OPERATION AND MAINTENANCE
ACTIVITY PLAN

Utility Pole Replacement Project

Prepared by : _____ 10/4/17
K.J Wells, F-Area Operation Environmental Compliance Authority — Date

Approved by : _____ 10/4/17
C. Jeff Ward, Environmental Support Manager — Date

Approved by: _____ 10/4/17
Rickey Lepard, Site Services — Date

2. AREA DESCRIPTION AND CONDITIONS

Contaminants of interest near the work area include:

The following Site Evaluation Areas exist within 200 feet of this work location:

1) Waste unit 141, F-Area Inactive Process Sewer Line from Building to Security Fence
   Location: F-Area.
   Contaminants – Cs-137, Pu-238, Pu-239, Sr-90, Am-241, U-235, U-238, H-3.
   Note: Cs-137 and Sr-90 were reported as most prevalent. Tritium in this system would be in the form of tritiated water (TOT or TOH). It should not be present from this source at this time.

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

3) SPF-002, 211-F Recycle Sump Overflow, 1/1/55
   Location: West of 211-F
   Constituents Of Concern: Ru-106, Sr-90, Cs-137

   Note: Ru-106 is a fission product and has a half life of 373 days. It is no longer present.

4) SPF-003, Jumper Work, 4/1/56
   Location: Area between the 221-F Railroad Tunnel Cut fence and the A-Line fence.
   Contaminants: Ru-106, Cs-137, Sr-90

   Note: Ru-106 is a fission product and has a 373 day half life. That is roughly 60 half lives from the date the spill occured. The Ru-106 that was present at that time has decayed away.

5) SPF-005, 292-F Stack Releases, 5/57, 8/57, and 11/61
   Location F-Area Adjacent to and South of 292-F
   Constituents of concern: Fission Products

   Note: The Reference 1 only provides for Ru-106. Ru-106 is a fission product and has a 373 day half life. The fact that there is one fission product present (Ru-106) says that others were present also. The most significant would be Cs-137 and Sr-90. Sr- 90 has a ~29 yr half life and Cs-137 has a 30 yr half life. Both radionuclides should still be present.

6) SPF-006, 292-1F Vessel Vent Fan Work, 11/1/57
   Location: F-Area, North and East of 221-F and North of 292-F (2 locations on map)
   Contaminants Unknown beta/gamma

7) SPF-007, Nash Exhauster Leak, 4/1/61
   Location: 500 Sq Ft of drainage ditch east of A-Line.
   Constituents Of Concern: Fission Products

   Note: The Reference 1 only provides for Ru-106. Ru-106 is a fission product and has a 373 day half life. The fact that there is one fission product present (Ru-106) says that others were present also. The most significant would be Cs-137 and Sr-90. Sr- 90 has a ~29 yr half life and Cs-137 has a 30 yr half life. Both radionuclides should still be present.

8) SPF-008, 772-F Stack (old stack) releases 4/56, 2/68, 5/68
   Location: F-Area
   Contaminants: Unknown alpha, beta and gamma

9) SPF-009, 221-F Segregated Solvent Sump
   Location: 1200 Sq Ft near 900 apron (seg solvent) and north seepage basin
   Constituents Of Concern: Sr-90, Cs-137, Ru-106

   Note: Ru-106 is a fission product and has a half life of 373 days. It is no longer present.

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 & REPORTING

The Project Manager will transmit the following documentation to the SRNS-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