

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

**Project Title:** Oklo Limited Construction Activities Rev 1

**Project Description and Purpose:**

**Revision 1:**

This ECP revision is based on Oklo requesting to spread soil in two areas as needed. There are two locations identified, On site and Medal of Honor Highway (MOH) and because the decision where to spread the soil is not yet known, both locations have been reviewed. Oklo will provide information regarding the amounts of soil moved and the location it was moved to after said soil moving activities have been completed. There are no known or expected contaminants in the soil. The two locations are identified in the maps below. The location at the facility site is identified the red rectangle to the east labeled "Non-Used Property (10 Acres)".

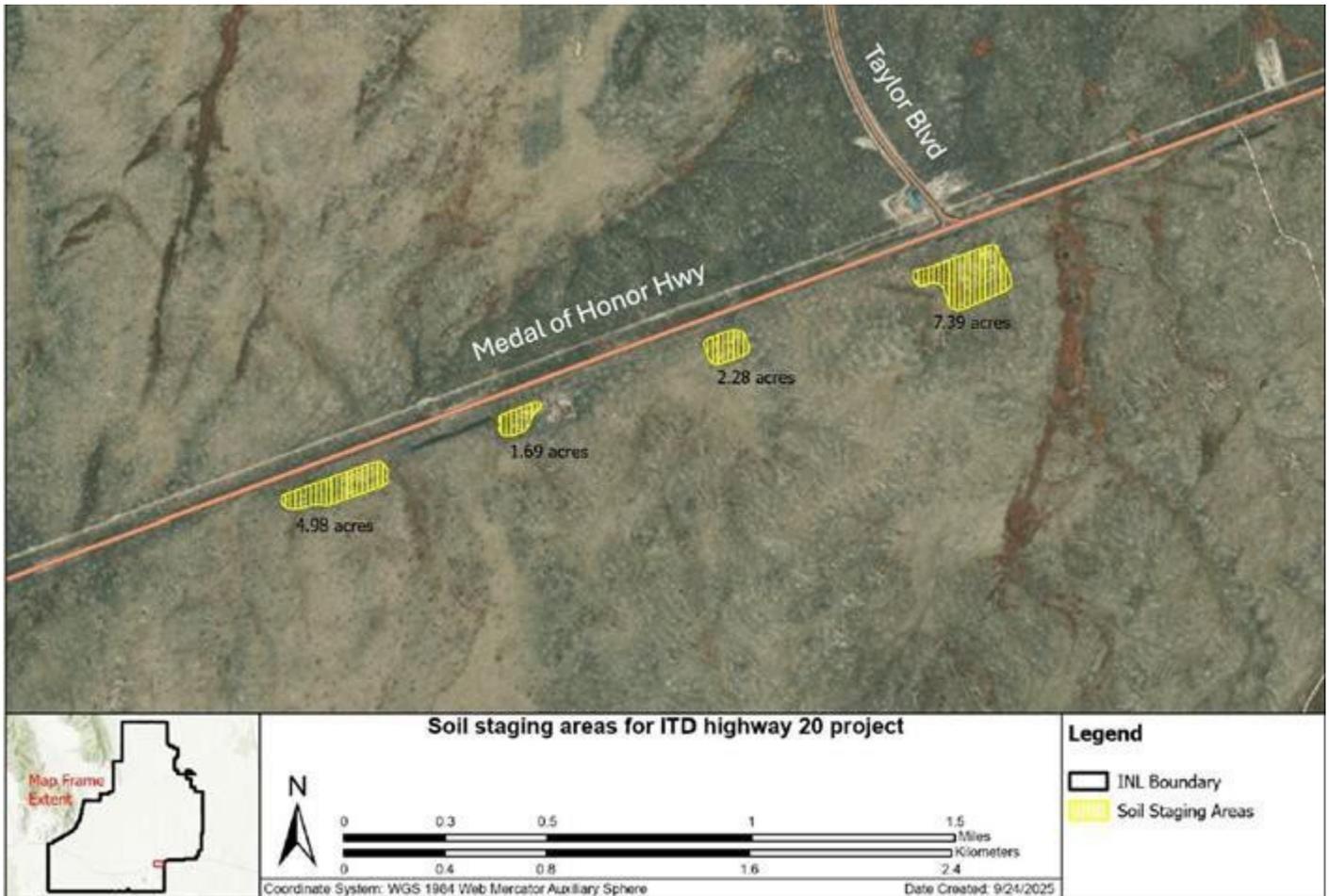
Oklo will be conducting blasting as part of construction excavating activities. The blasting will consist of one test blast plan and subsequent blasting relating to excavation. The purpose of the test blast plan is to generate measurable peak particle velocity (PPV) and Overpressure values and effects resulting usable, predictive data for the OKLO blasting operations, determine whether the blasting operations will have any impacts to current INL operations, and to give insight into the general blast plan. The test blast is scheduled for mid-December, 2025. Seismographs will be installed and the locations they will be installed are shown below (Test Blasting Seismograph locations). The excavation blasting will be conducted within the Maintenance Building Footprint.

Additional limited construction work will include staging heavy equipment temporarily at the northwest corner at the Taylor Blvd and Highway 20 intersection. This corner includes an area previously paved, and all equipment will be staged within this paved area. Equipment would travel to the worksite via Taylor Blvd. However, if such travel could adversely impact Taylor Blvd. itself or interfere with vehicular traffic, the equipment would travel alongside Taylor Blvd. This may occur on either the west and/or east side of Taylor Blvd. Because of the possibility of spoils being placed in the southeast corner of Taylor Blvd. and Highway 20, travel by heavy equipment may be impacted. As such, both sides of Taylor Blvd. was analyzed. To reduce impacts, the west side of Taylor Blvd. may only be used and by heavy equipment for a short distance that would allow said equipment to reach a feasible location to traverse Taylor Blvd. and continue traveling on the east side of the road. This applies to travel by heavy equipment to or from the staging area. Tracked vehicles may not travel on Taylor Blvd. The west side of Taylor Blvd may not be used for spoils transport. The use of a 50ft buffer was analyzed on either side of Taylor Blvd. from the intersection of Taylor Blvd. and Highway 20 to the Oklo work site.

In addition to the above activity, Oklo will also be using drones to take pictures of the progression of construction activities. These activities need to be coordinated with INL security.

**Site Location:**





Test Blasting Seismograph Locations:

**OKLO Aurora Unit 1  
Test Blast Seismograph Locations**

Seismograph 1 +/- 100 feet from Point of Initiation (POI) at Maintenance Building footprint.

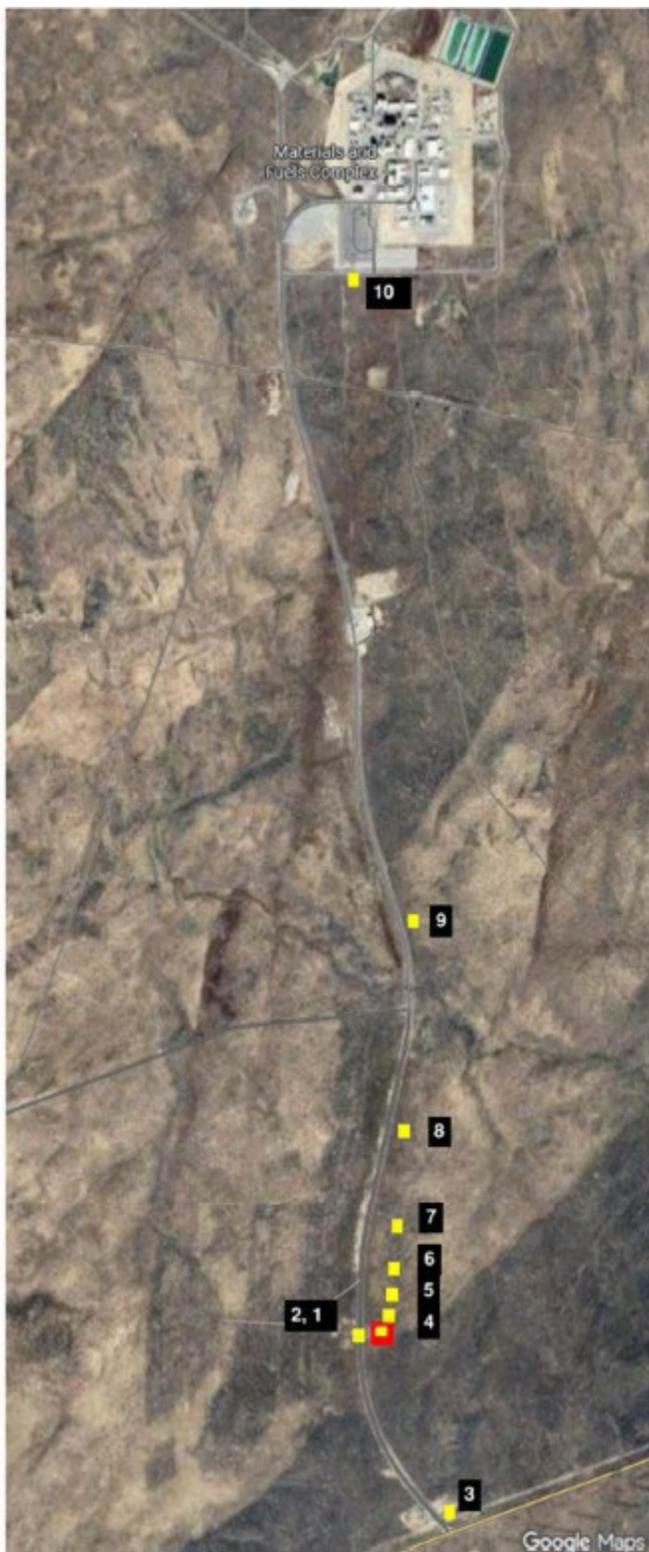
Seismograph 2  
+/- 800-LF from the blast (POI) at Maintenance Building to seismograph installed in the East Shoulder of Taylor Boulevard.

Seismograph 3  
2,700 Linear Feet from blast (POI) to installation at the North Right-of-Way to Idaho State Hwy 20.

Seismograph 4 - 9  
200-ft, 400-ft, 800-ft, 1,600-ft, 3,200-ft, and 6,400-ft from blast (POI), outside of the East Shoulder of Taylor Boulevard on bearing towards the INL Material and Fuels Complex (MFC). (To establish attenuation in direct line towards the MFC.)

Seismograph 10  
14,000 Linear Feet from the blast (POI) to installation outside the South Fence to the INL Material and Fuels Complex.

■ OKLO Site  
■ Seismograph Locations



**Original ECP:**

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.

#### **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.

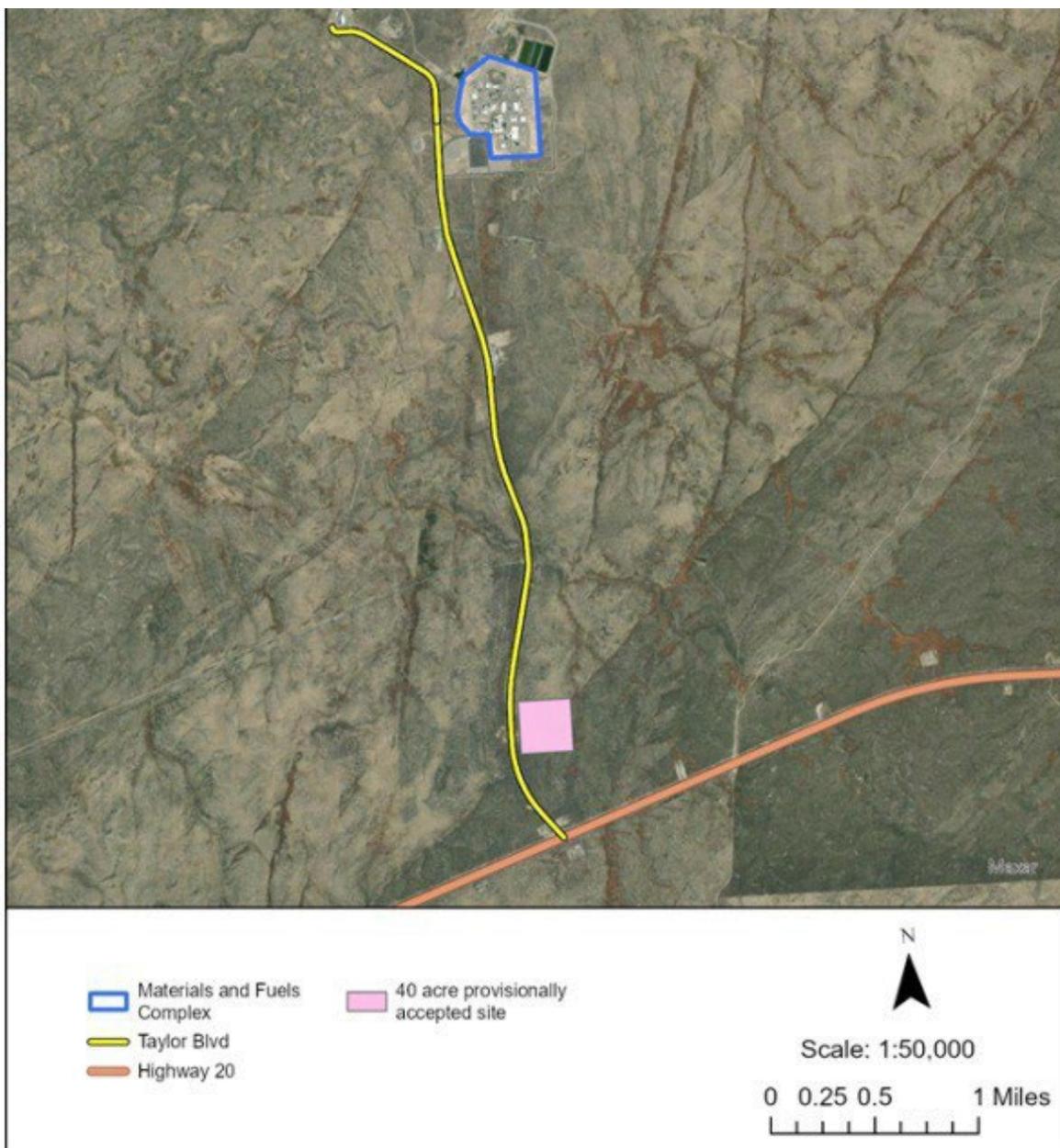
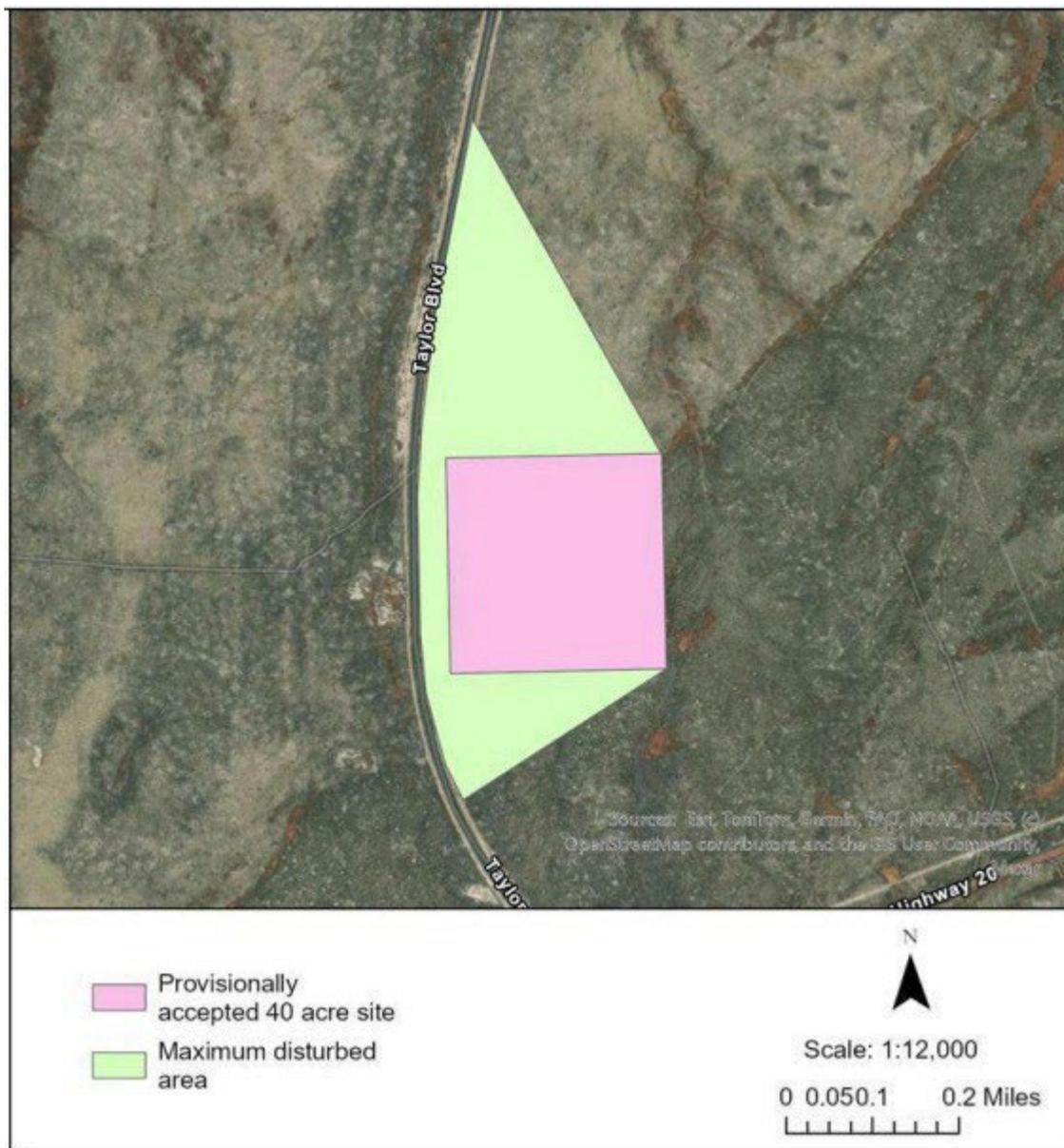


Figure 1: Location of Aurora INL Site in relation to MFC.



### 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 generate dust 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 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

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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 BEA-25-078 R2). This revision (BEA-25-078 R3) requires project-specific consultation, and carries forward the previous finding of effect; No Adverse Effect, remains. Please see Hold Points and Project-specific Instructions.

**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.

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

**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**

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.

<b>Determination</b>
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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:** B3.2 "Aviation activities", B3.6 "Small-scale research and development, laboratory operations, and pilot projects"

**Justification:** For the DOE regulations regarding the application of categorical exclusions, including the full text of each categorical exclusion, see 10 CFR 1021.102 and Appendix B to 10 CFR Part 1021. Implementing guidance for categorical exclusions can be found in DOE's National Environmental Policy Act Implementing Procedures (June 30, 2025): (See full text in regulations and implementing procedures).

The proposal must fit within the classes of actions listed in Appendix B to 10 CFR Part 1021 and must satisfy the conditions that are integral elements of the classes of actions therein.

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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.

B3.2 Aviation activities. Aviation activities for survey, monitoring, or security purposes that comply with Federal Aviation Administration regulations.

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: 12/10/2025