Minor
OPERATION AND MAINTENANCE
Activity Plan
Extend Concrete Pads at Canyon to Accommodate New HVAC Units.

Prepared by: _____ 8-15-2024

Victor G. Brzeg
ECA, H-Area Complex

Date

Approved by: _____ 8-15-2024

William E. Blackburn
Generator Certification Official

Date

Approved by: _____ 8/15/2024

Donald Turno
H-Canyon Area Manager

Date

Approved by: _____ 8/9/2024

Megan Corbin
Radiological Protection, H-Area Complex

Date

1. INTRODUCTION

This Operations and Maintenance (O&M) Plan is for Construction to excavate at six locations to extend existing concrete pads to accommodate new HVAC units. All work scope in this task is GS.

Three of the six excavations will be within or adjacent to CERCLA Unit SI 344(Reference 1).

The soil excavation for these activities will not exceed 10 percent of the surface area, excluding structures of the unit. The plan is characterized as a "minor intrusive activity" based on the soil excavation meeting the definition of both "minor" and "intrusive" as defined in Reference 2.

2. AREA DESCRIPTION AND CONDITIONS

The location of the work and excavation areas are shown on the map provided in Attachment 1.

For a discussion of the Site Index, see "Revision 0 for Appendix C for Fiscal Year 2022" of Reference 1. SI 591 is in the Federal Facility Agreement because of possible radiological or chemical contamination from past releases from Site operations. To date there has been no remediation of these units, and the status of the units is inactive. Per Appendix E of Reference 1, Remedial Actions are scheduled to begin in April 2043 for SI 344.

3. O & M ACTIVITY

A. O&M Activity Description

The scope of the activity is to excavate to a maximum depth of two feet to install additional concrete for new HVAC units. Workers will hand excavate to reveal all known/unknown Systems, Commodities, and Utilities (SCU) in compliance with Manual 8Q, Procedure 34 (Reference 3). Hand digging and probing will occur within six feet of each side of the expected SCU or to the excavation buffer zone (whichever is less) and to a depth of one foot below the expected SCU or one foot below the expected excavation (whichever is greater). Mechanical excavation will then be used to excavate the required soil. Workers will adhere to a one-foot buffer zone rule when using mechanical means to excavate. If excavation meets five feet, work will stop for additional slope review.

Rad Protection will sample the soil prior to excavation and adhere to Soil Contamination Area Posting Limits found in Manual 5Q, Chapter 2 (Reference 4).

A GPR survey for underground interferences and an Excavation Checklist (OSR 18-125) will be completed per Work Order.

Work is expected to take one month.

THE DISPOSAL OF ANY CONTAMINATED SOIL WILL BE PER THE ENVIRONMENTAL COMPLIANCE AUTHORITY (ECA) AND RADIOLOGICAL PROTECTION (RP) DIRECTION. IT IS ANTICIPATED EXCAVATED SOIL WILL BE RETURNED TO ITS ORIGINAL LOCATION UPON TASK COMPLETION.

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

The identified units are in the FFA because of possible radiological contamination from past releases from Site operations.

Radiological surveys will be required at the excavation site within the buffer zone. If radiological contamination is encountered, Rad Protection will determine if protective equipment and/or personnel access restrictions are required.

The work area will be barricaded with rope or rigid handrail to ensure that access is controlled for personnel safety around the work area. Worker health and safety will be directed and controlled as required in the work package and Assisted Hazard Analysis (AHA).

C. Health and Safety Plan

The health and safety concerns involve worker exposure to unknown waste material that could be excavated. 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 excavation work.

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

Material removed as part of the excavation will be returned as backfill when the job is completed. If any unknown waste material is excavated as part of this repair, a Timeout will be taken and the Shift Operations Manager (SOM), ECA, and the Maintenance/Site Services Manager will be notified until the Timeout is resolved.

E. Contaminated Materials Management and/or Disposal

Radiological contamination could be present in the excavated soil. All waste will be disposed in accordance with guidance from Rad Protection, the Generation Certification Official (GCO), and the ECA. Clean soil will be returned to the excavation once the work is complete.

F. Environmental Plans and Permit Modification Requests

This activity is not expected to involve other environmental plans / permits, required maintenance, and inspections, or erosion control practices.

Stormwater and sediment control shall be managed per SRS Manual 3Q, Procedure 12.2.

4. CONTINGENCY PLAN

During implementation of the activity, if the 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 Project Construction Manager, or the ECA shall:

- Immediately notify the SRNS-OSC. If necessary, the SRNS-OSC will notify the DOE-OSC.
- Stop work, secure the area, contain, and stabilize the area, and determine any necessary change to the activity plan.
- Notify the SRNS-OSC of the findings and proposed path forward. The SRNS-OSC will communicate the information to the DOE-OSC and obtain concurrence on the path forward.

5. DOCUMENTATION & REPORTING

SRTE will transmit the following documentation to the SRNS-OSC within twenty days of the completion of the activity:

- The signed O&M plan
- Any sampling and characterization data collected

The following information is not expected to be generated by this activity, but, if generated, will be forwarded to the SRNS-OSC:

- The quantity (if any) of any contaminated materials generated, and
- The disposal location of any contaminated materials, if generated.

Attachments

Attachment 1. Drawing Showing Excavation Locations

Attachment 2. H-04B Outfall Drainage Map with Location of Excavation

References

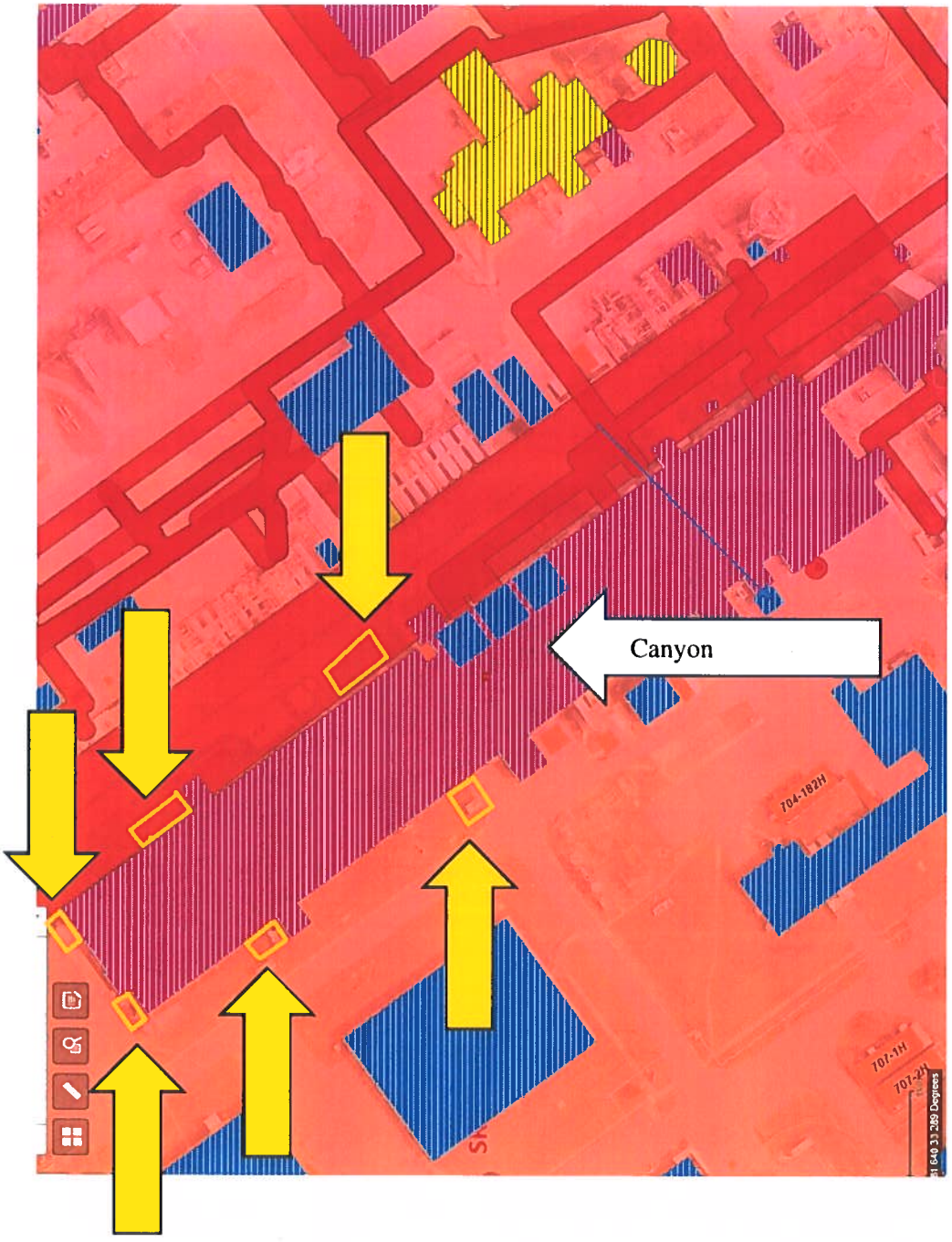
1. WSRC-OS-94-42, Federal Facility Agreement for the Savannah River Site, Administrative Document Number 89-05-FF, effective August 16, 1993, Revision 0 of Appendix C and Revision 0 of Appendix E for Fiscal Year 2024.

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. Manual 8Q, Procedure 34, Revision 11, *Excavations and Trenches*

4. Manual 5Q, Chapter 2, Revision 17, Radiological Standards

ATTACHMENT 1
Drawing Showing Excavation Locations
Page 1 of 1



ATTACHMENT 2
H-04B Outfall Drainage Map with Approximate Location of Excavation Site
Page 1 of 1

