Minor
OPERATION AND MAINTENANCE
Activity Plan

235-H Piping Repairs
Near ACP Waste Unit Index 531

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1. INTRODUCTION

This Operations and Maintenance (O&M) Plan is for 235-H piping repairs. The plan will provide a means by which activities can commence within a soil/media disturbance RCRA/CERCLA Unit or Site Evaluation Area (SEA) within SRTE.

The proposed soil excavation site disturbances are within RCRA/CERCLA Site Index No. 531 "Early Construction and Operation Disposal (ECOD_ Unit H-1) (West of Main H-Area Facilities)" of the Federal Facility Agreement, Appendix C.2 (WSRC-RP-96-45) and is specifically within the 200 foot buffer area of several site indices included therein and described below in Section 2.

The soil excavation for these activities will not exceed 10 percent of the surface area, excluding structures, of the unit. The plan is characterized as "minor intrusive activity" based on the soil excavation meeting the definition of both "minor" and "intrusive" as defined in Reference 2.

2. AREA DESCRIPTION AND CONDITIONS

The activity will be conducted at 235-H. The repairs will be completed on the sewer piping at the south entrance of the building.

There are no known or suspected radiological contaminates near Waste unit 531 "ECOD H-1".

3. O & M ACTIVITY

A. O&M Activity Description

The O&M activity involves repairs to the 235-H sewer piping. All excavation work will be performed under Work Order 1797215.

THE DISPOSAL OF ANY CONTAMINATED SOIL WILL BE PER THE ENVIRONMENTAL COMPLIANCE AUTHORITY (ECA) AND RADIOLOGICAL PROTECTION (RP) DIRECTION. IT IS ANTICIPATED EXCAVATED SOIL WILL BE RETURNED TO ITS ORIGINAL LOCATION UPON TASK COMPLETION.

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

The identified units are in the FFA because of possible radiological contamination from past releases from Site operations.

Radiological surveys will be required at the excavation site within the buffer zone. If radiological contamination is encountered, RP will determine if protective equipment and personnel access restrictions 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 work package and Assisted Hazard Analysis (AHA).

C. Health and Safety Plan

The health and safety concerns involve worker exposure to unknown waste material that could be excavated. The work will be completed in accordance with the requirements stated in the AHA. The safety requirements and personal protective equipment described in the AHA are appropriate for the excavation work.

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

Material removed as part of the excavation will be returned as backfill when the job is completed. If any unknown waste material is excavated as part of this repair, a Timeout will be taken and the Shift Operations Manager (SOM), Environmental Compliance Authority (ECA) and the Maintenance/ Site Services Manager will be notified until the Timeout is resolved.

E. Contaminated Materials Management and/or Disposal

Based on previous excavations in the vicinity, radiological contamination is not expected in the excavated soil. All waste will be disposed in accordance with guidance from RP, the Generator Certification Official (GCO), and the ECA. Clean soil will be returned to the excavation site once the work is complete.

F. Environmental Plans and Permit Modification Requests

There were no new permits identified in the Environmental Evaluation Checklist (EEC) OBU-H-2020-0186, Revision 1 "235-H Piping Repairs"

4. CONTINGENCY PLAN

During implementation of the activity, if the conditions change at any time such that the activity is no longer considered "minor" (as defined in Reference 2) or any other unanticipated event occurs, the Project Manager, the Project Construction Manager, or the ECA shall:

- Immediately notify the SRNS-OSC. If necessary, the SRNS-OSC will notify the DOE-OSC.
- Stop work, secure the area, contain, and stabilize the area, and determine any necessary change to the activity plan.

- Notify the SRNS-OSC of the findings and proposed path forward. The SRNS-OSC will communicate the information to the DOE-OSC and obtain concurrence on the path forward.

5. DOCUMENTATION & REPORTING

SRTE will transmit the following documentation to the SRNS-OSC within twenty days of the completion of the activity:

- The signed O&M plan
- Any sampling and characterization data collected

The following information is not expected to be generated by this activity, but, if generated, will be forwarded to the SRNS-OSC:

- The quantity (if any) of any contaminated materials generated, and
- The disposal location of any contaminated material, if generated.

Attachments

Attachment 1 Drawing Showing Approximate Location of 235-H Piping Repairs

Attachment 2 Map showing the Site Indices 531, "Early Construction and Operation Disposal (ECOD) Unit H-1.

Attachment 3 Emergency Reporting Flow Chart

References

1. 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 2020.

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

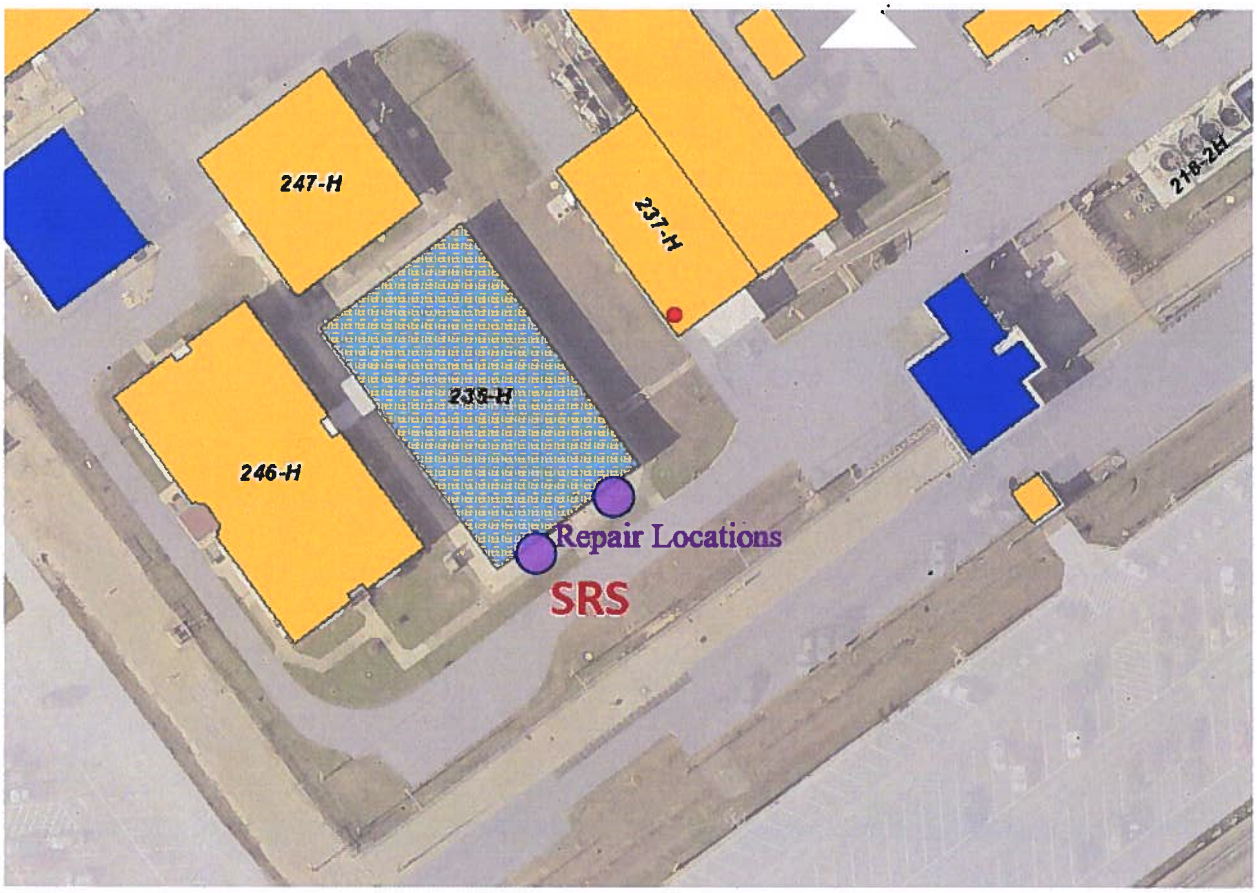
3. SRS Manual 8Q Procedure 34, Revision 11 "Excavations and Trenches"

4. P-PA-H-8776 R/2 "Area 200-H Process Sewer Routing Plan & Details"

5. M-DCF-H-13759 "235-H Exterior Cleanout (CO-2) Modification"

6. EEC # OBU-H-2020-0186, Revision 1 "235-H Piping Repairs"

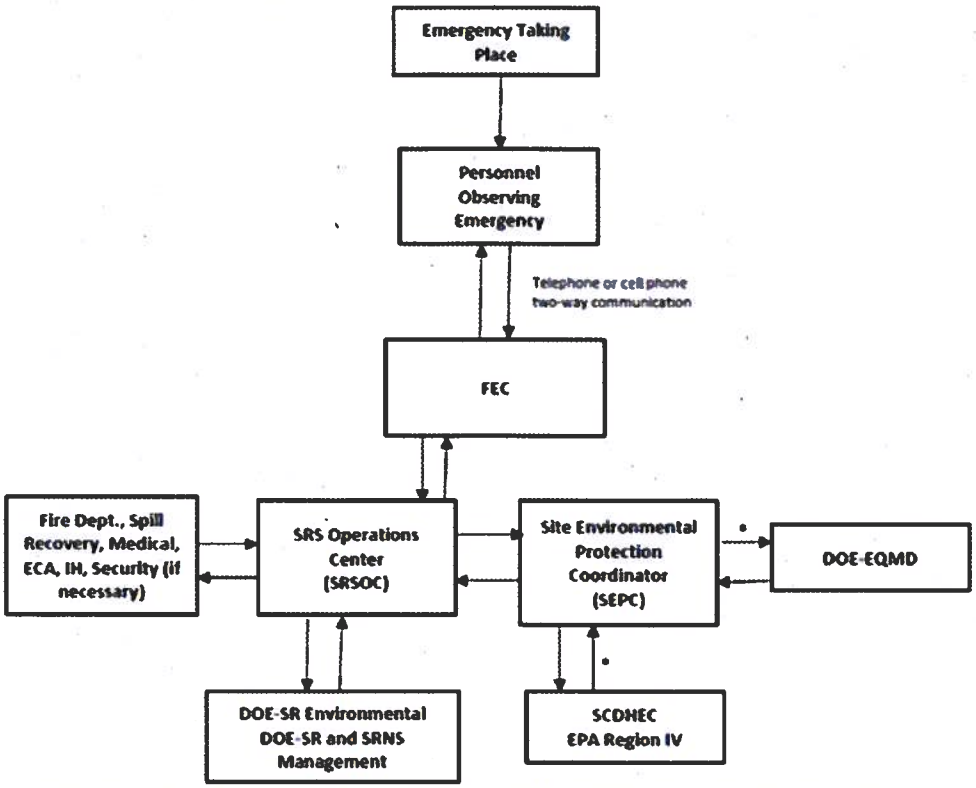
Attachment 1 Drawing Showing Approximate Location of 235-H Piping Repairs



Attachment 2 Map showing the Site Indices 531, "Early Construction and Operation Disposal (ECOD) Unit H-1.



Attachment 3 Emergency Reporting Flow Chart



* This line of communication will be made only if the Site Environmental Protection Coordinator determines the event to be environmentally related.

NOTE: Emergency Response Organization (ERO) is a composite of SRS organizations and duty positions.
FEC – Facility Emergency Coordinator
SRSOC – SRS Operations Center
SEPC – Site Environmental Protection Coordinator
ECA – Environmental Compliance Authority
SCDHEC – South Carolina Department of Health and Environmental Control
EPA – Environmental Protection Agency
DOE-EQMD – Department of Energy Environmental Quality and Management Division
DOE-SR – Department of Energy – Savannah River
IH – Industrial Hygiene