

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: MFC-775 Zero Power Physics Reactor Vault (ZPPR) Fuel Storage Bin Removal

SECTION B. Project Description and Purpose:

Continuing progress on the disposition of excess special nuclear material previously stored in MFC-775 Zero Power Physics Reactor (ZPPR) vault fuel storage bins will permit the removal of approximately 12-14 of these storage bins, once remaining stored material is consolidated. In terms of the volume and character of the waste to be generated by this activity, three of the bins weigh approximately 7000 lb and the remainder are about 5800 lb. The bins are made of steel and borated concrete. It is unknown if the paint contains PCBs; however MFC-775 was built in 1968. Some trace depleted uranium contamination has been found on other ZPPR storage bins and it is likely that such contamination may also be found on the bins to be removed. Removing the unneeded bins will free up vault storage space for potential new programs. The removal activities are expected to take place in the FY2020-FY2021 timeframe with physical bin removal and disposal activities taking place over the time span of about a month. The projected cost is primarily for removal labor and is estimated to be less than \$50,000.00.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The storage bins have the potential to have trace levels of depleted uranium contamination on them. All precautions will be taken to ensure contamination will not become airborne. The ZPPR suspect exhaust system is equipped with HEPA filters to limit any potential release of these materials into the atmosphere. The ZPPR stack is monitored and all emissions are reported annually in the INL NESHAP Report. These emissions would not constitute an increase in the potential to emit over current operations, and would not constitute a new source or modification.

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

MFC-775 was constructed in 1968 and is eligible for listing on the National Register of Historic Places; therefore, a cultural resource review and clearance from the Cultural Resource Management Office (CRMO) is required.

Generating and Managing Waste

This activity will generate low-level waste.

Polychlorinated biphenyl (PCB) waste will be generated when modifying or removing structures and equipment built before 1982 or working with pre-1982 equipment/materials. Examples include painted surfaces, caulking, and joint sealer.

Releasing Contaminants

If paint is chipped off of the storage bins while removing them; contain all paint chips and turn over to WGS for waste management and disposal.

Using, Reusing, and Conserving Natural Resources

All materials will be reused or recycled where possible. All applicable waste will be diverted from disposal in the landfill where conditions allow; however, for this activity conditions probably won't allow.

SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For Categorical Exclusions (CXs), the proposed action must not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, or similar requirements of Department of Energy (DOE) or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

References: 10 CFR 1021, Appendix B to Subpart D, B1.24 "Property transfers"

Final Waste Management Programmatic Environmental Impact Statement [WM PEIS] (DOE/EIS-0200-F, May 1997)

Final Environmental Impact Statement for the Nevada Test Site and Off-Site Locations in the State of Nevada (DOE/EIS-0243) and supplemental analysis (SA) (DOE/EIS-0243-SA-01).

Justification: Project activities are consistent with 10 CFR 1021, Appendix B to Subpart D, B1.24 "Transfer, lease, disposition, or acquisition of interests in personal property (including, but not limited to, equipment and materials) or real property (including, but not limited to, permanent structures and land),

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provided that under reasonably foreseeable uses (1) there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment and (2) the covered actions would not have the potential to cause a significant change in impacts from before the transfer, lease, disposition, or acquisition of interests."

The environmental impacts of transferring low level waste from the INL to the Nevada National Security Site were analyzed in the 1996 Nevada Test Site EIS (DOE/EIS-0243) and supplemental analysis (SA) (DOE/EIS-0243-SA-01) and DOE's Waste Management Programmatic EIS (DOE/EIS-200). The fourth Record of Decision (ROD) (65 FR 10061, February 25, 2000) for DOE's Waste Management Programmatic EIS established the Nevada National Security Site as one of two regional LLW and MLLW disposal sites. The SA considers additional waste streams, beyond those considered in the 1996 NTS EIS, that may be generated at or sent to the Nevada National Security Site for management.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) Yes No

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 6/29/2020