

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: HFEF Tritium Monitoring System Removal

### SECTION B. Project Description and Purpose:

In 1990, the Hot Fuels Examination Facility (HFEF) completed a NEPA evaluation for installing a tritium monitoring system in the basement to monitor incoming casks for the presence of tritium. The tritium monitoring system supported the Heavy Water Reactor-New Production Reactor (HWR-NPR) Engineering Development Program. Idaho National Laboratory (INL) has not used the tritium monitoring system for numerous years and proposes to remove it from HFEF. The proposed action removes the tritium monitoring system and about 100 feet of PVC lines. The components are in a Radiological Buffer Area (RBA) and will be disposed of as low level waste (LLW) under the direction of Waste Generator Services (WGS).

The environmental impacts of transferring LLW from the INL Site to the Nevada National Security Site were analyzed in the 2014 *Final Site-Wide Environmental Impact Statement for the Continued Operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and Off-Site Locations in the State of Nevada* (DOE/EIS-0426) and DOE's *Waste Management Programmatic EIS* (DOE/EIS-200). The fourth Record of Decision (ROD) (65 FR 10061, February 25, 2000) for DOE's *Waste Management Programmatic EIS* established the Nevada National Security Site as one of two regional LLW and MLLW disposal sites.

Onsite disposal of RH-LLW was analyzed in the *Final Environmental Assessment for the Replacement Capability for Disposal of Remote-Handled Low-Level Radioactive Waste Generated at the Department of Energy's Idaho Site* (DOE/EA-1793, 2011).

### SECTION C. Environmental Aspects or Potential Sources of Impact:

#### Disturbing Cultural or Biological Resources

HFEF (MFC-785) is eligible for nomination to the National Register of Historic Places. Project activities have the potential to impact HFEF.

#### Generating and Managing Waste

The proposed action will generate LLW and industrial waste such as scrap metal. Project personnel would work with WGS to properly package and transport waste according to laboratory procedures.

#### Releasing Contaminants

Project activities use typical construction chemicals such as fuels, lubricants, adhesives, concrete, concrete cure, asphalt, etc., and those used must be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. Although not anticipated, there is a potential for spills when using chemicals or fueling equipment.

#### Using, Reusing, and Conserving Natural Resources

All applicable waste will be diverted from disposal in the landfill when possible. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project will practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting have recycled content and are non-toxic or less-toxic alternatives. New equipment will meet either the Energy Star or SNAP requirements as appropriate (see <http://www.sftool.gov/GreenProcurement/ProductCategory/14>).

### 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, item B6.1 "Cleanup actions"

**DOE-ID NEPA CX DETERMINATION**  
**Idaho National Laboratory**

*Final Site-Wide Environmental Impact Statement for the Continued Operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and Off-Site Locations in the State of Nevada (DOE/EIS-0426, December 2014)*

*Final Environmental Assessment for the Replacement Capability for Disposal of Remote-Handled Low-Level Radioactive Waste Generated at the Department of Energy's Idaho Site (DOE/EA-1793, 2011).*

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B item B6.1 "Small-scale, short-term cleanup actions, under RCRA, Atomic Energy Act, or other authorities, less than approximately 10 million dollars in cost (in 2011 dollars), to reduce risk to human health or the environment from the release or threat of release of a hazardous substance other than high-level radioactive waste and spent nuclear fuel, including treatment (such as incineration, encapsulation, physical or chemical separation, and compaction), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the action. These actions include, but are not limited to:

- a) Excavation or consolidation of contaminated soils or materials from drainage channels, retention basins, ponds, and spill areas that are not receiving contaminated surface water or wastewater, if surface water or groundwater would not collect and if such actions would reduce the spread of, or direct contact with, the contamination;
- b) Removal of bulk containers (such as drums and barrels) that contain or may contain hazardous substances, pollutants, contaminants, CERCLA-excluded petroleum or natural gas products, or hazardous wastes (designated in 40 CFR part 261 or applicable state requirements), if such actions would reduce the likelihood of spillage, leakage, fire, explosion, or exposure to humans, animals, or the food chain;
- c) Removal of an underground storage tank including its associated piping and underlying containment systems in accordance with applicable requirements (such as RCRA, subtitle I; 40 CFR part 265, subpart J; and 40 CFR part 280, subparts F and G) if such action would reduce the likelihood of spillage, leakage, or the spread of, or direct contact with, contamination;
- d) Repair or replacement of leaking containers;
- e) Capping or other containment of contaminated soils or sludges if the capping or containment would not unduly limit future groundwater remediation and if needed to reduce migration of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products into soil, groundwater, surface water, or air;
- f) Drainage or closing of man-made surface impoundments if needed to maintain the integrity of the structures;
- g) Confinement or perimeter protection using dikes, trenches, ditches, or diversions, or installing underground barriers, if needed to reduce the spread of, or direct contact with, the contamination;
- h) Stabilization, but not expansion, of berms, dikes, impoundments, or caps if needed to maintain integrity of the structures;
- i) Drainage controls (such as run-off or run-on diversion) if needed to reduce offsite migration of hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum or natural gas products or to prevent precipitation or run-off from other sources from entering the release area from other areas;
- j) Segregation of wastes that may react with one another or form a mixture that could result in adverse environmental impacts;
- k) Use of chemicals and other materials to neutralize the pH of wastes;
- l) Use of chemicals and other materials to retard the spread of the release or to mitigate its effects if the use of such chemicals would reduce the spread of, or direct contact with, the contamination;
- m) Installation and operation of gas ventilation systems in soil to remove methane or petroleum vapors without any toxic or radioactive co-contaminants if appropriate filtration or gas treatment is in place;
- n) Installation of fences, warning signs, or other security or site control precautions if humans or animals have access to the release; and
- o) Provision of an alternative water supply that would not create new water sources if necessary immediately to reduce exposure to contaminated household or industrial use water and continuing until such time as local authorities can satisfy the need for a permanent remedy."

The environmental impacts of transferring LLW from the INL Site to the Nevada National Security Site were analyzed in the 2014 *Final Site-Wide Environmental Impact Statement for the Continued Operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and Off-Site Locations in the State of Nevada (DOE/EIS-0426)* and DOE's *Waste Management Programmatic EIS (DOE/EIS-200)*. The fourth Record of Decision (ROD) (65 FR 10061, February 25, 2000) for DOE's *Waste Management Programmatic EIS* established the Nevada National Security Site as one of two regional LLW and MLLW disposal sites.

Onsite disposal of RH-LLW was analyzed in the *Final Environmental Assessment for the Replacement Capability for Disposal of Remote-Handled Low-Level Radioactive Waste Generated at the Department of Energy's Idaho Site (DOE/EA-1793, 2011)*.

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

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 03/11/220