

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Upgrades to TRA-716 Warm Waste Lifting Station Electrical Components

SECTION B. Project Description and Purpose:

All low-level radioactive liquid waste (i.e., "warm waste" water) at Advanced Test Reactor (ATR) Complex is transferred to the ATR Evaporation Pond (TRA-715) through the Warm Waste Lifting Station (TRA-716). The lifting station is located south of the retired Materials Test Reactor (MTR) ventilation stack and is arranged as a below ground level concrete vault. Two sump pumps, controlled by float switches, pump the effluent from the lifting station to the evaporation pond. The lifting station's electrical components are in degraded material condition, and accessibility for operations and maintenance is restricted because the concrete vault is a permit-required confined space as well as a radiation area that is not routinely surveyed.

The proposed work scope is to reposition selected lifting station electrical components to a new location, above ground level, outside of the concrete vault, to improve accessibility for operations and maintenance. This activity will also replace the warm waste effluent flow meter that monitors flow out of ATR to TRA-715 evaporation ponds. The projects estimated cost is approximately \$350,000 with a projected start date of May 2020.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to generate fugitive dust or other fugitive emissions during excavation activities.

Discharging to Surface-, Storm-, or Ground Water

NA

Disturbing Cultural or Biological Resources

Activities in this EC have the potential to impact cultural resources. Therefore, a cultural resource review and clearance from the Cultural Resource Management Office (CRMO) is required. Please email the CRMO at grp-crmo@inl.gov.

Generating and Managing Waste

Proposed activities have the potential to generate low level and mixed low level waste.

Releasing Contaminants

Activities addressed by this EC have the potential to release contaminants through the following:

- Acquiring, using, storing and dispositioning chemicals.

Using, Reusing, and Conserving Natural Resources

Activities addressed by this EC have the potential for use, reuse and conservation of natural resources related to the following:

- Generating landfill waste or construction and demolition wastes
- Engaging in sustainable acquisition practices.

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.
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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 Items B2.5, "Facility Safety and Environmental Improvements" and B6.3, "Improvements to environmental control systems "

Justification: The proposed activities are consistent with 10 CFR 1021, Appendix B to Subpart D, items B2.5, "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground or belowground tanks and related

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piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)." and

B6.3, "Improvements to environmental monitoring and control systems of an existing building or structure (such as changes to scrubbers in air quality control systems or ion-exchange devices and other filtration processes in water treatment systems), provided that during subsequent operations (1) Any substance collected by the environmental control systems would be recycled, released, or disposed of within existing permitted facilities and (2) there are applicable statutory or regulatory requirements or permit conditions for disposal, release, or recycling of any hazardous substance or CERCLA-excluded petroleum or natural gas products that are collected or released in increased quantity or that were not previously collected or released."

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: 5/6/2020