Minor
OPERATION AND MAINTENANCE
Activity Plan 24-016

K-Area Soil Disturbance for Cellular Telephone Locker and Concrete Pad Installation in Site Evaluation Areas 476 and 302

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1. INTRODUCTION

This Operation and Maintenance (O&M) Plan is for the placement of a cellular telephone locker on concrete pad to be installed across the road (in the Restricted Area) from the Entry Control Facility-3 (704-741K) west of the new SPD Construction trailers. This O & M Plan provides for the soil/media disturbance within Site Evaluation Areas (SEA) 476 and 302 while protecting human health and the environment and minimizing impacts to long term characterization and remediation efforts. This O&M Plan is characterized as "minor intrusive" because less than 10 percent of the Site Evaluation Area will be excavated/disturbed.

2. AREA DESCRIPTION AND CONDITIONS

The Site Evaluation Area 476 is identified as requiring radiological evaluation due to the presence of moderator/radioactive impurities from spills associated with rail transport of cask cars containing filters, deionizers, etc. (from Purification Area) along the K-Area railroad system.

The SEA 302 is the K-Area Cooling Water Reservoir (186-K) identified as potential for metals and radionuclides as having been present in source water from the Savannah River.

This O & M Plan 24-016 credits the previously performed Radiological Protection (RP) sampling and O & M Plan 23-019 managed SEA disturbance activities performed within the K-Area Complex (KAC) Restricted Area at the new SPD Construction trailers. The RP soil sampling conducted for the SPD trailers per Reference 2 yielded no evidence of constituents of concerns when done in preparation for placement of the SPD Construction trailers and will serve as the sampling of record for soil disturbance associated with the cell phone locker placement/concrete pad installation.

To be clear, this O & M Plan 24-016 directs no further RP sampling, as the footprint impacted for cell phone locker placement recently underwent sampling in preparation for the placement of the new SPD trailers as provided in O & M Plan 23-019.

3. O&M ACTIVITY

A. O&M Activity Description

Soil disturbing activities in SEA 476 and 302 recently completed per O & M Plan 23-019 involved minor excavation in support of the installation of the new SPD trailers and a Quonset Building. Aspects of the scope of work included site prep, electrical and sewer connection, potable water supply lines, etc. There were no identified constituents of concern when the area was sampled by RP. Therefore, as the footprint sampled in O & M Plan 23-019 is the same footprint associated with O & M Plan 24-016, no further RP sampling is required.

This cell phone locker activity is expected to begin in June of 2024 and complete by end of calendar year 2025. If this work scope requires significant change for any reason, the SRNS On-Scene Coordinator (OSC) will be contacted to determine if modifications to this O & M Plan are required.

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

Radiological Protection (RP) recently completed sampling to support the soil disturbing activities that are described in O & M Plan 23-019. There was no waste associated with this activity in terms of soil, as it was returned as "clean" to the local area. The soils from SEA 476 and 302 were found to be at or below background for radiological constituents, therefore, RP allowed for the excavation in support of the SPD Construction trailers, as well as for the cellular telephone locker and pad installation which are the subject of this O & M Plan 24-016 activity.

C. Health and Safety Plan

The health and safety concern for this O & M Plan primarily involves worker exposure to potential radiological contamination. While there has been no detectible radiological contamination (above background) found in recent soil disturbances in K-Area SEA 476 or 302, RP shall be available for any questions or oversight requested during the

process of cell phone locker and pad installation, or preparatory activities.

D. Characterization and Sampling Plan for the Affected Area within SEA 476 and 302

Soil sampling was conducted for soil disturbance described in O & M Plan 23-019. The soil sampling scope was defined in the *"Soil Sampling Plan in Support of Work Orders #1995733 & #2007992 Work Order #1995733-01 - K-Area Install SPD Trailers – To Install 3 Trailers – 704-739K, 704-740K, & 704-741K West of 186-K for SPD Construction Support* and *Work Order #2007992 - Construct One Quonset Hut Fab Shop on Concrete Foundation, Concrete Pad Extensions for Laydown Area and Associated Utilities in the Grass Lot West of 183-2K and Southwest of 186-K"* (Ref. 2).

The characterization and sampling record for the minor intrusive O&M activity is the RP sample data for the presence of radiological contamination in the soil/media. O & M Plan 24-016 credits the sampling and analysis of work performed under O & M Plan 23-019.

If any radioactive contamination were found from sampling, the Environmental Compliance Authority (ECA), along with RP and K-Area Complex (KAC) Operations management would devise an alternative plan by which to carry out cell phone locker and pad placement.

Additionally, the SRNS-OSC would be notified by the Area ECA, and any additional work scope and sampling from the soil disturbance areas would be completed per SRNS-OSC guidance.

E. Contaminated Materials Management and/or Disposal

The disposition of any waste materials generated during the described activity would be contingent upon sample results. Since SEA 476/302 soil/media were determined to be "clean", normal waste disposal practices were applied, as determined by the KAC ECA. If contaminated, however, RP would advise soils/media/equipment disposition, in coordination with Waste Certification Engineering and

the ECA. These options would be explored and fully described in a revised O & M Plan (or addendum).

Contaminated waste would be characterized and disposed of as "Radioactive Waste" under current SRNS/KAC Waste Management procedures, or deconned, if deemed appropriate by RP and the SRNS-OSC.

F. Environmental Plans and Permit Modification Requests

The soil disturbing aspect of this task do not involve environmental plans/permits or other required maintenance and inspections, except if potential erosion control practices become necessary.

The Site Use/Site Clearance Permit process was addressed prior to soil disturbance initiation, as required.

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" (is greater than 10% of the waste unit area impacted or disturbed) or any other unanticipated event occurs, the Facility Operations Manager 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 Facility Operations Manager or the ECA will transmit the following close-out 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 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 Area (O&M) Plan (U), December 15, 1996.

2. *Soil Sampling Plan in Support of Work Orders #1995733 & #2007992 Work Order #1995733-01 - K-Area Install SPD Trailers – To Install 3 Trailers – 704-739K, 704-740K, & 704-741K West of 186-K for SPD Construction Support* and *Work Order #2007992 - Construct One Quonset Hut Fab Shop on Concrete Foundation, Concrete Pad Extensions for Laydown Area and Associated Utilities in the Grass Lot West of 183-2K and Southwest of 186-K.*