Minor
OPERATION AND MAINTENANCE
Activity Plan

782-1M Fire Water Pump House Deactivation

Prepared by: RYAN MCDANIEL (Affiliate) Digitally signed by RYAN MCDANIEL (Affiliate) Date: 2022.06.29 08:34:18 -04'00'

Ryan E. McDaniel — Date
SRNS-Environmental Compliance Authority

Approved by: Robert Stampley 6/29/22

Robert Stampley — Date
Work Planner
SRNS-Site Services

Approved by: Ashley Eskew 6/29/22

~~Kristin Brant~~ Ashley Eskew — Date
AE 6.24.22
EC&ACP/Infrastructure Services Rad Protection
SRNS-Radiological Protection

1. INTRODUCTION

The Purpose of this Operation and Maintenance (O&M) Plan is to provide guidance for activities associated with the 782-1M Fire Water Pump House Deactivation. The excavation site is within an area identified in the Land Use Control Assurance Plan for SRS (WSRC-RP-98-4125) and is approximately 25 feet outside the M-Area Inactive Process Sewer Lines (MIPSL) (081-M) Operable Unit boundary (Waste Unit 100). This excavation is also approximately 185 feet from the M-Area Sandblast Area CMM-004 (Waste Unit 189).

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 Plan for Performing Maintenance in Federal Facility Agreement Areas, WSRC-RP-96-45.

2. AREA DESCRIPTION AND CONDITIONS

Contaminants of interest near the work area include:

Unit 100 M-AREA SETTLING BASIN INACTIVE PROCESS SEWERS TO MANHOLE 1 (MIPSL), 081-M: primary constituents of concern in the identified contamination areas within the MIPSL are trichloroethene, tetrachloroethylene, and 1,1,1-trichloroethane used as cleaning solvents. Nitric acid, caustic, uranium, and other heavy metals were used for other purposes.

Unit 189 M-AREA SANDBLAST AREA CMM-004: primary constituents of concern in the identified contamination area are Lead and Chromium.

3. O&M ACTIVITY

A. O&M Activity Description

Site Services will excavate an area immediately North of building 782-1M to access the ~~appropriate valve, M1-782-FP-V-060 for removal~~. Flanges will be installed on the header and discharge piping to ensure proper isolation of the system from its sources and discharge. The excavated area will measure approximately 10ft long, 10 ft wide, and 4 ft deep.

discharge header to air gap for system isolation.

REM 5/10/22

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

Waste Unit 100 is considered suspect for internal radiological contamination. The potential exists for radiological contamination of soil in the vicinity of the RCRA/CERCLA unit of the M-Area Inactive Process Sewer Line.

Radiological surveys may be required at the excavation site. If radiological contamination is encountered, Radiological Control Operations (RCO) will determine if protective equipment and personnel access requirements 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

The health and safety concerns involve worker exposure to potential radiological and Volatile Organic Chemical (VOC) contamination. RCO may provide radiological monitoring and Industrial Hygiene may provide air monitoring during the excavation activities.

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

No formal sampling plan will be utilized for work in this area. The sampling and characterization for this minor intrusive O&M activity will be the RCO surveys taken for the presence of radiological contamination during the activity. Material removed as part of the excavation will be returned as backfill when the job is completed.

E. Contaminated Materials Management and/or Disposal

The disposal of any waste materials generated during this activity will be contingent upon sample results. 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. WSRC-RP-98-4125, Land Use Control Assurance Plan for SRS
3. AHA# SUD-20903 R0
4. WO# 1918787 : **PBI-22 DEACTIVATION ACTIVITIES OF 782-1M FIRE WATER PUMP HOUSE