

**U.S. Department of Energy- Idaho Operations Office
National Environmental Policy Act
Categorical Exclusion Determination**

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Categorical Exclusion Posting No.: DOE-ID-INL-25-033

Project Title: Oklo Limited Construction Activities

Project Description and Purpose:

Proposed Action

The U.S. Department of Energy Idaho Operations Office is proposing to allow Oklo Inc. (Oklo) to site The Aurora Powerhouse facility and reactor at the Idaho National Laboratory (INL). The Aurora Powerhouse is a compact fast reactor.

The Department of Energy (DOE) is reviewing the potential environmental impacts of the early-stage, non-nuclear work described in this document. In preparation for the future construction of the Aurora Powerhouse, Oklo will manage the limited construction activities that will occur at INL. These activities include clearing and grading the site, installing utilities and infrastructure, constructing support buildings, and performing excavation work.

Construction activities will take place on a 40-acre site located south of INL's Materials and Fuels Complex and north of U.S. Highway 20. The proposed work included in this document is expected to begin as early as fall 2025 and may continue for up to three years. The total area that may be temporarily disturbed during this period is 95 acres, although the final operational footprint is expected to be approximately 20 acres.

Description of Construction Activities

This document covers the full scope of non-nuclear construction activities that Oklo Inc. plans to perform at the Aurora Powerhouse site at the INL. These activities are intended to prepare the site for future construction of a reactor. No reactor components will be installed or constructed under this permit.

The following activities are included in the scope of this review:

Site Clearing and Grading

Clearing of vegetation and grading of the entire 40-acre site to prepare for infrastructure installation and construction staging.

Access and Internal Roads

Construction of permanent and temporary access roads to and within the site, including improvements to ingress/egress points from Taylor Boulevard (e.g., widening, turn lanes, culverts, paving).

Parking Areas

Construction of permanent and temporary parking lots to support workforce and construction logistics.

Stormwater and Water Discharge Management Systems

Installation of temporary and permanent systems to manage stormwater and other water discharges, including berms, culverts, swales, and drainpipes.

Water Chemistry Control Systems

Installation of systems to manage water quality for construction-related uses.

Water Storage and Distribution Systems

Installation of temporary and permanent water storage tanks and distribution lines to support potable water, dust suppression, fire protection, and concrete cooling.

Air-Cooled Condensers (ACCs)

Construction of the air-cooled condenser system, including foundations and structural components.

Electrical Switchyard

Installation of temporary and permanent electrical switchyard infrastructure to support site construction and operations.

Power Distribution Center

Power distribution Center including foundations and structural components.

Maintenance Building

Construction of the maintenance building, including all work necessary to obtain a Certificate of Occupancy.

Turbine Building and Annex

Construction of the turbine building and annex, including foundations and structural components. This would not include installation of safety Structures, Systems, and Components.

Reactor and Administrative Building Excavation

Excavation of the reactor and administrative building footprint and installation of temporary support systems within the excavation.

Temporary Structures

Installation of temporary facilities such as office trailers, storage units, portable toilets (10–30 units), and temporary laydown areas.

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Temporary Power and Fuel Systems

Use of portable diesel generators for temporary power (less than one year in a single location), and installation of temporary fuel storage tanks for refueling vehicles and equipment.

Utility Installation

Installation of utility services including water, septic, electrical, and data/communications systems (e.g., fiber optic lines, WiFi). This does not include the installation of transmission lines to or from the facility.

Signage and Security Infrastructure

Installation of commercial signage, fencing, vehicle barriers, and safety/security systems.

Waste Management and Environmental Controls

Implementation of best management practices for handling construction waste, hazardous materials, and air emissions. Waste will be managed in accordance with applicable federal, state, and local regulations.

Unexploded Ordnance (UXO) Clearance

Removal and clearance of UXO materials identified during site characterization, in accordance with MRAAN-2024-09 and related procedures.

Location

All limited construction activities will take place on a 40-acre site located at INL, south of the Materials and Fuels Complex (MFC) and north of U.S. Highway 20 (Figures 1 and 2).

Although the designated site is 40 acres, the total area that may be temporarily disturbed during preconstruction is up to 95 acres. (See figure 2) This includes space for laydown areas, temporary structures, and utility corridors.

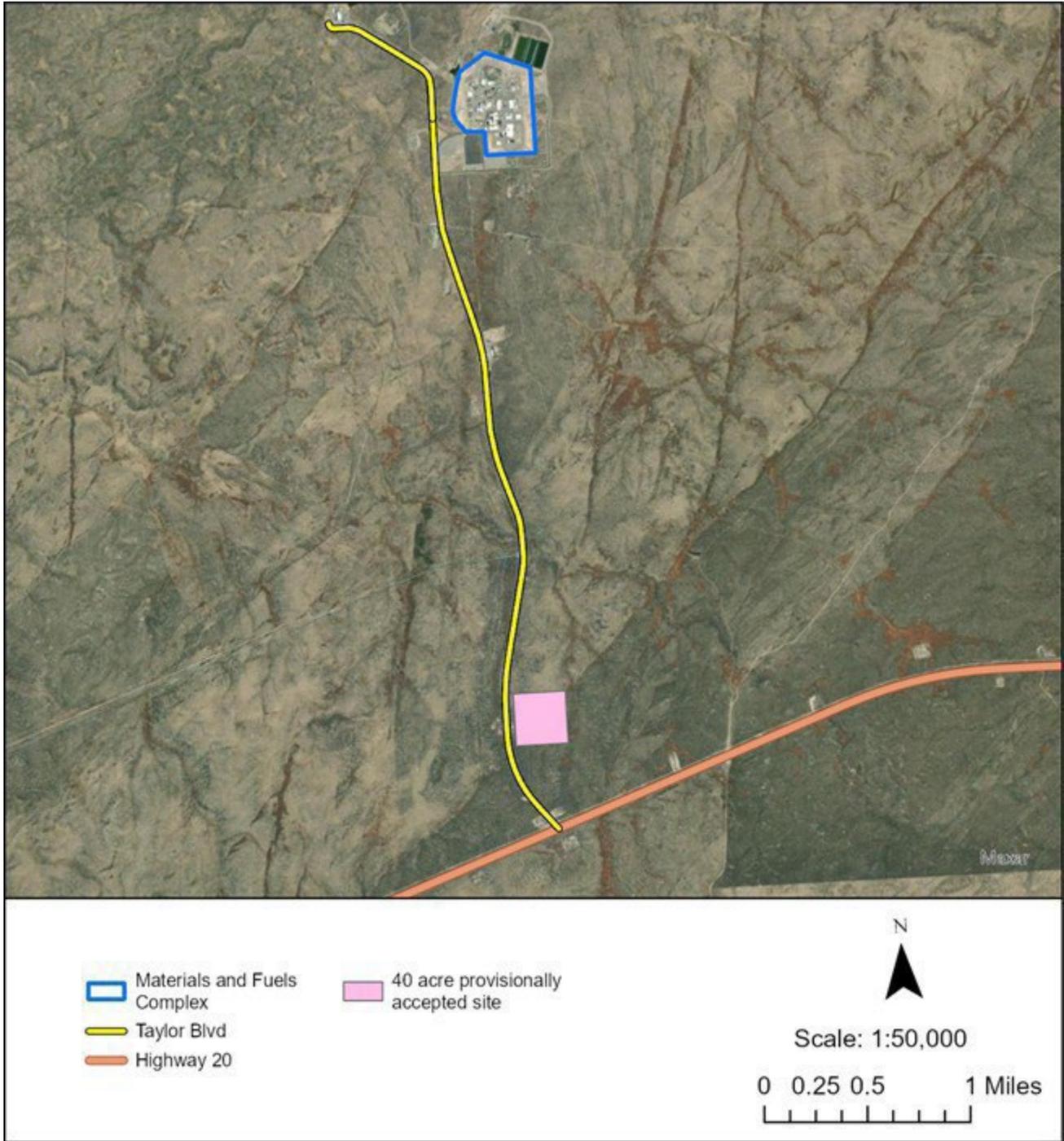


Figure 1: Location of Aurora INL Site in relation to MFC.

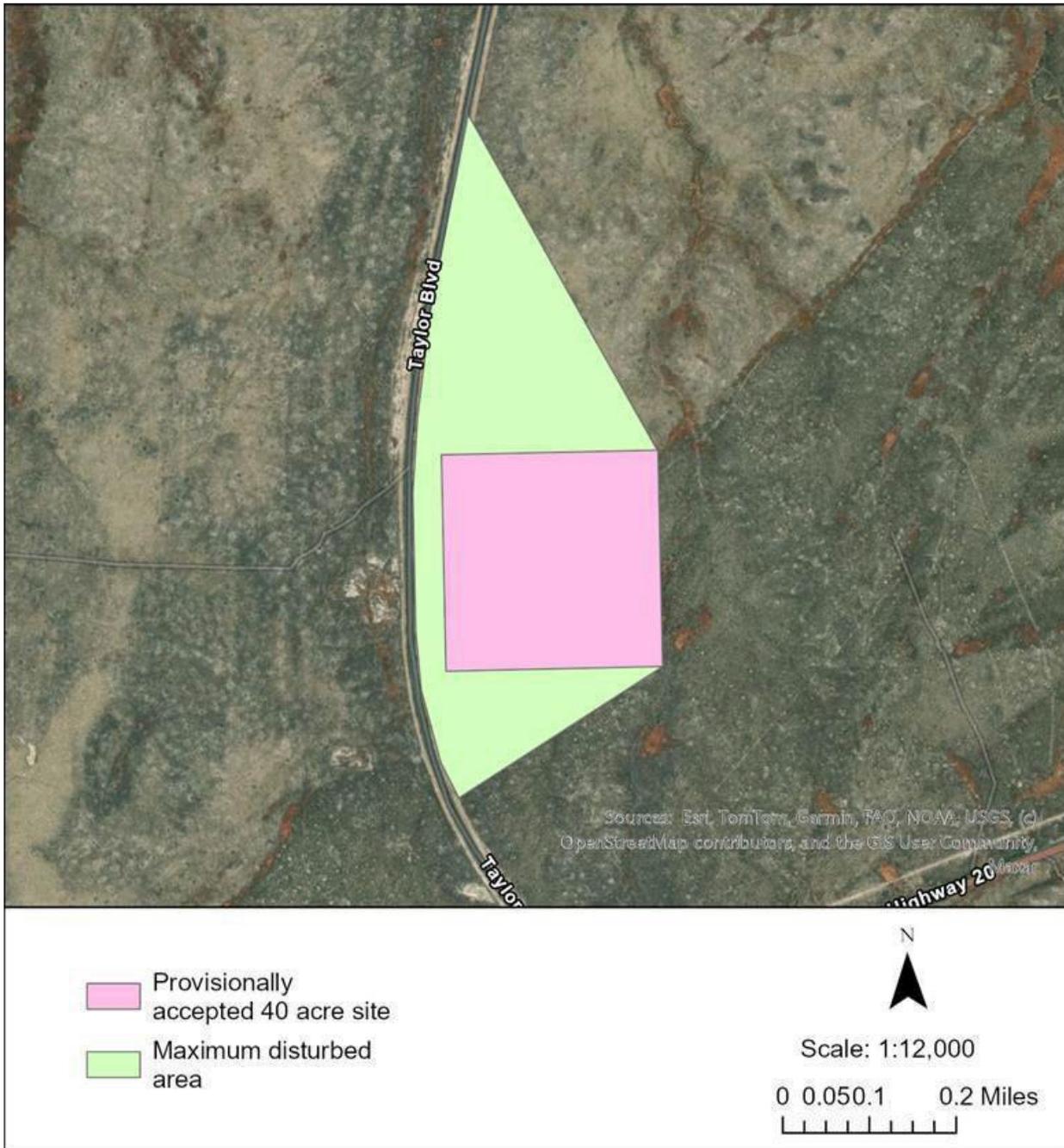


Figure 2: Maximum disturbed area for construction, with significantly less than the pink area anticipated for operating footprint.

Bounding Conditions

This document defines the complete scope of construction activities being reviewed by the U.S. Department of Energy (DOE) under the National Environmental Policy Act (NEPA). The scope of this NEPA review is limited to construction activities listed in this document.

Any changes to the scope, location, or methods of work that fall outside what is described in this document will require additional NEPA review and approval by DOE prior to implementation.

Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities are likely to result in fugitive dust emissions as well as emissions from vehicles and portable emissions sources such as generators. These emissions are considered temporary as they are generated from the construction activities, as a result they will not be rolled into

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INL's site-wide emissions, and not part for the PTC-FEC. The combustion sources of mobile equipment and temporary generators (in one location for less than 12 months) are exempt from permitting requirements.

The INL Site is in attainment for all U.S. National Ambient Air Quality Standards (NAAQS).

Discharging to Surface-, Storm-, or Ground Water

The septic system and potential industrial wastewater reuse systems will require permits from the appropriate State agencies.

Disturbing Cultural or Biological Resources

There is the potential for this work to impact vegetation and for project personnel to interact with various wildlife species. A Biological Resource Review will be arranged within two weeks prior to the initiation of any activities that might disturb soil or vegetation and again following completion of project activities. A nesting bird survey is included with the Biological Resource Review for actions occurring between April 1 - October 1 per compliance with the Migratory Bird Treaty Act. Bat surveys are also included with the Biological Resource Review in accordance with the INL Bat Protection Plan.

CULTURAL: A Section 106 review was completed for the preconstruction activities under CRMO project number (BEA-25-078), followed by a revision for updated construction plans (BEA-25-078_R1), and resulted in No Adverse Effect. Project-specific consultation is not required for this project. Please refer to Holds Points and Project Specific Instructions of the ECP.

Generating and Managing Waste

This project has the potential to generate waste and/or contaminants.

Releasing Contaminants

NA

Using, Reusing, and Conserving Natural Resources

NA

Determination

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); (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Appendix B. The proposal has not been segmented to meet the definition of a categorical exclusion. Segmentation can occur when a proposal is broken down into small parts in order to avoid the appearance of significance of the total action. However, segmentation does not include proposals that are developed and potentially implemented over multiple phases where each phase results in a decision whether to proceed to the subsequent phase. There is no extraordinary circumstance related to the proposal that is likely to cause a reasonably foreseeable significant adverse effect or for which DOE does not know the environmental effect. Extraordinary circumstances are unique situations presented by specific proposals, including, but not limited to, scientific controversy about the environmental effects of the proposal; uncertain effects or effects involving unique or unknown risks; and unresolved conflicts concerning alternative uses of available resources.

References: B3.6 "Small-scale research and development, laboratory operations, and pilot projects"

Justification: For the DOE procedures regarding categorical exclusions, including the full text of each categorical exclusion, see 10 CFR 1021.102 and Appendix B to 10 CFR Part 1021, and also Section 5.4 (Applying one or more categorical exclusions to a proposal) and Appendices B and C of

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DOE's National Environmental Policy Act Implementing Procedures (June 30, 2025). Requirements and guidance in 10 CFR 1021.102 and DOE's National Environmental Policy Act Implementing Procedures: (See full text in regulation and in Implementing Procedures).

The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures (June 30, 2025). To fit within the classes of actions listed in Appendix B to 10 CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures.

There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. DOE or an applicant may modify the proposal to avoid reasonably foreseeable adverse significant effects such that the categorical exclusion would apply.

The proposal has not been segmented to meet the definition of a categorical exclusion.

[Note: For proposals that fit within the categorical exclusions listed in Appendix C of DOE's NEPA Implementing Procedures, see DOE's notice of adoption for the subject Appendix C categorical exclusion for additional considerations. DOE notices of adoption for other agency categorical exclusions may be found on DOE's Section 109 webpage.]

B3.6 Small-scale research and development, laboratory operations, and pilot projects. Siting, construction, modification, operation, and decommissioning of facilities for small-scale research and development projects; conventional laboratory operations (such as preparation of chemical standards and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a concept before demonstration actions, provided that construction or modification would be within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible). Not included in this category are demonstration actions, meaning actions that are undertaken at a scale to show whether a technology would be viable on a larger scale and suitable for commercial deployment.

Approved by Jason L Anderson, DOE-ID NEPA Compliance Officer on: 9/15/2025