OPERATION AND MAINTENANCE
ACTIVITY PLAN

24-005

Installation of Remote Monitoring Poles in F-Area

Prepared by: _____ 1/3/2024

Kimberly A. Price, F Area Complex ECA — Date

Approved by: RYAN MCDANIEL (Affiliate) Digitally signed by RYAN MCDANIEL (Affiliate) Date: 2024.01.08 09:48:46 -05'00' _____

Ryan McDaniel, Operational Compliance Manager — Date

Approved by: _____ 1/3/2024

Donald Parkman, FAC Ops Support Manager — Date

Approved by: Rhianna Hubbard 1/3/2024

Rhianna Hubbard, RPD FLM — Date

Approved by: IAN REED (Affiliate) Digitally signed by IAN REED (Affiliate) Date: 2024.01.09 08:16:57 -05'00' _____

Ian Reed, F Area Safety Engineer — Date

1) INTRODUCTION

This Operation and Maintenance (O&M) Plan is being written to support work activities planned to excavate to install Unistrut type poles in concrete bases that will support installation of remote monitoring equipment in F-Area. This installation includes a 36-inch concrete base that will be buried 24-inches below grade and a grounding line that will be driven 8-feet below grade. This installation will occur at three locations. Pole 1 will be installed on the south end of Building 221-F, as shown in Figure 1 with the Site Evaluation Areas (SE Areas) identified in red (Reference 1). This O&M Plan is characterized as "minor intrusive" because the activity will impact less than 10% of the surface area of the SE Areas. The activities of installing Poles 2 and 3, as shown in Figures 2 and 3, do not require an O&M Plan because the excavations will be located further than 200 feet (Buffer Area) from any SE Areas.

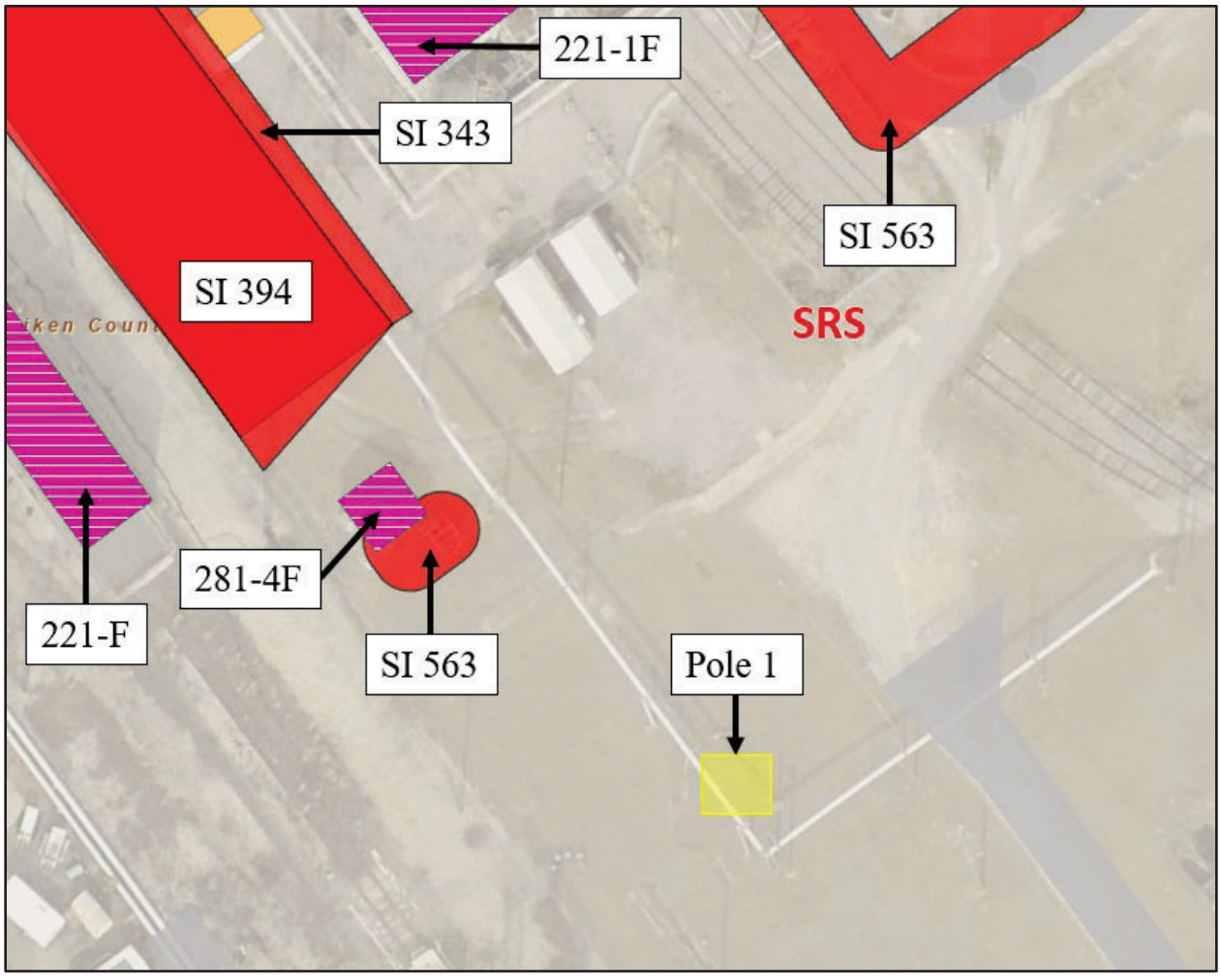


Figure 1. Site Evaluation Areas are identified in red. Location of Pole 1 O&M activity has been denoted with a yellow square.

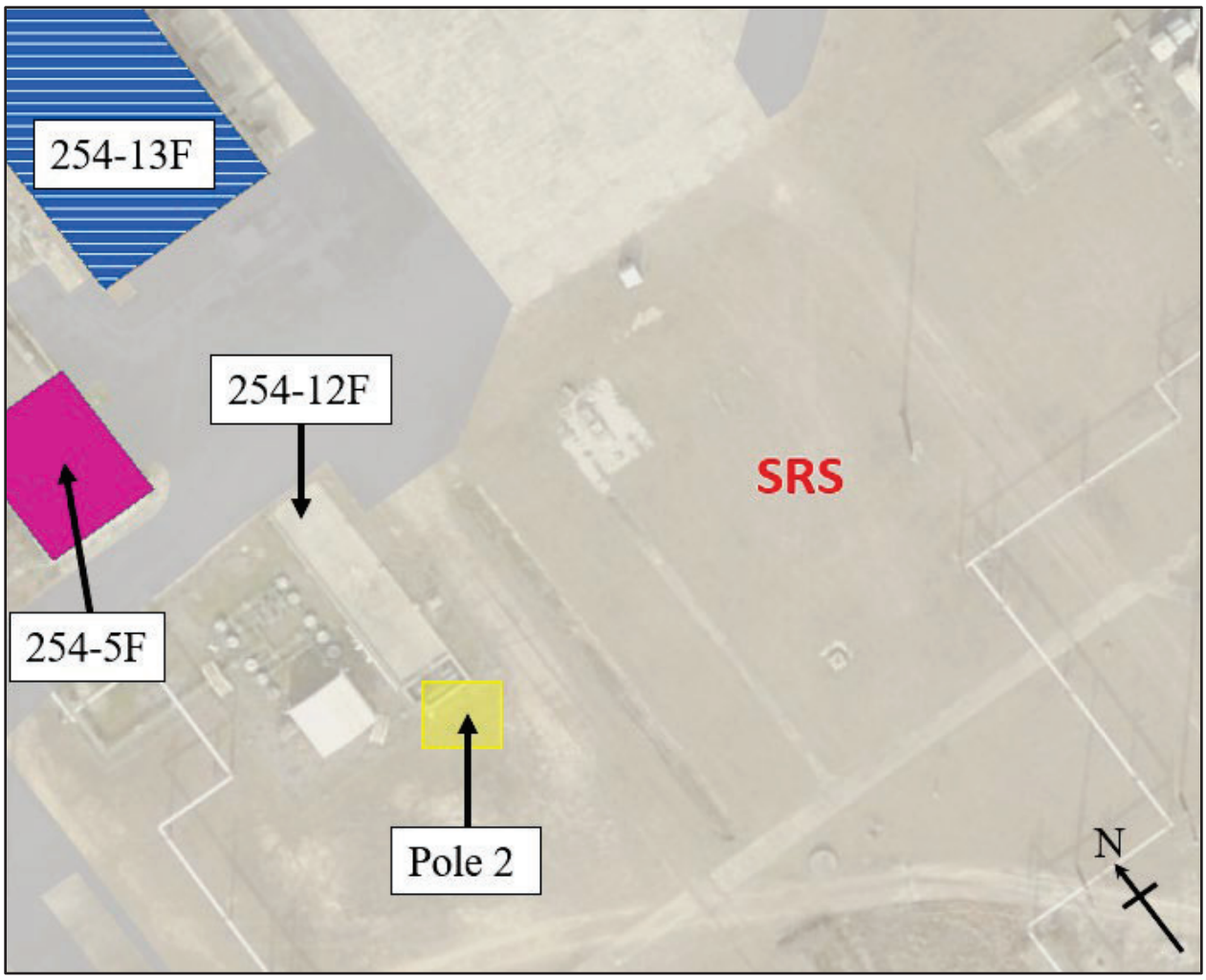


Figure 2. Location of Pole 2 activity has been denoted with a yellow square.

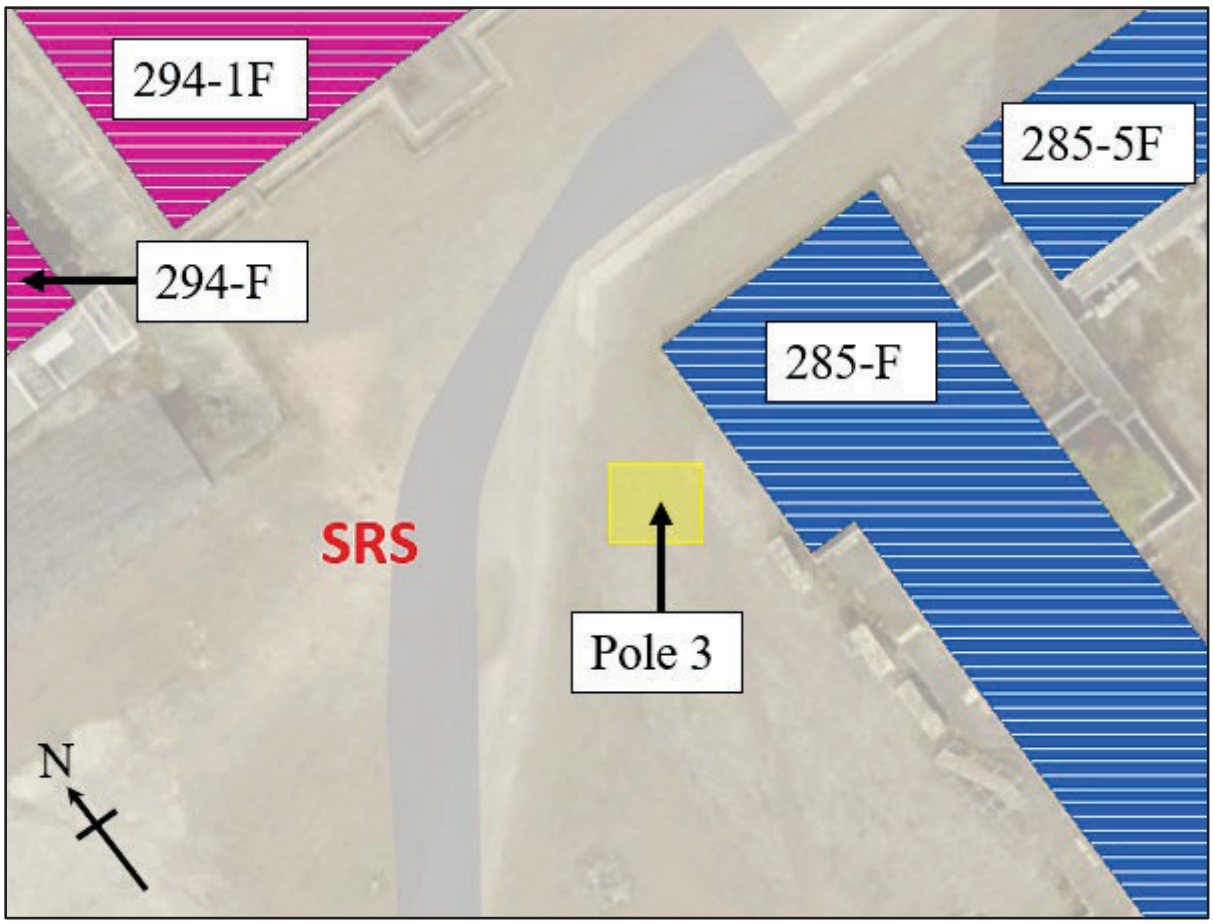


Figure 3. Location of Pole 2 activity has been denoted with a yellow square.

2) AREA DESCRIPTION AND CONDITIONS

Contaminants of interest near the work area include:

The following Site Evaluation Areas exist within 200 feet of the Pole 1 work location:

1) Waste Unit ID 343, Sandblast Area CMF-001, NBN
   Location: F-Area
   Contaminants: Lead and chromium

2) Waste Unit ID 394, Spill on 2/25/85 of 20000 CM of Water Vapor - RAD, NBN
   Location: F-Area
   Contaminants: Unknown alpha, beta, gamma, and metals

3) Waste Unit ID 563, F-Area Process Sewer Lines as Abandoned, NBN
   Location: F-Area
   Contaminants: Unknown alpha, beta, gamma, and metals

A site evaluation has not been performed and impacts to the IOU have not been determined.

3) O & M ACTIVITY

A. O & M Activity Description

The O&M activity involves excavation to bury a 36-inch concrete base 24-inches below grade and to drive a grounding line 8-feet below grade. Every attempt should be made to place any soil removed from the excavation site back into the hole.

If any soil cannot be placed back into its original hole it will be screened by RCO for free release to the C&D Landfill.

a. If the excess soil is below radiological limits and can be cleared for release to the C&D Landfill, it shall be placed into an appropriate container and shipped accordingly.
b. If the soil cannot be cleared for release to the C&D Landfill, it will be placed into one or more containers to be specified by the facility GCO. It shall be sampled for constituents to be determined by the F Area ECA and/or Waste CTF. The containers will be held pending analysis and waste characterization.

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 due to personnel safety around the work area.

Worker health and safety will be directed and controlled as required in the work package and the Assisted Hazard Analysis (AHA).

RPD will monitor the soil removal activities for radioactive contamination per their standard procedures. If radiological contamination is encountered, RPD 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 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 the Unit

The Soil Sampling Plan outlines the ongoing sampling/analysis. If soil is to be removed from this area, it will be sampled by RCO personnel. These samples will be analyzed to allow the soil to be cleared for release to the Three Rivers Landfill. If the excess soil cannot be cleared for release it will be sampled for waste characterization and planning for what will occur when that determination is made. The F Area ECA and/or Waste CTF will provide specific analytical requirements for that material.

Additional work scope and sampling from the soil disturbance areas or water removal activities may be necessary and will be addressed per guidance from the Facility Manager or designee, RPD, and the SRNS-OSC (On-Scene Coordinator) should radioactive contamination be found present.

E. Contaminated Materials Management and/or Disposal

The disposal of the waste materials generated during this activity will be contingent upon the survey results. Other clean waste originating from this job will be managed as appropriate and specified by RCO or handled in accordance with existing F Area procedures.

If radioactive contamination is found, the ECA and/or GCO will be contacted before any soil 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 the 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 Project Manager or Environmental Compliance Authority 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 AND REPORTING

The Project Manager will transmit the following documentation to the SRSN-OSC by the 31st day of the month the 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.

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.