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PENTALIZATION

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Email Scanned PM Copy

Ms. Kim Kuhn

South Carolina Department of Health and

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Environmental Control (DHEC)

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Our ref: LTR-RAC-19-45

Southern Storage Area Operable Unit Sampling Work Plan - Remedial Investigation Work Plan Addendum 1

June 18, 2019

Dear Ms. Kuhn:

Westinghouse has prepared the following multi-phase sampling work plan to investigate the Southern Storage Area (SSA) Operable Unit (OU). The SSA OU is described in the AECOM Remedial Investigation Work Plan that Westinghouse submitted to the Department on April 26, 2019 under the Consent Agreement signed on February 26, 2019.

One activity performed within the SSA OU is the storage of materials awaiting uranium (U) recovery within intermodal containers. On May 30, 2019, a scheduled inspection of intermodal containers within this OU was completed and identified impaired roofing and degraded drums due to rainwater intrusion in intermodal container C-40. The drums within this intermodal contained solid combustible materials, such as mop heads and filters, awaiting U reclamation by onsite incineration. C-40 was safely emptied of its contents by June 5, 2019; all drums were transferred to the main building for processing; and C-40 was wrapped with tarps to minimize further water intrusion. Three soil samples were collected 1 foot below soil surface (bss) in the areas of the degraded drums, with results ranging in U concentrations from 2-4 ppm. Soil containing less than 11 ppm U is below the limit for free release (i.e., clean).

The initial extent of condition (EOC) evaluation for other onsite intermodal containers identified a degraded floor in C-44 and roof leaks in C-35 and C-65, with no visible drum degradation. The roof leaks were immediately repaired. Corrective Action Program entry 2019-8970 was created, and a prioritized plan, starting with C-44 was developed for emptying each intermodal to inspect its contents. Implementation of the inspection plan will begin following installation of gravel described in Phase 1 of this work plan. DHEC approval is requested to begin the Phase 1 investigation.

WORK PLAN

Three Phase Approach

A multi-phase work plan for the SSA OU is described below. Upon completion of the scope of work for each phase, a hold point is established to discuss with DHEC the work that was completed, assessment of the results and proposed next actions. DHEC approval is required prior to the start of work on each subsequent phase.

