



Department of Energy
National Nuclear Security Administration
Pantex Site Office
P. O. Box 30030
Amarillo, TX 79120



NEPA Compliance Officer Rationale
Pantex Site Office
Proj. No.: GPP-11-004-C
NEPA ID No.: PXP-11-0005
B-Press and Extruder Modification

Application of DOE NEPA Procedure: The *Final Environmental Impact Statement for the Continued Operation of the Pantex Plant and Associated Storage of Nuclear Weapons*, also known as the Site Wide EIS, analyzed the impacts from “research and production of high explosives and weapons components.” In addition, Categorical Exclusions A7, B1.3, B1.15, B1.16, B1.27, and B1.31, Applicable to Facility Operations (10 CFR Part 1021, Subpart D, Appendices A& B), apply to project number GPP-11-004-C.

Rationale: The U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA), Pantex Site Office, proposes removal of an existing High Explosives (HE) extruder, acquisition of a new extruder, facility upgrades that involve replacement in kind, removal of utilities in some buildings, construction of a new facility to house HE freezers, and installation and operation of an extruder in a new location. The proposed project would also include modifications to the B-Press System and its operations. A detailed project description is found in NEPA Review Form PXP-11-0005, which is hereby incorporated by reference.

10CFR 1031, Subpart D, Appendix B applies to:

- a) Facility and B-Press upgrades: Section B1.3 “Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures, ... and equipment ... 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. Routine maintenance may result in replacement to the extent that replacement is in kind ...” **AND** Section B1.16, “Removal of asbestos containing materials...” **AND** Section B1.27, “Activities that are required for the disconnection of utility services such as water, steam, telecommunications, and electrical power after it has been determined that the continued operation of these systems is not needed for safety.”
- b) Removal of the HE extruder equipment: Section B1.3 ... (o) Routine decontamination of the surfaces of equipment, rooms...or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming) including the removal of intact contaminated equipment and other materials...”
- c) Building a new facility to house HE freezers: Section B 1.15 “Siting, construction (or modification), and operation of support buildings and support structures...within or contiguous

to an already developed area (where active utilities and currently used roads are readily available)....”

- d) Installation and operation of an extruder in a new location: Section 1.31 “Relocation and operation of machinery and equipment, ...including minor construction necessary for removal and installation, where uses of the relocated items will be similar to their former uses and consistent with the general missions of the receiving structure.”

1031, Subpart D, Appendix A applies to :

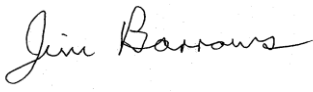
- a) Buying a new extruder: Section A7 “Transfer, lease, disposition, or acquisition of interests in personal property (e.g., equipment and materials”

Based upon the information in sections A, B, C and Additional Information of NEPA Review Form PXP-11-0005, project number GPP-11-004-C does not present any extraordinary circumstances of a unique or uncertain nature. It is not connected to other actions with potentially or cumulatively significant impacts.¹ It 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, this proposal meets the conditions that are the integral elements of the classes of actions to which application of the above listed Categorical Exclusions is appropriate.

If changes are made to the scope of action as described in PXP-11-0005, or if the scope is expanded to encompass other actions, NEPA requirements for the action will need to be reassessed at that time.

Signature: 

Jim Barrows

Title: NEPA Compliance Officer

Date: 3 August 2011

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

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