Minor
OPERATION AND MAINTENANCE
Activity Plan

Rainwater Intrusion Mitigation at Railroad Tunnel Airlock
Site Index 591

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1. INTRODUCTION

This Operations and Maintenance (O&M) Plan is for mitigation of rainwater intrusion into the railroad tunnel airlock.

These excavations will be within Site Index (SI) 591 (H-Area Process Sewer Lines as Abandoned, NBN) of the Federal Facility Agreement (FFA, Reference 1).

The soil excavation for these activities will not exceed 10 percent of the surface area, excluding structures, of the unit. The plan is characterized as a "minor intrusive activity" based on the soil excavation meeting the definition of both "minor" and "intrusive" as defined in Reference 2. Due to the size of SI 591 near where the excavation is located, it is not anticipated that this classification could change.
The scope is excavation and clean out of rainwater ditch for mitigation of rainwater intrusion into the railroad tunnel airlock. The work will be performed while protecting human health and the environment and minimizing the impact to long term characterization and remediation efforts. This activity is within and adjacent to Site Index (SI) 591 (H Area Process Sewer Lines as Abandoned, NBN).

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 Industrial Stormwater Outfall H-07C. The location of the excavation and cleaning is shown on Attachments 1, 2, and 3. Attachment 2 shows approximate locations for SI 591.

For a discussion of the SIs, see "Revision 0 for Appendix C for Fiscal Year 2019" of Reference 1. SI 591 is in the drainage basin of Four Mile Branch. The location of the work is shown as a yellow star on the portion of the Outfall Map provided in Attachment 1 and on the aerial image in Attachment 3. This SI is 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 this unit, and the status is inactive. Per Appendix E of Reference 1, Remedial Actions are scheduled to begin in April 2043 for SI 591. 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 excavate no more than 12 inches deep along the Railroad Tunnel south of 221-H. Depth of excavation along the airlock East wall needs to be lower than the RRT airlock floor to prevent future rainwater intrusion. Excavation area is expected to be 105'L x 3 W x 1'D. Construction personnel will perform the work in accordance with the provisions of Asset Suite Work Order #2046829 (Reference 3), AHA #HCA-28658 (Reference 4) and Manual 8Q-34 (Reference 5). The activity occurs within SI 591.

ALL EXCAVATED SOILS WILL BE RELOCATED ALONG THE RAILROAD TRACKS. 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 unit is 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 8Q-34 *Excavations, Trenches, and Ground Penetrations* (Reference 5) and the requirements listed in the AHA and work package. The safety requirements and personal protective equipment described in the AHA are appropriate for the potential hazards related to the RCRA/CERCLA units.

Characterization and Sampling Plan for the Affected Area within the Unit

RP will conduct sampling of the soil under an approved soil sampling plan 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 or relocated further down the railroad tracks when the activity is completed.

D. 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 relocated along the railroad tracks.

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 Damaged Junction Box shown as a Yellow Star
Attachment 2. Drawing Showing Approximate Location of Damaged Junction Box (Yellow Box) at Railroad Tunnel Airlock at SI 591
Attachment 3. Aerial Image Showing Location of Excavation at Railroad Airlock (Yellow Box)
Attachment 4. Photo Showing Physical Location

References

1. WSRC-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.

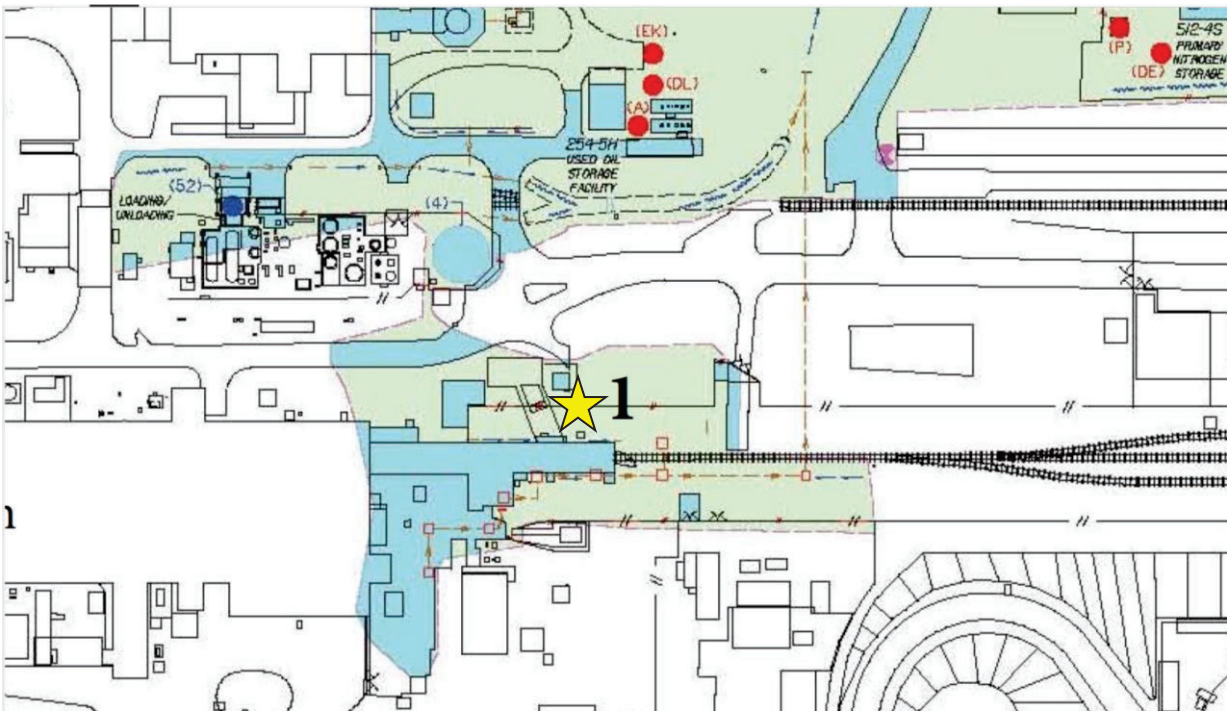
2. WSRC-RP-96-45, *Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U)*, December 15, 1996.

3. Assisted Hazard Analysis (AHA) #HCA-28658 Rev. 0.

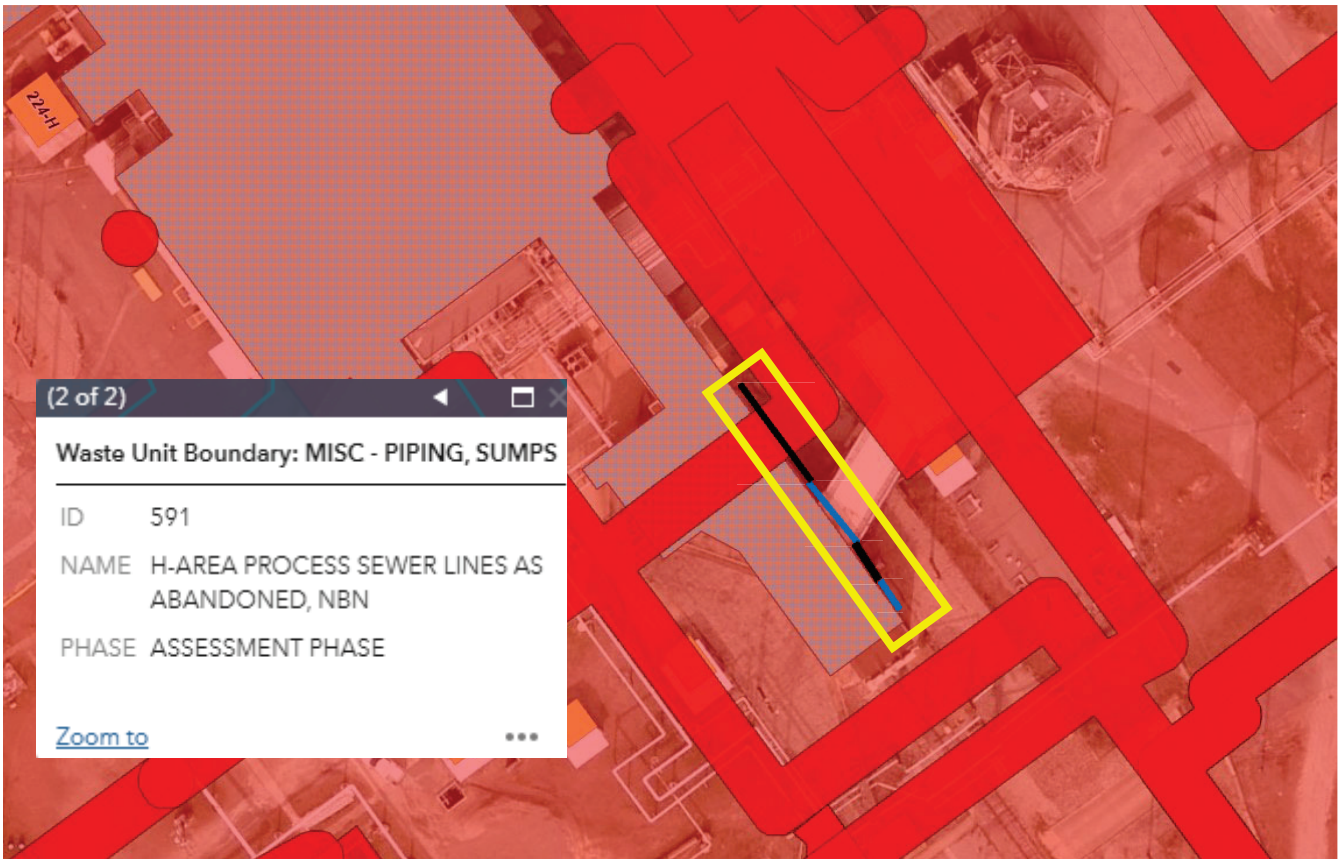
4. Asset Suite Work Order #2046829, created by Tabitha Jenkins.

5. 8Q Employee Safety, Procedure 34 *Excavations, Trenches, and Ground Penetrations*, Rev. 14

Attachment 1
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Outfall Drainage Map with Approximate Location of Excavation as a Yellow Star

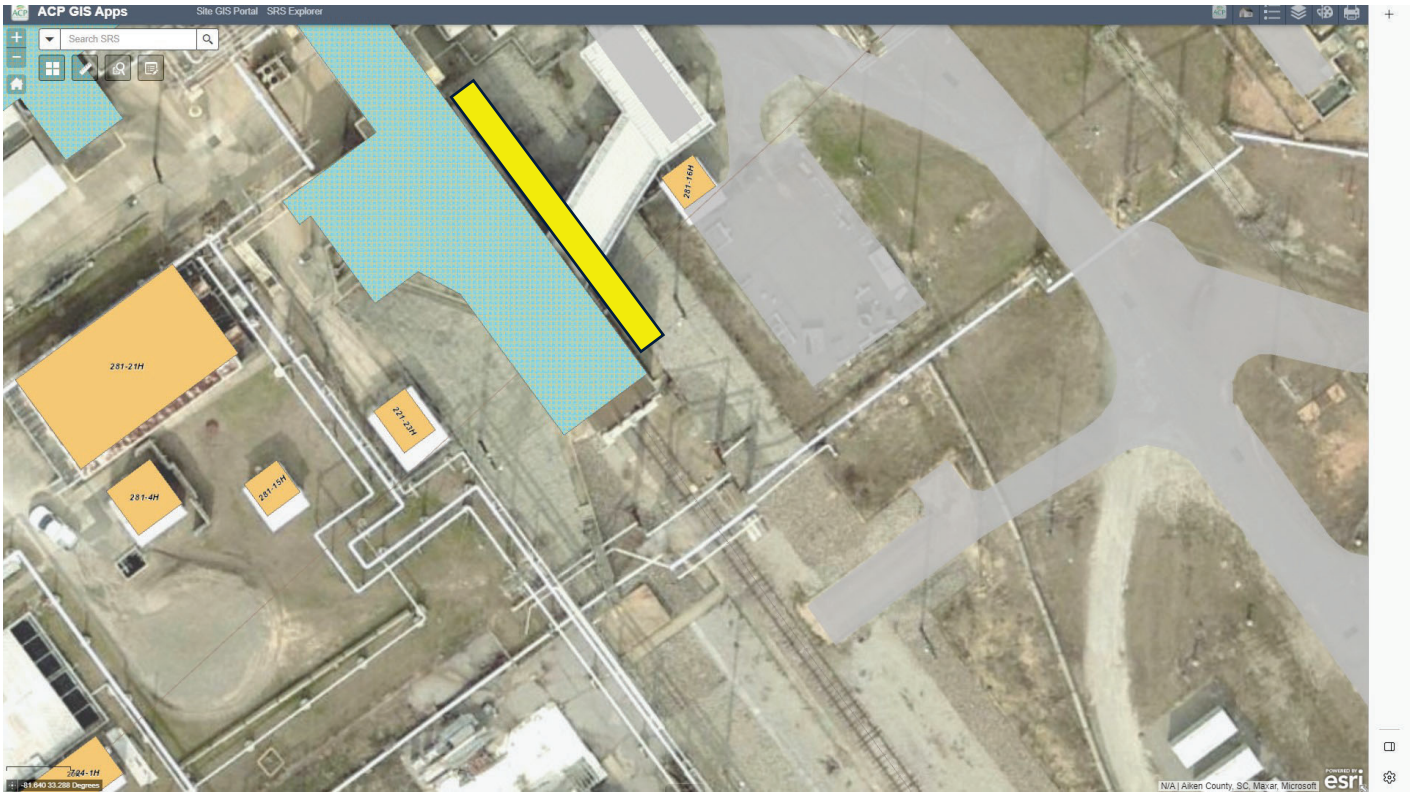


Attachment 2
Page 1 of 1
Drawing Showing Approximate Location of Excavation (Yellow Box) at Railroad tunnel airlock in SI 591

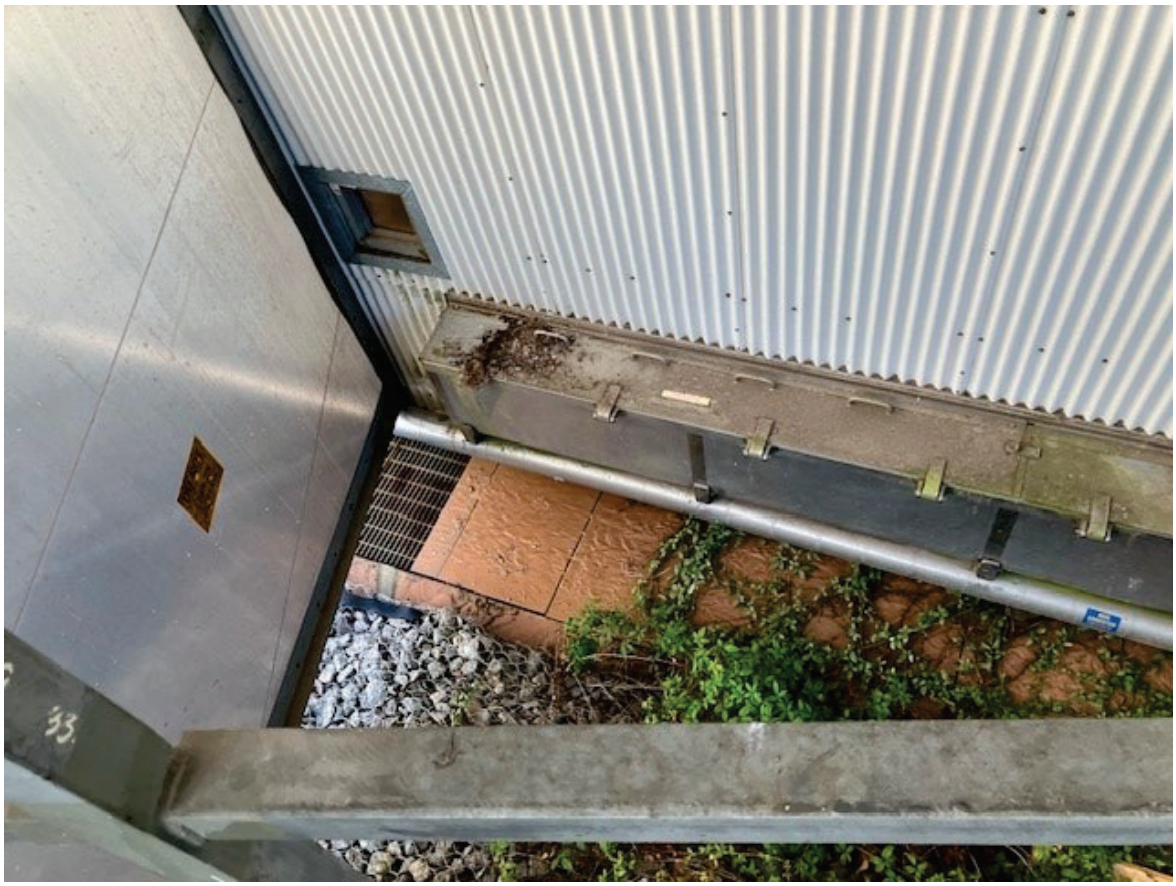


* Blue portion is concrete, and black portion is bare ground

Attachment 3
Page 1 of 1
Aerial Image Showing Location of Excavation at Railroad airlock (Yellow Box)



Attachment 4
Page 1 of 2
Photo Showing Physical Location



Attachment 4
Page 2 of 2
Photo Showing Physical Location (Red Box)

