



Department of Energy
National Nuclear Security Administration
Pantex Site Office
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Amarillo, TX 79120



NEPA Compliance Officer Rationale
Pantex Site Office
Orig. Proj. No.: D&D-10-003-C
NEPA Amendment No.: 11-002
Demolition of Buildings 11-10 and 11-30

Application of DOE NEPA Procedure: Categorical Exclusion B1.23, Applicable to Facility Operations (10 CFR Part 1021, Subpart D, Appendix B), applies to the proposed activity described below.

Rationale: The U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), proposed to demolish Buildings 11-10 and 11-30 at the Pantex Plant, as described in NEPA Review Form (NRF) No. PXP-10-0007, which is hereby incorporated by reference.

While removing the asphalt from the concrete slab at Building 11-30 during demolition, unknown concrete sumps, manholes, and drainage troughs were discovered. Removal of the sumps, manholes, and drainage troughs has been added to the scope of project no. D&D-10-003-C and would require deeper excavation. The added scope would not require excavating outside of the boundary that was identified in the original scope. In addition, B&W Pantex personnel have taken core samples of the concrete to allow for appropriate waste determinations. Sampling protocol, based on information provided in the Final RCRA Facility Investigation Report, Zone 11, January, 2003, eliminated concerns related to potential explosives contamination in the sumps and drainage troughs.

More in-depth discussions of the expanded scope can be found in NRF Amendment No. 11-002, which is hereby incorporated by reference.

The expanded scope for demolition of Buildings 11-10 and 11-30 still fits within the parameters of Categorical Exclusion B1.23, which applies in cases of:

Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces).

Based upon the information in NRF Amendment No. 11-002 referenced above, this expanded scope as described does not present any extraordinary circumstances of a unique or uncertain nature. There are demolition activities being proposed in other zones at Pantex, but these actions do not pose potentially or cumulatively significant impacts.¹


¹ See 10 CFR § 1021.410(b)(2)and(3)for full text of regulation.

Supported by information provided by PXP-10-0007 and Amendment No. 11-002, the proposed demolition with expanded scope would not²:

1. threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/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;
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; or
4. adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B.(4)).

Therefore, the expanded scope of project number D&D-10-003-C meets the conditions that are integral elements of the class of actions in Appendix B, and application of Categorical Exclusion B1.23 is appropriate.

If further changes are made to the project scope, or if the scope is expanded to encompass other actions, NEPA requirements will need to be reassessed at that time.

Signature: 
Jim Barrows

Title: NEPA Compliance Officer

Date: 14 February 2011

² See 10 CFR Part 1021 Subpart D Appendix B (B(1)through(4)).