Minor
OPERATION AND MAINTENANCE
Activity Plan

Replace 13.8KVA Power Pole H3A318

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C. A. Bishop, Jr EC/ACP ECA Date

1. INTRODUCTION

The Operation and Maintenance (O&M) Plan for the replacement of 13.8KVA power pole H3A318 will provide a means by which activities can commence within Tritium/H-Area, while protecting human health and the environment, and minimizing the impact to long term characterization and remediation efforts.

2. AREA DESCRIPTION AND CONDITIONS

The work area is located between 234-H and 234-7H, west of 233-1H. A new approximately 8-foot-deep hole will be hand-excavated near existing power pole H3A318, and a new pole will be installed. During a scheduled power outage for buildings 234-H (Inert), 234-7H, 246-2H, 233-38H, 217-3H, 263-170H, 246-1H, 248-H, and 719-H, the commodities at the top of the old pole will be switched to the new pole, then the top portion of the old pole will be cut and removed. This work is being completed under work order # 1882915. L/T of the 13.8KVA feed will be required, as well as an approved critical lift plan. Soil sampling by RPD is required (see contaminants of interest below). Backfill will be performed per work instructions.

Identified Site Evaluation Areas. Unit 591 "H-AREA PROCESS SEWER LINES AS ABANDONED, NBN" and Unit 142 "H-AREA INACTIVE PROCESS SEWER LINES FROM BUILDING TO THE SECURITY FENCE, 081-H" and Unit 531 “ECODS H-1 (INCLUDING THREE H-AREA ASBESTOS TRANSITE PITS) (WEST OF MAIN H-AREA FACILITIES)”

Contaminants of interest near the work area include: Cs137, Sr90, U235, U238, Pu238, & Pu239.

3. 0 & M ACTIVITY

A. O&M Activity Description

The O&M activity involves: hand-excavation of an 8-ft hole to install a new power pole between 234-H and 234-7H.

To the extent possible, excavated soil is to be returned to its original location upon task completion. Disposal of remaining soil will require written approval from Rad Con and EC/ACP.

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.

C. Health and Safety Plan

The health and safety concerns involve worker exposure to contaminants of interest listed in Section 2 above.

The work will be completed in accordance with the requirements stated in the AHA. The safety requirements and personal protective equipment described in the AHA are appropriate for the potential hazards of the waste units

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

No formal sampling plan will be utilized for work in this area. If deemed necessary by RCO, 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 require radiological survey before disposal.

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

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 or handled in accordance with existing Tritium procedures.

If radioactive contamination is found, the soil and other job control waste will be disposed of as "Low Level Radioactive Waste" under current Tritium 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.

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 1) or any other unanticipated event occurs, 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.

5. DOCUMENTATION & REPORTING

The Project Manager will transmit the following documentation to the SRNS-OSC by the 20th 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 Area (O&M) Plan (U), December **15,** 1996

2. AHA # TRI-57335

3. WO # 1882915