Minor
OPERATION AND MAINTENANCE
Activity Plan

REPAIR DOMESTIC WATER LEAK SOUTHEAST of 701-17F

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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 repair to the underground Domestic Water leak southeast of 701-17F near the FTF fence. The excavation site is near the F-Area Abandoned Process Sewer Lines RCRA/CERCLA Unit (Waste Unit # 563) and F-Area Tank Farm (Waste Unit # 283).

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.

Unit 283 F-Area Tank Farm: primary constituents of concern in the identified contamination areas within the Tank Farms are radionuclides, especially cesium-137 and strontium-90.

3. O&M ACTIVITY

A. <u>O&M Activity Description</u>

Site Services to repair underground Domestic water leak southeast of 701-17F near the FTF fence. The water line is located near the F-Area Abandoned Process Sewer Lines RCRA/CERCLA Unit and FTF Waste unit. Digging will be done by hand/mobile equipment excavation. An excavation of approximately 4 ft. in depth will be necessary to expose the repair site.

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. <u>O&M Activity Sampling and Monitoring for Health and Safety</u>

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.

Waste Unit 283 is considered suspect for internal radiological contamination. The potential exists for radiological contamination of soil in the vicinity of the RCRA/CERCLA unit of the F-Tank farm.

Radiological surveys will be required at the excavation site. If radiological contamination is encountered, Radiological Control Operations (RCO) will determine if protective equipment and personnel access requirements 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 Assisted Hazard Analysis.

C. Health and Safety Plan

The health and safety concerns involve worker exposure to potential radiological contamination. RCO shall provide for radiological monitoring during the excavation activities.

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

No formal sampling plan will be utilized for work in this area. 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 be returned as backfill when the job is completed.

E. Contaminated Materials Management and/or Disposal

The disposal of any waste materials generated during this activity will be contingent upon sample results. If media (pipe 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. The clean surface soil will be stockpiled separately from the remainder of the deeper soils. The deeper soils will be backfilled followed by the clean surface soil 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-22365
3. WO# 2060953: FTF Excavate/correct UG domestic water leak.