

**SECTION A. Project Title:** EBR-I Post Season Maintenance 2024

**SECTION B. Project Description and Purpose:**

Scope of Work: EBR-I 2024 Post-Season Maintenance

During a walkdown of EBR-I on 14 October 2024 to determine post-season maintenance needs, the following work was identified as necessary to maintain or improve conditions for the public following the Summer 2024 season. All work is being done under Maintenance Work Request (MWR) 2024-7842.

EBR-I Interior Maintenance:

- Rewire plug to the four lightbulbs: Tours reports that the wires to the plug have frayed and wires are exposed. Replace plug component and rewire as necessary. This is not an original component of the building.
- Adjust door closer on the north door of the mezzanine classroom: Tours reports that the door will no longer stay open. Adjust tension on the door closer to enable this functionality. (Figure 1)



Figure 1. South door in classroom.

- UV Film on Mezzanine Windows: The UV film on the windows located on the mezzanine level appears to have reached the end of its useful life and is beginning to crack, peel, and flake. Remove the current film, being cautious not to damage the panes or disturb the glazing. (Note: original glazing compound may contain asbestos.) Replace UV film with similar product. New film should offer

adequate UV protection while being minimally visible and should be easily removable. Final product choice will be confirmed with CRMO before installation. (Figure 2)



Figure 2. Windows in classroom with failing UV film.

- Reinstall logbook stand in Control Room: Display case formerly used for the Zinn Journal was removed to allow Archives to retrieve the journal. Reinstall the display case in the metal frame without plexiglass cover to allow guest access to a reproduction journal. (Figure 3)



Figure 3. Frame for logbook display in Control Room.

- Turbine Deck carpeting: The green carpeting around the turbine and the generator prevents life safety events as it encloses metal grate flooring, but is not historically accurate. Replace green carpet with a low-profile or low-shag flooring material that matches or is close in color to the surrounding concrete floor and does not require permanent installation. Confirm final product choice with CRMO before installation. (Figure 4)



Figure 4. Green carpet in Turbine Area.

- Handrails: Handrails on the stairs between the main floor and the mezzanine are showing signs of wear. Clean by the gentlest means possible. If wear extends beyond built up dirt, repainting may be necessary. Contact CRMO to confirm paint match. (Figure 5)



Figure 5. Stair in northwest corner of low bay, showing paint loss.

- Hot Cell Display Contents: Several non-historic display items were placed in the hot cell at an unknown time. Several of these, namely flasks filled with colored liquids, are showing signs of deterioration. Remove non-historic contents. Coordination with RadCon and WGS will be necessary to open the hot cell and dispose of contents appropriately.
- South Door Weatherstripping: The weatherstripping on the bottom of the south overhead door (by the hot cell) has deteriorated to the point that light is visible beneath the door. Water staining in the area indicates that water intrusion has also occurred in this location in the past. Replace weatherstripping with a product that will prevent water and wildlife intrusion and is minimally invasive. (Figure 6)



Figure 6. North door of Hot Cell Area.

- Annex Women's Restroom: Door to the stall in the restroom sticks on opening/closing and the receiver is misaligned with the slider. Repair as practical. These doors are not original to the building, but were installed in 1980. (Figure 6)



Figure 7. Annex Women's Restroom.

- Light Switch Indicators: Several of the original light switches on the main floor have indicators that illuminate when in the “on” position. The indicators are comprised of a red lens and a small bulb behind. Several of these bulbs have burned out over time. Remove faceplates, being careful not to damage the red lens. Replace the bulbs behind. Reinstall face plates. (Figure 4)



Figure 8. Light switch with burned out indicator.

- Repair Paint over Washroom: The red paint on the reactor floor that indicates the area of the Washroom beneath had deteriorated to the point several large areas are missing. Repair paint with matching color. Confirm color choice with CRMO prior to work. Before work begins, assess for possible lead paint and fixed contamination. (Figure 9)





Figure 9. Area over Wash Room showing paint loss.

Exterior Maintenance:

- Repair Fencing: the fencing panels have come detached at several locations along the parking lot. Reaffix panels and repair as necessary. (Figure 10)



Figure 10. Current condition of fencing.

**SECTION C. Environmental Aspects or Potential Sources of Impact:**

**Air Emissions**

NA

**Discharging to Surface-, Storm-, or Ground Water**

NA

**Disturbing Cultural or Biological Resources**

Cultural: A Section 106 review was completed under CRMO project number (BEA-25-020) and resulted in No Historic Properties Affected. Please refer to the Cultural Resource Review (CRR) (BEA-25-020) for details or Hold Points and Project Specific Instructions of the ECP.

**Generating and Managing Waste**

When wastes are generated, how they are disposed can adversely affect the environment. Managing wastes appropriately and responsibly and implementing recycling or reuse practices, where feasible, during project activities can reduce the potential impact on the environment.

Polychlorinated Biphenyl (PCB) waste could be generated when work activities involve structures or buildings built before 1982 (e.g., painted surfaces, caulking, adhesives, rubber gaskets, joint sealer, cable/wire insulation, ventilation duct gaskets or insulation).

**Releasing Contaminants**

When chemicals are used during the project there is the potential for spills that could impact the environment (air, water, soil).

**Using, Reusing, and Conserving Natural Resources**

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Project description indicates materials will need to be purchased or used that require sourcing materials from the environment. Being conscientious about the types of materials used could reduce the impact to our natural resources.

**Environmental Justice**

NA

**SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification:** 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:** B1.3 "Routine maintenance"

**Justification:** Based on the purpose and need and description of the proposed action and potential environmental impacts, the proposed action fits within the class of actions that is listed in Appendix B CX B1.3. There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal. The proposed action has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)) and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

Authorizing the proposed action will not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive orders; (2) require siting of new facilities or expansion of existing facilities; (3) disturb hazardous substances, pollutants, or contaminants; (4) adversely affect environmentally sensitive resources; or (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

B1.3 Routine maintenance. Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:(a)Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;(b)Door and window repair or replacement;(c)Wall, ceiling, or floor repair or replacement;(d)Reroofing;(e)Plumbing, electrical utility, lighting, and telephone service repair or replacement;(f)Routine replacement of high-efficiency particulate air filters;(g)Inspection and/or treatment of currently installed utility poles;(h)Repair of road embankments;(i)Repair or replacement of fire protection sprinkler systems;(j)Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;(k)Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);(l)Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;(m)Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use/Prohibitions) or its successor;(n)Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);(o)Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and(p)Removal of debris.

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

Approved by Robert Douglas Herzog, DOE-ID NEPA Compliance Officer on: 2/18/2025