Minor
OPERATION AND MAINTENANCE
Activity Plan

Repair Drainage at 772-F and 772-1F

Prepared by: _____ 2/10/21
C. B. Stevens — Date
Environmental Compliance Authority F/H Labs ECA

Approved by: _____ 2/10/21
E. W. Roy — Date
F-Area Complex Operations

Approved by: _____ 02/10/2021
R. M. Simmons — Date
RPD FLM

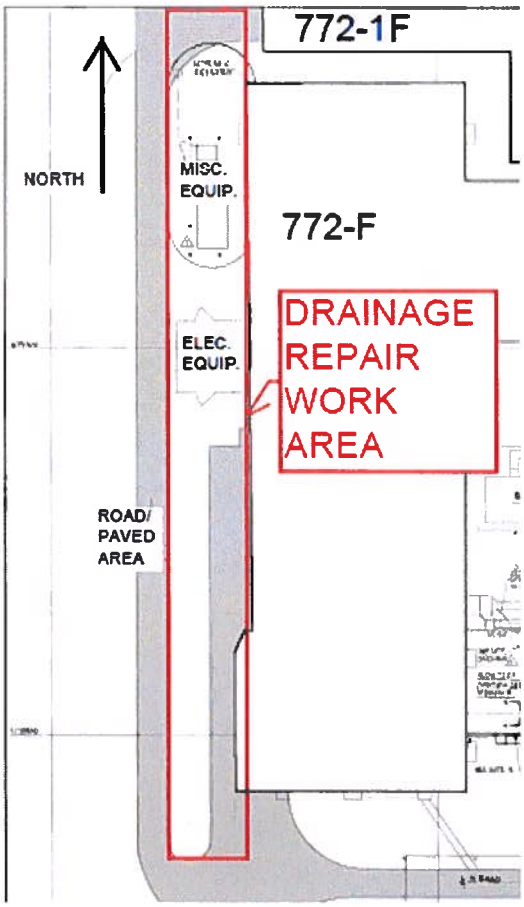
Approved by: _____ 02/10/2021
J. D. Kay — Date
Construction Field Engineer/Planner

Approved by: _____ 2/10/21
C. J. Ward — Date
Operational Compliance Manager, EC&ACP

1. INTRODUCTION

This Operation and Maintenance (O&M) Plan details work activities to improve the drainage around the west sides of 772-F and 772-1F (see work area outlined in sketch below). An additional work area is located on the east side of 772-F. This plan is characterized as "minor intrusive activity" based on the soil excavation meeting the definition of both "minor" and "intrusive" as defined in Reference 1.

Additionally, this O&M Plan is characterized as "minor intrusive" due to no excavation in RCRA/CERCLA areas (see section 2, Reference 2). The subject areas are located at least 100' to 200' from known areas of contaminants (Reference 2) but within the 200' buffer area. In addition, any material being removed, that is not placed back into the excavation, will be transferred to a CERCLA Offsite Rule unit (Reference 3) if necessary, as determined by site SMEs, facility Environmental Compliance Authority (ECA) and Radiological Protection (RP).



2. AREA DESCRIPTION AND CONDITIONS

The work areas are located on the exterior of the 772-F/772-1F analytical laboratory facility.

Areas and contaminants of interest near the work area include the following:

- Site Evaluation Area, SRS Index Number is SPF-008, 772-F Stack release 4/56, 2/68 and 5/68. Contamination released from the 772-F Stack to the surrounding grounds. The area surrounding the 772-F Stack is approximately 200 feet radius. The constituents of concern are unknown alpha, beta and gamma.
- CERCLA Unit, SRS Index Number 308, Low Level Radioactive Drain Lines from F-Area Laboratory, 772-F, F-Area Laboratory (772-F & -1F) High Activity Tanks C and D.
- CERCLA Unit, SRS Index Number 429, Spill on 05/26/88 of 10 Gallons of Ethylene Glycol-Rad from F-Area Laboratory, No Building Number (NBN).
- CERCLA Unit, SRS Index Number 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.

RCO will sample the excavation for radioactive contamination per RCO standard procedures, the work permit and the Soil Sampling Plans (Reference 4 & Reference 5).

3. O&M ACTIVITY

A. O&M Activity Description

The scope of this activity is to improve the drainage around the west sides of 772-F and 772-1F. Drainage improvements include grading swales and re-routing drainage piping and roof downspouts to promote positive drainage. The execution of this work scope will expose personnel to heavy equipment hazards, hazardous chemicals and loud noises. Excavation is expected to be less than 5 feet.

SRNS forces will perform this work in accordance with the provisions of Asset Suite Work Order #1826688 (Reference 6) and the Assisted Hazard Analysis (AHA) #CLB-9990 R1 (Reference 7). The activity occurs adjacent to several identified RCRA/CERCLA areas but does not occur within one of these areas.

An additional scope item is the repairing of a crack in the lab building's exterior wall on the east side of 772-F that goes below the ground surface as noted on pages 19 and 90 of the Structural Integrity Program Inspection Report (Reference 8). It is estimated that a 3' x 3' x 2' (max) excavation will be required to allow the repair activity to be performed.

A. O&M Activity Description (cont.)

SRNS forces will perform this work in accordance with the provisions of Asset Suite Work Order #1712957 (Reference 9) and AHA #CLB-9825 (Reference 10). The activity occurs adjacent to several identified RCRA/CERCLA areas but does not occur within one of these areas.

ALL EXCAVATED SOILS/MATERIALS WILL BE RETURNED TO THE ORIGINAL LOCATION OF SOIL DISTURBANCE. SOILS/MATERIALS NOT RETURNED TO THE ORIGINAL LOCATION SHALL BE CONTAINED PER GENERATOR CERTIFICATION OFFICIAL (GCO) DIRECTION AND THE DISPOSAL OF ANY THESE ITEMS WILL BE PER THE ECA, SITE SMEs, AND RP DIRECTION.

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

The work area will be barricaded with rope or rigid handrail to ensure that access is controlled. This is to ensure personnel safety around the work area.

Worker health and safety will be directed and controlled as required in the Technical Work Documents (TWD) (i.e., work package) and the AHAs.

RPD will monitor these excavation work activities for radioactive contamination per their standard procedures, the work permit and the Soil Sampling Plans. If radiological contamination is encountered, RP will determine if protective equipment and personnel access restrictions are required.

C. Health and Safety Plan

The health and safety concerns involve worker exposure to contaminants of interest listed in Section 2 above.

The TWD and/or AHA for these activities will contain instructions to comply with this plan.

The safety requirements and personal protective equipment described in these documents is appropriate for the potential hazards of the waste units.

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

RP will conduct sampling of the soil excavated during this activity per RCO standard procedures, the work permit and the Soil Sampling Plans.

Additional work scope and sampling involving the water removal activities will be addressed per guidance from the Facility Manager (FM) or designee, RP, site SMEs and the SRS On-Scene Coordinator (OSC) should radioactive contamination outside the identified area be found present.

E. Contaminated Materials Management and/or Disposal

Based on previous excavations in these vicinities, radiological contamination is not expected in the excavated soil. All waste will be disposed in accordance with guidance from RP, the GCO, site SMEs and the ECA. Clean soil will be returned to the excavation as controlled backfill as necessary.

If radioactive contamination is found, the ECA and/or GCO will be contacted before any rad waste is placed into a container for disposal. Any other job control waste will be disposed of as "Low Level Radioactive Waste" under current F-Area Waste Management procedures if deemed appropriate by the SRNS-OSC.

F. Environmental Plans and Permit Modification Requests

No permit modifications are required as a result of this activity.

4. CONTINGENCY PLAN

If at any time during the implementation of this activity, the conditions change such that the activity is no longer considered "minor" (as defined in Reference 1) or any other unanticipated event occurs, the FM or ECA shall:

- Immediately stop work, secure the area, contain and stabilize the area if it is safe to do so.
- Immediately notify the SRS-OSC. The SRS-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 SRS-OSC as to the findings and the requested path forward. The SRS-OSC will communicate the information to the DOE-OSC and obtain concurrence on the path forward.

5. DOCUMENTATION & REPORTING

The Project Manager will transmit the following documentation to the SRS-OSC by the 20th day of the month the activity is completed:

- The signed O&M plan.
- Any sampling and characterization data collected.
- Quantity (if any) of any contaminated materials generated.
- Treatment, storage, and disposal location of contaminated material.

6. 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. SRNS-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 2019.

3. ARF#14719, "Notice of Acceptability Pursuant to the CERCLA Off-Site Rule Savanah River Site, Aiken, SC", J.I. Palmer to J. Allison, May 23, 2007.

4. Soil Sampling Plan Excavate/Repair Storm Drain On The West Side Of 772-1F. (URMA) 02/09/2021.

5. Soil Sampling Plan for PERFORM STRUCTURAL REPAIRS (SS) PER SIP T-CLC-F-00557, 772-F EAST WALL EXPANSION JOINT, 02/08/2021.

6. Asset Suite Work Order #1826688, REPAIR DRAINAGE ON WEST SIDE OF 772-1F.

7. Assisted Hazard Analysis (AHA) #CLB-9990 R1.

8. T-CLC-F-00557, 2017 Structural Integrity Program Inspection Report for 772-F, 772-1F, and 772-4F, 07/16/2018.

9. Asset Suite Work Order #1712957, PERFORM STRUCTURAL REPAIRS (SS) PER SIP.

10. Assisted Hazard Analysis (AHA) #CLB-9825.