

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: EBR-I Brick and Drainage Repair

SECTION B. Project Description and Purpose:

The Experimental Breeder Reactor (EBR-I), building EBR-I-601, is missing a storm water drainage downspout on the south side of the building. This has resulted in inadequate storm water drainage that has damaged the building brick. The EBR-I Preservation Plan requires inspection and corrective action of the building drainage system and replacement of spalling brick and mortar when necessary. The proposed action replaces damaged bricks and installs a new storm water downspout. EBR-1 has been designated a National Historic Landmark, and, therefore, Idaho National Laboratory (INL) Cultural Resource Management personnel will approve the downspout. In addition, a subcontractor approved by the Idaho Preservation Society will be hired to replace damaged bricks and will use bricks left over from the last building renovation.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Disturbing Cultural or Biological Resources

EBR-I is listed on the National Register of Historic Places as a National Historic Landmark and is considered a Signature DOE historic property. Removal and/or changes of original features may adversely impact this historic property. Maintenance recommendations are outlined in the EBR-I Historic Preservation Plan; however, prior to implementing any project activities a cultural resource review of the proposed maintenance and materials must be completed. Contact Christina Olson (526-1692 or christina.olson@inl.gov) to initiate cultural resource review.

Generating and Managing Waste

Waste in the form of brick scrap and mortar and scrap metal may be generated.

Releasing Contaminants

Chemicals such as brick mortar, adhesives and paints may be used during the project.

Using, Reusing, and Conserving Natural Resources

Scrap metal will be diverted from landfill disposal and recycled to the extent practical.

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 Procedure, Final Rule, " 10 CFR 1020 Appendix B to Subpart D," Categorical Exclusions B1.3 "Routine maintenance" and B1.20 "Protection of cultural resources, fish and wildlife habitat."

Justification: The proposed activities are consistent with 10 CFR 1021, Appendix B1.3, "Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life).

Routine maintenance activities include, but are not limited to:

- a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses

**DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory**

- b) Door and window repair or replacement
- c) Wall, ceiling, or floor repair or replacement
- d) Reroofing
- e) Plumbing, electrical utility, lighting, and telephone service repair or replacement
- f) Routine replacement of high-efficiency particulate air filters
- g) Inspection and/or treatment of currently installed utility poles
- h) Repair of road embankments
- i) Repair or replacement of fire protection sprinkler systems
- j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces
- k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation)
- l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
- m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor
- n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes)
- o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors)
- p) Removal of debris;" and

B1.20, "Small-scale activities undertaken to protect cultural resources (such as fencing, labeling, and flagging) or to protect, restore, or improve fish and wildlife habitat, fish passage facilities (such as fish ladders and minor diversion channels), or fisheries. Such activities would be conducted in accordance with an existing natural or cultural resource plan, if any."

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: 8/29/2017