

NA-LA NEPA COMPLIANCE OFFICER - COMPLIANCE DETERMINATION FORM

LANS No: 17-01

Project/Activity Title: Los Alamos National Laboratory (LANL) Domestic and Foreign Sealed Source Recovery Project	Accession No: 22325 PRID No: N/A	Date: January 10, 2017
<p>Purpose: The National Nuclear Security Administration (NNSA) proposed action is to continue the recovery of domestic and foreign actinide-and non-actinide bearing sealed sources and remove the preparation of yearly categorical exclusions (CX) for the Off-site Source Recovery Project (OSRP). The OSRP is an established multi-year program covered by a Department of Energy’s (DOE) National Environmental Policy Act (NEPA) CX. The OSRP recovers both domestic and foreign sealed sources. CXs have been prepared yearly for both domestic and foreign recovery efforts. The NNSA proposes to continue the OSRP and discontinue the preparation of yearly CXs with the submission of this CX for the LANL domestic and foreign OSRP. Yearly CX preparation is unnecessary as the OSRP is clearly covered under CX B2.6 and will result in a saving of personnel time and budget. The OSRP will still undergo a yearly evaluation to verify that project activities remain within the boundaries of the CX.</p>		
Location: Technical Area (TA)-54 and TA-55	Project Contact: Randy Reddick, LANS EPC-ES 7-4299, reddick_r@lanl.gov	
<p>Applicable NEPA Coverage: DOE NEPA Implementing Procedures 10 Code of Federal Regulations (CFR) Part 1021, Appendix B to Subpart D of Part 1021—Categorical Exclusions Applicable to Specific Agency Actions</p> <p>B2.6 Recovery of radioactive sealed sources Recovery of radioactive sealed sources and sealed source-containing devices from domestic or foreign locations provided that (1) the recovered items are transported and stored in compliant containers, and (2) the receiving site has sufficient existing storage capacity and all required licenses, permits, and approvals.</p> <p>Previous NEPA Coverage:</p> <ol style="list-style-type: none"> 1) <i>Department of Energy, Finding of No Significant Impact Radioactive Source Recover Program, Los Alamos National Laboratory.</i> December 21, 1995. Anticipated the program would have a duration of 15 years and involve the recovery of less than 3 kilograms of ²⁴¹Am [Am-be neutron sources] and less than 1 kg of ²³⁸Pu [²³⁸Pu-be]. 2) <i>Supplement Analysis, Site-Wide Environmental Impact Statement for Continued Operation of Los Alamos National Laboratory, Modification of Management Methods for Certain Unwanted Radioactive Sealed Sources at Los Alamos National Laboratory</i> (DOE/EIS-0238-SA-01) (2000). This SA was prepared to evaluate a proposal to modify the Off-Site Source Recovery Project from one that accepted the sealed sources and chemically reclaimed the radioactive material to one that accepted the sealed sources and managed them as radioactive waste. 3) <i>Supplement Analysis, Site-Wide Environmental Impact Statement for Continued Operation of Los Alamos National Laboratory, Recovery and Storage of Strontium-90 (Sr-90) Fueled Radioisotope Thermal Electric Generators at Los Alamos National Laboratory</i> (DOE/EIS-0238-SA-04) (2004). This SA was prepared to evaluate a proposal to recover, store, and manage as waste certain radioisotope thermal electric generators containing sealed sources as part of the Off-Site Source Recovery Project. 		

4) *National Nuclear Security Administration, Record of Decision: Site-Wide Environmental Impact Statement for Continued Operation of Los Alamos National Laboratory, Los Alamos, NM.* Federal Register/Vol. 73, No. 188/Friday, September 26, 2008/Notices. Broadened the types and quantities of radioactive sealed sources (^{60}Co , ^{192}Ir , ^{252}Cf , ^{226}Ra) that LANL can manage and store prior to their disposal.

BACKGROUND: The DOE/NNSA's OSRP was initiated after DOE prepared the *Environmental Assessment, Radioactive Source Recovery Program* (DOE/EA-1059) in 1995 that supported a finding of no significant impact. The initial scope of the Project included any sealed sources comprising Greater than Class C low-level radioactive waste. However, since September 11, 2001, the mission expanded from environmental concerns to address broader public safety and national security requirements.

DESCRIPTION OF PROPOSED ACTION: The OSRP, managed by the Los Alamos National Security, LLC (LANS) Nuclear Engineering and Nonproliferation Division, recovers domestic origin actinide and non-actinide sealed sources from within the United States and foreign locations. Sufficient handling and storage facilities exist at LANL and other storage facilities to support OSRP operations. OSRP personnel, prior to disposal, and after safely and securely packaging the recovered actinide-and non-actinide bearing sealed sources arrange for their transport and storage at LANL and other storage facilities. Following LANL receipt of the sealed source material, the LANS Nuclear Material Control and Accountability Group make a determination whether or not to terminate safeguard requirements on non-plutonium-239 sources. If safeguard requirements are not required, the non-Pu-239 sealed sources are managed as waste and stored at Technical Area (TA)-54. Plutonium-239 sealed sources are stored at TA-55 and safeguard requirements maintained until the material is approved for shipment to the Waste Isolation Pilot Plant (WIPP) which is the only disposal path available for transuranic sources. Non-transuranic sources are disposed of at the Nevada National Security Site.

IMPACT ASSESSMENT: In preparation of this NEPA Determination, NNSA personnel determined that there would be no significant impact from the proposed action to continue the recovery of domestic and foreign actinide-and non-actinide bearing sealed sources or the termination of the yearly preparation of a LANL OSRP CX. The OSRP will still undergo a yearly evaluation to verify that project activities remain within the conditions of CX B2.6 (storage in compliant containers and the receiving site has sufficient and approved storage capacity).

CONCLUSION: Based on this NEPA determination analysis the proposed action does not present a significant effect on the human environment. There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects or threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or executive orders. Consequently, no further NEPA analysis is necessary or required.

NEPA DETERMINATION

Based on my review of the Proposed Action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), I have determined that the Proposed Action as described herein, falls within the Department of Energy National Environmental Policy Act Implementing Procedures listed in 10 CFR Part 1021, Subpart D, Appendix B 10 CFR Part 1021, Appendix B to Subpart D of Part 1021—Categorical Exclusions Applicable to Specific Agency Actions: B2.6 Recovery of radioactive sealed sources. There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects or threaten a

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LANS No: 17-01

violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or executive orders. If changes are made to the scope of the action so that it is no longer bounded by the enclosed description, or the project is changed to encompass other actions, NEPA requirements for the action will need to be reassessed at that time and further analysis may be required.

NNSA NEPA Compliance Officer: Jane Summerson

Date:

Signature:



1/9/17