

**DOE-ID-NEPA CX DETERMINATION
IDAHO NATIONAL LABORATORY**

SECTION A. Project Title: ZPPR Surveillance Glovebox

SECTION B. Project Description:

The purpose of the proposed action is to limit exposure hazards and better contain airborne hazards, beyond current capabilities, associated with performing surveillance, characterization, and repackaging activities for transuranic materials in the Zero Power Physics Reactor (ZPPR) workroom hoods. In order to meet this purpose and need, the Transuranic Surveillance Glovebox (TSG) would be installed. This equipment would replace one of the existing hoods used to open secondary containers of radiological material and inspect the condition of the primary packages.

This activity is being done to address safety issues associated with the hoods and does not change or modify the scope or quantity of work being done. The current scope of work for the hoods, which would be conducted in the TSG, involves inspection, packaging, and storage activities associated with the existing inventory of nuclear materials. Any project proposed for the glovebox outside of this scope of work would be required to submit an additional environmental checklist.

The ZPPR Surveillance Glovebox project includes the installation of the glovebox and attached radiological fume hood, their appurtenances, and facility interfaces, and facility modifications required to provide the glovebox and hood the required utilities, such as inert gas and ventilation exhaust. The project scope includes removal of existing ZPPR hoods (north), and the design, fabrication, and installation of the new glovebox system.

SECTION C. Environmental Aspects / Potential Sources of Impact:

Air emissions: Activities in the glovebox could generate radionuclide emissions. However, installation of the glovebox would not result in a change in scope or potential emissions since the glovebox would replace hoods in which the same activities have occurred. With no change in scope or increase in emissions, no further air permitting determination needs to be done.

There is a possibility that materials containing asbestos could be disturbed. All work on asbestos containing building materials would be performed by properly trained personnel. If the scope of work specified in the work package identifies an amount of regulated asbestos-containing material (RACM) to be removed that equals or exceeds the threshold quantity (260 linear feet on pipes / 160 square feet on other facility components / 35 cubic feet on facility components where the length or area could not be measured previously) specified in 40 CFR 61.145, contact the Asbestos Coordinator and provide the necessary information for completion of a 10-Day Demolition or Renovation Notification. Instructions provided in LWP-8000 Section 4.3 will be implemented where applicable.

Disturbing Cultural / Biological Resources: As described, this project will impact an INL historic property. However, the impact would not be adverse and may proceed as planned without further cultural resource review.

Generating and Managing Waste: Installation activities could generate industrial waste. Activities in the glovebox could generate radioactive waste. Radioactive waste forms would include gloves, swipes for radiological detection, cleaning rags, and other supplies used to clean the glovebox. All waste generated from this activity would be managed in accordance with company procedure. Pollution prevention would be implemented where economically practicable to reduce the volume of waste. All waste would be transferred to WGS for appropriate disposition.

Releasing Contaminants: The glovebox would replace existing hoods resulting in better contaminant containment of potential releases.

SECTION D. 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.

Note: 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, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment 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) adversely affect environmentally sensitive resources. 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: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule. 10 CFR 1020 Appendix B to Subpart D, Categorical Exclusion B2.5 "Facility safety and environmental improvements" effective November 14, 2011.

Justification: Project activities in this EC are 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...facility air filtration systems."

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: 7/9/2012