DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-16-074

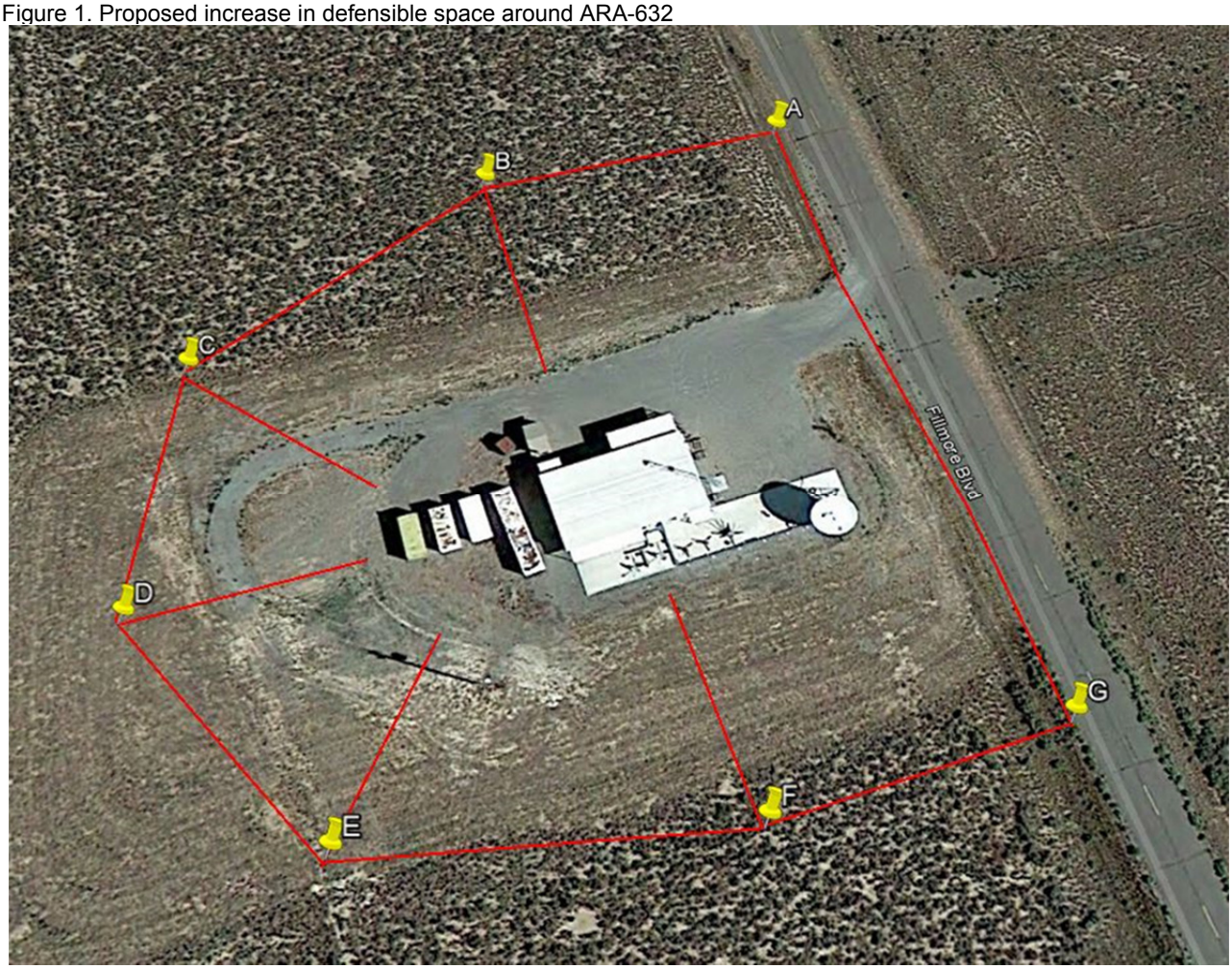
SECTION A. Project Title: Fillmore Test Facility (Auxiliary Reactor Area [ARA]-632) Increase of Defensible Space

SECTION B. Project Description and Purpose:

The Fillmore Test Facility (ARA-632) is a remote facility in the Critical Infrastructure Test Range Complex (CITRC) Area at Idaho National Laboratory (INL). ARA-632 houses unique and valuable test equipment. There is an open space approximately 30 feet from the gravel and concrete area that is mowed to provide defensible space for fire protection. Water is unavailable for fire suppression for the building.

Due to the equipment located in the facility and the lack of water for fire suppression, an increase in the size of defensible space is needed. The proposed action would increase the mowed area around the facility from 30 feet to 100 feet to provide additional protection against wildland fires (see Figure 1).

Figure 1. Proposed increase in defensible space around ARA-632



PLAN (PLN)-14401, "INL Wildland Fire Management Plan," specifies a 30- to 50-ft defensible space around all INL Site buildings, structures, and significant support equipment and up to a 30-ft defensible space around parking lots, storage pads, propane and fuel tanks, substations and active portions of the INL Site rail system as analyzed in Department of Energy/Environmental Assessment (DOE/EA)-1372, "Idaho National Engineering and Environmental Laboratory (INEEL) Wildland Fire Management Environmental Assessment."

The areas between markers A-C, E-G, and G-A in Figure 1 include sage brush that would be eradicated by mowing. To maintain DOE's goal to achieve no net loss of sagebrush on the INL Site identified in the Candidate Conservation Agreement for Sage-grouse on the INL Site (CCA), the project must compensate for the lost sagebrush. The project must re-establish sagebrush in acreages equal to or greater than acreages lost by project activities. Re-establishment must occur within the restoration priority areas identified in the CCA. Restoration activities may be coordinated with other sagebrush restoration activities currently being conducted on the INL Site.

In addition, the undisturbed area within the markers shown in Figure 1 must be surveyed for cultural resources prior to mowing. If mowing is performed prior to 1 September, a breeding bird survey must be completed no more than 1 week prior to mowing. Recommendations made in both biological and cultural resource reviews must be implemented as part of the project.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities may generate fugitive dust.

Disturbing Cultural or Biological Resources

Project activities have the potential to disturb cultural and biological resources, including sagebrush.

Generating and Managing Waste

Operations could generate small amounts of common trash.

Releasing Contaminants

Small amounts of air emissions will be generated.

Using, Reusing, and Conserving Natural Resources

All applicable waste will be diverted from disposal in the landfill when possible.

SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR)1021, Appendix B, give the appropriate justification, and the approval date.

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). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

References: 10 CFR 1021, Appendix B, B2.5 "Facility safety and environmental improvements"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B2.5 "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 and 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 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)."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) ☐ Yes ☒ No

Approved by Jason Sturm for Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 7/5/2016