

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Pad Installations at TRA-1710 and TRA- 605

SECTION B. Project Description and Purpose:

In 2012, Idaho National Laboratory (INL) proposed to move the low-level radioactive waste (LLW) stored on the pad at building Test Reactor Area (TRA)-617 to the smaller TRA-1710 Radioactive Materials Storage Area at the Advanced Test Reactor (ATR) Complex and no longer use TRA-617 (see environmental checklist [EC] INL-12-032). However, INL still stores LLW at the TRA-617 pad which is currently scheduled for decommissioning and demolition and needs to be replaced. The proposed action paves two locations to meet this need. The project constructs a 75' x 80' asphalt pad surrounded by a 6' chain link fence east of TRA-605 and adds an unfenced 50' x 102' (5,100 ft²) asphalt pad adjacent to TRA-1710. The total area of new pavement is about 11,100 ft². The pads at 1710 and 605 are both managed as less than Haz Cat 3 Radiological Facilities. None of the pads are associated with any treatment, storage and disposal, or RCRA permits. The replacement areas will store LLW generated from current ATR Complex operations, and the amount of LLW stored at the new and modified locations is expected to be consistent with current operations.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to generate fugitive dust.

Radioactive waste stored on the pads generates air emissions from radionuclides. Low-level waste emissions are tracked through the Integrated Waste Tracking System (IWTS) using waste container radionuclide inventories and using 40 CFR Part 61 Appendix D emission factors. These fugitive emissions are included in the INL Annual National Emission Standards for Hazardous Air Pollutants (NESHAP) Report for Radionuclides. Past years ATR Complex waste handling fugitive emissions have resulted in off-site dose rates significantly below 0.1 mrem/year and this would remain the case with the proposed project.

Disturbing Cultural or Biological Resources

Project activities have the potential to disturb biological and cultural resources.

Generating and Managing Waste

The proposed action generates industrial waste such as asphalt, wood, packaging materials, etc. Scrap metal from fencing will be recycled.

Waste stored at the replacement locations will be from existing ATR Complex Operations. This waste is characterized, stored, and disposed at the direction of Waste Generator Services (WGS) and according to company procedures. The amounts of radiological low level waste that will be generated at the ATR Complex are anticipated to be consistent with past operations.

Pollution prevention will be implemented where economically practicable to reduce the volume of waste generated.

Releasing Contaminants

Construction chemicals such as marking paint, fuels, lubricants, adhesives, paints, etc., will be used during the project. The subcontractor will submit chemical inventories and associated Safety Data Sheets through the vendor data system prior to bringing them to the INL. The Construction Chemical Coordinator will enter these chemicals into the INL Comply Plus chemical management system for tracking purposes.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility PEL. If the PEL 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 would be reused and/or recycled where economically practicable. All applicable waste would 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.

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

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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, item B6.6, "Modification of facilities for storing, packaging, and repacking waste" and item B6.10, "Upgraded or replacement waste storage facilities."

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, Item B6.6 "Modification (excluding increases in capacity) of an existing structure used for storing, packaging, or repacking waste other than high-level radioactive waste or spent nuclear fuel, to handle the same class of waste as currently handled at that structure;" and

Item B6.10 "Siting, construction, modification, expansion, operation, and decommissioning of a small upgraded or replacement facility (less than approximately 50,000 square feet in area) within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible) for storage of waste that is already at the site at the time the storage capacity is to be provided. These actions do not include the storage of high-level radioactive waste, spent nuclear fuel or any waste that requires special precautions to prevent nuclear criticality. (See also B6.4, B6.5, B6.6 of this appendix, and C16 of appendix C)."

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: 8/21/2019