

**Revised Finding of No Significant Impact
for the
Proposed Use of Savannah River Site Lands for Military Training**

Agency: U.S. Department of Energy

Action: Revised Finding of No Significant Impact

Summary: The Department of Energy (DOE) prepared an environmental assessment (EA) (DOE/EA-1606, *Proposed Use of Savannah River Site Lands for Military Training*, [Army EA]) in 2011 to evaluate the potential environmental impacts of the proposed use of Savannah River Site (SRS) lands and facilities for military training. Based on the analyses in the Army EA, DOE determined that the proposed activity does not constitute a major federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act (NEPA) of 1969 and issued a Finding of No Significant Impact (FONSI) on December 15, 2011.

In the 2011 Army EA, DOE presented the proposed action as the use of SRS lands for 26 types of low intensity non-live-fire tactical maneuver training activities by the military and other government agencies. In the EA, DOE defined “Army” as an all-inclusive term to denote Department of Defense (DOD) and Department of Homeland Security (DHS) organizations (e.g., Army, Navy, Marine Corps, Air Force, Coast Guard, National Guard and Reserve units, other military organizations, and civilian employees, sponsors, and contractors associated with or attached to a branch of DOD or DHS) that may use SRS lands and facilities for training purposes. Now, DOE is clarifying this definition to include work performed by the Savannah River National Laboratory (SRNL) under Work for Others (WFO) agreements, for example, overseeing and facilitating the Federal Bureau of Investigation’s (FBI) Vehicle Borne Radiological Dispersal Device (VBRDD) training. DOE uses this definition throughout this revised FONSI.

Training activities described in the EA included (Type 5) “Chemical, Biological, Radiological, Nuclear Defense Operations” and (Type 24) “Civil Support Team and Chemical, Biological, Radiological, Nuclear, and Explosive Agents Enhanced Response Force Package Operations.”

Because these training activities are consistent with the types of exercises described in the Army EA, and because they would be conducted in accordance with the Joint Standard Operating Procedures [JSPOP] (Appendix A to the Army EA), DOE finds that these exercises can be conducted without significant environmental impacts.

Public Availability: Copies of the Army EA and FONSI, this revised FONSI, and further information on the DOE NEPA process are available from:

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The EA and FONSI are available on the web at <http://www.srs.gov/general/srs-home.html> and <http://energy.gov/nepa/nepa-documents/environmental-assessments-ea>.

Background: DOE prepared the Army EA to evaluate potential environmental impacts of proposed and alternative actions regarding the United States Departments of Defense and Homeland Security (DOD and DHS, respectively) and other government agencies' use of SRS lands and facilities for military and other government agency training purposes. In the Army EA and this revised FONSI, the expression 'Army' is used as an all-inclusive term to denote DOD, DHS, and other government agencies (e.g., Army, Navy, Marine Corps, Air Force, Coast Guard, National Guard and reserve units, other military organizations, and civilian employees, sponsors, and contractors associated with or attached) that may use SRS lands and facilities for training purposes. In this revised FONSI, DOE is including work performed by SRNL under WFO agreements in the definition of Army training.

In a Memorandum of Understanding (MOU) dated June 11, 2007, DOE and the Army established a framework for providing Army access to SRS for low intensity non-live-fire military tactical maneuver training. This MOU was implemented by an Interagency Agreement (IAG) entered into by the DOE Savannah River Operations Office (DOE-SR) and the Department of the Army – Fort Gordon (DOA-FG) on September 4, 2009. Guidelines, procedures, and processes governing the Army's use of SRS for the proposed military training mission are contained in the JSOP developed by DOE and the Army. The JSOP is Appendix A of the Army EA.

The JSOP specifies the overarching actions and responsibilities to be taken by all SRS organizations and all Army organizations relative to the coordination, scheduling, and conduct of military training at SRS and the use of Site land and facilities. It is designed to facilitate combat realism in training, maximize use of facilities and training areas, eliminate or minimize safety hazards and unsafe practices, and avoid or minimize interference with DOE operations at SRS. The provisions of the JSOP apply to all organizations and individuals involved in any aspect of Army training activities at SRS. This includes SRS organizations as well as all national and state security and response units.

Purpose and Need for Agency Action: As described in DOE/EA-1606, the primary mission of the Army is to provide forces and capabilities necessary to maintain and protect the Nation's security. In support of this mission, the Army requires suitable land area to conduct tactical maneuver training activities. There is currently a lack of sufficient land area for these training activities in the continental U.S. and the shortfall is growing. SRS possesses large tracts of

undeveloped land suitable for military and other government agency training. The purpose of the proposed action considered in this EA is to enable the Army to conduct low intensity, non-live-fire tactical maneuver training activities on SRS to support current and future Army mission requirements. The utilization of SRS by the Army will satisfy, in part, its need for additional land area to support vital training missions.

Proposed Action: DOE proposes to further define tactical maneuver training and WFO specialized tactical training to include, for example, the FBI's VBRDD training. This activity would demonstrate the FBI's ability to respond to a radiological dispersal device (RDD) detonated in a vehicle using the field division of the Hazardous Materials Response Teams (HMRTs). RDD training activity would be conducted on SRS lands, such as Gunsite 51 as described in the Army EA, with minor explosives. After the detonation, Savannah River National Laboratory (SRNL) experts in the use of radiological materials would disperse a very short-lived radioactive isotope and "salt" the debris field with sealed sources (e.g., ^{60}Co and ^{137}Cs). Training participants would then respond to a scenario where a "dirty bomb" has been detonated in a vehicle. SRNL personnel will monitor the conduct of the training exercise, retrieve and safely store sealed sources, and ensure that dispersed radionuclides have decayed to background levels.

Prior to the initiation of each training exercise, SRNL training coordinators will evaluate proposed training exercises and areas, and prepare a site-specific training plan designed to ensure safety, and to protect and sustain the human environment. DOE will document pre-training site conditions of the training area. This evaluation will identify potential land use conflicts, such as the presence of sensitive environmental resources and/or controlled areas which will require avoidance. Subsequent to each training event, DOE will assess the training site and determine what actions may be required to mitigate any observed environmental damage. The training entity will be responsible for restoring impacted SRS resources to their documented pre-training state, and DOE will determine if the mitigation actions taken are adequate. Training activity conducted under WFO arrangements will follow the planning and mitigation procedures as described in the JSOP, including planning meetings with all potential affected SRS organizations at specified times in advance of the proposed training activity.

Alternatives: In accordance with NEPA regulations, the other alternative DOE considered is the 'No Action' alternative, which is the same as the proposed action in the existing EA and FONSI. Under the 'No Action' alternative, the training activities conducted under WFO arrangements would not be carried out at SRS. In the past, SRS has supported training by specialized Army units for limited, short-term, non-live-fire tactical training exercises. Prior to the Army training EA and FONSI, each of these training events was individually reviewed under NEPA and categorically excluded from further NEPA review. Under the 'No Action' alternative, DOE expects that this baseline level of military training at SRS would continue.

Environmental Impacts: As with the original proposed training activity, no significant impacts to the human environment would be expected to result from the use of SRS lands and facilities for training. Implementation of the proposed action would be supported by existing SRS infrastructure and resources (e.g., waste management, power, potable water, roads, etc.). Any


additional waste loads and resource utilization generated by the proposed action would be accommodated easily by existing site facilities, and the associated environmental impacts would be negligible. Radiological and non-radiological air emissions resulting from the minor explosives detonations and post-detonation use of short-lived radioactive material and sealed sources (e.g., ^{60}Co and ^{137}Cs) would be well within established regulatory limits and not adversely impact local air quality. Surface and groundwater resources would not be impacted. Any spills or leaks occurring during training exercises would be cleaned up in accordance with Site procedures and protocols.

Work force requirements and costs associated with implementation of the proposed action would be minimal compared to the total SRS budget. Employment, consequently the potential for significant socioeconomic impacts within the SRS region-of-influence, would be negligible. Any environmental impacts associated with the proposed action would be limited to specific geographic areas within SRS and not be evidenced beyond the Site boundary. The potential for engendering environmental justice issues would, therefore, be negligible.

Implementation of the proposed action is not expected to have a measurable impact on the human environment (e.g., socioeconomics, human health and safety, threatened and endangered species, wetlands, migratory avian species, air, land, and water resources). The proposed action would not add measurably to the cumulative environmental effect of other ongoing actions and operations within SRS and the surrounding area. Implementation of the proposed action would significantly enhance the U.S. Government's ability to train staff to respond to a radiological dispersal device "dirty bomb" scenario detonated in a vehicle.

Determination: Based on the information and analysis presented in DOE/EA-1606, as well as the successful demonstration of a similar pilot training exercise previously conducted at SRS, training activities by other Army units conducted under WFO arrangements with the SRNL does not constitute a major federal action significantly affecting the quality of the human environment within the meaning of NEPA. Expected environmental impacts of allowing other government agencies to train on SRS lands and facilities are less than or equal to those of Army, or are otherwise bounded by the Army EA analysis. Therefore, an Environmental Impact Statement is not required, and DOE is issuing this revised FONSI.

Signed at Aiken, South Carolina this 26 day of July, 2012.



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