MINOR

OPERATION AND MAINTENANCE

ACTIVITY PLAN

O&M 25-012 REV. 0

L-Area Maintenance and Modification of Gates O&M Plan

(Site Index No. 584 "L-Area Operable Unit")

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1. INTRODUCTION

This Operations and Maintenance (O&M) Plan addresses soil disturbing activities necessary to support the following project work: clean out existing gate drop receiver holes and drill into concrete or asphalt to make them deeper. Note this has the potential for possibly going into the soil. If this goes into soil, a depth of 2 inches below concrete or asphalt is anticipated. For conservatism, 4 inches can be assumed. This work is to be done at 3 gates inside the 105-L protected area.

Excavation activities are within RCRA/CERCLA Site Index No. 584 "L-Area Operable Unit" of the *Federal Facility Agreement, Appendix C.2* (WSRC-OS-94-42) and are specifically within the 200' buffer area of several site indices included therein and 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 RCRA/CERCLA Site Index No. 584 "L-Area Operable Unit". The following site indices are included in this operable unit. The potential drilling into soil is occurring within 200' of Site Indexes #479 and 560 and LUCAP-L Reactor Building (105-L).

- SRS Index #1770 "Building 108-4L, Emergency Diesel Generator & Fuel Oil Storage"
- SRS Index #560 "L-Area Process Sewer Lines, as Abandoned"
- SRS Index #479 "L-Area Reactor Cask Car Railroad Tracks, as Abandoned"
- SRS Index #303 "Potential Release from L-Area Disassembly Basin"
- SRS Index #305 "Potential Release from L-Area Reactor Cooling Water System, 186/190-L"
- SRS Index LUCAP-L-Area Southern Groundwater
- SRS Index LUCAP-L Reactor Building (105-L)

Unit 584 is in the FFA because of potential metals and radionuclide contamination from the various activities associated with the above indices.

3. O&M ACTIVITY

A. O&M ACTIVITY

This O&M plan addresses soil disturbing activities necessary to support the following project work: maintenance and modify three gates inside the 105-L protected area by cleaning out existing gate drop receiver holes and drilling into concrete or asphalt to make them deeper. This has the potential for possibly going into the soil.

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

Unit 584 is in the FFA because of **potential** metals and radiological contamination.

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 metals and radionuclide contamination.

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

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

Unit 584 is in the FFA for potential metals and radiological contamination. Radiological Protection has prepared a sampling plan and conducts 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 (Bette Ross), 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. No residuals from the excavation/soil disturbance/boring are to be removed from the immediate area. This is critical for CERCLA compliance purposes.

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

6. 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 2017)

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

8. EEC # EMO-L-2025-00008 Rev. 0

9. *Soil Sampling Plan for* WO#02120178-01 (Inclusive of Current Project Scope Sampling Locations)

Attachments

1. None