Minor
OPERATION AND MAINTENANCE
Activity Plan

Exploratory dig to check for interferences for setting a new pole for feeder F3B in F-area

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1. INTRODUCTION

The Purpose of this Operation and Maintenance (O&M) Plan is to provide guidance for activities associated with the exploratory dig to check for interferences for setting a new pole for Feeder F3B in F-Area. The excavation site is near the F-Area Abandoned Process Sewer Lines RCRA/CERCLA Unit (Waste Unit # 563).

This O&M Activity Plan is defined as a "minor intrusive activity" based on the soil excavation meeting the definition of both "minor" and "intrusive" as defined in the SRS Operations and Maintenance Plan(RCRA/CERCLA), WSRC-RP-93-904.

2. AREA DESCRIPTION AND CONDITIONS

Contaminants of interest near the work area include:
Unit 563 "F-Area Process Sewer Lines As Abandoned, NBN"
The F-Area Process Sewer Lines conveyed wastewater potentially contaminated with metals, organics, and radionuclides from separations process facilities. COCs are Cs 137, Pu 238, Pu 239, Sr 90, AM 241 U 238. Most prevalent : Cs 137, Sr 90.

Waste Unit 563 is considered suspect for internal radiological contamination.

3. O&M ACTIVITY

A. O&M Activity Description

Site Infrastructure is tasked with performing an exploratory dig to check for interferences for setting a new pole for Feeder F3B in F-Area. The valve is located near the F-Area Abandoned Process Sewer Lines RCRA/CERCLA Unit.

ALL EXCAVATED SOILS WILL BE RETURNED TO THE ORIGINAL LOCATION OF SOIL DISTURBANCE. THE DISPOSAL OF ANY SOIL WILL BE PER THE ENVIRONMENTAL COMPLIANCE AUTHORITY (ECA) AND RP DIRECTION.

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

Waste Unit # 563 is considered suspect for internal radiological contamination. The potential exists for radiological contamination of soil in the vicinity of the RCRA/CERCLA unit if leaks have occurred from the process sewer lines.

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 Assisted Hazard Analysis.

C. **Health and Safety Plan**

Based on RPD walkdown of the area, health and safety concerns should not involve worker exposure to potential radiological contamination.

The work will be completed in accordance with the requirements stated in the Assisted Hazards Analysis. The safety requirements and personal protective equipment described in the AHA are appropriate for the potential hazards of the RCRA/CERCLA Unit.

D. **Characterization and Sampling Plan for the Affected Area near the Unit**

A formal sampling plan will be utilized for work in this area. The sampling and characterization for this minor intrusive O&M activity will be per the sampling plan written by F-Area RPD. Material removed as part of the excavation will be returned as backfill when the job is completed.

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

E. **Contaminated Materials Management and/or Disposal**

Any waste materials generated during this activity will be disposed of as appropriate . If media (valve and other waste materials) is determined to be "clean," normal work practices would occur. This waste will be managed as appropriate per facility Waste Management and ECA guidance, and handled in accordance with existing SRNS waste guidance procedures. Clean soil can be put back in place once the leak repair 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.

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" (greater than 10% of a waste unit area impacted or disturbed), the Shift Operations Manager (SOM) shall be notified and the Facility Manager (or designee) or the 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 or designee will transmit the following documentation to the SRNS-OSC by the 20th day of the month following the month that the land disturbing activity was completed:

- The signed O&M Plan
- Any sampling and characterization data that was collected.
- The quantity of contaminated materials, if generated.
- The disposal location of any contaminated material, if generated.

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# SUD 21211
3. WO# 1980024