

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

Project Title: Oklo Limited Construction Activities Rev 2

Project Description and Purpose:

Revision 2

This ECP revision is based on the objective for Oklo to install temporary power lines to the Aurora-INL project site, install a production well at the Aurora-INL site, and utilize an MFC construction water supply source to provide water to support Aurora-INL limited construction activities.

Construction Water

BEA will provide Oklo with access to water for construction related activities for the Aurora-INL project. Water will be provided using hydrant FS-FH-34, located east of the MFC TREAT Office Building (MFC-721), to fill the Oklo's water trucks and/or temporary water tank. This task shall not start prior to Oklo fully executing an Other Transaction Agreement (OTA) with DOE, stating that the Aurora-INL project is under the authority, authorization and control of DOE. Water use will be limited to construction purposes, and Oklo will be responsible for tracking daily usage and submitting monthly reports. INL will manage hydrant operations, while Oklo will provide downstream equipment and ensure compliance with operational requirements, including air gap protection for potable water, proper valve installation, and roadway maintenance. Oklo will bear all costs for labor, support services, and any repairs for damage to INL infrastructure, including hydrants and Taylor Blvd. Measures will be implemented to minimize roadway impacts and debris deposition. Seasonal operating procedures will be followed to prevent freezing-related issues. Work related to construction water will not generate any waste.

Oklo plans to stage an approximately 12,000 gallon water tank near the hydrant. This tank will fill two 4,000 gallon water trucks at an expected frequency of 6 trips a day but may be more. Other sources may be used in the future, pending prior agreement with INL.

Production Well

Oklo plans to install at least one production well within the planned facility footprint, capable of supplying at least 200 gallons per minute to ensure sufficient water for off-normal events.

Temporary Power

BEA will provide temporary electrical power to Oklo's Aurora-INL project site using the existing Test Line. The temporary power service will only be provided to support activities under Oklo's Other Transactional Agreement (OTA) with DOE and not during any potential future commercial activities. Interconnection will be provided using a pole specified by BEA located at the junction between the East bound route following Haul Rd and the North bound route towards MFC. The Test Line, interconnection point, and Aurora-INL project site are shown in Figure 1. Power infrastructure connecting the Aurora-INL project site to the Test Loop is the responsibility of Oklo, and Oklo must obtain separate approval from DOE to allow it to perform these activities on INL lands Oklo is not currently approved to perform work on. Power to the Test Line will be provided by BEA using the Obsidian Test Pad (OTP) substation.



Figure 1. Map of the Test Line, interconnect point near or Pole 109, and the Oklo Aurora-INL Project site.

Modifications to the OTP Substation

This effort is intended to provide reliable and safe electrical power to the transmission line for Oklo's power connection by executing necessary upgrades within the Obsidian Test Pad (OTP) substation and connecting the 13.8 kV conductors to the existing 138 kV test line. To accomplish this, the proposed action includes reconditioning the main tank oil and replacing the LTC oil in the OTP 8T12-1 138/13.8 kV transformer, testing the oil, and completing cable connections on bushings. Commissioning activities will involve revising relay settings, implementing them in the field, and completing commissioning of 311L relays. Outside the substation, work will include installing two new power poles within the test line right-of-way, connecting 13.8 kV conductors to the 138 kV test line, installing and testing medium-voltage underground cables from the OTP indoor switchgear to the riser pole using an existing spare conduit, and installing vertical jumpers between the new poles up to the test line. The final steps will involve connecting jumpers, installing an in-line insulator to isolate 138 kV from 13.8 kV, conducting phasing checks, and energizing the line. The waste that will be generated during this action will be managed by BEA.

Power Line Interconnection

BEA will perform modifications to the existing transmission line at a designated connection point to enable Oklo's interconnection and power supply to its facility. The defined connection point, including its location, configuration, and technical specifications, will be provided to Oklo for coordination and interface design purposes. The connection point is currently planned to be Pole 109; however, if changes are required, INL and Oklo will agree to a new connection point in writing. Tasks under this scope may include, but are not limited to, installing a dropdown from the transmission line to the distribution line and programming the meter (meter provided by Oklo). The waste that will be generated during this action will be managed by BEA.

Oklo's Power Line Construction Activities

Oklo will install power infrastructure from its site to the designated connection point, which will require construction on land managed and maintained by INL. All activities must comply with applicable DOE standards and requirements, as well as INL policies, procedures, directives, and internal controls. Oklo must also adhere to all relevant industry codes, standards, and best practices. Any proposed deviations from these requirements must be formally documented and approved in writing by INL prior to implementation. INL will provide the technical specifications and interface requirements governing the design, construction, and installation of power infrastructure located on INL-managed land. Before any construction begins, Oklo must submit complete design packages for all proposed power infrastructure to INL for review and approval. INL will evaluate the designs for compliance with applicable standards and specifications and provide comments or required revisions within a mutually agreed-upon timeframe. Oklo will install a revenue-grade meter at the designated transmission line connection point or another agreed-upon location. INL will provide specifications for the meter and any additional interface equipment required for the connection. Oklo must submit all equipment information, specifications, and procurement documentation related to connection components for INL review and approval prior to installation. After the connection to the transmission line is complete, INL will program the meter and inspect compliance. Oklo must coordinate all field activities with INL to ensure work does not obstruct or adversely impact ongoing INL operations. When ready to establish the physical connection to the transmission line, Oklo must coordinate with INL Power Management to inspect its line and transformer installation prior to final

connection and energization. Final connection to INL's power system will be performed by INL Power Management. INL will coordinate with Oklo to schedule and safely execute the connection in accordance with approved procedures and site requirements. Oklo must provide a minimum of two 2 week advance notice to INL before the connection. The waste that will be generated during this action will be managed by Oklo.

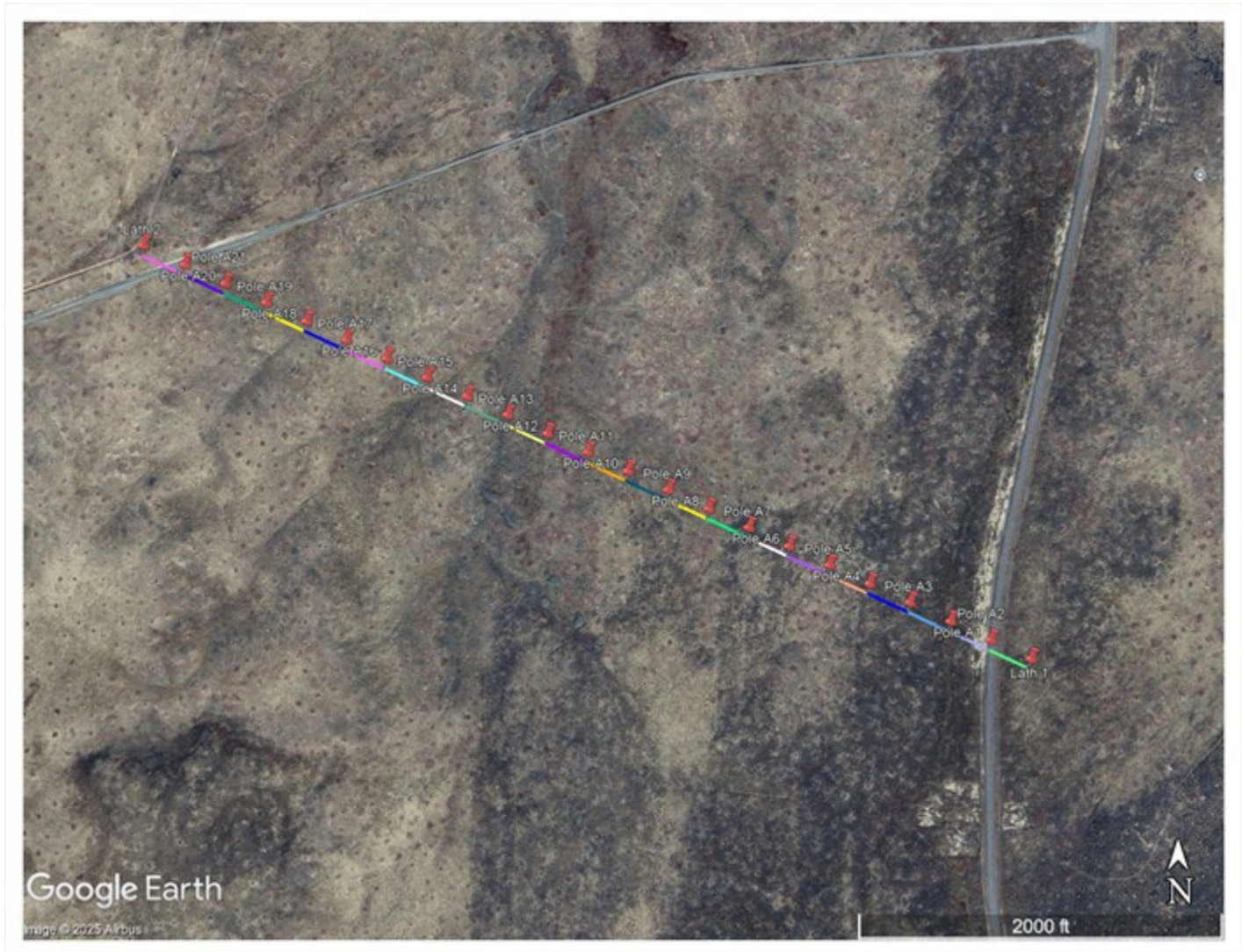


Figure 2. Planned power line route connecting the Aurora-INL project site to the INL test line.

Temporary Power Supply Service

INL will provide power services to Oklo, including temporary power supply for an anticipated duration of five (5) years. Oklo must submit a monthly rolling energy consumption forecast to support INL's forecasts to Idaho Power Company; this information will be provided to INL Power Management. INL Power Management will own and perform all maintenance and operations (M&O) activities on the distribution service from the transmission line to, and including, the pad-mounted transformer. The demarcation point between INL Power Management and Oklo will be at the low-side bushings of the secondary side of the pad-mounted transformer. Oklo is responsible for full cost recovery of any maintenance activities performed from the transmission line to Oklo's site.

Power costs will be billed in two categories: actual power usage and power management. There will be no waste generated during this action.

Power Usage: Oklo will be billed monthly based on usage recorded on the billing meter located near the connection to the Test Line. Billing is based on Oklo's proportional share of INL's total utility costs, which include:

- Energy charges based on total kWh used by Oklo each month.
- Demand charges calculated using coincidental demand, which occurs when INL's desert site reaches peak electrical demand for the month. Oklo's load at that time determines its demand charge.
- Miscellaneous costs such as conservation charges, allocated based on energy usage.
- Power Management: INL maintains the commercial power received from Idaho Power Company and distributes it through approximately 87 miles of 138 kV transmission lines and 65 miles of 2.4–13.8 kV distribution lines, supported by 11 substations. Each end user, including Oklo, is charged a Power Management rate to support this maintenance.

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INL will provide power in megavolt-amperes (MVA) in the amount agreed upon between DOE and Oklo. Oklo may request increases in supply at any time during the service period; all requests will be reviewed and approved through DOE and INL Power Management. INL and Oklo will jointly prepare an Interface Plan (PLN-25108) detailing roles, responsibilities, and a comprehensive list of services, including temporary power supply.

Oklo's Power Line Deconstruction

Power supplied to Oklo will be temporary, with the expectation that Oklo will transition to an independent utility provider within five (5) years of executing this agreement. INL will provide written notice at least 45 business days before the planned conclusion of power supply service. Upon termination of service, Oklo will be responsible for removing any transmission lines or related infrastructure it installed to facilitate the temporary power connection. All Oklo-installed power infrastructure must be fully removed no later than one (1) year following the service termination date, unless otherwise authorized in writing by INL. Oklo will perform all necessary decommissioning, demolition, and remediation activities to restore affected utilities and associated systems to their original or mutually agreed-upon condition. The waste generated in this action will be managed by Oklo.

Revision 1

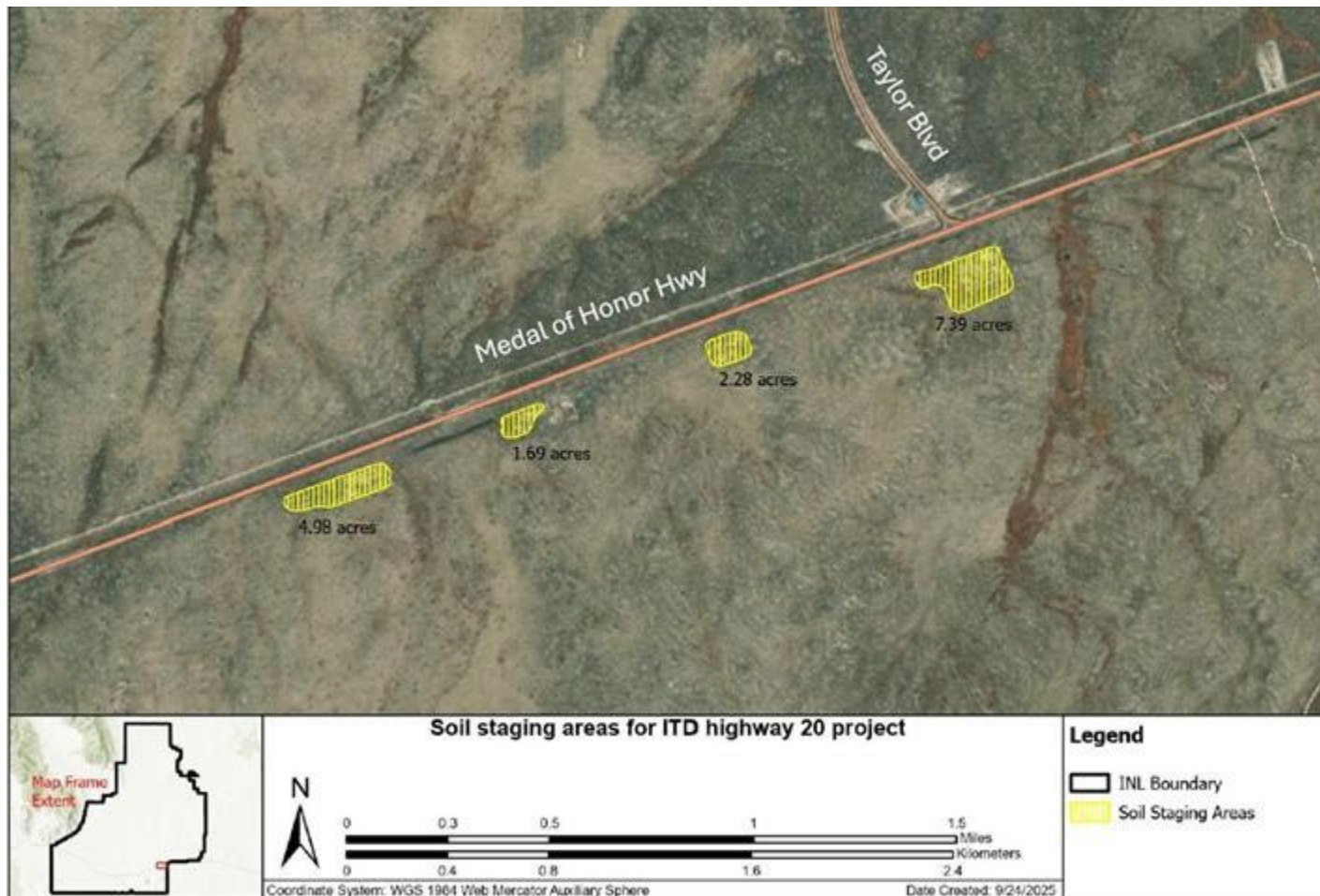
This ECP revision is based on Oklo requesting to spread soil in two areas as needed. There are two locations identified, on site and Medal of Honor Highway (MOH) and because the decision where to spread the soil is not yet known, both locations have been reviewed. Oklo will provide information regarding 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.

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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.

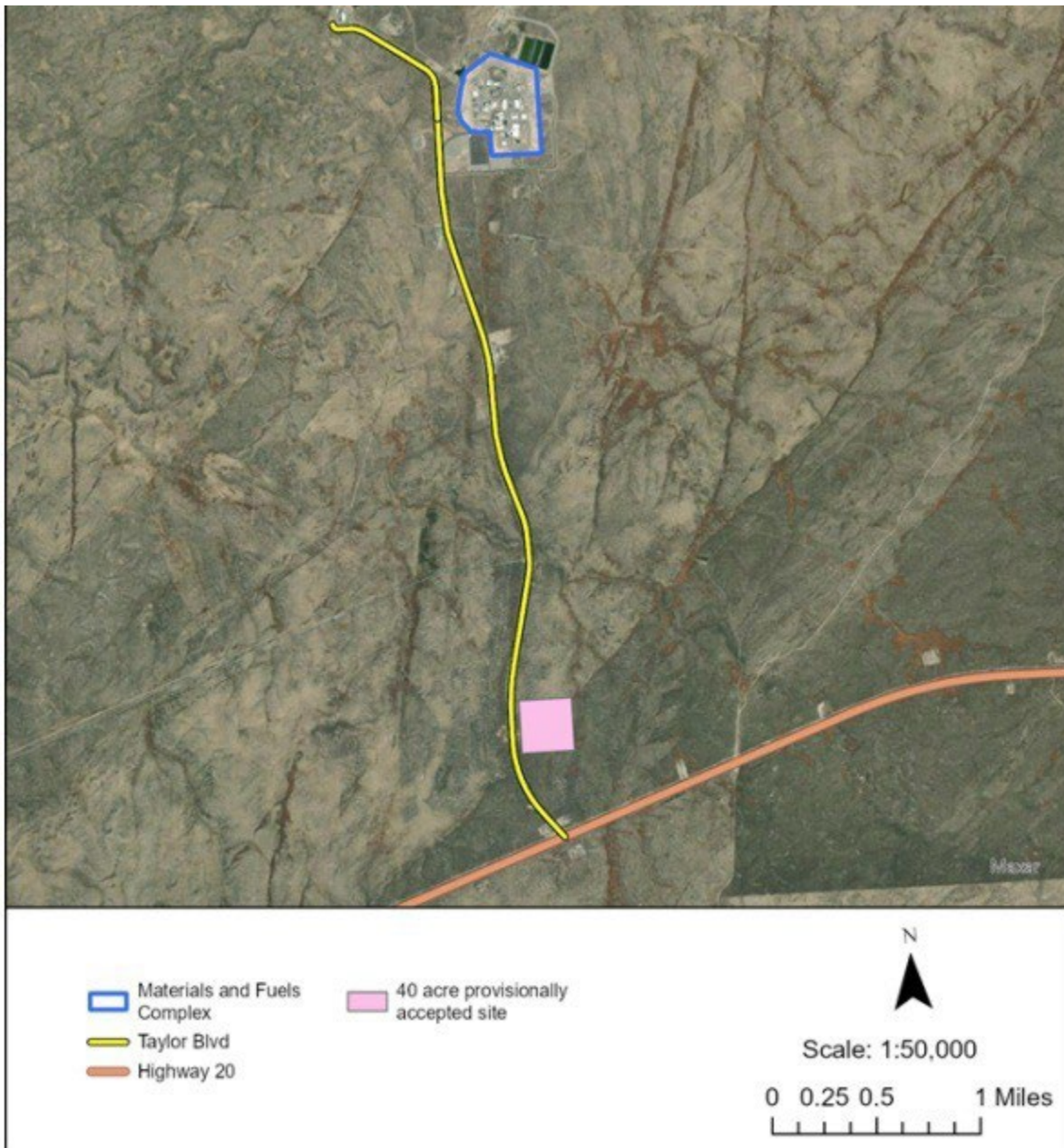
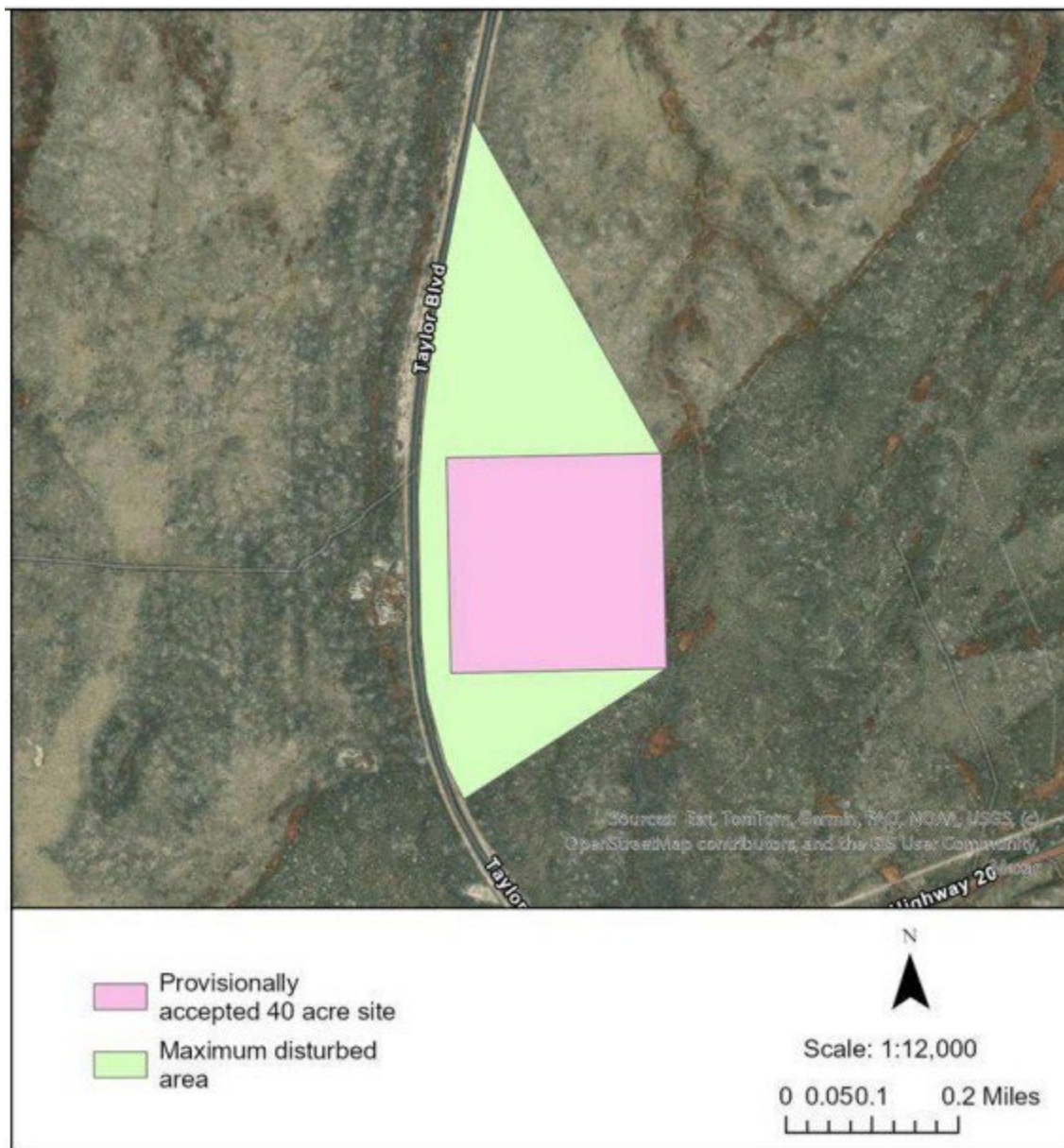


Figure 1: Location of Aurora INL Site in relation to MFC.



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).

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Discharging to Surface-, Storm-, or Ground Water

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

The new production well will require a well permit from IDWR. The DOE water right can be used as long as the facility is DOE Authorized (not NRC).

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 revisions for updated construction plans (BEA-25-078 R1, BEA-25-078 R2, BEA-25-078 R3). This revision (BEA-25-078 R4) carries forward the previous finding of effect; No Adverse Effect. 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.

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.

Determination:

References:

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.

B4.11 Electric power substations and interconnection facilities. Construction or modification of electric power substations or interconnection facilities (including, but not limited to, switching stations and support facilities).

B4.12 Construction of powerlines. Construction of electric powerlines approximately 10 miles in length or less, or approximately 20 miles in length or less within previously disturbed or developed powerline or pipeline rights-of-way.

The proposal fits within the classes of actions listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures and satisfies the conditions that are integral elements of the classes of actions therein. The proposal does not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Appendix B; (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

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environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Appendix B.

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.

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.

Based on my review of the proposed action, I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

Approved by Jason L Anderson, DOE-ID NEPA Compliance Officer on: 2/5/2026