

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Removal of Out of Service (OOS) Equipment and Installation of high-efficiency particulate air (HEPA) Filter in Test Reactor Area (TRA)-670 Pump Test Room

SECTION B. Project Description:

The room commonly called the Pump Test Loop is located in TRA-670 on the south side of the First Basement and just west of the Dry Transfer Cubicle (DTC). The room's lower level contains out of service (OOS) equipment that supported testing of Advanced Test Reactor (ATR) Loop pumps. The proposed action would remove the OOS equipment and prepare the room for installation of permanent HEPA filter housing into the DTC exhaust ventilation system. Equipment to be removed includes a heat exchanger, pump, accumulators, piping, tubing, glovebox, instrumentation and associated cabinets, valves, pipe supports, conduit, electrical conduit, etc. A general cleanup of the area would be performed with the target of releasing the contamination area. The project would include replacing the temporary HEPA filter, 670-HEPA-1735, with a maintenance friendly Bag-In Bag-Out HEPA Housing with sections for testing, prefilter and HEPA filters.

Projected Start Date: June 2015

Projected End Date: July 2015

Estimated Cost: Approximately \$12,500.00



SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions – Emissions typical of cutting/grinding/welding are expected. The emissions from this activity are not considered construction of a new stationary emission source.

There is a potential for disturbing regulated asbestos containing material (RACM). All asbestos work must be conducted by properly trained personnel using appropriate abatement methods. Quantities of asbestos to be disturbed will be communicated to the Construction Environmental Support and Services (ES&S) representative in order to file the Asbestos Removal Notification Form (450.04). Asbestos work will not take place until the project has received approval from the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) Technical Point of Contact (TPOC).

Disturbing Cultural or Biological Resources - TRA-670 is eligible for nomination to the National Register of Historic Places and removal and/or changes of original features could adversely impact this historic property. 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.

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Generating and Managing Waste - This activity has the potential to generate Resource Conservation and Recovery Act (RCRA) hazardous waste and waste from a radiological contamination area that would need to be managed according to laboratory procedures. Pollution prevention/waste minimization would be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated would be transferred to Waste Generator Services (WGS) for appropriate disposition. All waste generated from these activities must have an identified disposition path prior to generation.

There is the potential for possible disturbance of suspect polychlorinated biphenyl (PCB) paint. Approved work controls would be in place to ensure that no releases occur during project activities.

Releasing Contaminants – Chemicals typically used in construction/maintenance would be managed in accordance with laboratory procedures.

Using, Reusing, and Conserving Natural Resources - All material would 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 (see <https://sftool.gov/green-products/0?agency=7>).

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): 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: 10 CFR 1021, Appendix B, B2.5 "Facility safety and environmental improvements"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B2.5 "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground and belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) Yes No

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 5/19/2015