

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

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

**DECONTAMINATION AND DECOMMISSIONING PROJECTS (Task Order #2)  
CONTRACTED BY THE NAVAL NUCLEAR LABORATORY**

**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**

Naval Nuclear Laboratory will be contracting to perform Decontamination and Decommissioning (D&D) Projects (Task Order #2) to remediate, dismantle, and dispose of select above grade structures and select components associated with Building 19 (S3G Plant Support/Interactive Display Equipment (IDE) Building), Building 20 (Equipment Service Building), Building 21 (Fuel Service Building), Building 80A and 80B (M-140 Complex), and Pad 90 (MARF Reactor Access Enclosure). As part of this project, the contractor will also remediate, dismantle, and dispose of select below grade structures and inactive components associated with the Ultimate Heat Sink (UHS) Tunnel, MARF Emergency Core Cooling System (ECCS) Trench, and the MARF Radioactive Liquid Waste (RLW) Trench.

MARF prototype work covered under Task Order #2 for this action is considered part of disassembly activities and does not include reactor decommissioning work such as removal of the defueled reactor vessel. Future reactor compartment D&D will be separately evaluated in accordance with applicable requirements.

This project will remove hazardous material and supports future Kesselring Site projects. The contractor will perform building demolition, excavation, asbestos abatement, minor PCB cleanup and disposal, minor lead abatement, and minor radiological contamination cleanup. The contractor will characterize materials to support safe work completion and compliant disposal. The contractor or NNL will disconnect or reroute utilities to establish safe working conditions. The contractor will apply sediment and erosion control in accordance with all applicable local, state, and federal requirements during demolition and excavation activities. The contractor may establish and maintain job site trailers or small portable buildings to support execution. Additional information is provided below within Table 1 and Table 2.

Table 1: Indefinite Delivery – Indefinite Quantity (IDIQ) Task Order #2 Scope of Work

Building / Location	General Scope of Work
19	Remove inactive MARF & S8G Interactive Display Equipment (IDE) platforms, remove asbestos floor tiles, and perform radiological release of area.
20	Remove inactive systems and components (former S3G Off-Hull) and radiologically release the area.
MARF Radioactive Liquid Waste (RLW) Trench	RLW trench from Building 72 to Building 21 and associated piping. Radiologically release area as applicable.
ECCS Trench	Remove MARF ECCS trench from Building 72 to Building 81 and associated piping.
UHS Tunnel	Remove inactive non-radiological systems and components in the UHS Tunnel.
80A and 80B (M-140 Complex)	Demolish Building 80A and radiologically release footprint as applicable. Perform radiological release on Building 80B stair tower.
21 Area	Remove pipes and overhead pipe rack that runs from Building 20 over the top Building 21 roof to the east side of Building 72.
21	Remove Bilge Drain Radioactive (BDR) Processing System major components and RLW /Primary Coolant System, located in the Radioactive Area (RA) cell. Remove tanks, pumps and associated piping in the high-bay area. Utility Isolations for Building 21/21A.
Pad 90	Demolish legacy MARF Reactor Access Enclosure (RAE) Passageway (located at Pad 90) and miscellaneous components.

Table 2: Optional Scope of Work

Building / Location	Optional Scope of Work
21	Demolish Building 21/21A. Remediate pool area, perform radiological release, as applicable, and backfill. Restore area to final grade.

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

D&D Projects (Task Order #2) Contracted by the Naval Nuclear Laboratory is categorically excluded from additional NEPA documentation under 10 CFR 1021 Subpart D, Appendix B, B1.3, B1.15, B1.16, B1.17, B1.23, B1.27, B1.28, B1.33, and B1.34. Specifically, the DOE NEPA categorical exclusions that applies are as follows:

### 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.

#### B1.15 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; storage of supplies

and equipment for administrative services and 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, B1.29, 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 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).

#### B1.17 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 aboveground locations in accordance with applicable requirements (such as 40 CFR part 761).

#### B1.23 Demolition and disposal of buildings

Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces), provided that there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment.

#### 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.

#### B1.28 Placing a facility in an environmentally safe condition

Minor activities that are required to place a facility in an environmentally safe condition where there is no proposed use for the facility. These activities would include, but are not limited to, reducing surface contamination, and removing materials, equipment or waste (such as final defueling of a reactor, where there are adequate existing facilities for the treatment, storage, or disposal of the materials, equipment or waste). These activities would not include conditioning, treatment, or processing of spent nuclear fuel, high-level waste, or special nuclear materials.

#### 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).

#### 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 745, "Lead-Based Paint Poisoning Prevention In Certain Residential Structures").

NRRO Approval:

HARRY S.  
MILLER

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