DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 1 of 2

CX Posting No.: DOE-ID-INL-19-087

SECTION A. Project Title: Installation of pressure gauges on nitrogen supply bottles in TRA-670

SECTION B. Project Description and Purpose:

The Advanced Test Reactor (ATR) Vessel Vent System (VVS) operates during a Loss of Coolant Accident by relieving pressure in the primary coolant system (PCS) and allowing injection of firewater. The VVS utilizes instrument air pressure under normal circumstances, however, nitrogen gas supplied by pressurized bottles backup the system during a loss of instrument air. Check valves in the nitrogen gas to instrument air interface prevent the nitrogen gas from entering the instrument air system upon a loss of instrument air and direct nitrogen pressure to the VVS. The proposed action replaces the dial pressure indicators with digital gauges and installs instrument calibration valves on the Advanced Test Reactor backup nitrogen bottle pressure indicators to enable more precise reading during monitoring.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to contribute to air emissions through the following:

- Generating fugitive dust or other fugitive emissions.
- Emissions typical of cutting/grinding/welding are expected. The emissions from this activity are not considered construction of a new emissions source.

Disturbing Cultural or Biological Resources

Activities included in this EC have the potential to disturb cultural or biological resources as follows:

Maintaining or repairing facilities, structures, equipment or processes

TTRA-670/ATR, constructed in 1964, is eligible for listing on the National Register of Historic Places (NRHP) and is considered a Category 1 historic property. The Area of Potential Effect (APE) for the project consists of the interior of TRA-670/ATR; one historic property has been identified within or adjacent to the APE, TRA-670/ATR. The project activities are anticipated to have No Effect on the historic property within or adjacent to the APE; the project as described will maintain the historic use of the building. As such, the project may proceed as described without further cultural resource review.

Any change in project description or scope will require additional cultural resource review.

Generating and Managing Waste

Modification activities may generate a variety of waste. It is anticipated that the following types of waste could be generated:

- Industrial (non-hazardous, non-radioactive) waste includes typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and some metals.
- Hazardous wastes have the potential to be generated during maintenance operations on systems or equipment containing hazardous chemicals, or by
 using hazardous chemicals to clean or decontaminate equipment and systems. Hazardous metal waste (e.g., lead, electronics, brass, metal
 containing paints, etc.) may also be generated during maintenance work or by replacement of outdated equipment. Note: Lead has been
 encountered very infrequently (e.g., shielded cables).

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

Using, Reusing, and Conserving Natural Resources

All material will be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill when possible. Project personnel would use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible.

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)).

DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 2 of 2

CX Posting No.: DOE-ID-INL-19-087

References: 10 CFR 1021, Appendix B to Subpart D item B2.2 "Building and Equipment Instrumentation"

Justification: The proposed activities are consistent with 10 CFR 1021, Appendix B to Subpart D, item B2.2, "Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment)."

	Is the project funded by the American	Recovery and Reinvestment Act of 2009 (Recovery Act)	🗌 Yes 🛛 No
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Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 1/14/2020