

**Minor
OPERATION AND MAINTENANCE
Activity Plan**

**Installation of Bollards Outside of 766-H
RCRA/CERCLA Unit 591**

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1. INTRODUCTION

This Operation and Maintenance (O&M) Plan for the Machining Training Center (MTC) bollard installation will provide a means by which soil/media disturbance can commence within the buffer zone of RCRA/CERCLA Unit 591 while protecting human health and the environment and minimizing impacts to long term characterization and remediation efforts. This O&M Plan is characterized as “minor intrusive” because less than 10 percent of the Site Evaluation Area (SEA) will be disturbed.

2. AREA DESCRIPTION AND CONDITIONS

The MTC has planned renovations for a third high bay room (1054) in 766-H. Part of the planned renovations includes installing bollards outside of the high bay room.

The H-Area Process Sewer Lines run parallel to the outside of the high bay rooms, alongside other classrooms in 766-H. The bollard installation is planned to possibly be within 20 feet of the process sewers horizontally and within 2 feet of the top of the sewers.

Figure 1. Location of Bollard Installation

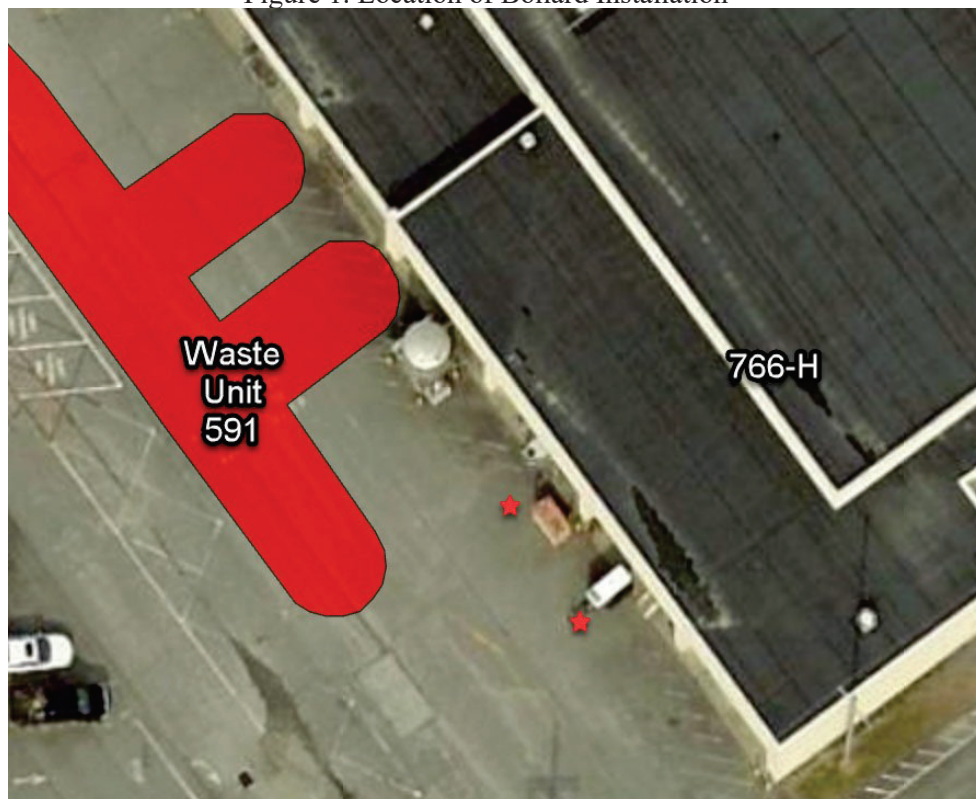
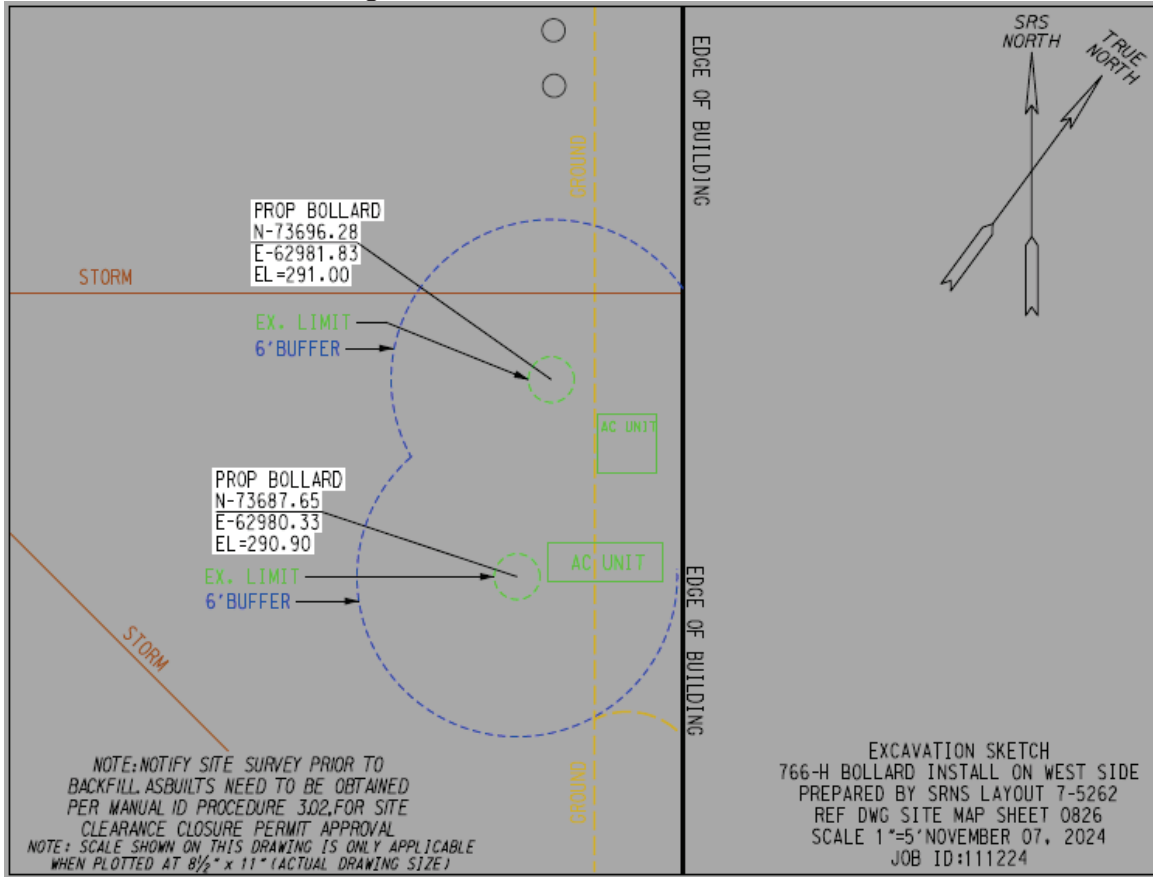


Figure 2. Exact Locations of Disturbance



The excavation limit may not actually reach within 20 feet of the process sewer, but the 6’ buffer does, so the O&M plan will be prepared in case the buffer zone is breached. The Process Sewer lines were determined to be 5 feet below ground level by using engineering drawings and taking the difference between the elevations of the top of the pipe and ground level, as shown in Table 1 below. The planned disturbance depth will be less than 4 feet, so the buffer area will be disturbed if the disturbance does end up going within 20 feet horizontally of the process sewers.

Table 1. Elevations of Process Sewers

Top of Pipe	Local Ground Elevation	Difference in Feet
290	295	5

The H-Area Process Sewer Lines were apart of the H-Area Hazardous Waste Management Facility and have the primary contaminants of radionuclide as a concern.

3. O&M ACTIVITY

A. O&M Activity Description

The planned soil disturbing activity in the buffer zone of RCRA/CERCLA Unit 591 involves minor disturbance to install bollards outside of the MTC 1054 high bay room. The disturbance depth required to install the bollards will be less than 4 feet. The process sewers are 5 feet below ground elevation, as determined using engineering drawings of the process sewer (calculation shown in table 1).

This activity is expected to begin in May 2025 and complete by June 2025. If this work scope requires significant change for any reason, the SRNS On-Scene Coordinator (OSC) will be contacted to determine if modifications to this O&M Plan are required.

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

Radiological Protection (RP) will not perform sampling, as they have determined that the process sewer does not contain a radiological hazard. RP personnel determined that radiological sampling was not required in the buffer areas.

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

Worker health and safety will be described and controlled, as required, in the work package, and the Assisted Hazards Analysis (AHA).

C. Health and Safety Plan

The health and safety concern for this O & M Plan primarily involves worker exposure to potential radiological contamination. RP shall be available for any questions or oversight requested during the land disturbance process.

The Work Order 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 RCRA/CERCLA Area 591

Soil sampling will not be required per radiological protection personnel.

E. Contaminated Materials Management and/or Disposal

RCRA/CERCLA unit 591 buffer area soil/media are determined to be “clean” by RP. Normal waste disposal practices may be applied as determined by SRPPF ECA.

F. Environmental Plans and Permit Modification Requests

The soil disturbing aspect of this task is not expected to involve environmental plans/permits or other required maintenance and inspections.

The Site Use/Site Clearance Permit process has been completed for this activity.

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” (is greater than 10% of a waste unit area impacted or disturbed) or any other unanticipated event occurs, the Facility Operations Manager 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 SRPPF ECA will transmit the following close-out 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 collected,
- quantity of contaminated materials generated, and
- treatment, storage, and disposal location of contaminated material.

References

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

WSRC-OS-94-42, Federal Facility Agreement for the Savannah River Site, August 16, 1993.