

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: 2A, 2B, 2D, and 1D Pressurizer Seismic Upgrades

SECTION B. Project Description

The loop pressurizers in cubicles 2A, 2B, 2D, and 1D located in Test Reactor Area (TRA)-670 have been found to be inadequate to meet the desired seismic requirements. In order to seismically qualify these pressurizers to meet current seismic criteria a modification will be needed. This modification may require the removal of asbestos insulation in order to access the pressurizer support legs. The modification may also require the electrical to be ripped out and modified to bring it up to date with new code requirements. There will be new seismic legs fabricated and installed on the existing pressurizer support legs. Since the bottom support legs are carbon steel and painted, it is possible paint will need to be removed in order to install the new seismic legs. The new seismic legs will either be bolted or welded to the existing support legs and will be anchored to the concrete floor.

Projected Start Date: December of 2014
Projected End Date: December of 2015
Estimated Cost: Approximately \$300,000

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions: Emissions typical of welding are expected. The welding emissions from the proposed action 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. The project as described is exempted from cultural resource review (Idaho National Laboratory [INL] Cultural Resources Management Plan, Table 2, exemption 6 [Department of Energy Idaho Operations Office (DOE/ID)-10997 rev. 5]). Therefore, the project may proceed as planned.

Generating and Managing Waste: The work being performed will be conducted in a contamination area and a high radiation area. All waste will be transferred to Waste Generator Services (WGS) for proper disposition. Asbestos and/or lead based paint and polychlorinated biphenyls (PCBs) may have been used in the construction of the facility and could be disturbed by construction activities. Approved work controls will be in place to ensure that no airborne release of asbestos and lead will occur during removal activities. Project personnel will work with WGS to properly characterize, store, and dispose all waste according to established waste streams and laboratory procedures.

Releasing Contaminants: All chemicals utilized by this activity will be managed in accordance with laboratory procedures.

Using, Reusing, and Conserving Natural Resources: All materials would be reused and/or recycled where economically practicable and as accepted by the customer. All applicable waste would be diverted from disposal in the landfill where conditions allow. New equipment would meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <https://sftool.gov/green-products/0/hvacmechanical?agency=0>). In addition, 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, or are non-toxic or less-toxic alternatives. Such purchases could include hydraulic fluid in accordance with BioPreferred requirements (<https://sftool.gov/green-products/0/lube-oil-hydraulic-fluid-grease?agency=0>).

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 Code of Federal Regulations (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"

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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: 11/13/2014