

DOE-ID-NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Hot Fuels and Examination Facility (HFEF) Documented Safety Analysis (DSA) Implementation Tasks

SECTION B. Project Description:

The Hot Fuels Examination Facility (HFEF) (MFC-785) Documented Safety Analysis (DSA) was upgraded in compliance with DOE-STD-3009 to verify that facility operations could be conducted without undue risk to the public or MFC personnel. The full implementation of the DSA requires procedure and software modifications and implementation of the following four tasks:

Task 1: Oxygen Analyzer - The oxygen analyzer is used to verify continued argon atmosphere in the HFEF main cell. There is an existing oxygen analyzer on the system which would be replaced with a new analyzer. This action is part of a Safety Significant System, Structure, and Component (SSC) per the upgraded DSA. The new oxygen analyzer will be a Quality Level II item. The system would tie into existing exhaust and sampling systems at HFEF that were used by the original oxygen analyzer.

Task 2 - Networked Balance - HFEF uses scales or balances to determine the mass of objects and samples. A balance that is electronically tied to the network would be installed in the main cell to determine the mass of small samples. The balance would be able to transfer information to the Materials Tracking system.

Task 3 - Halon removal and wet sprinkler installation - Within the Neutron Radiography Reactor (NRAD) control room, the Halon fire suppression system would be removed and replaced with conventional water sprinklers supplied by the system that presently exists in HFEF. Drawings are INL 782428, 782429, 782430 and a construction spec SPC-1702, MFC-785 NRAD Control Room Halon Removal.

Task 4 -Trailer lease and removal at end of 2 year lease - In support of the DSA implementation, an agreement has been made with CH2M-WG Idaho, LLC (CWI) to take over the lease of a personnel office trailer presently at the Materials and Fuels Complex owned by Pacific Mobile. The trailer has power and data connections but no water or sewer services. At the present time it is undetermined if at the end of the lease, the trailer would be leased back to CWI or decommissioned and disassembled or returned to Pacific Mobile.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions: There is a possibility for disturbance of asbestos containing building materials. All asbestos work must be conducted by properly trained personnel using appropriate abatement methods.

Disturbing Cultural or Biological Resources: HFEF (MFC-785) is eligible for nomination to the National Register of Historic Places. The activities described in tasks 1, 2, and 3 are exempted from cultural resource review ("INL Cultural Resource Management Plan" Table 2, exemptions 6 and 8; Table 1, exemption 7, DOE/ID-10997 rev. 5). Therefore, the project could proceed as described without further cultural resource review.

Generating and Managing Waste: The installation of the new oxygen analyzer, networked balance and wet sprinkler system and the removal of the Halon-1301 fire suppression system would generate both industrial and radioactive low-level waste. Project personnel will work with Waste Generator Services (WGS) to properly dispose of industrial and radioactive low-level wastes. Waste determination and disposition forms (WDDF's) are already established for both industrial and radioactive low-level waste streams at HFEF. The removed Halon-1301 cylinders will be transferred to the Central Facilities Area and retained for future use.

Releasing Contaminants: Typical construction chemicals such as fuels, adhesives, lubricants, paints, etc. would be used on the project. The Subcontractor would enter all chemicals and associated MSDS's in the vendor data system for approval. The Construction Chemical Coordinator would track these chemicals in the INL Comply Plus Chemical Management System. Chemical use has a potential for small amounts of air emission and spills. Any spills that occur from these chemicals would be reported to the Spill Notification Team and would be cleaned up by the subcontractor.

PCB contamination is not anticipated, however contamination control methods may be required if disturbing painted surfaces inside HFEF.

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 <http://www.sftool.gov/GreenProcurement/ProductCategory/14>). 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.

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

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construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; 3) disturb hazardous substances, pollutants, contaminants, or 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 which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: 10 CFR 1021, Appendix B to Subpart D item B2.5, "Facility safety and environmental improvements".

Justification: The proposed action is consistent with 10 CFR 1021, Appendix B to Subpart D categorical exclusion 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 or 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 of 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: 5/21/20144