activity will be conducted is near the border between the drainage basins of Industrial Waste Water Outfall H-12 and Industrial Storm Water Outfall H-08. The location of the support poles to be removed and replaced is shown on Attachments 1, 2, and 3. Attachment 2 shows approximate locations for SIs 262, 294, 295, 298, 344, 391, and 591 as red areas. The following large structures are located in this portion of the drainage basin:

- 221-H Canyon
- 281-1H and 281-2H H-Canyon Process Cooling Water Basins
- 704-H Office, Shop, and Storage Building
- 281-21H

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For a discussion of the SIs, see "Revision 0 for Appendix C for Fiscal Year 2019" of Reference 1. Due to size, SIs 344 and 549 are located in the drainage basins of both Upper Three Runs Creek and Four Mile Branch. SI 391 is located in the drainage basin of Upper Three Runs Creek. SIs 262, 294, 295, 298, and 591 are located in the drainage basin of Four Mile Branch. The location of the work is shown as green dots on the portion of the Outfall Map provided in Attachment 1 and on the aerial image in Attachment 3. These SIs are in the FFA because of possible radiological or chemical contamination from past releases from H-Area operations. To date, there has been no remediation of these units; the current status of the units is inactive. Per Appendix E of Reference 1, Remedial Actions are scheduled to begin in April 2043 for SIs 294, 344, 391, and 591, May 2046 for SIs 262 and 298, and May 2047 for SI 549. A photo of the actual location is provided in Attachment 4.

3. O & M ACTIVITY

A. O&M Activity Description

The scope of the activity is to replace the steam line support poles H47 and H48 located near 281-21H. Excavation is expected to be 6 to 8 feet and will be done by hand. SRNS Site Utilities forces will perform the work in accordance with the provisions of Asset Suite Work Order #01747090-01 (Reference 3) and AHA #SUD-18876 Rev. 0 (Reference 4). The activity occurs within a general SI and adjacent to several identified SIs. Work is expected to be completed by April 30, 2020. The removal of the current poles may take place at a future time.

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.

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.

Worker health and safety will be directed and controlled as required in the Assisted Hazard Analysis (AHA).

C. Health and Safety Plan

The health and safety concerns involve worker exposure to potential radiological contamination. RP shall provide for radiological monitoring during the excavation activities.

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 related to the RCRA/CERCLA units.

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

A sampling plan for work in this area has been prepared, and RP 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

Based on previous excavations in the vicinity, radiological contamination is not expected in the excavated soil. All waste will be disposed in accordance with guidance from RP, the Generation Certification Official (GCO), and the ECA. Clean soil will be returned to the excavation 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

During implementation of the activity, if the 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 Project Construction Manager, or the ECA shall:

- Immediately notify the SRNS-OSC. If necessary, the SRNS-OSC will notify the DOE-OSC.
- Stop work, secure the area, contain and stabilize the area, and determine any necessary change to the activity plan.
- Notify the SRNS-OSC of the findings and proposed path forward. The SRNS-OSC will communicate the information to the DOE-OSC and obtain concurrence on the path forward.

5. DOCUMENTATION & REPORTING

H Canyon will transmit the following documentation to the SRNS-OSC within twenty days of the completion of the activity:

- The signed O&M plan
- Any sampling and characterization data collected

The following information is not expected to be generated by this activity, but, if generated, will be forwarded to the SRNS-OSC:

- The quantity (if any) of any contaminated materials generated, and
- The disposal location of any contaminated material, if generated.

Attachments

Attachment 1. Outfall Drainage Map with Approximate Location of Steam Line Support Poles H47 and H48 shown as Green Dots
Attachment 2. Drawing Showing Approximate Location of Steam Line Support Poles (Green Dots) and Specific Site Indices (Red Areas)
Attachment 3. Aerial Image Showing Location of Steam Line Support Poles H47 and H48 (Green Dots)
Attachment 4. Photo Showing Physical Location
Attachment 5. Sketch Showing Proposed Pole Locations (Black Xs)

References

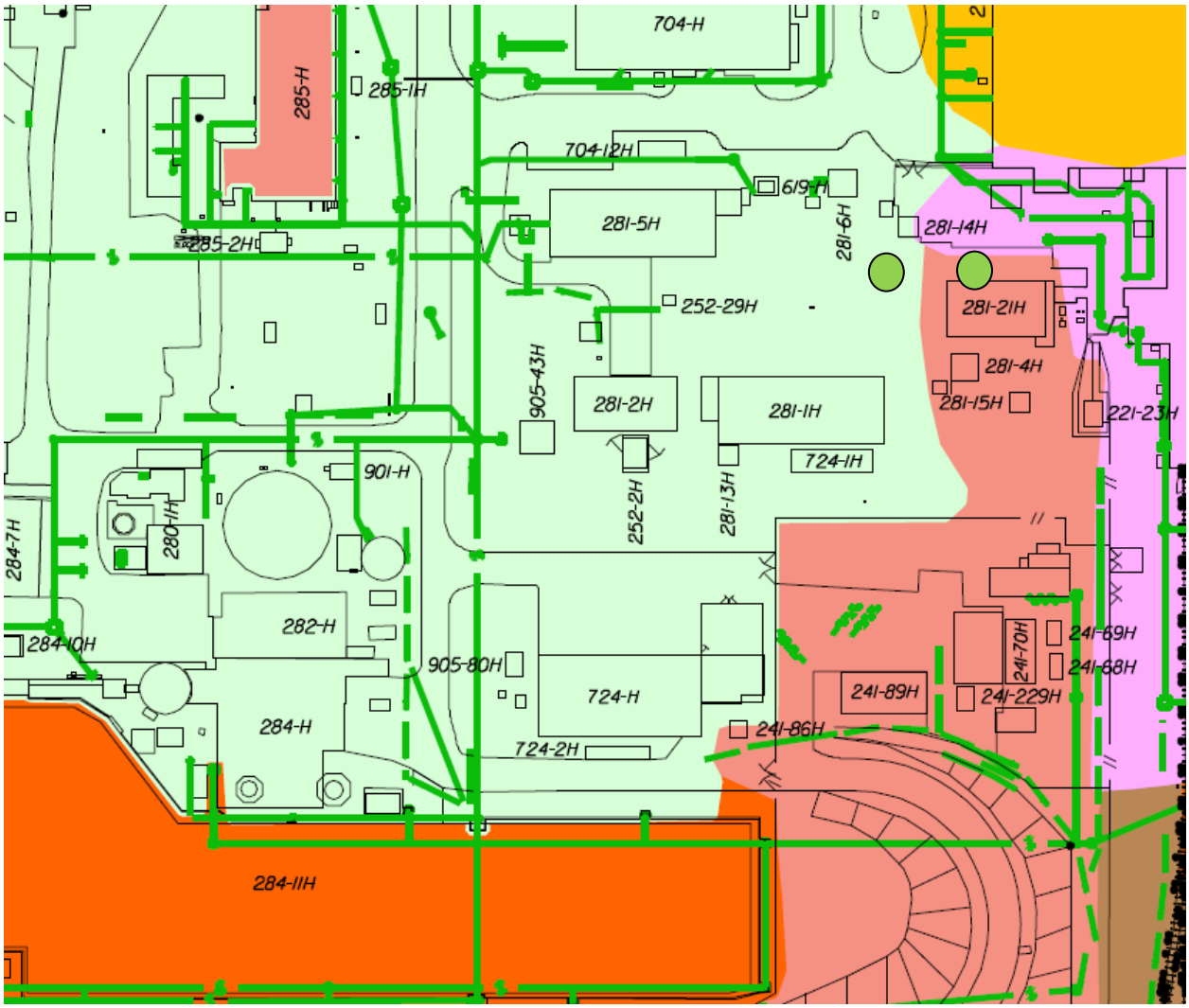
1. SRNS-OS-94-42, Federal Facility Agreement for the Savannah River Site, Administrative Document Number 89-05-FF, effective August 16, 1993, Revision 0 of Appendix C and Revision 0 of Appendix E for Fiscal Year 2019.

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

3. Assisted Hazard Analysis (AHA) #SUD-18876 Rev. 0, entitled "Correct Steam Poles in H Area," modified by Stephen Neal, on 11/13/19.

4. Asset Suite Work Order #01747090-01, created by Brad Harbuck.

Attachment 1. Outfall Drainage Map with Approximate Location of Steam Line Support Poles shown as Green Dots



Legend:
Gold – H-04B Storm Water Outfall Drainage Area
Brown – H-07 Storm Water Outfall Drainage Area
Orange – H-07B Storm Water Outfall Drainage Area
Pink – H-07C Storm Water Outfall Drainage Area
Light green – H-08 Storm Water Outfall Drainage Area
Peach – H-12 Industrial Waste Water Outfall Drainage Area
Approximate Support Pole Location

Attachment 2. Drawing Showing Approximate Location of Steam Line Support Poles (Green Dots) and Specific Site Indices (Red Areas)



Note: The entire drawing is within SI 549.

Attachment 3. Aerial Image Showing Location of Steam Line Support Poles (Green Dots)



Attachment 4. Photo Showing Physical Location



Attachment 5. Sketch Showing Proposed Pole Locations (Black Xs)

