

**U.S. Department of Energy  
Naval Reactors Laboratory Field Office**

**Knolls Laboratory**

National Environmental Policy Act (NEPA) Categorical Exclusion (CX)  
Determination Summary Form

**KNOLLS LABORATORY ENTRANCE UTILITIES REPLACEMENT PROJECT**

**REFERENCE**

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

**PROJECT SCOPE DISCUSSION**

The Knolls Laboratory (Site) Entrance Utilities Replacement Project (Project) encompasses the removal and replacement of several underground utility sections, some of which are in excess of 70 years old. Redevelopment of the areas above these utilities will include construction of two employee plazas and a monument to the Navy and the Naval Nuclear Propulsion Program (NNPP).

The Project scope consists of removal and/or replacement of domestic water, fire water, stormwater, steam, compressed air, and duct banks in the area north of the Site entrance. Removal of the utilities may also include removal of asbestos material. The excavated area will then be redeveloped to construct a west plaza adjacent to Buildings A5 and A2, and an east plaza north of Building A11. The two plazas flank each side of Center Road, just north of the Site's vehicle inspection area. The plazas include hardscape walking surfaces, planters, commemorative plaques, a flagpole, and seating areas for employees and visitors. The east plaza also incorporates the sail from a Los Angeles-class submarine in a monument that mimics a submarine breaking the surface of the ocean. The propulsion system of the Los Angeles class submarine was developed at the Knolls Laboratory.

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 Knolls Laboratory Entrance Utilities Replacement Project is categorically excluded from additional NEPA documentation under 10 CFR Part 1021, Subpart D, Appendix B, B1.3, B1.16, B1.27, and B1.33. Specifically, the categorical exclusions that apply are the following:

### *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);
- (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, 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.

#### *B1.16 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).

*B1.27 Disconnection of utilities*

Activities that are required for the disconnection of utility services (including, but not limited to, water, steam, telecommunications, and electrical power) after it has been determined that the continued operation of these systems is not needed for safety.

*B1.33 Stormwater runoff control*

Design, construction, and operation of control practices to reduce stormwater runoff and maintain natural hydrology. Activities include, but are not limited to, those that reduce impervious surfaces (such as vegetative practices and use of porous pavements), best management practices (such as silt fences, straw wattles, and fiber rolls), and use of green infrastructure or other low impact development practices (such as cisterns and green roofs).

NRLFO  
Approval:



---

D. A. Delwiche

Date: June 18, 2024

---

CX Determination Date