

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

**Knolls Laboratory**

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

**CLASSIFIED ISLANDS GENERAL PLANT 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) Classified Island General Plant Project will modify existing buildings to establish areas within the Knolls Laboratory that will operate as classified Vault Type Rooms (VTR) within an otherwise unclassified facility. Several buildings at the Knolls Laboratory will need to be modified in order to establish the VTRs. The modifications include replacing access doors; window, ceiling and wall modifications; and installing electrical and communication infrastructure. Due to the age and known history of buildings, asbestos, lead based paint, and polychlorinated biphenyl containing materials may be encountered during modifications to the building infrastructure.

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 Classified Islands General Plant Project is categorically excluded from additional NEPA documentation under 10 CFR 1021 Subpart D Appendix B1.3, B1.15, B1.16, B1.17, B1.34 and B2.2. 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.

#### *B1.15 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, B1.35, 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 above ground locations in accordance with applicable requirements (such as 40 CFR part 761)

*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 system, control systems to provide automatic shutdown, fire detection and protection systems, criticality and radiation monitors and alarms, and safeguards and security equipment).

NRLFO  
Approval:



D. A. Delwiche

Date: July 31, 2024

CX Determination Date