# U.S. Department of Energy Naval Reactors Representative's Office Kesselring Site

National Environmental Policy Act (NEPA) Categorical Exclusion (CX)

Determination Summary Form

# KESSELRING SITE BOILER HOUSE DEAERATING FEED TANK REPLACEMENT PROJECT

#### REFERENCE

10 CFR Part 1021, Department of Energy National Environmental Policy Act Implementing Procedures, Subpart D, Typical Classes of Actions.

#### PROJECT SCOPE DISCUSSION

The Kesselring Site (KS) Boiler House (BH) Deaerating Feed Tank (DFT) has been in service for over 30 years and has surpassed its service life. Interior tank deficiencies identified since 2012, have been repaired and tracked on a regular inspection interval. Interior inspection during the 2021 Steam Shutdown revealed widespread deficiencies, also requiring weld repair.

The DFT is a single point failure within the steam generating system; failure of this component during the heating season will shut down the entire KS steam heating system. Replacement of the DFT is required in order to minimize the potential for interruptions to the steam service at KS. During the project, additional improvements shall be made to the DFT support structure, feed pumps, and instrumentation.

The project does not violate applicable regulatory requirements, require construction or major expansion of waste handling facilities, result in unpermitted releases of hazardous substances, or adversely affect environmentally sensitive resources, including wetlands. The project does not involve genetically engineered organisms or species. There are no extraordinary circumstances related to the proposed action. The project has not been segmented to meet the definition of a categorical exclusion and is not connected to other actions with potentially significant and/or cumulative impacts.

### **CONCLUSION**

The Kesselring Site Boiler House DFT Replacement Project is categorically excluded from additional NEPA documentation under 10 CFR 1021 Subpart D, Appendix B, B1.3 B1.5, B1.16, and B5.2. Specifically, the categorical exclusions that apply are:

#### B1.3 Routine maintenance

Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a

substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- (a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;
- (b) Door and window repair or replacement;
- (c) Wall, ceiling, or floor repair or replacement;
- (d) Reroofing;
- (e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;
- (f) Routine replacement of high-efficiency particulate air filters;
- (g) Inspection and/or treatment of currently installed utility poles;
- (h) Repair of road embankments;
- (i) Repair or replacement of fire protection sprinkler systems;
- (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;
- (k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);
- (I) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
- (m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);
- (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and
- (p) Removal of debris.

#### B1.5 Existing Steam Plants and Cooling Water Systems

Minor improvements to existing steam plants and cooling water systems (including, but not limited to, modifications of existing cooling towers and ponds), provided that the improvements would not: (1) Create new sources of water or involve new receiving waters; (2) have the potential to cause significant impacts on water withdrawals or the temperature of discharged water; or (3) increase introductions of, or involve new introductions of, hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products.

# B1.16 Asbestos Removal

Removal of asbestos-containing materials from buildings in accordance with applicable requirements (such as 40 CFR part 61, "National Emission Standards for Hazardous Air Pollutants"; 40 CFR part 763, "Asbestos"; 29 CFR part 1910, subpart I, "Personal Protective Equipment"; and 29 CFR part 1926, "Safety and Health Regulations for Construction"; and appropriate state and local requirements, including certification of removal contractors and technicians).

# B5.2 Modifications to Pumps and Piping

Modifications to existing pump and piping configurations (including, but not limited to, manifolds, metering systems, and other instrumentation on such configurations conveying materials such as air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, nitrogen gas, oil, produced water, steam, and water). Covered modifications would not have the potential to cause significant changes to design process flow rates or permitted air emissions.

Sincerely,

Harry S. Digitally signed by Harry S. Miller
Date: 2023.09.07
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H. S. Miller, NRRO Facilities and Construction Project Officer