

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: Removal of Modifications to ATR Control Room AC 670-HVA-2

### SECTION B. Project Description and Purpose:

The proposed work activity is to remove a recent modification from the Advanced Test Reactor (ATR) Control room air conditioner, 670-HVA-2. The modification, documented under EC INL-17-092, added four-inch branch ducts running from the supply duct of 670-HVA-2 to the individual Relay Cabinets (RC). Volume dampers were also added to each branch line to provide airflow control.

During a recent fire in the RC-3 cabinet, there was reason to believe that the airflow from the branch ducts into the RC cabinets interfered with fire suppression efforts. Therefore, since this modification did not have the desired impact and poses a potential safety hazard, the decision has been made to remove the modifications.

The proposed work will remove the branch ducts from 670-HVA-2 supply duct and the associated RC cabinets to return the cabinets back to their original design. Sheet metal plates will be used to cover the holes in the supply duct and RC cabinets.

### SECTION C. Environmental Aspects or Potential Sources of Impact:

#### Disturbing Cultural or Biological Resources

TRA-670 (Advanced Test Reactor), constructed in 1964, is eligible for listing on the National Register and is considered a Category 1 historic property. The Area of Potential Effect (APE) for the project includes the interior of TRA-670. The project activities as described in EC INL-19-176, Removal of Modifications to ATR Control Room AC 670-HVA-2, are exempt activities under routine maintenance and safety systems. No Adverse Effect are anticipated for historic properties within the project APE. The project may proceed as described without further cultural resource review.

#### Generating and Managing Waste

Project activities have the potential to generate a variety of waste. The following waste types are anticipated:

- Industrial (non-hazardous, non-radioactive) waste, including typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and some metals.
- Hazardous wastes, which 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.
- Polychlorinated Biphenyl (PCB) waste could be generated when performing maintenance associated with pre-1982 equipment/materials such as capacitors, lubricants/dielectric fluids, transformers/bushings, painted surfaces and other electrical equipment/components.

#### Releasing Contaminants

Although not anticipated, chemical use has a potential for small air emissions and spills.

#### Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would practice sustainable acquisition.

### 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 items 1.4, "Air conditioning systems for existing equipment" and 2.5 "Facility safety and environmental improvements"

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**Justification:** The proposed activity falls within the scope of 10 CFR 1021 Appendix B items 1.4, "Installation or modification of air conditioning systems required for temperature control for operation of existing equipment." and B2.5, "improvementsSafety 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 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)."

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: 1/13/20