

**DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory**

SECTION A. Project Title: Obsidian Test Pad Revision 2

SECTION B. Project Description and Purpose:

Revision 2

The purpose of this revision is to address snow removal, specifically using a grader (patrol), on the road that connects the Obsidian Test Pad to the T-25 road (See Figure 1). Snow removal was not specifically identified in the original EC. Cultural reviews were not specifically completed for snow removal activities. Snow removal must be performed in accordance with the requirements listed in the cultural resource review (CRR) record. Additional work may include having cultural resources personnel place markers on the road so the patrol will remain on the established roadways.

In order to adequately cover the activity of snow removal, 10 CFR 1021 Appendix B1.31, "Routine maintenance" was added as a NEPA reference.

Figure 1. Connecting Road between the Obsidian Test Pad and T-25 Road requiring snow removal (indicated in red).



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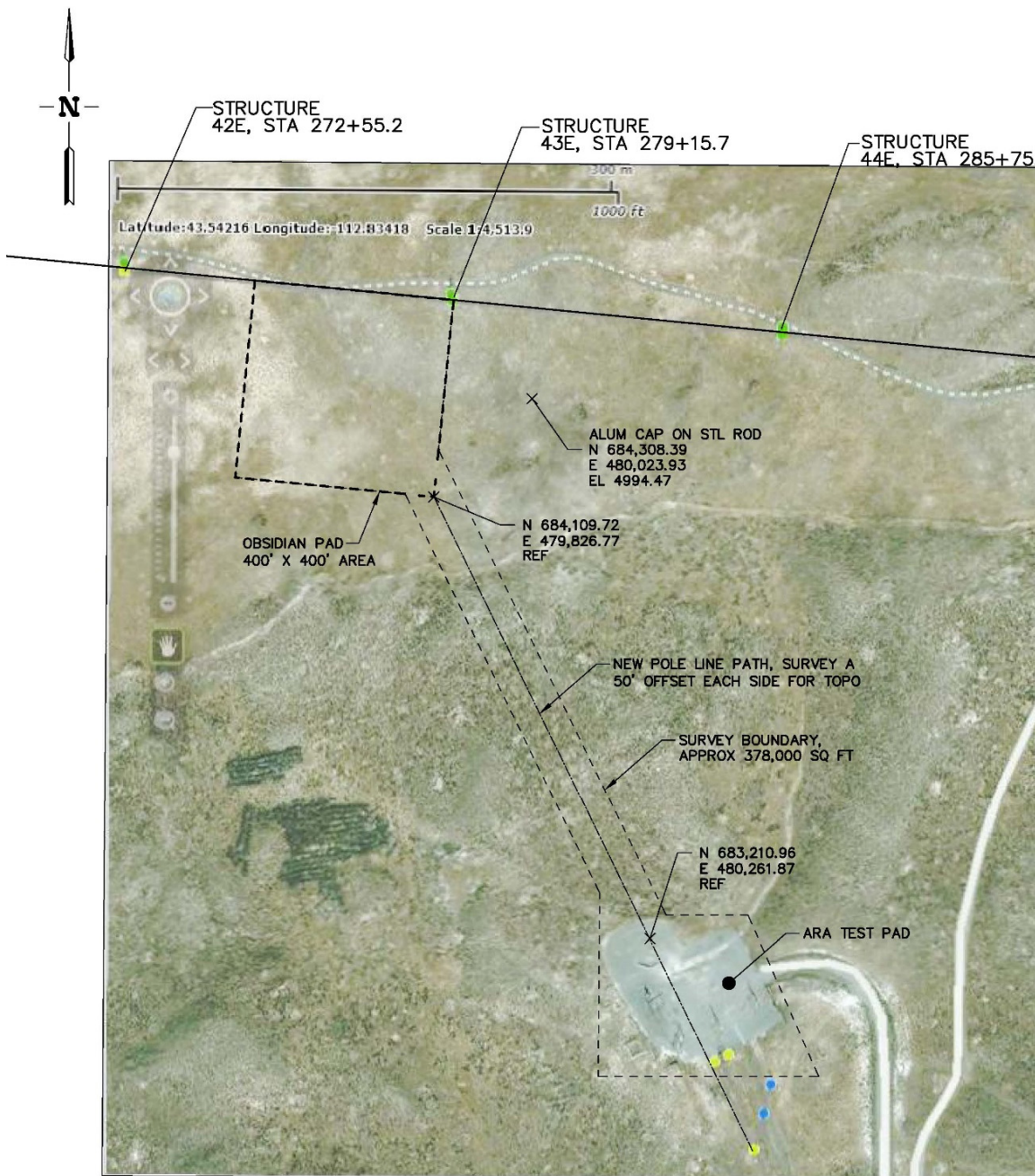
Revision 1

This revision to EC INL-18-110 covers construction of a metal building within disturbed area of the Obsidian Test Pad (OTP). The original EC referred to two site locations for the OTP. The site chosen is shown in Figure 2 below. The proposed building is about 30 feet X 120 feet and located along the OTP south fence and within the parking area identified on the design drawings for the OTP. The revised scope does not include additional parking areas. The proposed building is similar in design to other substation-type buildings constructed at the INL Site. Building utilities include electrical power for heating and room ventilation. A portable trailer supplies restroom facilities and bottled water will be used for drinking.

Original EC

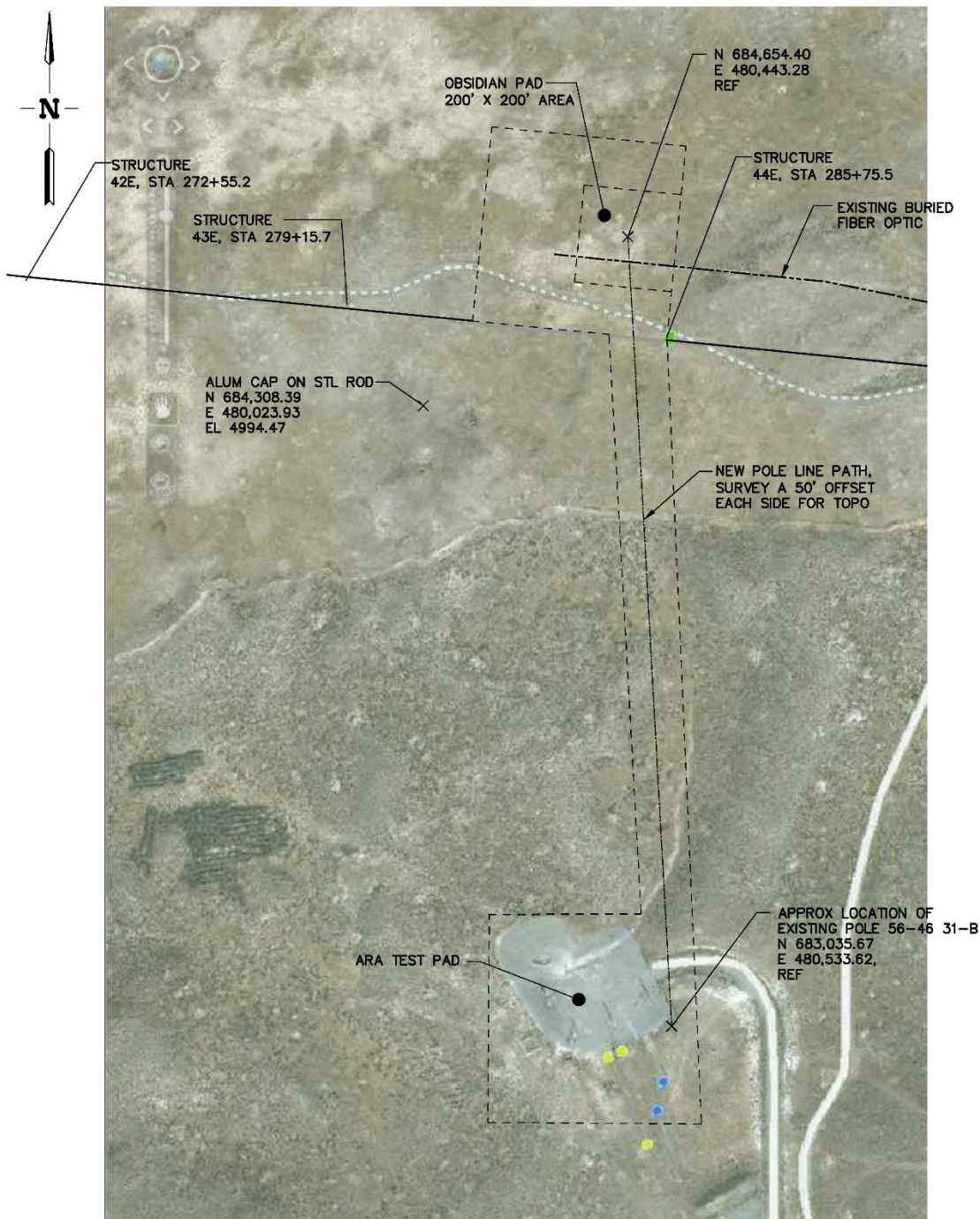
The proposed action designs and constructs a test pad (Obsidian Test Pad) adjacent to the existing 138kV overhead power line (OHL) near the Auxiliary Reactor Area (ARA) Test Pad (also known as the Bode Test Site) to support electric grid testing. Two locations are being considered for the Obsidian Test Pad (see Figures 1 and 2). The Obsidian Test Pad is anticipated to be 400' X 400'. The proposal also extends the Circuit 56 13.8kV OHL from the end of the Bode Test Pad to the new Obsidian Test Pad approximately 1/4 mile to the north. The new Obsidian Test Pad is similar other test pads in the area and supports N&HS customer directed tests.

Figure 1. Proposed Obsidian Test Pad Site #1



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Figure 2. Proposed Obsidian Test Pad Site #1



Construction of the test pad includes clearing, grubbing, and backfilling the test pad with put run gravel. Construction includes developing catch basins for electrical fluids, installation of a ground grid, and finishing the pad with crushed gravel. The extension of Circuit 56 installs approximately 12 new power poles with overhead conductor. The project installs fiber optic cable from the CITRC Substation to the Obsidian Test Pad on the current 13.8 kV Circuit 56 power poles, and the fiber optic cable terminates at both ends.

In addition, a section of the T25 Road from the Auxiliary Reactor Area (ARA) test pad (Bode) west approximately 1/2 miles needs to be mowed to reduce fire risk during preliminary design work for the new pad. Mowing will be limited to the current width of the road. Mowing activities require cultural and biological review prior to beginning work. Mowing must also be approved by the INL Fire Chief, in accordance with applicable fire restrictions for field work.

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The scope of this EC covers construction of the Obsidian Test Pad and overhead electrical power line. Testing activities will be addressed in a separate evaluation in compliance with the National Environmental Policy Act (NEPA).

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to generate fugitive dust.

Disturbing Cultural or Biological Resources

Soil disturbing and snow removal activities have the potential to impact cultural resources.

Impacts to biological resources (e.g., vegetation, birds, nests, leks) have the potential to occur during project activities.

Generating and Managing Waste

Industrial (non-hazardous, non-radioactive) waste such as wood, metal, wire insulation, etc. will be generated.

Releasing Contaminants

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

- Acquiring, using, storing and dispositioning chemicals
- Managing and dispositioning excess property and materials
- Reporting and cleaning up spills and releases

Disturbing CERCLA sites.

Using, Reusing, and Conserving Natural Resources

Materials such as wood and metal generated by work activities would be reused and/or recycled as practicable.

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, B3.6 "Small-scale research and development, laboratory operations, and pilot projects;" B4.7 "Fiber optic cable;" B4.12 "Construction of powerlines," and B1.3 "Routine maintenance".

Justification: Activities are consistent with 10 CFR 1021, Appendix B, B3.6, "Siting, construction, modification, operation, and decommissioning of facilities for small-scale research and development projects; conventional laboratory operations (such as preparation of chemical standards and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a concept before demonstration actions, provided that construction or modification would be within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible). Not included in this category are demonstration actions, meaning actions that are undertaken at a scale to show whether a technology would be viable on a larger scale and suitable for commercial deployment;"

B4.7, "Fiber optic cable Adding fiber optic cables to transmission facilities or burying fiber optic cable in existing powerline or pipeline rights-of-way. Covered actions may include associated vaults and pulling and tensioning sites outside of rights-of-way in nearby previously disturbed or developed areas;"

B4.12, "Construction of electric powerlines approximately 10 miles in length or less, or approximately 20 miles in length or less within previously disturbed or developed powerline or pipeline rights-of-way."

B1.3, "Routine Maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as

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hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- (a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;
- (b) Door and window repair or replacement;
- (c) Wall, ceiling, or floor repair or replacement;
- (d) Reroofing;
- (e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;
- (f) Routine replacement of high-efficiency particulate air filters;
- (g) Inspection and/or treatment of currently installed utility poles;(h) Repair of road embankments;
- (i) Repair or replacement of fire protection sprinkler systems;
- (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;
- (k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);
- (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
- (m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);
- (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and
- (p) Removal of debris.

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: 1/13/2020