Minor
OPERATION AND MAINTENANCE
Activity Plan

Inspection and Treatment of Power and Steam Poles within K-Area Operable Units 476 and 572

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1. INTRODUCTON

The Operation and Maintenance (O&M) Plan for the Inspection and Treatment of Power and Steam Poles in K-Area will provide a means by which soil / media disturbance can commence within RCRA/CERCLA Units or Site Evaluation Areas (SEA) within K-Area.

The proposed soil disturbances are within RCRA/CERCLA Site Index Number 583 of the Federal Facility Agreement, Appendix C.2, are specifically within the 200' buffer area of several site indices included therein and described below in Section 2. The potential area of disturbance is less than 10% of the waste unit area, characterizing it as "minor intrusive" activity. An O&M plan is required per WSRC-RP-96-45, Savannah River Site Plan for Performing Maintenance in Federal Facility Agreement Area (O&M) Plan (U), December 15, 1996. An O&M plan provides added protection to human health and the environment and minimizes impact to long-term characterization and remediation efforts.

2. AREA DESCRIPTION AND CONDITIONS

The proposed activity is within RCRA/CERCLA Site Index Number 583. The following site indices are included in this operable unit and are within 200' of the excavation activities.

- SRS Index #476 "K-Area Reactor Area Cask Car Railroad Tracks As Abandoned"
- SRS Index #572 "K-Area Process Sewer Lines As Abandoned"

Both Units 476 and 572 are in the FFA because of potential radionuclides (but potential metals, oils, solvents, acids/caustics) contamination from the various activities associated with the above indices.

3. O&M ACTIVITY

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

The planned soil disturbing activity involves poles within the K-Area inner and outer fence that are maintained for power and steam line supports. The soil disturbance is specifically the removal of up to 12 inches of soil immediately around the base of the power / steam poles, the treating of the poles to 12" below the surface level and backfilling the excavation with the removed materials.

ALL EXCAVATED SOILS WILL BE RETURNED TO THE ORIGINAL LOCATION OF SOIL DISTURBANCE. THE DISPOSAL OF ANY SOIL WILL BE PER THE ENVIRONMENTAL COMPLIANCE AUTHORITY (ECA) AND RADIOLOGICAL PROTECTION (RP) DIRECTION.

If the work scope requires change for any reason, contact the Environmental Compliance Authority (ECA). The ECA will determine if modifications to the O&M Plan are required.

B. **O&M Activity Sampling and Monitoring for Health and Safety**
RCRA/CERCLA Site Index Number 583 is in the FFA primarily because of **potential** radiological contamination.

Worker health and safety will be monitored/controlled as required in the Assisted Hazards Analysis (AHA) with approvals and direction from RP and Industrial Hygiene (IH).

C. **Health and Safety Plan**
The health and safety concerns involve **potential** worker exposure to radionuclide contamination.

Worker safety is covered in the Assisted Hazard Analysis and Work Orders/Technical Work Documents and reviewed in the Pre-job briefing.

D. **Characterization and Sampling Plan for the Affected Area within the Unit**
RCRA/CERCLA Site Index Number 583 is in the FFA primarily for potential radiological contamination. Radiological Protection will prepare a sampling plan and conduct surveys for work at pole locations.

IH and RP will review the work order and AHA to determine worker protection requirements.

If unexpected contamination is found, a Time-Out will be called. The Shift Operations Manager (SOM) and ECA will be notified. The ECA will notify the SRNS On-Scene Coordinator (Carl Shealy), who may request additional work scope and sampling from soil disturbed by the activity.

E. **Contaminated Materials Management and/or Disposal**
All excavated soils will be returned to their point of origin. The disposal of any soil will be per ECA and RP direction.

F. **Environmental Plans and Permit Modification Requests**
This activity is not expected to involve other environmental plans/permits, required maintenance and inspections, or erosion control practices.

4. CONTINGENCY PLAN

During implementation of the activity, if 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 planner, the Operations Manager or ECA shall:

- Stop work, secure the area, contain and stabilize the area if it is safe to do so.
- Immediately notify the Shift Operations Manager (SOM) and the RPD First Line Manager (Operations Support Center), followed by the SRNS-OSC (On Scene Coordinator). If necessary, the SRNS-OSC will notify the DOE-OSC and receive concurrence on the path forward (if applicable).
- Determine if any necessary changes to work authorization documents are needed.

5. DOCUMENTATION & REPORTING

The facility will transmit the following documentation to the SRNS-OSC within twenty (20) days of the completion of the activity:

- A statement that the activity is complete
- Sampling and characterization data

6. SUPPORTING DOCUMENTATION

1. WSRC-OS-94-42, *Federal Facility Agreement for the Savannah River Site,* Administrative Document Number 89-05-FF, effective August 16, 1993. (Revision 0, Appendix C for Fiscal Year 2017)

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

3. Environmental Evaluation Checklist PBU-K-2018-0006 (contains attachments with maps)