

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Replacement of Man Hole Covers Test Reactor Area (TRA)-Confined Space (CS)-051 and TRA-CS-091

SECTION B. Project Description:

Entrances for confined spaces TRA-CS-051 and TRA-CS-091 are enclosed with flat metal covers which tend to freeze during the winter. The valves in these confined spaces are required to be checked daily, and removing the cover when frozen presents a safety hazard. The proposed work scope is to replace the covers with new type E roof hatch covers. The new hatch covers provide several new features including, but not limited to, the following:

1. Compression spring operators to provide smooth, easy, one-hand operation
2. Automatic hold-open arm that locks the cover in the open position to ensure safe egress
3. Fully insulated cover and curb to ensure weather tightness and energy efficiency
4. Heavy gauge construction and positive latching mechanism to help maintain building security.

In addition to a new cover hatch, a LadderUP® Safety Post would be installed in TRA-CS-091 to provide easier, safer ladder access. Work would consist of installing concrete anchors in the precast concrete to mount the hatch covers and install the ladder assist handle.

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.

Disturbing Cultural or Biological Resources - Although changes to original features associated with TRA-CS-051 will create impacts to the view shed of properties eligible for nomination to the National Register of Historic Places, the project as described is an exempt activity ("INL Cultural Resource Management Plan" Table 2, exemption 6 [Department of Energy Idaho Operations (DOE/ID)-10997 rev. 5]), and as such may proceed without further cultural review.

Generating and Managing Waste - All waste generated from this activity will be managed in accordance with laboratory procedures. 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 will be managed in accordance with laboratory procedures. Polychlorinated Biphenyl (PCB) contamination is not anticipated, however, contamination control methods may be required if disturbing painted surfaces.

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. New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (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 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: 3/31/2015