

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

**Project Title:** INL Survey Activities

**Project Description and Purpose:**

Many tasks performed at the Idaho National Laboratory (INL) site require field surveying activities to measure and identify information pertaining to the physical or legal characteristics of the earth, man-made improvements, and the space above, on or below the earth. Field surveying activities are needed to support engineering design and analysis; locating and mapping of man-made improvements; walkdown of proposed construction boundaries and alignments; and maintenance and perpetuation of survey control and coordinate systems at the INL site. Most field surveying activities will take place within INL facility fence boundaries and at proposed construction locations; however, much of INL's survey control falls outside of the facility fences (see LWP-10103, and STD-139-02-2100) and must be maintained to support site operations (see LRD-10102). Maintenance and perpetuation of INL survey control and coordinate systems is an on-going task, and may require placement of new markers at or around Public Land Survey System (PLSS) corners, the INL permanent control markers, and the various facilities at the INL site. Maintenance of survey control requires travel to and from the location of the existing markers. Motorized access will be limited to existing roads. Field surveying tasks involve the use of survey-grade global positioning system (GPS) equipment and/or conventional surveying equipment to measure and store data about physical features on the earth, their location and elevation. Surveying tasks may include drilling into rock or concrete surfaces, mixing and placing mortar or epoxy, working in or around roadways and driving areas, using hammers and chisels to stake/mark survey locations, installing and removing aerial flyover target panels, placement of temporary markers, and mobilizing and demobilizing survey instruments. Replacement of survey markers may include removal of existing grouting and set material and replacement in-kind of the same markers at the exact locations to maintain historic references.

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**Environmental Aspects or Potential Sources of Impact:**

**Air Emissions**

NA

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

NA

**Disturbing Cultural or Biological Resources**

NA

**Generating and Managing Waste**

NA

**Releasing Contaminants**

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

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

NA

<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:** B1.3 "Routine maintenance"

**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 DOE's National Environmental Policy Act Implementing Procedures (June 30, 2025). Requirements and guidance in 10 CFR 1021.102 and DOE's NEPA 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.]

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,

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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.

Approved by Robert Herzog, DOE-ID NEPA Compliance Officer on: 9/18/2025

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