

**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 Classified Islands 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 Classified Islands project will modify existing buildings to create Vault Type Rooms (VTR). VTR's will be created in existing buildings either as a whole building VTR or subsections within a building. In general, the modifications required to create a VTR, and applications of CX's, are:

1) Modification of Support buildings:

- a) Support buildings at the Kesselring site will be modified to create VTRs.
- b) Support building modifications are covered by CX B1.15

2) Modification or replacement of existing doors:

- a) Doors will have special locking hardware installed for each entry/exit door of a VTR.
- b) Door replacements are to update the security measures invoking CX B1.3
- c) There are known doors that will be replaced that contain lead paint invoking CX B1.34

3) Window modifications:

- a) Windows will be made intrusion resistant. Windows will be made inoperable by locking mechanism. Windows will also be made visually obscure by installing curtains or blinds.
- b) There are known windows located in paneling that contains asbestos and polychlorinated biphenyls (PCB) invoking CX B1.16 and B1.17 respectively.

4) Penetrations, in the envelope of a VTR, will be made intrusion resistant.

5) Partition modifications:

- a) For VTR's that are subsections of a building, partitions (i.e. walls) shall be integrated between the floor and ceiling of the building requiring modification.

b) There are known walls requiring modification that have asbestos containing paint invoking CX B1.16.

6) Installation of security system hardware:

a) Security panels, conduit runs for power and conduit runs for security cables will be installed.

b) Installation of security system hardware is covered by CX B2.2

7) Removal and installation of IT infrastructure:

a) Network cables, network switches and desktop computers will be removed or installed.

b) Removal and installation IT infrastructure, including electronic equipment is covered by CX B1.31.

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 Classified Island project is categorically excluded from additional NEPA documentation under 10 CFR 1021 Subpart D Appendix B1.3, B1.15, B1.16, B1.17, B1.31 B1.34 and B2.2.

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 reseeded, gabions, grading, and revegetation);
- (l) 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, cross arms, insulators, and downed power lines, 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.

B1.15 Support Buildings

Siting, Construction or Modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities). Assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.129, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix.

B1.16 Asbestos removal

Removal of asbestos-containing material from building 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).

B1.17 Polychlorinated biphenyl removal

Removal of polychlorinated biphenyl (PCB)-containing items (including, but not limited to, transformers and capacitors), PCB-containing oils flushed from transformers, PCB-flushing solutions, and PCB-containing spill materials from buildings or other above ground locations in accordance with applicable requirements (such as 40 CFR part 761).

B1.31 Installation or relocation of machinery and equipment

Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably

increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.

B1.34 Lead-based paint containment, removal and disposal

Containment, removal, and disposal of lead-based paint in accordance with applicable requirements (such as provisions relating to the certification of removal contractors and technicians at 40 CFR part 725, "Lead-Based Paint Poisoning Prevention in Certain Residential Structures").

B2.2 Building and equipment instrumentation

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, criticality and radiation monitors and alarms, and safeguards and security equipment).

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