

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: MFC-774 ZPPR Control Room Fire Sprinkler Modifications

SECTION B. Project Description and Purpose:

Modifications to the walls and ceiling in the office located within the Materials and Fuels Complex MFC-774 ZPPR control room have created the need to move and add fire water sprinkler heads to maintain sprinkler coverage. The sprinklers in the office are positioned several feet away from the ceiling, not meeting code. The small section of walled-off area on the west side of the office does not contain sprinklers; sprinklers need to be configured such that full coverage is achieved. These modifications require a modification to the fire sprinkler piping in the basement of MFC-774 (room B3A) to accommodate the new sprinkler heads. The Engineering Job specifically addresses the changes to sprinkler piping and sprinkler heads required to meet PRD-14401 requirements.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Disturbing Cultural or Biological Resources

MFC-774 (ZPPR Support Wing/Control Room), constructed in 1967, is eligible for listing on the National Register of Historic Properties (36 CFR 60) and is considered a Category 3 historic property (INL Cultural Resource Management Office 2016, 339). Modifications to may create impacts to the historic integrity of this property; however, the activities as described in EC INL-19-034 are exempt as Safety Systems (INL Cultural Resource Management Office 2016, 51). No effects are anticipated for historic properties within the area of potential effect (APE; 36 CFR 800.5). The project may proceed as described with no further cultural resource review.

Generating and Managing Waste

It is anticipated that project activities will generate industrial (non-hazardous, non-radioactive) metal waste from the sprinkler piping replacement. Potential waste materials will be evaluated for waste minimization prior to generation, and industrial waste generated during proposed activities will be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.

All solid waste will be managed by WGS using approved laboratory procedures.

Releasing Contaminants

All chemicals and associated Safety Data Sheets (SDS's) must be submitted in the vendor data system for approval. The Chemical Coordinator would track these chemicals in the INL Comply Plus Chemical Management System. Chemical use has a potential for small air emissions and spills. 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 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. The project would practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, and are non-toxic or less-toxic alternatives.

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: National Environmental Policy Act (NEPA) Implementing Procedures, finale Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B2.2 "Building and equipment instrumentation".

Justification: The proposed activities are consistent with CX 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

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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

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 3/25/2019