Minor
OPERATION AND MAINTENANCE
Activity Plan

Project Y744 Storage Shelters and Office Trailer Installation Site Preparation (O&M 25-019)

PAMELA VAUGHN (Affiliate) Digitally signed by PAMELA VAUGHN (Affiliate) Date: 2025.07.15 09:40:33 -04'00'

Prepared by: _____
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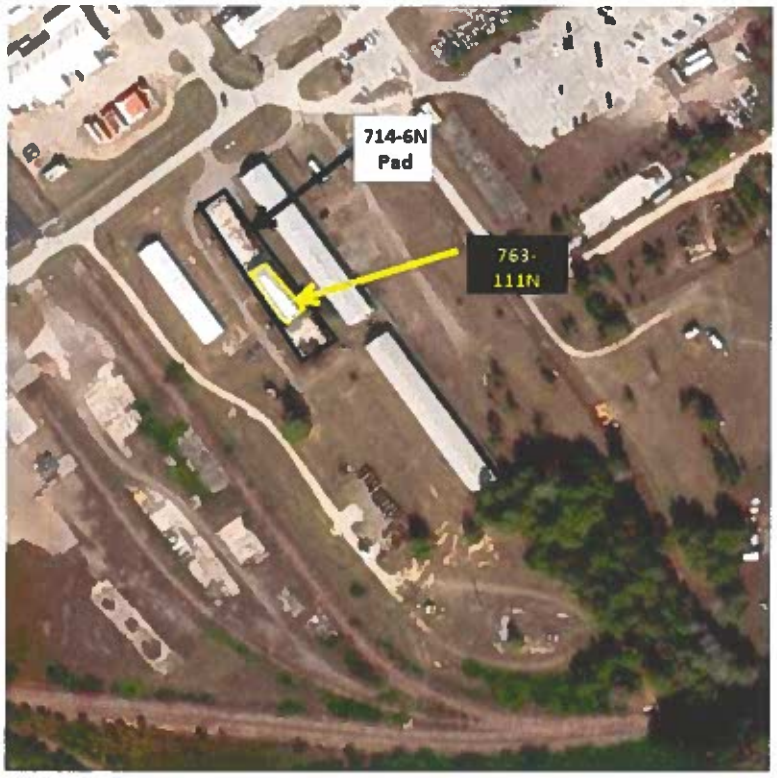
ASHLEY ESKEW (Affiliate) Digitally signed by ASHLEY ESKEW (Affiliate) Date: 2025.07.15 10:05 30 -04'00'

Approved by: _____
Ashley Eskew, RP Facility Manager Date

Approved by: _____ 7/24/2025
Brian Blackwell, SPD Construction Manager Date

1. INTRODUCTION

This Operation and Maintenance (O&M) Plan is for the construction of a level B warehouse (quonset hut), fabricated office trailer(s), and surrounding utilities, access road and parking in N-Area. This requires trenching, grading and other soil excavation detailed in Reference 3. This O&M plan will provide a means by which soil/media disturbance can commence within 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 will be excavated/disturbed.



2. AREA DESCRIPTION AND CONDITIONS

The 763-111N Quonset hut sits atop a concrete pad which was once known as Building 714-6N, which occupied a footprint of approximately 320 feet

long and was 50 feet wide. On the southwest end of the existing pad, there is an 11' X 20' concrete pad which was originally used as a sump for the building.

Building 714-6N was once used to house a cladding operation in the 1950's. Thorium and uranium slugs were produced for various testing in various reactor facilities. A Quonset hut (763-111N) was installed on the 714-6N building pad shortly after the 714-6N was removed and appears to have been used to store depleted uranium oxide and low enriched uranium based on the survey records after 714-6N building was taken down.

Based on historical use, 714-6N pad is listed on Appendix C.4 of the Federal Facility Agreement (FFA) between DOE, SCDES and EPA, which states that "facilities listed on Appendix C.4 will require a determination as to whether a response action is warranted."

Additionally, Site Clearance Permit SC-8569 calls out 3 waste sites as follows (Ref. 4).

UNIT_ID 311: NEW SALVAGE YARD, 741-G.

UNIT_ID 506: PEN BRANCH INTEGRATOR OPERABLE UNIT (INCLUDING INDIAN GRAVE BRANCH).

UNIT_ID 567: CENTRAL SHOPS GROUNDWATER OPERABLE UNIT.



Note: Red area left is Unit ID 311 and the other red lines are Unit ID 506. Unit 567 was not located on the ACP GIS map. Units 506 and 567 are

screened out per the site clearance permit because they are groundwater and integrator operable units.

3. O&M ACTIVITY

A. O&M Activity Description

The O&M plan is being updated to cover trenching and excavation related to utilities installation/removal, access road preparation, creation of a new swale to the northeast of the new structure gravel parking, and foundational features fabricated trailer(s). Some of the utility work such as trenching may fall within the 200' buffer zone of Unit ID 311 (New Salvage Yard). The deepest trenching to be done is 6' (Ref. 5). 6'6" should be assumed for conservativeness. The concrete pad for the level B storage warehouse (Quonset Hut) was done under revision 0 of this O&M plan, which covered tree removal in the area.

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

Radiological Protection (RP) is conducting sampling to support excavation activities related to trenching and utilities excavation (Ref. 2). The soils from the trenching are planned to be replaced or sent to land fill if there is no radiological contamination. However, if soils contaminated by radionuclides are discovered, waste disposition will be performed typical for SRS waste protocol. Given that the soil is found to be at or below background for radiological constituents, RP will allow for the excavation as described in Section D to proceed.

The work area will be barricaded to ensure that access is controlled. This is a personnel safety issue.

Worker health and safety will be described and controlled, as required, in the Assisted Hazards Analysis.

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 process of construction.

D. Characterization and Sampling Plan for the Affected Area

Soil sampling is required for any soil disturbance in this Site Evaluation Area. The soil sampling scope is defined in the *Soil Sampling plan for N Area Trenching*. (Ref. 2). The characterization and sampling record for this minor intrusive O&M activity will be the RP sample data for the presence of radiological contamination in the soil/media.

If any radioactive contamination is found from sampling, the Environmental Compliance Authority (ECA), along with RP and SPD Project Management, will devise an alternative plan by which to carry out construction related activities. As indicated above, evidence of soil contamination would likely require revision to this O & M Plan, or a possible addendum.

Additionally, the SRNS-OSC shall be notified by the ECA, and any additional work scope and sampling from the soil disturbance areas will be completed per SRNS-OSC guidance.

E. Contaminated Materials Management and/or Disposal

The disposition of any waste materials generated during this activity will be contingent upon sample results. If the trenched/excavated areas are determined to be "clean," normal waste disposal practices may be applied. If contaminated, however, RP will advise soils/media/equipment disposition, in coordination with K-Area Waste Certification Engineering and the ECA. These options would be explored and fully described in a revised O & M Plan (or addendum).

Contaminated waste should be characterized and disposed of as "Radioactive Waste" under current SRNS Waste Management procedures, or deconned, if deemed appropriate by RP.

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, except for potential erosion control practices.

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 Facility Operations Manager or the 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 (if Radiological Protection) determines the soil to be contaminated,

- quantity of contaminated materials generated (if present)

6. REFERENCES

1. WSRC-RP-96-45, *Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U)*, 12/15/1996.

2. *Soil Sampling Plan for N Area Trenching* WO# 2084000, 8/15/2024.

3. C-CG-N-00011 , Sheet 0, Rev. 2 (Page 1), *PROJECT Y744 SURPLUS PLUTONIUM DISPOSITION (SPD) STORAGE WAREHOUSE AND OFFICE TRAILER - GRADING, DRAINAGE AND UTILITY PLAN*, 5/1/2025.

4. Site Clearance Permit SC-8569, 7/24/24

5. E-E1-N-00012, Sheet 0, Rev. 1, *Y744 SURPLUS PLUTONIUM DISPOSITION (SPD) STORAGE WAREHOUSE OVERHEAD POLE DETAIL*, 10/31/2024