Minor
OPERATION AND MAINTENANCE
Activity Plan

Tritium Area Paving

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SRTE

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SRTE

1. INTRODUCTION

This Operations and Maintenance (O&M) Plan is for the Tritium Area Paving.

This activity is within Site Index (SI) 549 (General Separations Area Eastern Groundwater Operable Unit, No Building Number (NBN)) of the Federal Facility Agreement (FFA, Reference 1). The paving activities will be in the vicinity of Site Index Site Index (SI) 531 (ECODS H-1) and cross over SI 591 (H-Area Process Sewer Lines as Abandoned, NBN) & (SI) 142 (H-Area Inactive Process Sewer Lines From Building to the Security Fence, 081-H) in several locations. A marked-up drawing was provided showing the areas where excavation would be performed.

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. Due to the size of SI 142, SI 531, and 591 near where the excavations are located, it is <u>not</u> anticipated that this classification could change.

2. AREA DESCRIPTION AND CONDITIONS

The area in which the activity will be conducted is in the drainage basin of SRTE Industrial Wastewater Outfall H-02 (Attachment 5).

For a discussion of the SIs, see "Revision 0 for Appendix C for Fiscal Year 2020" of Reference 1. The location of the work is shown on Map provided in Attachment 1. SI 142, 531 & 591 are in the FFA because of possible radiological or chemical contamination from past releases from Site operations. To date, there has been no remediation of these units; the current status of the units is inactive. Per Appendix E of Reference 1, Remedial Actions are scheduled to begin April 2043 for SIs 142, 531 & 591.

3. O & M ACTIVITY

A. <u>O&M Activity Description</u>

The scope of the activity is for Paving/Repaving/Concrete Placement inside the Tritium Fence.

The Subcontract Technical Representative (STR) provided a drawing showing the ground disturbance areas in blue highlight. It was also understood that the excavation for Work Scope #19 would be approximately 40" deep and the remainder would be approximately 12" deep.

Work is expected to take two months.

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/or 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 Service 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) NNSA-H-2021-0005 “Paving/Repaving/Concrete Placement inside the Tritium Fence”. Site Clearance (Permit # SC-7703) was granted for this activity in 2019.

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 - On-Scene Coordinator (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 materials, if generated.

Attachments

Attachment 1. Drawing Showing Areas to be Paved and Excavation Areas

Attachment 2. Drawing Showing Waste Unit Boundaries

Attachment 3. Drawing Showing Excavation Areas around 232-H

Attachment 4. Drawing Showing Excavation Areas around 234-H

Attachment 5. H-02 Outfall Drainage Map with Approximate Location

Attachment 6. Map showing the Site Indices 549, General Separations Area Eastern Groundwater Operable Unit

Attachment 7 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”

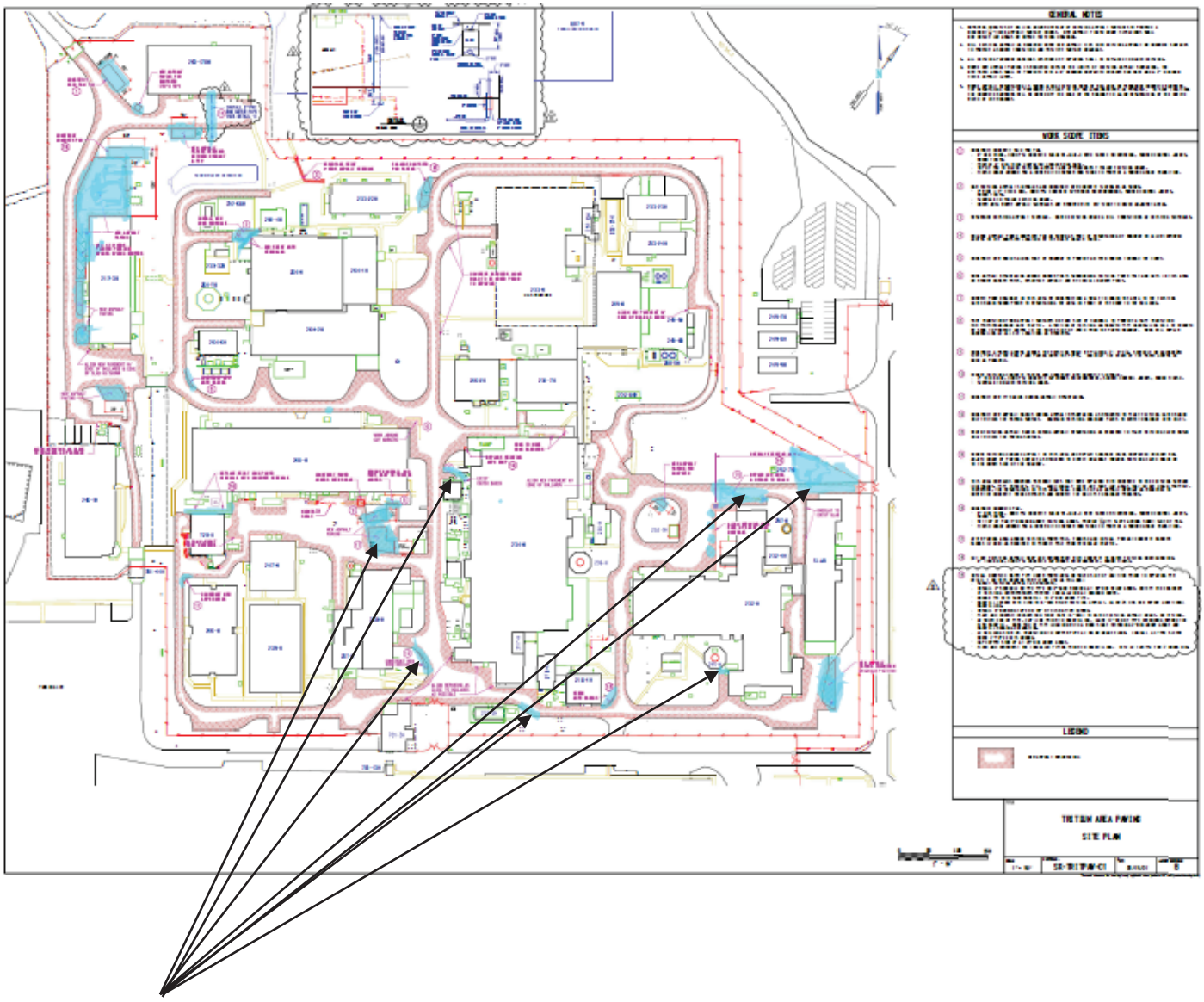
5. EEC# NNSA-H-2021-0005 “Paving/Repaving/Concrete Placement inside the Tritium Fence”

6. SCD-7 Section 5, SRS Emergency Plan

7. Site Clearance (Permit # SC-7703)

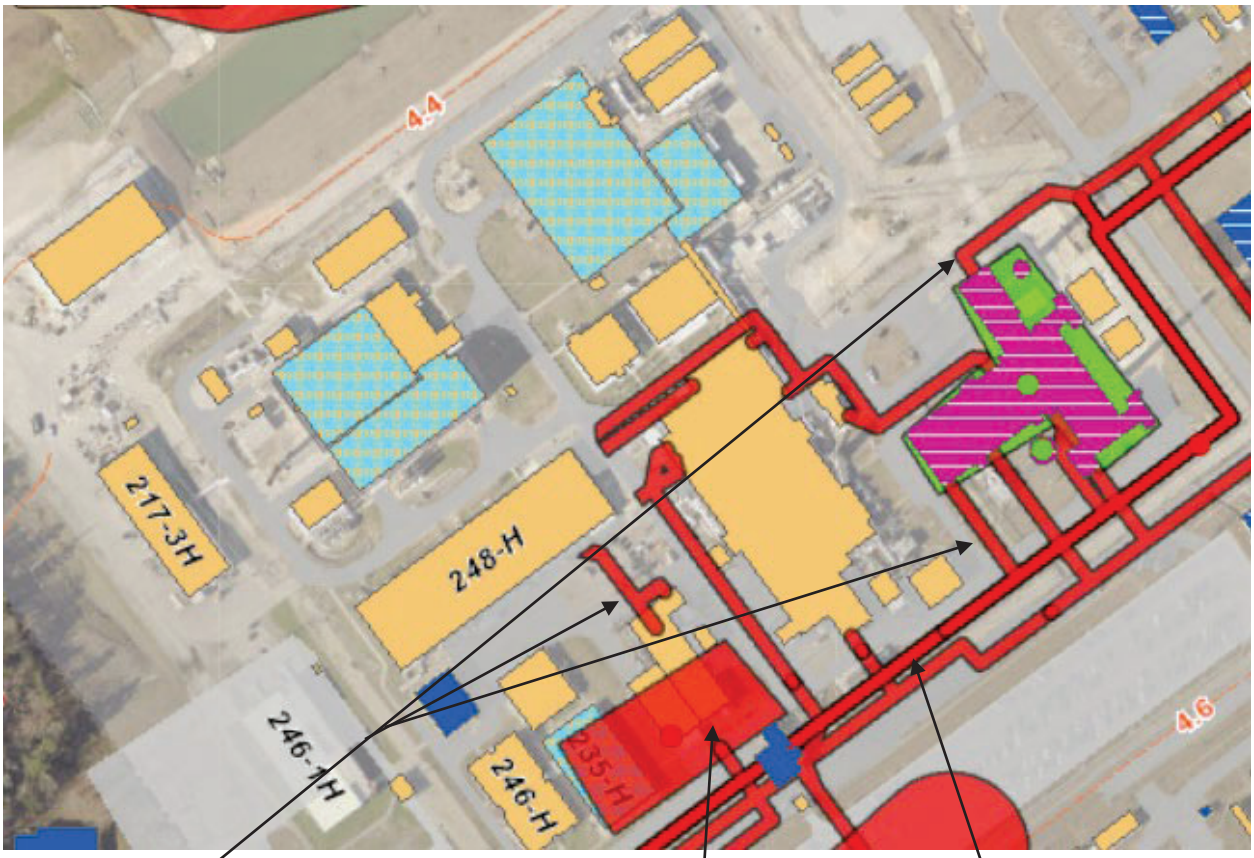
8. SK-TRITPAV-C1 “Tritium Area Paving Site Plan”

Attachment 1. Drawing Showing Areas to be Paved and Excavation Areas.



Excavations in the vicinity of Waste Unit Boundaries.

Attachment 2. Drawing Showing Waste Unit Boundaries



Waste Unit Boundary: MISC - PIPING, SUMPS

ID	591
NAME	H-AREA PROCESS SEWER LINES AS ABANDONED, NBN
PHASE	ASSESSMENT PHASE

Waste Unit Boundary: MISC - FACILITY AREAS

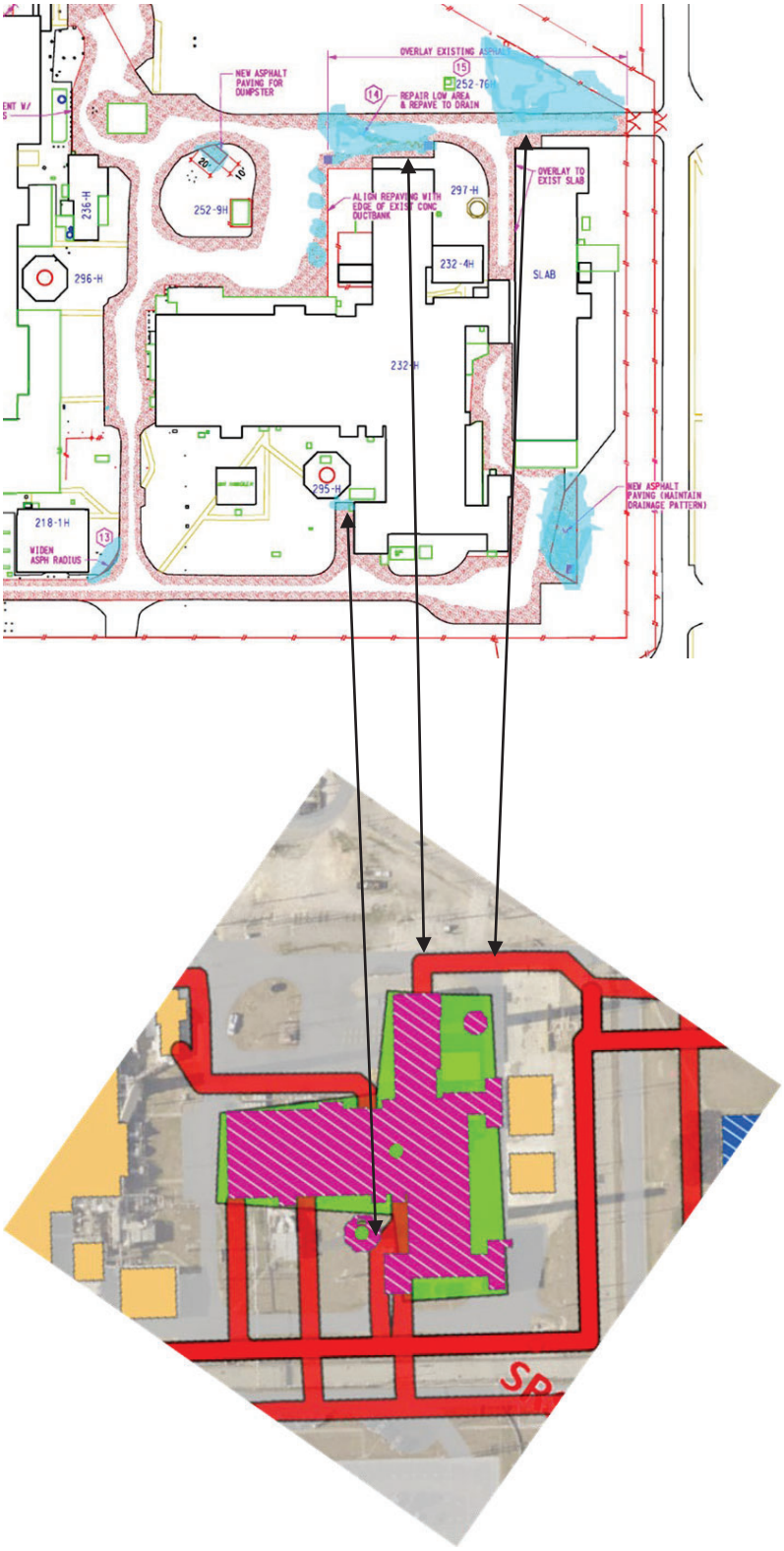
ID	531
NAME	ECODS H-1 (WEST OF MAIN H-AREA FACILITIES)
PHASE	ASSESSMENT PHASE

Waste Unit Boundary: MISC - FACILITY AREAS

ID	142
NAME	H-AREA INACTIVE PROCESS SEWER LINES FROM BUILDING TO THE SECURITY FENCE, 081-H
PHASE	ASSESSMENT PHASE

Attachment 3. Drawing Showing Excavation Areas around 232-H

Work Scope Items 14, 15, and the area near 295-H are in the vicinity of the process line.

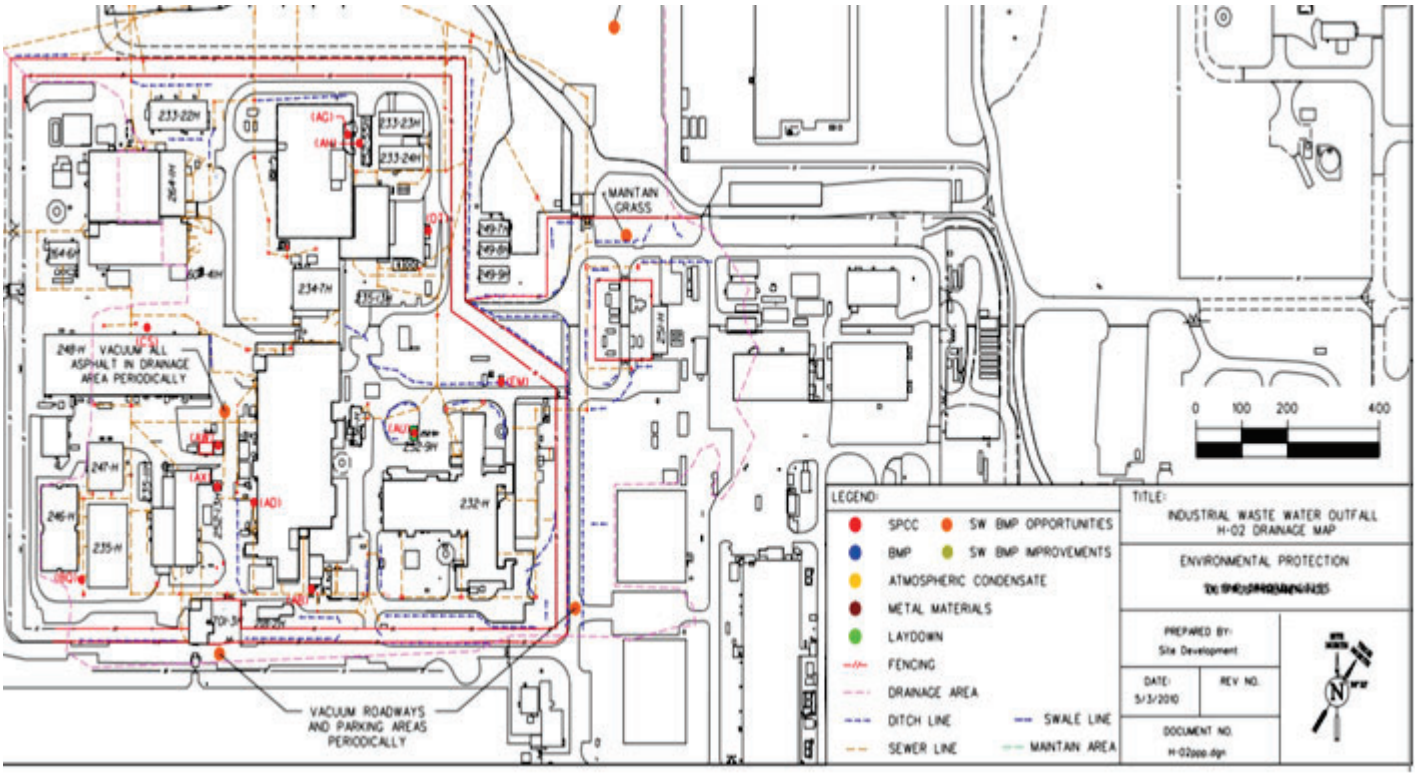


Attachment 4. Drawing Showing Areas around 234-H & 237/238-H.

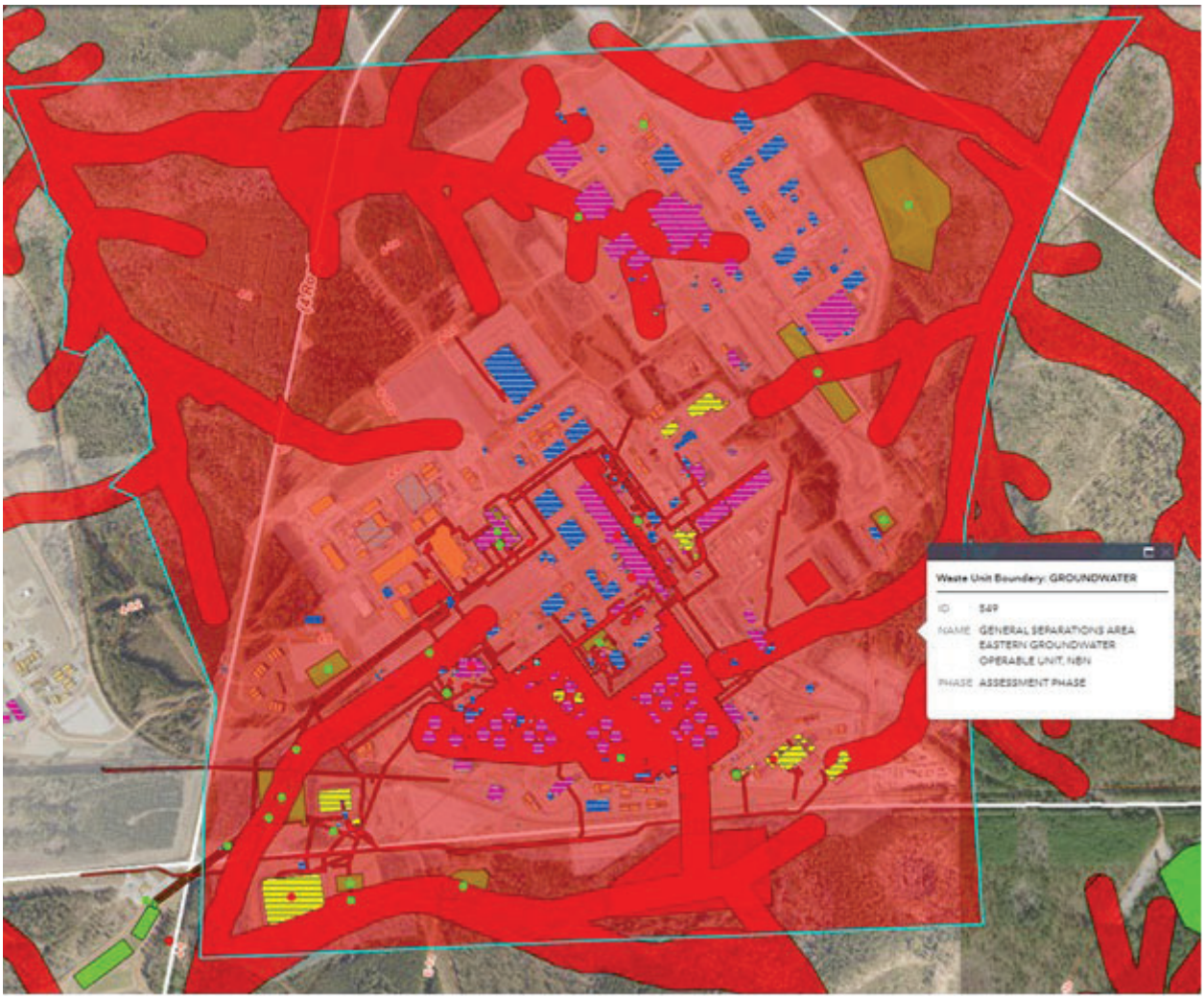
Work Scope Item 12 is within a waste unit & Work Scope Item 7, 17, and the highlighted area near 218-2H is in the vicinity of the process line.



Attachment 5. H-02 Outfall Drainage Map

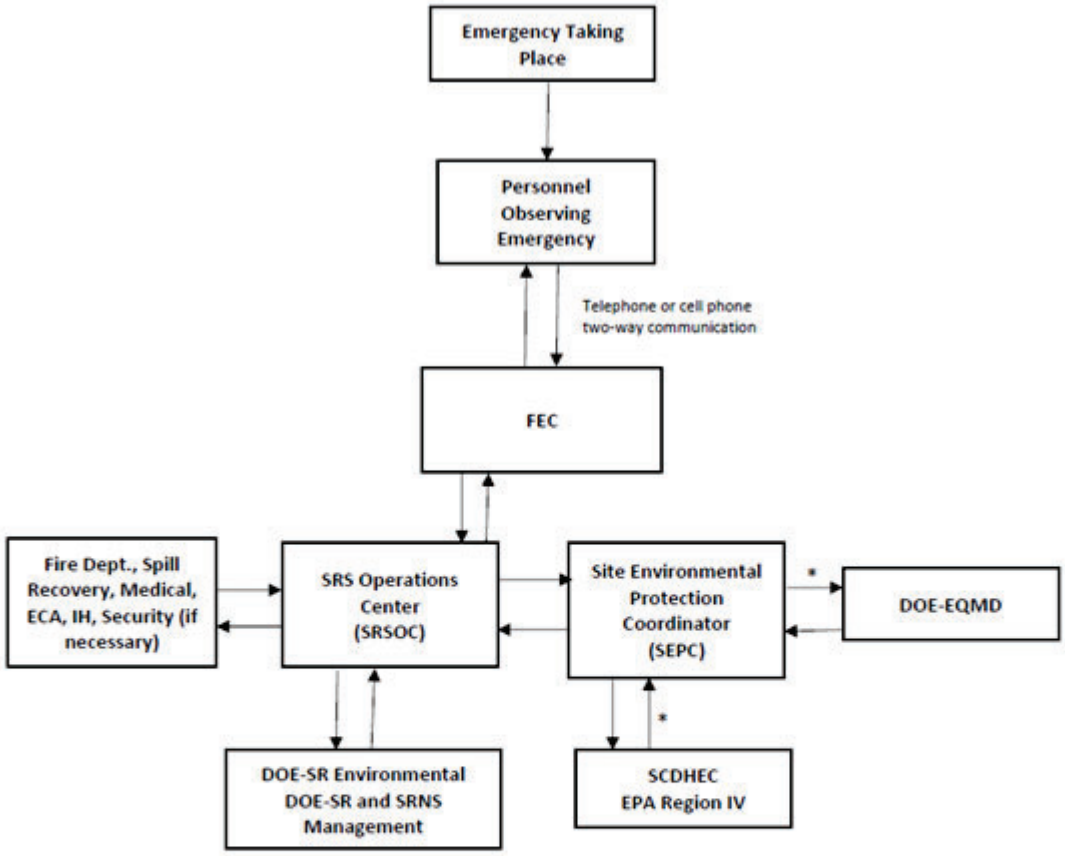


Attachment 6. Map showing the Site Indices 549, General Separations Area Eastern Groundwater Operable Unit



Attachment 7: Emergency Reporting Flow Chart

been opened read-only to prevent modification.



* 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