

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Hot Fuel Examination Facility (HFEF)-Irradiated Materials Characterization Laboratory (IMCL) Shielded Container Material Transfer Station

SECTION B. Project Description and Purpose:

Time and Cost efficient materials transfers between the Irradiated Materials Characterization Laboratory (IMCL) and the Hot Fuel Examination Facility (HFEF) at the Materials and Fuels Complex (MFC) building MFC-785 are needed. To address this need, the proposed action would modify the west and south walls in the HFEF hot repair area to facilitate transfer of materials between the IMCL shielded container and HFEF Hot Cells. Manipulators will be installed above the south wall window of the hot repair area, and an approximate 6 ft. x 5 ft. penetration will be constructed in the west wall of the hot repair area for connection of the IMCL shielded container. The hot repair area is a radiological contamination area, and construction activities in the hot repair area have the potential to generate radioactive waste.

All penetrations will be oversized, and equipment will be grouted into the wall. The following activities are part of the proposed action:

- Remove, rearrange, and install lead shielding
- Anchor items to the floor
- Reroute electrical conduit and wire
- Install new electrical and instrumentation connections
- Install a false floor
- Paint as needed
- Seal penetrations.

A steel shield plug will be used to shield the penetration when the shielded container is not in place.

It is anticipated that work could start as early as July 2017 and end as late as July 2018. Cost is approximately \$2,000,000.

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
- HFEF (MFC-785) is eligible for nomination to the National Register of Historic Places. Prior to beginning work, obtain cultural/historical resource review by contacting Christina Olson (526-1692). Approval must be demonstrated by written communication from this organization prior to beginning work, and any instructions contained in the review must be followed.

Generating and Managing Waste

- Project activities have the potential to generate approximately 30 ft³ of radioactive waste from constructing a wall penetration in the hot repair area.
- Lead waste could also 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

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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: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B1.31 "Installation or relocation of machinery and equipment."

Justification: The proposed activities are consistent with CX B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts."

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: 1/17/2017