

SECTION A. Project Title: INTEC – Upgrade of the Emergency Communication System

SECTION B. Project Description

The proposed action will design, procure, and install an upgrade to the emergency communication system (ECS) for the Idaho Nuclear Technology and Engineering Center (INTEC). The existing system does not meet the new Life Safety codes and parts are no longer available for the antiquated system. Approximately 39 buildings will be included in the system modification and upgrade of ECS equipment.

Specific actions:

- Remove old ECS equipment such as ECS panels, strobes, horns, conduit/wire, etc. as necessary
- Install new wireless ECS panels and new speakers in ~39 facilities; facilities that are deemed to be “unoccupied” will not have new ECS communication equipment installed
- Install new strobes when necessary
- Connect new speakers/strobes to new ECS panels using existing conduit/wire when possible
- Install conduit/wire to connect new speakers/strobes to new ECS panels when necessary
- Install power wiring to new ECS panels from electrical distribution panels
- Program and test communication equipment

The following buildings are involved with ECS upgrade project: CPP-603, 626, 2710, 604, 605, 649, 606, 644, 613, 797, 1749, 652, 655, 659, 662, 663, 666, 679, 684, 692, 708, 697, 1782, 698, 749, 1604, 1605, 1606, 1608, 1617, 1618, 1631, 1634, 1674, 1642, 1643, 1646, 1647, 1650, 1651, 1662, 1663, 1666, 1671, 1673, 1683, 1684, 1686, 1688, 1689, 1696, 2719, 1774.

SECTION C. Environmental Aspects / Potential Sources of Impact

1. Air Pollutants - If excavation is necessary to replace existing ECS equipment, then fugitive dust emissions may be generated as a result of excavation of gravel/soils.

Project activities may generate emissions from operating diesel-fueled mobile equipment (i.e., forklifts, scissor lifts, etc.). Such equipment is exempted as mobile internal combustion engines per IDAPA 58.01.01.222.02.e.

2. Asbestos Emissions – Limited quantities of non-friable and friable asbestos-containing material (ACM) may be generated during the FCS building modifications. Submittal of internal notification is required prior to removal of ACM. Non-radioactive friable and non-friable ACM waste will be disposed of at the INL Landfill Complex as appropriate and the radioactive friable or non-friable ACM waste will be disposed of at an approved offsite facility.

4. Chemical Use and Storage – The proposed project activities will involve the use of fuels for diesel-powered equipment and chemicals, such as adhesives, sealants, and paints. As applicable, project personnel will use non-hazardous chemical substitutes in place of hazardous chemicals as long as the non-hazardous substitutes meet the requirements/specifications of the project. Spill prevention/minimization measures will be used during storage and use of chemicals.

5. Contaminated Sites Disturbance - Any soil disturbance activities that may be required for equipment repair/replacement will be performed within Site CPP-88. A notice of soil disturbance will be completed and approved prior to excavation actions.

6. Cultural/Historical Resource Disturbance – CPP-603 and CPP-604 are eligible for listing on the National Register of Historic Places and are considered a Category 2 historic properties; CPP--606 is also eligible for listing on the National Register of Historic Places and is considered a Category 3 historic property. Removal and/or changes of original features may adversely impact these historic properties; however, the project activities as described are exempt as safety system activities. As such, the project may proceed as described without further cultural resource review.

9. Hazardous/Mixed Waste Generation and Management - Hazardous waste may be generated in the process of removing old ECS materials. Hazardous, mixed, and/or universal waste disposal will be conducted at an appropriate licensed disposal facility and in accordance with the disposal facility’s waste acceptance criteria (WAC) through Waste Generator Services.

Some of the impacted INTEC buildings are Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) permitted facilities. However, the nature of the minor modifications will not require modifications to the HWMA/RCRA permit.

10. Hazardous/Rad. Material or Waste Handling and Trans. – As applicable, hazardous waste determinations will be performed on all generated waste to determine the appropriate management practices. Waste streams will be evaluated to determine if any of these materials can be recycled or reused and will be further evaluated to implement actions for minimizing waste generation.

11. Industrial Waste Generation and Management - Industrial waste will be generated as a result of the ECS upgrade project. Examples of industrial waste include horns, strobes, speakers, wiring, mounting brackets, metal conduit, packaging, etc. that are not deemed to be hazardous. This waste stream will be managed through Waste Generator Services and disposed of at the INL Landfill Complex.

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12. Interaction with Wildlife/Habitat - Project personnel will take steps (e.g., installation of bird netting) to mitigate potential bird nesting in areas where nesting could be disturbed by project activities (e.g., covered door railings and porticos above doorways). Project personnel are not to disturb active bird nesting sites.

14. PCB Contamination – A small quantity of PCB-contaminated waste may be generated during modifications (e.g., paint chips). MCP-3480, Appendix C lists potential sources of Non-Liquid PCBs that may be present.

16. Radioactive Waste Generation and Management - Low level waste (LLW) may be generated as a result of work in contaminated or potentially contaminated areas (PPE, old ECS equipment, etc.). Waste Generator Services will facilitate disposal of any LLW.

19. Work within areas Subject to Flooding – The following buildings are within the Bureau of Reclamation 100-year Big Lost River floodplain: CPP-613, 644, 652, 684, 749, 1604, 1617, 1618, 1634, 1674, 1646, 1662, 1673, 1683, 1686, 1774. If the hypothetical 100-year flood event occurs while hazardous, mixed, and/or universal waste are generated or present in these buildings, then the potential exists for flood waters to contact and “wash out” the hazardous wastes. As discussed in 40 CFR 264.18(b), procedures need to be in effect which will cause the wastes to be removed safely, before flood waters can reach the facility, to a location where the wastes will not be vulnerable to flood waters.

SECTION D. Determine the Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification, and the approval date.

Note: 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, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; 3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; 4) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not “connected” nor “related” (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: Categorical Exclusion B2.5, Safety and environmental improvements of a facility, replacement/upgrade of facility components

Justification: The emergency communication upgrades will ensure the INTEC system is efficient and in compliance with new Life Safety codes.

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

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on August 22, 2016.