

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Repair of the North Radiography Station (NRS) Gamma Shield

SECTION B. Project Description and Purpose:

The North Radiography Gamma Station (NRS) at the Neutron Radiography Reactor (NRAD) is out of service (OOS). The gamma shield has failed to fully reposition and needs to be repaired. The proposed action would replace the gamma shield. The shield is located along the beam tube in a trench cut into the floor of the north side of the basement of the Hot Fuel Examination Facility (HFEF) in the Radiological Buffer Area (RBA). Removable shielding consisting of ferro-phosphorous ore mixed with probertite and placed in polyethelene bags, polyethylene slabs, paraffin, and lead bricks cover the trench. Accessing the gamma shield involves removing this shielding. The shielding will be put back in place following the proposed action. Degraded shielding bags found during the project will be replaced.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The proposed action has the potential to disturb asbestos containing material.

Disturbing Cultural or Biological Resources

MFC-785 (Hot Fuel Examination Facility) is eligible for nomination to the National Register of Historic Places and is considered a Category 2 historic property. Removal and/or changes of original features may adversely impact this historic property; however, the project activities are exempt and may proceed as described without further cultural resource review. The described project activities fall under exemptions 2 (routine maintenance activities) and 6 (safety systems) listed in Table 2 (Idaho National Laboratory Cultural Resource Management Office. Idaho National Laboratory Cultural Resource Management Plan. DOE/ID10997, revision 6, Idaho Falls, Idaho: U.S. Department of Energy, Idaho Operations Office, 2016, pg 51).

Generating and Managing Waste

Project activities will generate radioactive waste.

Lead waste could be generated.

Industrial waste may include typical waste such as scrap metal. Any scrap material, if generated, will be recycled or excessed to the extent practicable.

Polychlorinated biphenyl (PCB) bulk product waste may be generated from suspect PCB paint that is on the existing facility components.

Pollution prevention/waste minimization will be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated will be transferred to Waste Generator Services (WGS) for appropriate disposition.

Releasing Contaminants

All chemicals typically used in construction/maintenance, if used, will be managed in accordance with laboratory procedures. There is the potential for possible disturbance of suspect polychlorinated biphenyl (PCB) paint. Approved work controls will be in place to ensure that no releases occur during project activities.

Using, Reusing, and Conserving Natural Resources

All materials suitable for recycle such as scrap metal would be diverted from landfill disposal when practicable.

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)).

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References: 10 CFR 1021, Appendix B to Subpart D, B2.1 "Workplace enhancements"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B to Subpart D, B2.1 "Modifications within or contiguous to an existing structure, in a previously disturbed or developed area, to enhance workplace habitability (including, but not limited to, installation or improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation, and noise reduction)."

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: 5/08/2017