MINOR

OPERATION AND MAINTENANCE

ACTIVITY PLAN

O&M 21-019

L-Area Fence Installation

(Site Index No. 479 "L-Area Operable Unit")

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1. INTRODUCTION

This Operations and Maintenance (O&M) Plan addresses soil disturbing activities necessary to support installation of fencing to complete a section of fence that was removed years ago to allow removal of a large object that was stored on a concrete pad in in that fenced area.

Excavation activities are within the 200' buffer area of one RCRA/CERCLA Sites that are described in section 2Z "L-Area Operable Unit" of the *Federal Facility Agreement, Appendix C.2* (WSRC-OS-94-42) and is described below in Section 2. The potential area of disturbance is less than 10% of the waste unit area, characterizing it as "minor intrusive" activity. An O&M plan is required per WSRC-RP-96-45, *Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U),* December 15, 1996. An O&M plan provides added protection to human health and the environment and minimizes impact to long-term characterization and remediation efforts.

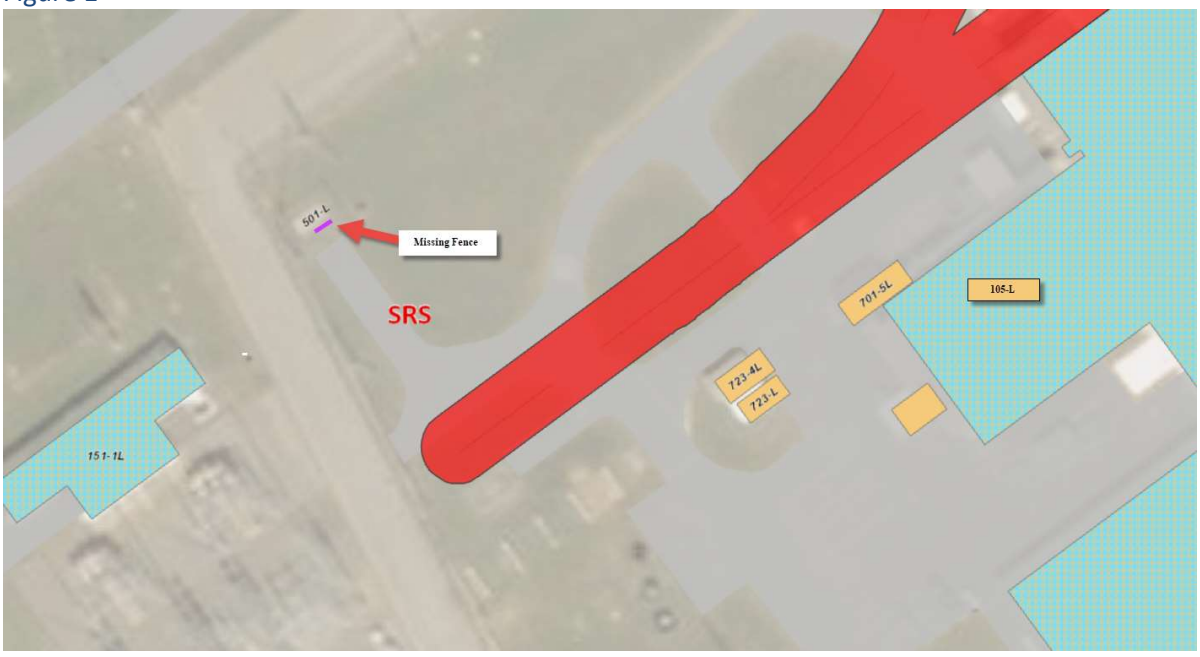
2. AREA DESCRIPTION AND CONDITIONS

The proposed activity is within the 200-foot buffer area for the following RCRA/CERCLA Site:

- SRS Index #479 "L-Area Reactor Area Cask Car Railroad Tracks as Abandoned, NBN"

The area where the work will occur is shown in Figure 1

Figure 1



3. O&M ACTIVITY

A. O&M ACTIVITY

The scope of the activity is to excavate soil in the form of a post holes that are 12" wide by 36" deep to install two fence posts to allow a fence to be closed around pad 501-L in the north west corner of the L-Area PA that surrounds 105-L.

B. O&M ACTIVITY SAMPLING AND MONITORING FOR HEALTH AND SAFETY

Unit 479 is in the FFA because of **potential** radiological contamination. No characterization work has been done in the L-Area Operable unit at this time but the P-Area and R-Area Rail lines were characterized during closure and C-137 and Ba-137m (Cs-137 daughter product) were the primary constituents of concern for those areas. It is likely that the same contaminant exists in the L-Area Railroad Tracks as the process was the same.

Radiological survey will be required at the excavation site. If radiological contamination is found, Radiological Protection 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) with approvals from Radiological Protection, Industrial Hygiene and the Environmental Compliance Authority (ECA).

C. HEALTH AND SAFETY PLAN

The health and safety concerns involve **potential** worker exposure to radioactive contamination.

Worker safety is covered in the Assisted Hazard Analysis and Work Order **01899380** and reviewed in the Pre-job briefing.

D. CHARACTERIZATION AND SAMPLING PLAN FOR THE AFFECTED AREA WITHIN THE UNIT

Unit 479 is in the FFA for potential radiological contamination. Radiological Protection has prepared a sampling plan and conduct surveys for work in this area.

Industrial Hygiene and Radiological Protection will review the work order and Assisted Hazard Analysis (AHA) to determine worker protection requirements.

If unexpected contamination is found, a Time-Out will be called. The ECA will be notified. The ECA will notify the SRNS On-Scene Coordinator (Carl Shealy), who may request additional work scope and sampling from soil disturbed by the activity.

E. CONTAMINATED MATERIALS MANAGEMENT AND DISPOSAL

The excavated soil will be returned as backfill when the activity is complete.

F. ENVIRONMENTAL PLANS AND PERMIT MODIFICATIONS

This activity is not expected to involve other environmental plans/permits.

4. CONTINGENCY PLAN

During implementation of the activity, if 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 planner, the Operations Manager or ECA shall:

- Stop work, secure the area, contain and stabilize the area if it is safe to do so.
- Immediately notify the SRNS-OSC and request a path forward. If necessary, the SRNS-OSC will notify the DOE-OSC and receive concurrence on the path forward
- Make any necessary changes to work authorization documents.

5. DOCUMENTATION AND REPORTING

The facility will transmit the following documentation to the SRNS-OSC within twenty (20) days of the completion of the activity:

- A statement that the activity is complete
- Sampling and characterization data

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, Appendix C for Fiscal Year 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. Work Order 01899380