

**GENERIC CATEGORICAL EXCLUSION FOR SAFETY AND SECURITY  
COMPONENT INSTALLATION AND ALTERATION,  
PACIFIC NORTHWEST NATIONAL LABORATORY,  
RICHLAND, WASHINGTON**

**Proposed Action:**

The U.S. Department of Energy (DOE) Pacific Northwest Site Office (PNSO) proposes to install, alter, and/or maintain safety and security components to maintain an adequate protective planning stance.

**Location of Action:**

The proposed action would largely occur on the Pacific Northwest National Laboratory (PNNL) campuses in Richland and Sequim, Washington, and occasionally at other locations in the United States.

**Description of the Proposed Action:**

DOE proposes to install, alter, and/or maintain safety and security systems to continue to provide appropriate levels of protection against unauthorized access, theft, diversion, loss of custody, and destruction of DOE assets. As determined necessary, these activities would consist of installing, altering, and/or maintaining components such as:

- Alarm, warning, and emergency call systems; access control systems; control systems to provide automatic shutdown; fire detection and protection systems; and radiation and criticality monitors and alarms
- Vehicle and pedestrian access points
- Safety and security information signs
- Fencing, barriers, and other devices, as long as they do not have the potential to significantly impede wildlife population movements (including migration) or surface water flow, to direct authorized access and to deter unauthorized access.

The proposed actions would also include reasonably foreseeable actions necessary to implement the safety and security activities, such as staging personnel, equipment, and materials, installing conduit and wiring, providing personal protective equipment and other supplies, maintaining equipment, and awarding grants and contracts.

**Biological and Cultural Resources:**

Biological and cultural resources reviews will be conducted prior to such activities to assure that impacts to sensitive resources are avoided or minimized.

The biological resources review will identify the occurrence of federally and state-protected species and habitats in the project area such as avian species protected under the Migratory Bird Treaty Act (MBTA); species protected by the Marine Mammal Protection Act (MMPA); essential fish habitat as defined by the Magnuson-Stevens Fisheries Conservation and Management Act (MSA); plant and animal species and critical habitat protected under the Endangered Species Act (ESA), including candidates for such protection; and state species listed as threatened or endangered. Resource review recommendations will be followed during security installment, alteration, and maintenance activities to assure there are no adverse impacts to sensitive species and resources.

DOE will conduct a cultural resources review as part of the Section 106 process of the National Historic Preservation Act (NHPA). The Section 106 process assesses undertakings to determine if the undertaking will have an adverse effect/impact to historic properties.

If the biological and/or the cultural resources review determines that resources may be adversely affected/impacted, the use of this categorical exclusion (CX) would be reevaluated. Potential options could be, but are not limited to, changing the proposed activity location, the development of mitigation measures to render the impacts not significant, or the performance of additional National Environmental Policy Act (NEPA) analysis and review.

#### **Categorical Exclusion to Be Applied:**

As the proposed action is to install, alter, and/or maintain safety and security components, the following CXs, as listed in the DOE NEPA implementing procedures, 10 CFR 1021, would apply:

*B1.11* Installation of fencing, including, but not limited to border marking, that would not have the potential to significantly impede wildlife population movements (including migration) or surface water flow.

*B2.2* Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment).

Generic CXs are authorized by 10 CFR 1021.410(f) for recurring activities to be undertaken during a specified period of time, after considering potential aggregated impacts.

#### **Eligibility Criteria:**

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts [40 CFR 1508.25(a)(1)], is not related to other actions with individually insignificant but cumulatively significant impacts [40 CFR 1508.27(b)(7)], and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed below:

<b>INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, Appendix B (1)-(5)</b>	
<i>Would the Proposed Action:</i>	Evaluation
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health?	The proposed action would not threaten a violation of regulations or DOE or Executive Orders.
Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities?	No waste management facilities would be constructed under this CX. Any generated waste would be managed in accordance with applicable regulations in existing facilities. Waste disposal pathways would be identified prior to generating waste and waste generation would be minimized.
Disturb hazardous substances, pollutants, or contaminants that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No preexisting hazardous substances, pollutants, or contaminants would be disturbed in a manner that or results in uncontrolled or unpermitted releases.
Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species?	The proposed action would not involve the use of genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species (unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements).
<p>Have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited, to:</p> <ul style="list-style-type: none"> <li>• protected historic/archaeological resources</li> <li>• protected biological resources and habitat</li> <li>• jurisdictional wetlands, 100-year floodplains</li> <li>• Federal- or state-designated parks and wildlife refuges, wilderness areas, wild and scenic rivers, national monuments, marine sanctuaries, national natural landmarks, and scenic areas.</li> </ul>	<p>No environmentally sensitive resources would be adversely affected by the proposed safety and security alteration actions.</p> <p>The proposed action would not adversely affect floodplains, wetlands regulated under the Clean Water Act, national monuments, or other specially designated areas, prime agricultural lands, or special sources of water.</p> <p>Potential impacts to Biological or Cultural resources would be addressed as described above.</p>

**Summary of Environmental Impacts:**

The following table summarizes environmental impacts considered when preparing this CX determination.


<b>Environmental Impacts Considered when Preparing this CX Determination</b>	
<i>Would the Proposed Action:</i>	Evaluation

Result in more than minimal air impacts?	There might be temporary and localized dust and fumes from construction equipment while safety and security components are being installed or altered. These would be minimized as necessary, using water applications or other emission controls, and would be compliant with applicable permits, local, state, and federal regulations, DOE orders, and PNNL guidelines.
Increase offsite radiation dose measurably?	Safety and security alterations are not likely to include activities that would increase offsite radiation dose.
Require a radiological work permit?	It is possible that installing or altering radiation detection or other safety and security components might require a radiological work permit. Activities would be performed in compliance with as low as reasonably achievable (ALARA) principles, applicable state and federal regulations, DOE Orders, and PNNL guidelines. The radiation received by workers during the performance of activities would be administratively controlled below DOE limits as defined in 10 CFR 835.202(a). Under normal circumstances, those limits control individual radiation exposure to below an annual effective dose equivalent of 5 rem.
Discharge any liquids to the environment?	Although unlikely, it is possible that safety and security alterations might result in minor and short-term liquid discharges, for example, water applications to control dust and cleanup rinse water. Effluents would be managed in accordance with applicable regulations and best management practices.
Require a Spill Prevention, Control, and Countermeasures plan?	Safety and security alterations are not likely to require a specific Spill Prevention, Control, and Countermeasures plan. Operations would be conducted in accordance with best management practices (BMP) to prevent and control accidental releases.
Use carcinogens, hazardous, or toxic chemicals/materials?	Although unlikely, safety and security activities might involve the use of carcinogens, hazardous and/or toxic chemicals and materials, such as cleaning solvents, fuel, oil, and antifreeze. Project inventories would be maintained at the lowest practicable levels, and chemical wastes would be recycled, neutralized, or regenerated if possible. Product substitution (use of less toxic chemicals in place of more toxic chemicals) would be considered where reasonable.
Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?	Safety and security activities might result in minor amounts of waste, such as excess caulking, paint, epoxy, and cleaning fluids and rags. If unrecyclable, such wastes would be characterized, handled, packaged, transported, treated, stored, and/or disposed of in existing treatment, storage, and disposal facilities in accordance with applicable regulations.

Cause more than a minor or temporary increase in noise level?	It is possible that installation of security signs, access controls, or other components would cause short-term increases in the ambient noise level. These impacts would be isolated and temporary.
Create light / glare, or other aesthetic impacts?	Safety and security alterations are not likely to cause light, glare, or other aesthetic impacts.
Require an excavation permit (e.g., for test pits, wells, utility installation)?	An excavation permit, such as a PNNL or Hanford Site excavation permit, might be required to install signs or other safety and security components. Stipulations in the excavation permit to minimize potential impacts to safety and the environment would be followed. Applicable permits would be obtained including evaluations of impacts to biological and cultural resources.
Disturb an undeveloped area?	It is possible that security signs, access controls, or other components might be placed in undeveloped areas. Additional NEPA would be required if disturbances would impact sensitive species and/or habitats; cultural resources, including historic buildings and Traditional Cultural Properties; or other resources.
Result in more than minimal impacts on transportation or public services?	It is possible that installation of security signs, access controls, or other components might cause short-term disruption of traffic flow. These impacts would be isolated and temporary.
Disproportionately impact low-income or minority populations?	Safety and security alterations would not disproportionately affect low-income or minority populations.
Require environmental or other permits from federal, state, or local agencies?	Although not expected, it is possible that limited safety and security activities might require notifications and approvals from air regulatory agencies to use temporary and/or portable air pollution sources, such as engines or generators.

**Compliance Action:**

I have determined that the proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, and meets the requirements for the CX referenced above. Therefore, using the authority delegated to me, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This determination must be reviewed at least once every 5 years.

**Signature:**  Digitally signed by  
 THOMAS MCDERMOTT  
 Date: 2023.02.01  
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Tom McDermott  
 PNSO NEPA Compliance Officer

cc: ES Norris, PNNL