OPERATION AND MAINTENANCE ACTIVITY PLAN

H-17 Liquid Effluent Station Solar Panel Replacement and Ground Rod Installation Project

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1. INTRODUCTION

This Operation and Maintenance (O&M) Plan is being written to support work activities planned for the solar panel replacement and grounding rod installation at the Environmental Monitoring liquid effluent station, H-17 as seen in Figure 1. This is considered a minor intrusive activity. Figure 2 and 3 show the Site Evaluation Areas and or RCRA/CERCLA unit within a 200-foot buffer zone of the installation site identified in which the conveyance system associated with the RCRA/CERCLA unit or Site Evaluation Area such as piping and NPDES outfalls that have or have had a potential for a release of a hazardous substance are considered a part of the unit.

Figure 1 – H-17 Location (SRS Explorer Portal)

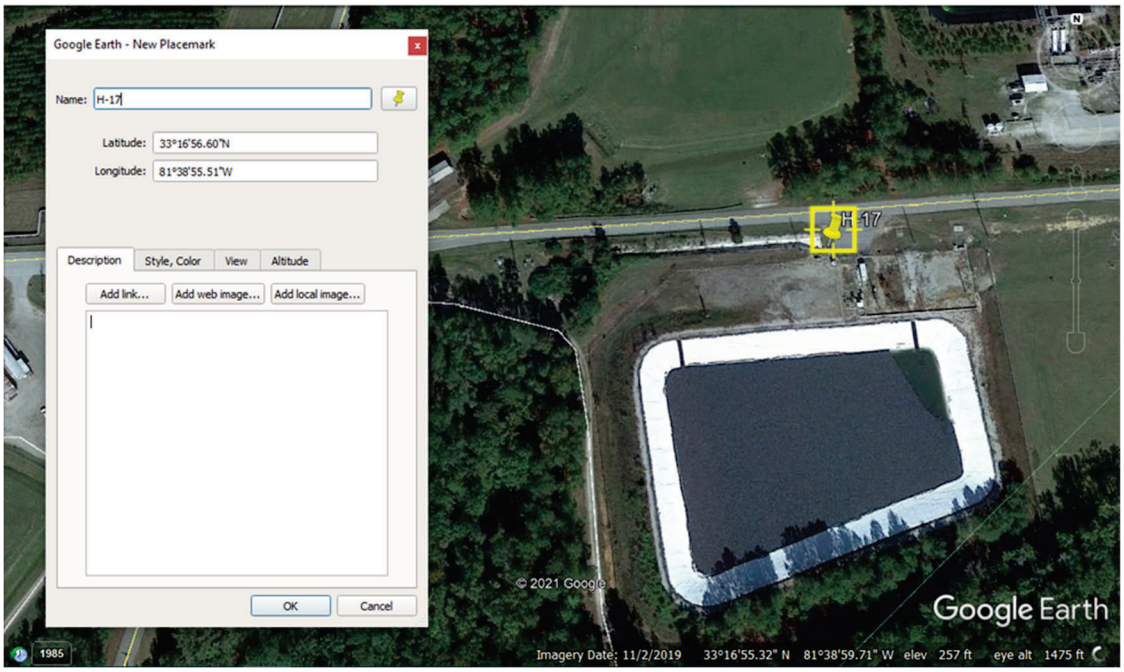


Figure 2 – Waste Units within 200 Foot Buffer of Excavation Site (ACP GIS Map Portal)

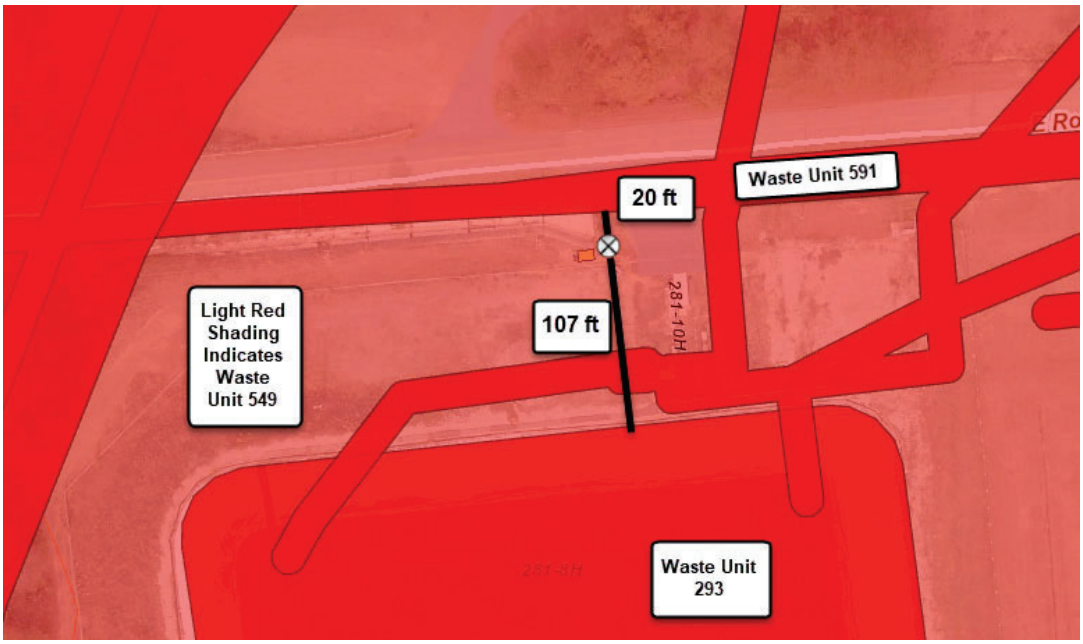
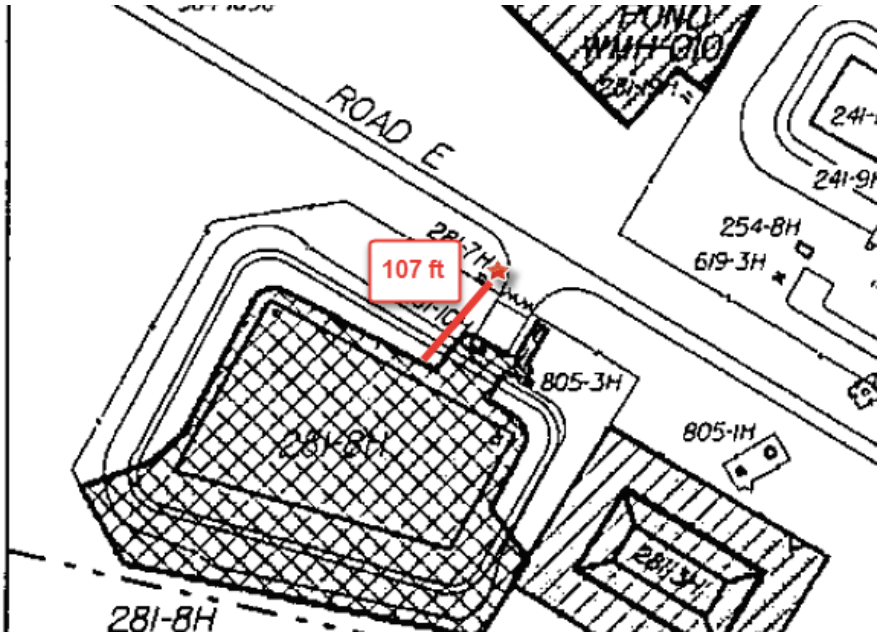


Figure 3 – RCRA/CERCLA and/or Site Evaluation Areas within 200 Foot Buffer of Excavation Site (Reference 2)



2. AREA DESCRIPTION AND CONDITIONS

Contaminants of interest near the work area include:

The following RCRA/CERCLA units and/or Site Evaluation Areas exist within 200 feet of this work location (Reference 1 & 2):

1) Waste Unit: 591, H-Area Process Sewer Lines As Abandoned
   Location: H-Area
2) Waste Unit: 293, H-Area Retention Basin (Including the Former 281-7H Basin), 281-08H
   Location: H-Area, 281-8H
3) Waste Unit 549, General Separations Area Eastern Groundwater Operable Unit
   Location: H-Area

For a discussion of the waste units, see "Revision 0 for Appendix C for Fiscal Year 2021" of Reference 3. These waste units are in the Federal Facility Agreement (FFA) due to 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 3, Remedial Actions are scheduled to begin in April 2043 for waste units 591 and 293, and May 2047 for waste unit 549. A site evaluation has not been performed and impacts to the IOU have not been determined.

3. O & M ACTIVITY

A. O&M Activity Description

The O&M activity is the solar panel replacement and grounding rod installation at the Environmental Monitoring liquid effluent station, H-17. The grounding rod will be driven into the ground to a depth of approximately 8ft. Generation of soil is not anticipated; however, if soil is generated, then every attempt should be made to place any soil removed back into the hole.

If any soil cannot be returned to its original location, it will be screened by RPD for free release to the Three Rivers Landfill.

a. If the excess soil is below radiological limits and can be cleared for release, it shall be placed into an appropriate container as determined by facility GCO and transferred accordingly.
b. If the soil cannot be cleared for release to the Three Rivers Landfill, it will be placed into one or more containers to be specified by the facility GCO. It shall be sampled for constituents to be determined by the B-Area Laboratories ECA and/or Waste CTF. The containers will be held pending analysis and waste characterization.

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

The work area will be barricaded with rope or rigid handrails to ensure that access is controlled. This is to ensure personnel safety around the work area.

Worker health and safety will be directed and controlled as required in the work package.

C. Health and Safety Plan

The health and safety concerns involve worker exposure to the contaminants of interest listed in Section 2. The Work Order and/or AHA for these activities will contain instructions to ensure compliance with the Health and Safety Plan. The safety requirements and personal protective equipment described in these documents are appropriate for the potential hazards of the waste units.

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

Waste is not expected to be generated during this project due to the method of installation for the ground rod; therefore, no formal sampling plan will be utilized for work in these areas. If soil is generated in this area, it will be sampled by RCO personnel. The samples will be analyzed to determine if the soil can be cleared for release to the Three Rivers Landfill. If the soil is released for disposal at the Three Rivers Landfill, then no further sampling is planned. If the soil cannot be cleared for release, it will be sampled for waste characterization and planning that will occur when that determination is made. The B-Area Laboratories ECA and/or the Waste CTF will provide specific analytical requirements for that material.

Additional work scope and sampling from the soil disturbance areas may be necessary and will be addressed per SRNS-OSC guidance, should radioactive contamination be found present.

E. Contaminated Materials Management and/or Disposal

Waste is not expected to be generated during this project due to the installation method. However, the disposal of waste materials generated during this activity will be contingent upon RCO survey results. Other clean waste originating from this job will be managed as appropriate and as specified by RCO or handled in accordance with existing EC&ACP procedures.

If radioactive contamination is found, the ECA or GCO will be contacted before any soil is placed into a container for disposal. Contaminated soil will be dispositioned in accordance with the 1S Manual. Any other job control waste will be disposed of as "Low Level Radioactive Waste" under current EC&ACP Waste Management procedures if deemed appropriate by the SRNS-OSC.

F. Environmental Plans and Permit Modification Requests:

The Environmental Evaluation Checklist performed for this activity is EEC No. EP-B-2021-0011. No permit modifications are required as a result of this activity. Standard erosion control measures and storm water management will be used, if 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" (as defined in Reference 2) or any other unanticipated event occurs, the Project Manager or 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 will transmit the following documentation to the SRNS-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

6. References

1. SC-8100, Site Clearance Request to Install a Solar Panel and Ground Rod to Operate Flow Equipment at Environmental Monitoring Station H-17. Located North East of 281-8H., June 17, 2021
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. WSRC-OS-94-42, Federal Facility Agreement for the Savannah River Site, Administrative Document 89-05-FF, August 16, 1993.