Operation and Maintenance Plan

24-011

For Tree Removal South of 763-111N Quonset Hut

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Prepared by:_____

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Introduction

This Operation and Maintenance (O&M) Plan will support work activities planned to remove several trees that are located to the south of Building 763-111N (aka Building 714-6N pad) located in N-Area.



Area Description and Conditions

The 763-111N Quonset hut sits atop a concrete pad which was once known as Building 714-6N, which occupied a footprint of approximately 320 feet long and 50 feet wide. On the southwest end of the existing pad, there is an 11' x 20' concrete pad which was originally used as a sump for the building.

Building 714-6N was once used to house a cladding operation in the 1950's. Thorium and uranium slugs were produced for testing in various reactor facilities. Quonset hut (763-111N) was installed on the 714-6N building pad shortly after the 714-6N was removed and appears to have been used to store Depleted Uranium Oxide and Low Enriched Uranium based on the survey records after 714-6N building was taken down.

Based on its historical use, 714-6N pad is listed on Appendix C.4 of the Federal Facility Agreement (FFA) between DOE, SCDHEC and EPA, which states that "*facilities listed on Appendix C.4 will require a determination as to whether a response action is warranted*.

This O&M Plan is characterized as "minor intrusive" because the activity will impact less than 10% of the surface area of the RCRA/CERCLA Unit.

O&M Activity

A. O&M Activity Description

The O&M plan to cover tree removal in the vicinity of 714-6N/763-111N pad. The trees are located on the south and southwestern portions of land that surround the 714-6N area. The trees and any soil from the tree removal could contain contaminants from the 714-6N area. The trees and soil will be collected for Radiation Protection surveys. Area Radiation Protection will survey the trees and soil after they have been removed to clear the trees and soil for disposal at the C&D landfill.



Trees within the orange box are to be removed.

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. This is due to personnel safety around the work area.

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

RPD will monitor the trees and soil removal activities for radioactive contamination per their standard procedures. If radiological contamination is encountered, RPD will determine if protective equipment and personnel access restrictions are required.

C. Health and Safety Plan

The health and safety concerns involve worker exposure to contaminants of interest listed in Area Description and Conditions above.

The Work Order and/or AHA for these activities will contain instructions to comply with this plan.

The safety requirements and personal protective equipment described in these documents is appropriate for the potential hazards of the waste units.

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

Per Area Radiation Protection personnel, the portion of the tree that was under the ground will be screened.

E. Contaminated Materials Management and/or Disposal

The disposal of the waste materials generated during this activity will be contingent upon the survey results. Other clean waste originating from this job will be managed as appropriate and specified by RCO.

If radioactive contamination is found, the GCO and/or the ECA will be contacted before any soil is placed into a container for disposal. Any other job control waste will be disposed of as “Low Level Radioactive Waste” under current N-Area Waste Management procedures if deemed appropriate by the SRNS-OSC.

F. Environmental Plans and Permit Modification Requests

No permit modifications are required because of this activity.

Contingency Plan

If at any time during the implementation of the activity, the conditions change such that the activity is no longer considered “minor” (as defined in Reference 1) or any other unanticipated event occurs (e.g., ash is found, etc.), the Project Manager or Environmental Compliance Authority 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.

Documentation and Reporting

The Project Manager will transmit the following documentation to the SRSN-OSC by the 31st day of the month the activity was completed:

• The signed O&M plan,

• Any sampling and characterization data collected,

• Quantity of contaminated materials generated, and

• Treatment, storage, and disposal location of contaminated material.

References

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