OPERATION AND MAINTENANCE ACTIVITY PLAN

704-H Fire Water Line Replacement Project

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1. INTRODUCTION

This Operation and Maintenance (O&M) Plan is being written to support work activities planned for the excavation to replace the underground fire water piping near 704-H as seen in Figure 1. This is considered a minor intrusive activity. Figure 2 and 3 show the Site Evaluation Areas and or RCRA/CERCLA unit within a 200-foot buffer zone of the excavation site identified in which the conveyance system associated with the RCRA/CERCLA unit or Site Evaluation Area such as piping and NPDES outfalls that have or have had a potential for a release of a hazardous substance are considered a part of the unit.

Figure 1 – Field Map Sketch for Future Firewater Line Replacement (Reference 1)

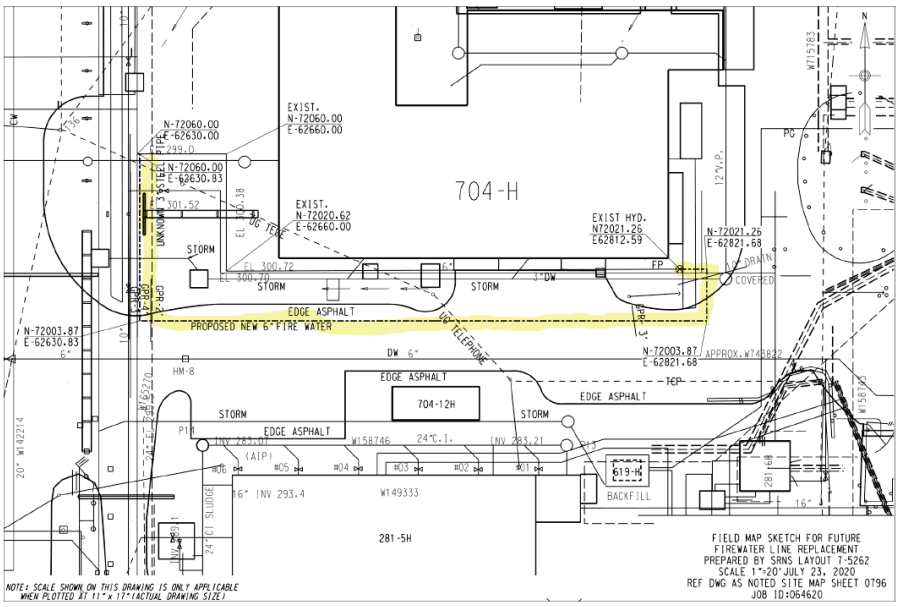


Figure 2 – Waste Units within 200 Foot Buffer of Excavation Site (ACP GIS Map Portal)

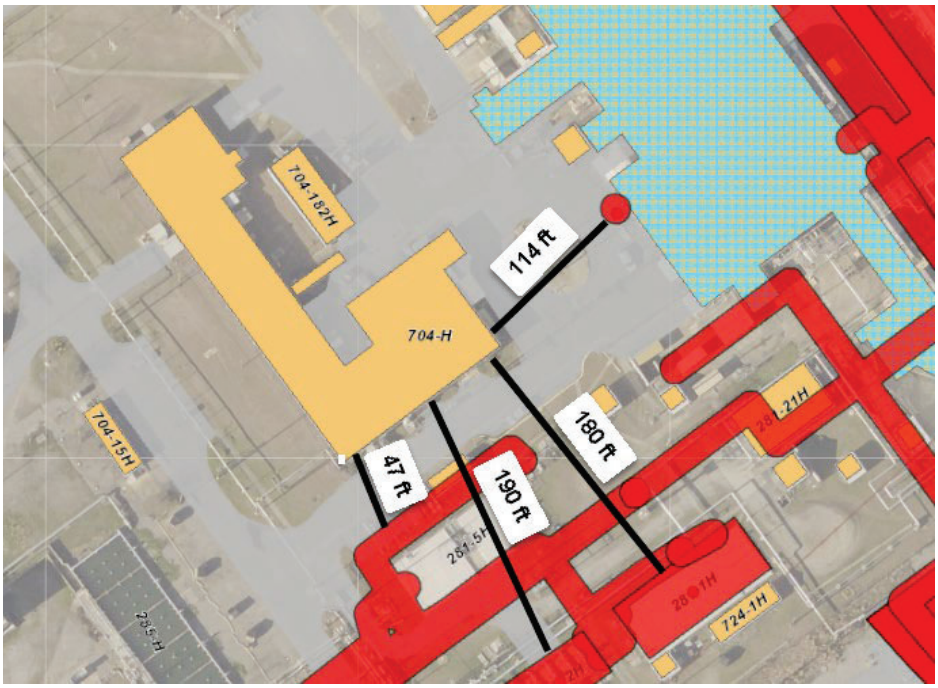
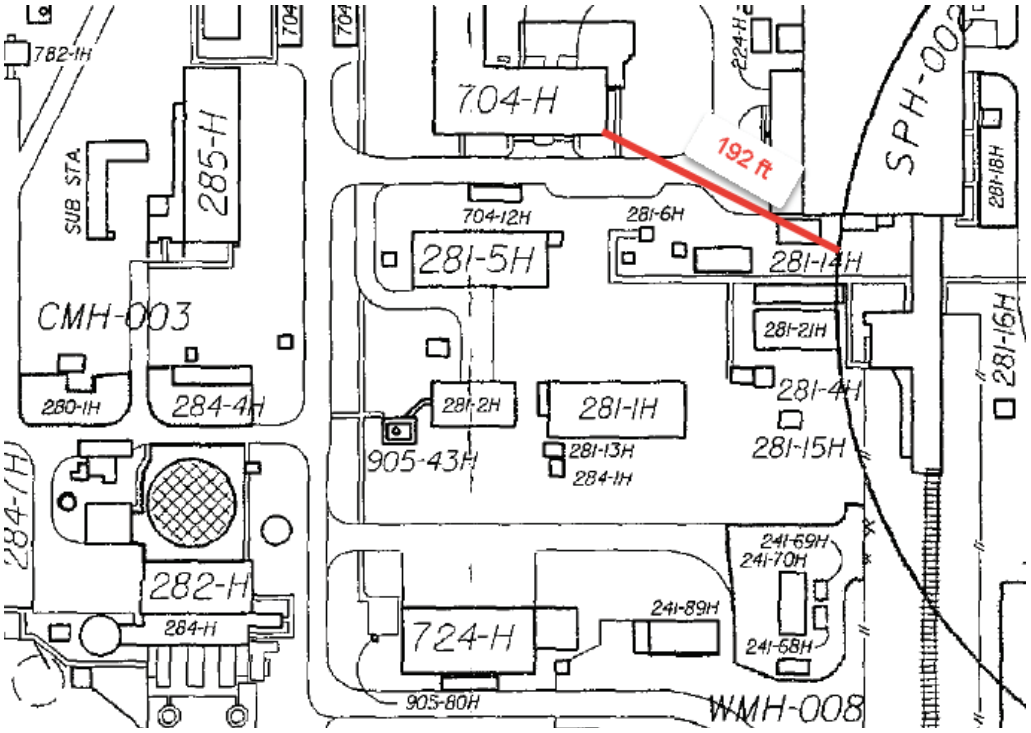


Figure 3 – RCRA/CERCLA and/or Site Evaluation Areas within 200 Foot Buffer of Excavation Site (Reference 2)



2. AREA DESCRIPTION AND CONDITIONS

Contaminants of interest near the work area include:

The following RCRA/CERCLA units and/or Site Evaluation Areas exist within 200 feet of this work location (Reference 2 & 3):

1) Waste Unit: 294, H-Area Retention Basin 281-1H
   Location: H-Area, 281-1H
2) Waste Unit: 295, H-Area Retention Basin, 281-2H
   Location: H-Area, 281-2H
3) Waste Unit 391, Spill on 02/01/83
   Location: H-Area, west of 221-H and south of 224-H
   Contaminants: 50 gal of oil
4) Waste Unit 591, H-Area Process Sewer Lines As Abandoned
   Location: H-Area
5) SPH-001, 291-H stack release, 7/1/56
   Description: Contamination released from 291-H stack. Ground turned under.
   Location: 125,000 sq ft in a 400-foot radius quadrant south east of N 71899.10, E 63539.50
   Constituents of Concern: Unknown beta, gamma
6) SPH-002, 291-H stack release, 4/1/69, 6/1/70
   Description: Contamination released from 291-H stack. Ground turned under.
   Location: 500,000 sq ft in a 400-foot radius around 291-H stack
   Constituents of Concern: Unknown beta, gamma

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 is for subcontractors performing excavation near 704-H to replace the underground fire water line due to normal wear and tear of the current fire water line. The fire water line being replaced will be 260 lineal feet and 6-8 ft deep. Every attempt should be made to place any soil removed from the hole back into the hole.

If any soil cannot be returned to its original location, it will be screened by RPD for free release to the Lower 40 or Coal Yard areas in H-Area for future reuse or to transfer to C&D Landfill or Three Rivers Landfill using skid or roll off pans.

a. If the excess soil is below radiological limits and can be cleared for release, it shall be placed into an appropriate container as determined by facility GCO and transferred accordingly.
b. If the soil cannot be cleared for release to the Lower 40 or Coal Yard areas, 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 H-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

A soil sampling plan will be conducted in accordance with 5Q1.2 Procedure 485. Normal RPD coverage will be provided as determined by RPD. Safety glasses and work gloves will be worn. 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

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

Soil to be removed from the area will be sampled by RPD personnel. These samples will be analyzed to allow the soil to be cleared for release to the Three Rivers Landfill. If the excess soil is released to store for future use at the Lower 40 or Coal Yard, no further sampling is currently planned. If the excess soil cannot be cleared for release it will be sampled for Waste Characterization and planning for that will occur when that determination is made. The H-Area Waste ECA and/or Waste CTF will provide specific analytical requirements for that material.

Additional work scope and sampling from the soil disturbance areas may be necessary and will be addressed per SRNS-OSC guidance, should radioactive contamination be found present.

E. Contaminated Materials Management and/or Disposal

Soil removal is being performed in a non-radiological area. However, any soil removed will be managed based on sampling and analysis. 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 H-Area procedures.

If radioactive contamination is found, the ECA or GCO will be contacted before any soil is placed into a container for disposal. Contaminated soil will be dispositioned in accordance with the 1S Manual. Any other job control waste will be disposed of as "Low Level Radioactive Waste" under current H-Area Waste Management procedures if deemed appropriate by the SRNS-OSC.

F. Environmental Plans and Permit Modification Requests:

The Environmental Evaluation Checklist performed for this type of activity is EEC No. FIX-G-2020-0003. No permit modifications are required as a result of this activity. Standard erosion control measures and storm water management will be used, if required.

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 2) 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. F-SOW-H-00020 Rev 2, H-Area OSUG Fire Water Line Replacement, April 19, 2021
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. DPSP-84-1054, Sites of Radioactive Contamination on the Savannah River Plant, July 2, 1984