Department of Energy
National Nuclear Security Administration
Pantex Site Office
P. O. Box 30030
Amarillo, TX 79120

National Nuclear Security Administration

NEPA Compliance Officer Rationale
Pantex Site Office
Proj. No.: EXP-10-015-C
NEPA ID No.: PXP-10-0001
Uninterruptable Power Supply (UPS)/Generator Replacement

Application of DOE NEPA Procedure: Categorical Exclusions B1.3 and B1.23, Applicable to Facility Operations (10 CFR Part 1021, Subpart D, Appendix B), apply to the proposed activity described below.

Rationale: The U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), proposes to demolish Building 12-20, which is 225 square feet (sf) in size, along with a small concrete pad of approximately 32 sf. The building currently houses an inoperable emergency diesel generator (EDG), which would be removed and excessed. A concrete pad 8 ft. x 12 ft. x 1 ft. would be installed in the general area to support a new EDG and UPS. More in-depth discussions can be found in Pantex NEPA review form PXP-10-0003, which is hereby incorporated by reference.

The proposed generator replacement fits within the parameters of Categorical Exclusion B1.3:

> Routine maintenance activities...required to maintain and preserve buildings, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that replacement is in kind and is not a substantial upgrade or improvement.

The proposed demolition of Building 12-20 fits within the parameters of Categorical Exclusion B1.23, which applies in cases of:

> Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces).

Based upon the information in the NEPA review form referenced above, discussion with the project specialists, and my knowledge, this proposal as described does not present any extraordinary circumstances of a unique or uncertain nature. There are demolition activities being proposed in other zones within the Pantex plant, but these actions do not pose potentially or cumulatively significant impacts.[1]

[1] See 10 CFR § 1021.410(b)(2)and(3)for full text of regulation.

Supported by the information provided by the project specialists, the plant historian, and my knowledge of this activity, this proposal would not[2]:

1. threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders;

2. require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions;

3. disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or

4. adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B.(4)).

Therefore, this proposal meets the conditions that are integral elements of the class of actions in Appendix B, and application of Categorical Exclusions B1.3 and B1.23 is appropriate.

If changes are made to the project scope, or if the scope is expanded to encompass other actions, NEPA requirements will need to be reassessed at that time.

Signature: Jim Barrows

Jim Barrows

Title: NEPA Compliance Officer

Date: 19 April 2010

[2] See 10 CFR Part 1021 Subpart D Appendix B (B(1)through(4)).