

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: University of Pittsburgh Experiment in TREAT

SECTION B. Project Description and Purpose:

The proposed action aims to address gaps in knowledge by determining the thermal conductivity of U-Pu-Zr fuels irradiated to various burnup levels. To meet this need, the proposed action performs irradiation testing and post-irradiation examination (PIE) to evaluate the feasibility of these techniques and furnish data beyond the current knowledge base. The University of Pittsburgh experiment uses U-Pu-Zr fresh fuel and previously irradiated fuel rods from historical EBR-II experiments to fabricate small scale specimens. The experiment uses the Minimal Activation Retrievable Capsule Holder (MARCH) irradiation vehicle system to irradiate fabricated specimens in the Transient Reactor Test facility (TREAT) in a sodium environment module called the Temperature Heat sink Overpower Response (THOR) capsule.

Project personnel complete pretest assembly, posttest disassembly, and PIE at the Materials and Fuel Complex (MFC). Low radioactivity shipping to and from TREAT uses approved transfer/shipping containers (e.g., Type 7A).

The proposed experiment irradiates one fresh U-Pu-Zr specimen and three previously irradiated U-Pu-Zr fueled specimens (of varying burnups). The program determines the burnup levels of the pre-irradiated specimens based on the availability and feasibility of retrieval and will document specific fuel rods and their associated burnups in the neutronics Engineering Calculations and Analysis Report (ECAR). Each transient includes a minimum of five oscillations but will not heat specimens above 600°C. The amplitude of each oscillation deposits enough energy in the specimen to cause about 20-25°C temperature rise.

Cylindrical fuels will be sodium bonded and annular fuels will be helium bonded. The experiment is designed to deliver time resolved data of significant fuel length change during the transient and to measure time of fuel specimen cladding rupture during the transient.

Nearly all plutonium at MFC was supplied by defense programs. MFC involvement with defense-related programs and materials has been continuous since the earliest days of operation. MFC facilities that are qualified for plutonium handling are contaminated with transuranics from these programs.

The Department of Energy (DOE) evaluated the environmental impacts of transient irradiations in the TREAT reactor, including 1) transporting experiment materials between MFC and TREAT, 2) pre- and post-irradiation radiography, 3) PIE of test components at HFEF or other MFC facilities, and 4) waste generation and disposal in the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the Resumption of Transient Testing of Nuclear Fuels and Materials (DOE/EA-1954, February 2014).

After PIE, irradiated test pin segments and PIE remnants will be stored with other similar DOE-owned irradiated materials and experiments at MFC, most likely in the HFEF or the Radioactive Scrap and Waste Facility (RSWF) in accordance with DOE's Programmatic SNF Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement (FEIS) and ROD (DOE/EIS-0203, 1995) and supplemental analyses (DOE/EIS-0203-SA-01 and DOE/EIS-0203-SA-02) and the Amended Record of Decision (February 1996). Ultimate disposal of the irradiated test pin segments and PIE remnants will be along with similar DOE-owned irradiated materials and experiments currently at MFC. Categorizing this material as waste is supported under Department of Energy Order (DOE O) 435.1, Att. 1, Item 44, which states "...Test specimens of fissionable material irradiated for research and development purposes only...may be classified as waste and managed in accordance with this Order...".

In addition, to complete proposed work activities, it is necessary for the project to use the HFEF hot cell which contains both defense and nondefense related materials and contamination. Project materials will come into contact with defense related materials. It is impractical to clean out defense related contamination, and therefore, waste associated with project activities is eligible for disposal at the Waste Isolation Pilot Plant (WIPP). National Environmental Policy Act (NEPA) coverage for the transportation and disposal of waste to WIPP are found in Final Waste Management Programmatic Environmental Impact Statement [WM PEIS] (DOE/EIS-0200-F, May 1997) and Waste Isolation Plant Disposal Phase Supplemental EIS (SEIS-II) (DOE/EIS-0026-S-2, Sept. 1997), respectively. The 1990 ROD also stated that a more detailed analysis of the impacts of processing and handling transuranic (TRU) waste at the generator-storage facilities would be conducted. The Department has analyzed transuranic (TRU) waste management activities in the Final Waste Management Programmatic Environmental Impact Statement (WM PEIS) (DOE/EIS-200-F, May 1997). The WM PEIS analyzes environmental impacts at the potential locations of treatment and storage sites for TRU waste; SEIS-II addresses impacts associated with alternative treatment methods, the disposal of TRU waste at WIPP and alternatives to that disposal, and the transportation to WIPP.

Packaging, repackaging, transportation, receiving, and storing used nuclear fuel and R&D for used nuclear fuel management is covered by DOE's Programmatic Spent Nuclear Fuel (SNF) Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement (EIS) and Record of Decision (DOE/EIS-0203, 1995) and supplemental analyses (DOE/EIS-0203-SA-01 and DOE/EIS-0203-SA-02) and the Amended Record of Decision (February 1996). The analyses include those impacts related to transportation to, storage of, and research and development related to used nuclear fuel at the INL (see Tables 3.1 of the SNF Record of Decision (May 30, 1995) and Table 1.1 of the Amended Record of Decision [February 1996]).

The environmental impacts of transferring LLW from the INL Site to the Nevada National Security Site were analyzed in the 2014 Final Site-Wide Environmental Impact Statement for the Continued Operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and Off-Site Locations in the State of Nevada (DOE/EIS-0426) 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.

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SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The proposed action has the potential to generate radiological and chemical emissions from irradiation in TREAT and the destructive and non-destructive PIE at MFC. Air emissions are anticipated to be minor, and concentrations would not exceed the current monitored air emissions from these facilities. An Air Permit Applicability Determination (APAD) may be required.

The TREAT irradiation activities are not modifications in accordance with Idaho Administrative Procedures Act (IDAPA) 58.01.01.201 and 40 Code of Federal Regulation (CFR) 61 Subpart H. TREAT radionuclide emissions are sampled and reported in accordance with Laboratory Wide Procedure (LWP)-8000 and 40 CFR 61 Subpart H. All experiments will be evaluated by Environmental Support and Services staff. All radionuclide release data (isotope specific in curies) directly associated with this proposal will be calculated and provided to the Environmental Support organization.

The irradiated specimens will be delivered to the MFC HFEF for disassembly and then undergo routine PIE. All radionuclide release data associated with the PIE portion of this experiment will be recorded as part of the HFEF continuous stack monitor. The PIE examination in HFEF is not a modification in accordance with Idaho Administrative Procedures Act (IDAPA) 58.01.01.201 and 40 Code of Federal Regulation (CFR) 61 Subpart H.

In 2018, the effective dose equivalent to the offsite maximally exposed individual (MEI) from all operations at the INL Site was calculated as 1.02 E-02 mrem/yr, which is 0.10% of the 10-mrem/yr federal standard and was calculated using all sources that emitted radionuclides to the environment from the INL site. The additional increment in emissions from the proposed action would not significantly change the total site-wide MEI dose. Therefore, the emissions are bounded by the analysis in the 1995 EIS, which estimated the annual cumulative doses to the maximally exposed worker, offsite maximally exposed individual (MEI), and the collective population from DOE's decision to implement the preferred alternative (DOE/EIS-0203). The potential air emissions and human health impacts associated with the proposed action would be smaller than and are bounded by the impacts presented in the 1995 EIS.

Disturbing Cultural or Biological Resources

MFC-720/TREAT is eligible for listing on the National Register of Historic Places (NRHP) and is considered a Category 1 historic property; as such, all project activities associated with the building must undergo cultural resource review (CRR).

Generating and Managing Waste

Transient testing at TREAT generates waste at the facilities where test assemblies are assembled, disassembled, and analyzed. Transient testing in from the proposed action has the potential to generate LLW from assembling, transporting, irradiating, disassembling, and analyzing test assemblies at MFC.

Operations also have the potential to generate MLLW. MLLW, if generated, is accumulated and stored in accordance with Federal and state regulations, treated if required, and disposed at an off-site permitted/licensed facility.

The proposed activities could generate about 5 mL of transuranic (TRU) waste.

These experiments have the potential to generate 16 mL of sodium waste.

Releasing Contaminants

Chemicals will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval prior to use. The Facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility environmental staff. If environmental staff cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

Using, Reusing, and Conserving Natural Resources

All materials will be reused and recycled where economically practicable. All applicable waste will be diverted from disposal in the landfill where conditions 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.

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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 B3.6, "Small-scale research and development, laboratory operations, and pilot projects"

Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the Resumption of Transient Testing of Nuclear Fuels and Materials (DOE/EA-1954, February 2014).

Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement and Record of Decision (DOE/EIS-0203, 1995) and supplemental analyses (DOE/EIS-0203-SA-01 and DOE/EIS-0203-SA-02) and the Amended Record of Decision (1996)

Final Environmental Impact Statement for the Waste Isolation Pilot Plant (DOE/EIS-0026, October 1980) and *Final Supplement Environmental Impact Statement for the Waste Isolation Pilot Plant* (SEIS-I) (DOE/EIS-0026-FS, January 1990)

Final Waste Management Programmatic Environmental Impact Statement [WM PEIS] (DOE/EIS-0200-F, May 1997) and *Waste Isolation Plant Disposal Phase Supplemental EIS* (SEIS-II) (DOE/EIS-0026-S-2, September 1997)

Final Site-Wide Environmental Impact Statement for the Continued Operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and Off-Site Locations in the State of Nevada (DOE/EIS-0426, December 2014).

Justification: The proposed R&D activities are consistent with CX 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); 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 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."

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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: 01/29/2020