U.S. Department of Energy
Office of Nuclear Energy
National Environmental Policy Act
Determination

NEPA Identification: DOE-ID-INL-26-028

Proposed Action Title: ROUTINE ACTIVITIES

Location(s) (City/County/State):

Proposed Action Description:

Background

Idaho National Laboratory's (INL's) mission is to discover, demonstrate and secure innovative nuclear energy solutions, other clean energy options, and critical infrastructure. INL activities include nuclear energy and homeland security research, development, and demonstration. Battelle Energy Alliance, LLC, manages and operates INL. Most INL Site buildings and structures are located within developed areas that are typically less than a few square miles and separated from each other by miles of undeveloped land. The U.S. Department of Energy (DOE) controls all land within the INL Site. In addition to INL Site facilities, INL manages and operates leased and DOE-owned laboratories and administrative offices in Idaho Falls.

Purpose and Need

INL needs to manage facilities and property in a safe, secure, cost-effective, efficient, and sustainable manner to ensure assets are available, utilized, and in a suitable condition to support efficient mission execution. INL must sustain assets by completing maintenance and repair activities to assure mission readiness, operational safety, worker health, environmental protection and compliance, security, and property preservation to cost-effectively meet program missions. This ECP will be reviewed, and updated as necessary, on a routine basis.

This document replaces the following:

- INL-20-022 Routine Maintenance (B1.3)
- INL-21-073 Installing or Relocating Machinery and Equipment at Idaho National Laboratory (B1.31)
- INL-21-035 Building and Equipment Instrumentation (B2.2)
- INL-21-090 Personnel Safety and Health Equipment at Idaho National Laboratory (B2.3)
- INL-21-074 Facility Safety and Environmental Improvements at Idaho National Laboratory (B2.5)

Activities described in and bounded by this document will not require confirmatory review through INL's NEPA process i.e., they will not require submission into the Environmental Review Process (ERP). The activities described below are low to no risk and do not impact the environment. Qualified INL environmental personnel have the discretion to make the determination of the applicability of this document to the proposed action.

Important Considerations & Exclusions

Activities under this ECP may be excluded from further NEPA review but are not excluded from review by Secretary of the Interior-qualified practitioners under the National Historic Preservation Act (NHPA).

An activity must be submitted to the ERP, Asset Suite, or equivalent electronic work-flow applications, when the activity will take place in, at, or on a historic property (see CRMO SharePoint: Historic Properties at the INL) or when an activity is excluded from this ECP as listed below. An activity must also be submitted to the ERP, Asset Suite, or equivalent electronic work-flow applications when the activity involves ground disturbance within the CITRC boundary.

When there is uncertainty regarding an activity and/or a historic property, contact CRMO for guidance.

Type and Scope of Activities

Activities covered by this ECP include preventive, predictive, and corrective maintenance; custodial services; in-kind repair and replacement of existing systems, structures, and equipment; installation or relocation of equipment; improvements to building instrumentation; installation or replacement of personnel safety and health equipment; and facility safety or environmental improvements that do not significantly change the design capacity, function, expected useful life, or operational mission of an existing facility. Work may include associated fabrication, installation, removal, testing, calibration, adjustment, inspection, and other minor supporting activities necessary to complete the work. The activities covered by this document are routine in nature, are performed as part of normal facility operations, and are limited to work that does not result in significant changes to the function, capacity, or environmental impacts of existing facilities.

The activities authorized under this ECP are limited to existing facilities, infrastructure, developed areas, and established operational footprints. Covered activities **shall not**:

- Represent a major upgrade, expansion, or change in facility mission or function.
- Significantly increase design capacity or extend the intended service life of a facility beyond routine replacement.
- Fail to satisfy the eligibility requirements and integral elements applicable to the referenced DOE categorical exclusions.

Use of this ECP does not waive or replace compliance with other applicable federal, state, or local environmental requirements. Activities must comply with all applicable permits, regulations, DOE Orders, and laboratory requirements. Where required by law or laboratory procedures, including activities with the potential to affect historic properties under the National Historic Preservation Act (NHPA) or other protected environmental resources.

Compliance with natural resource regulations including but not limited to Migratory Bird Treaty Act (MBTA), Endangered Species Act (ESA), and Federal noxious weed laws is still required and is implemented through site-specific plans (e.g., Candidate Conservation Agreement and Bat Protection Plan) and laboratory procedures (e.g., LWP-8000).

When there is uncertainty regarding whether a proposed activity falls within the scope or intent of this ECP, the activity shall be submitted through the Environmental Review Process for evaluation by the appropriate environmental subject matter experts. Professional judgment should be applied conservatively, and activities shall only be conducted under this ECP when they clearly meet the applicable DOE categorical exclusion criteria and the bounding conditions established by this document.

Description of Proposed General Maintenance Activities and Processes

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.

B1.31 Installation or relocation of machinery and equipment.

Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.

B2.2 Building and equipment instrumentation.

Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment).

B2.3 Personnel safety and health equipment.

Installation of, or improvements to, equipment for personnel safety and health (including, but not limited to, eye washes, safety showers, radiation monitoring devices, fume hoods, and associated collection and exhaust systems), provided that the covered actions would not have the potential to cause a significant increase in emissions.

B2.5 Facility safety and environmental improvements.

Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground or belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, “Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities” and 40 CFR part 280, “Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks”). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel).

Proposed activities, must meet the DOE categorical exclusion (CX) eligibility criteria as found in 10 CFR 1021.102 and the following conditions:

1. Each activity must comply with applicable facility safety and environmental requirements, including all local, state, and federal regulations and DOE Orders.
2. Activities must not generate, use, or reprocess used nuclear fuel (UNF), and must not generate transuranic (TRU) waste or any waste with no path for disposal.
3. Activities must not include the development or demonstration of reactors. Separate NEPA review is required for all reactor projects.
4. Activities must not be part of, or support, a larger project that requires an Environmental Assessment (EA) or an Environmental Impact Statement (EIS).
5. Activities are not covered by this ECP if they occur within the National Historic Landmark (NHL) boundary at EBR-I (including within the fence line), or if they could significantly impact historic, archaeological, or culturally important sites, buildings, or structures that are eligible for the National Register of Historic Places.
6. Activities are not covered by this ECP if they occur outside of designated facility boundaries or outside of fenced areas. Activities are not covered if they disturb native vegetation or soils.

This document is not meant to be exhaustive or all encompassing. Activities that do not fit the descriptions provided or that fall outside of any listed exclusion may not be covered by this document. Use of this document requires reasonable professional judgement to ensure the action is consistent with the intent of the routine activities and does not represent actions that a reasonable person would consider non-routine.

Environmental Aspects and Impacts:

Air Emissions

Activities addressed by this ECP may require an Air Permitting Applicability Determination (APAD) and have the potential to contribute to air emissions through:

- Generating air pollutants, including but not limited to radionuclides, chemical and combustion emissions. Some activities may involve stationary air emission sources, including stationary internal combustion engines.
- Generating hazardous and radiological emissions, such as by operation of fuel burning equipment, decontamination work, use of maintenance products that contain hazardous constituents, and disturbance of contaminated soils.
- Distributing, excessing, or disposing of appliances containing refrigerants.
- Maintaining, servicing, or repairing stationary heating, ventilation, air conditioning and refrigeration equipment.
- Maintaining, testing, or disposing of halon-containing equipment or halon.
- Purchasing equipment containing refrigerants or halon.
- Acquiring and dispositioning chemicals.
- Working with asbestos-containing materials (ACM) that could release friable material to the air.
- Generating fugitive dust or other fugitive emissions.
- Purchasing, relocating, operating, modifying, or maintaining portable air emission sources, including non-road internal combustion engines.

Discharging to Surface, Storm, or Ground Water

Activities addressed by this ECP have the potential to contaminate waters of the United States (U.S.) or groundwater through:

- Construction or modification of drinking water systems and cross connections at the INL and in-town facilities.
- Maintaining, repairing, or altering drinking water systems and cross connection at the INL and in-town facilities.
- Using drinking water systems and cross connections at the INL and in-town facilities.
- Constructing or modifying sewage and other reuse systems.
- Maintaining or repairing septic tanks or septic systems.
- Discharging Wastewaters.
- Managing storm water discharges.

Disturbing Cultural or Biological Resources

Activities addressed by this ECP have the potential to disturb cultural resources through:

- Constructing or modifying facilities, structures, equipment, roads, underground utilities, or processes, in such a way that may introduce physical, visual, atmospheric and/or auditory alterations to cultural, regardless of whether the activity is inside or outside of facility fence lines.
- Maintaining or repairing facilities, structures, equipment, roads, underground utilities, or processes.
- Refer to Hold Points and Project-Specific Instructions for more information.

There is the potential for this work to impact various wildlife species. Nesting bird inspections are required between April 1 - October 1 to minimize impacts to birds and their nests per compliance with the Migratory Bird Treaty Act. Bat surveys are also required within structures being modified or enclosed between June 1 to July 31 and November 1 to March 31 in accordance with the INL Bat Protection Plan.

Generating and Managing Waste

Activities addressed by this ECP have the potential to generate waste requiring management through:

- Constructing or modifying facilities, equipment or processes at permitted or interim status Resource Conservation Recovery Act (RCRA) facilities.
- Decontaminating equipment or structures that contain or are contaminated with polychlorinated biphenyls (PCBs) (From equipment or facilities manufactured before 1982).
- Maintaining equipment or structures that contain or are contaminated with PCBs (From equipment or facilities manufactured before 1982).
- Disposing asbestos-containing material.
- Disturbing asbestos or removing asbestos-containing material.
- Generating wastes.

Releasing Contaminants

Activities addressed by this ECP have the potential to release contaminants through:

- Acquiring, using, storing, and dispositioning chemicals.
- Managing and dispositioning excess property and materials.
- Reporting and cleaning up spills and releases.
- Managing elemental lead.
- Removing lead from service or from a structure.

Using, Reusing, and Conserving Natural Resources

Activities addressed by this ECP have the potential for use, reuse and conservation of natural resources related to:

- Generating greenhouse gasses.
- Building energy use.
- Consuming potable, industrial or irrigation water.
- Generating storm water.
- Generating landfill waste or construction and demolition wastes.
- Generating recyclable materials.
- Providing an opportunity to engage in sustainable acquisition practices

References:

B1.3 "Routine maintenance", B1.31 "Installation or relocation of machinery and equipment", B2.2 "Building and equipment instrumentation", B2.3 "Personnel safety and health equipment", B2.5 "Facility safety and environmental improvements"

For Categorical Exclusion Determinations:

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 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.

NEPA Compliance Officer

Signed by: Robert Douglas Herzog, NEPA

Compliance Officer Date Signed: 9/28/2026