DOE/EIS-0380-SA-03

SUPPLEMENT ANALYSIS FOR A PROPOSAL TO IMPLEMENT FACILITY MODIFICATIONS TO MAINTAIN SAFE HANDLING AND STORAGE, AND TO CONDUCT PROCESSING STUDIES OF 60 TRANSURANIC REMEDIATED NITRATE SALT WASTE DRUMS AT LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS, NEW MEXICO

U. S. DEPARTMENT OF ENERGY
Environmental Management Los Alamos Field Office (EM-LA)
3747 West Jemez Road MS-A316
Los Alamos, New Mexico 87544

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SUMMARY

The U.S. Department of Energy (DOE) proposes to implement facility modifications to maintain safe handling and storage, and to conduct processing studies of 60 remediated transuranic (TRU) waste drums that contain remediated nitrate salts (RNS) by implementing minor building modifications, installation of a pressure relief device with supplemental filtration and execution of tests to determine appropriate treatment methodologies. Collectively, these activities are referred to as the proposed action. In compliance with DOE and other Federal regulatory requirements, DOE has prepared a supplement analysis (SA) to determine whether (a) an existing environmental impact statement (EIS) should be supplemented; (b) a new EIS should be prepared: or (c) that no further National Environmental Policy Act (NEPA) documentation is required. In preparation of the SA, DOE reviewed various environmental and technical documents, including existing NEPA analyses and reviewed updated accident analysis calculations. Based upon this review, DOE was able to conclude that there are no substantial changes in the proposed action that are relevant to environmental concerns or significant new circumstances or information relevant to environmental concerns that would merit development of additional or new environmental analysis. Accordingly, upon review and consideration of the information and analysis within this SA, DOE has determined that the evaluation and analysis within the *Site-Wide Environmental Impact for Continued Operations at Los Alamos National Laboratory* (DOE/EIS-0380, identified herein as the 2008 LANL SWEIS) sufficiently bounds the potential environmental impacts from the proposed action and there is no need to prepare a supplemental EIS.

INTRODUCTION

Council on Environmental Quality (CEQ) NEPA regulations (40 Code of Federal Regulations [CFR] 1502.9(c)) require Federal agencies to prepare supplements to either draft or final EISs if "(i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns" or "(ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." In cases where it is unclear whether a supplemental EIS is required, DOE regulations (10 CFR 1021.314(c)) direct the preparation of a SA to assist in making that determination by assessing whether there is a change in the proposed action that is "substantial" or whether new circumstances or information are "significant," pursuant to CEQ regulations (40 CFR 1502.9(c)). This SA examines a proposal to implement facility modification to maintain safe handling and storage, and to conduct processing studies of 60 TRU RNS waste drums at the Los Alamos National Laboratory (LANL) in Los Alamos, New Mexico, in order to determine whether a supplement to the 2008 LANL SWEIS is necessary, or whether significant new circumstances or information exist relevant to environmental concerns and bearing on the proposed activities and their impacts that would require preparation of a new or supplemental NEPA analysis.

This SA relies upon the description of the affected environment and impacts analysis conducted in the 2008 LANL SWEIS. A sliding-scale approach is applied to the discussion in this SA. Unless the proposed action results in changes to these descriptions and analysis, no discussion is included in this SA. This analysis is performed in the "Evaluation of Impacts" section. Application of a sliding-scale approach eliminates the discussion of resources not affected or impacts by the proposed action and focuses the analysis upon resources where changes are anticipated.

PURPOSE AND NEED FOR ACTION

There are 60 TRU waste drums that contain RNS in storage at LANL that were remediated with an organic absorbent.[1] The remediation with an organic absorbent led to the creation of an incompatibility which resulted in an exothermic reaction in one of the drums emplaced below ground at the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico. Full-scale container tests performed by LANL have determined that the potential for a sustained thermal runaway reaction in a container of RNS waste would require that the container become pressurized and the waste reach elevated temperatures. Filter vent blockage or overwhelming gas flow may compromise the existing drum filter vent and result in drum pressurization. The installation of a pressure relief device with supplemental filtration in addition to the existing high-efficiency particulate air (HEPA) filter is prudent to maintain safe configuration of the existing TRU RNS drums at LANL.

Tests previously conducted at LANL indicated that maintaining cooler temperatures for storage and handling of the waste substantially mitigate internal reactions from incompatible waste. Therefore, cooling the storage and handling environments is prudent to maintaining safe conditions and was integrated as a performance requirement in the Facility safety basis[2]. Accordingly, DOE previously evaluated and installed a cooling system into the storage area at TA-54 and, therefore, is not included in the proposed action. The hazard controls for cooling the TRU RNS drums is further identified in the LANL Waste Isolation Plan[3] approved by the New Mexico Environment Department (NMED) and has been integrated into the draft Hazardous Waste Facility Permit[4] (HWFP) requirements for management of Resource Conservation Recovery Act (RCRA) waste. Additional modifications to the storage and processing facilities are prudent to maintain safe operating conditions and prepare for final treatment and safe handling activities.

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[1] Additional information regarding the waste stream profile, waste processing activities and remediation actions that led to the creation of the incompatible waste is available in Accident Investigation Report, Phase 2 (April 2015).

[2] Los Alamos National Security, LLC (LANS) prepared and submitted to National Nuclear Security Administration Los Alamos Field Office an analysis of the safety conditions at the facilities supporting RNS operations, AREAG-ESS-14-002.

[3] LANS develops and maintains configuration control for the "LANL Nitrate Salt-Bearing Waste Container Isolation Plan" and submits revisions to NMED for approval.

[4] DOE and LANS are joint permit holders in the RCRA HWFP issued by NMED.

Lastly, DOE has committed to requesting a modification of the RCRA HWFP to conduct treatment activities of the TRU RNS waste drums. While the future treatment activities are not within the scope of the proposed actions evaluated in this SA, it is necessary to conduct a variety of tests to assess the most appropriate method of treatment for mitigating waste incompatibilities and remediating the waste to meet disposal requirements specified in the WIPP Waste Acceptance Criteria (WAC). A variety of tests are also needed to identify the appropriate procedural steps and tools to execute proposed treatment as planned. Such tests are included within the proposed actions evaluated in this SA.

DESCRIPTION OF PROPOSED ACTION

DOE performs waste management and disposition work at LANL through its management and operating contractor, LANS. DOE proposes to have LANS conduct the following activities to maintain the safe handling and storage and to conduct processing studies of the 60 TRU RNS drums:

1. Perform installation of a pressure relief device with supplemental filtration with an increased flow capacity to sustain adequate ventilation within the drums, presently located at TA-54, Building 375. The existing charcoal filter on the 60 TRU RNS drums will remain intact.
    a. Installation of the pressure relief device with supplemental filtration will involve removal of the standard waste box (SWB) overpack lid and the addition of the device to each individual drum. No additional equipment or electrical supply is needed to complete installation of the pressure relief devices with supplemental filters.
2. Maintain the safe storage and handling of the 60 TRU RNS drums.
    a. Implement minor facility modifications at Technical Area (TA) 50, Buildings 84 and 69: operations center reconfiguration and camera installation; installation of refrigerators in preparation for treatment; installation of an administrative support trailer outside of the waste handling facility in a previously disturbed area for the work crew.
        i. Operations center reconfiguration consists of mounting two (2) additional television/computer monitors on the wall and additions to the existing camera system for operations oversight; elimination of six (6) workstations in an existing enclosure and creating a conference room in the same space. No additional utilities or increased capacity of existing utilities are needed.
        ii. Installation of the refrigerator units to support cooling of up to four (4) TRU RNS drums simultaneously to support handling and transport of TRU RNS drums for processing. No additional utilities or increased capacity of existing utilities are needed.
        iii. Installation of an administrative support trailer to create workspaces for up to 14 individuals in a single-wide trailer (approximately 8-feet by 40-feet). The trailer will be placed in a previously disturbed area outside of the waste operations activities. No additional infrastructure (e.g., water, sewer,

power, etc.) is needed to install the administrative support trailer. These utilities already exist on-site.

b. Implement minor facility modifications at TA-54, Building 375: modifications to install the refrigerator unit to the existing roll-up door to route air away from workers while maintaining a negative operating pressure within the facility for potential contamination control.
    i. Purchase of refrigeration units is necessary. No additional utilities or increased capacity of existing are needed.

3. Conduct studies and testing to assess and determine the appropriate safe handling and processes, using surrogate materials that mimic nitrate salt waste, in support of a modification to the LANL RCRA HWFP (Permit Number NM0890010515).
    a. Testing consists of blending surrogate materials, mockup tests, bolt removal test, surrogate treatability test, debris treatability test. Waste from on-site testing is not expected to produce more than two (2) 55-gallon drums of non-hazardous, solid waste.
        i. Blending Test: At LANL, surrogate materials will be blended using a commercially available mixer to test the process for creating waste uniformity prior to applying treatment. Surrogate materials contain rock salt and Swheat® mixtures. Waste from blending testing is anticipated to include sold waste from surrogate mixture and personal protective equipment.
        ii. Mock-up Test: At LANL, conditions anticipated for processing the TRU RNS drums will be created to evaluate whether the handling activities could be conducted as planned. Mock-ups include physically adding water then zeolite to surrogate material and blending to determine treatment process recipe for waste-to-water-to-zeolite ratios. Mock-ups will be performed inside a glovebox to assure tools and processes can be performed within the proposed environment. Waste from mock-up testing is anticipated to include sold waste from surrogate mixture and personal protective equipment.
        iii. Bolt Removal Test: At LANL, removal of bolts on the SWBs will be performed to evaluate methods and tools for safe removal of the lid. This will include the use of breaker bars and drilling out bolts as needed. Waste from bolt removal testing is anticipated to include small amounts of metal shavings and sold waste from personal protective equipment.
        iv. Surrogate Treatability Test, Non-Radiologic: At an off-site analytical laboratory, the surrogate materials in various forms (e.g., as a liquid, after mixing with Swheat®, after mixing with Swheat® and neutralizer, etc.) will be blended with zeolite and then tested to evaluate ignitibility and corrosivity characteristics. Waste disposal of the testing materials would be completed by the off-site laboratory under their disposal permit.

v. Surrogate Treatability Test, Radiologic: At LANL, differential scanning calorimetry test of the waste will be conducted to determine if radioactively-spiked surrogates would have a different heat capacity than the nonradioactive surrogate. Quantities of radioactive spikes used are benchtop scale quantities (i.e., less than 250 grams quantity). Waste from surrogate treatability testing of radiologic characteristics is anticipated not to exceed five (5) gallons.

vi. Debris Treatability Test: At an off-site analytical laboratory, surrogate materials containing Swheat® will be mixed with debris that is likely to be found in RNS waste to evaluate ignitibility and assess treatment criteria. Waste disposal of the testing materials would be completed by the off-site laboratory under their disposal permit.

b. Additional activities include operator training, procedure development, updated safety basis documentation and support for submittal of the request for modification of the HWFP.

EXISTING NEPA AND OTHER ENVIRONMENTAL ANALYSIS

DOE evaluated existing NEPA analyses which are potentially relevant to this SA. Below is a brief summary of the germane analysis and decisions that are related to the proposed activities.

2008 LANL Site-Wide Environmental Impact Statement (2008 LANL SWEIS) and Records of Decision (ROD) (DOE/EIS-0980; 73 FR 55833; 74 FR 33232):

The proposed activities are conducted routinely at LANL in waste management and disposition operations. The proposed activities are not considered new operations at the specified facilities. Environmental factors associated with the proposed activities, including human health for workers, waste management and worker and public exposure from potential facility accidents, were reviewed under the LANS Project Requirements Identification (PR-ID) System. Changes from the 2008 LANL SWEIS (DOE/EIS-0380) are described below.

- Building modifications at TA-50 and TA-54 are minor and bounded by the exclusions identified in Appendix L, Support Structure Activities.
- Testing activities are using surrogate materials and laboratory scale amounts of radiological materials. Therefore, impacts to workers, the public and the environment are minor and bounded by the analysis conducted in Chapter 5, Worker Radiological Exposure from the No Action Alternative (Table 5-25).
- The potential environmental impact associated with waste handling, storage, processing and disposition activities at TA-50 and TA-54, including RCRA-regulated waste and TRU waste. The potential environmental impacts associated with accident scenarios include a hypothetical explosion of a TRU waste drum during retrieval/processing operations and involve a radiological release to involved workers and the public from operational accidents. Additionally, potential impacts associated with non-operational events (e.g., wildfire, seismic release) evaluated the full inventory of waste at LANL key

facilities, including TA-54. Waste quantities used in these scenarios were greater than the quantity of waste considered in this proposed action. The TRU RNS waste stream was present at LANL at the time of the scenario evaluations; although TRU RNS waste was not in its present incompatible configuration. The proposed action is consistent with the operations and accident scenarios analyzed in Appendix D, Evaluation of Human Health Impacts from Facility Accidents, and Appendix H, Waste Management Facilities Transition Impacts Assessment.

- LANS conducted additional calculations and risk analyses to assess the extent of safety conditions for the TRU RNS waste drums (AREAG-ESS-14-002). With the additional safety measures implemented (e.g., those proposed in this SA), the risk to the involved worker and the public would be bounded by the operational limits identified Chapter 5, Worker Radiological Exposure from the No Action Alternative (Table 5-25).

1997 WIPP SEIS and RODs (DOE/EIS-0026-S-2; 63 FR 3623; 69 FR 3629): DOE evaluated impacts from a TRU waste container (e.g., drum or SWB) fire during storage operations at WIPP. The scenario postulated the occurrence of a fire resulting from incompatible materials. The 1997 WIPP SEIS analysis considered waste remediation and/or treatment activities that would occur at sites, including LANL.

- Accident conditions postulated exposures to involved workers and the public resulting from a TRU waste container fire at WIPP to be minor and bounded by the analysis for potential impacts from intentional destructive acts. The analysis for a TRU waste container fire was conducted in Volume II, Appendix G, Section G.3, Storage Accident Scenarios and Section G.4, WIPP Disposal Accident Scenarios.

2016 Evaluation of the Safety of the Situation (ESS) Potential Inadequacy of the Safety Analysis (PISA)- TRU Waste Drums Containing Treated Nitrate Salts (ESS-14-002-R5): LANS conducted an analysis of the potential airborne release impacts and hazards analysis from the storage, handling and processing activities for the TRU RNS waste drums at LANL. The analysis updated the safety documentation for operations at TA-54. The postulated accidents considered a release event from a drum containing incompatible waste. The proposed safety measures associated with the proposed action are designed to mitigate radiological releases thereby enhancing the protections to the workers and the public. Maintenance of the TRU RNS waste drums at lower temperatures and installation of the supplemental filtration with pressure relief device together assure the overall operational condition would be inherently safer. The analysis concluded that with the proposed safety and compensatory measures incorporated into the proposed action, adequate protection is achieved for all radiological receptors (e.g., involved worker, uninvolved worker, the public on-site and the public off-site, and the environment).

EVALUATION OF IMPACTS

DOE evaluated the proposed action against the analysis in the existing aforementioned NEPA documents. DOE determined no substantial changes or significant new circumstances or information relevant to environmental concerns occurred in the following resources as previously analyzed: Land Use; Visual Resources; Geology and Soils; Water Resources; Air Quality; Noise; Ecological Resources; Human Health to the Public; Cultural Resources; Socioeconomics and Environmental Justice; Infrastructure; and Transportation. Site conditions that formed the bases of the impacts analyzed in the 2008 LANL SWEIS would differ from implementing the proposed action in three areas: Human Health to the Involved Worker (from normal operations); Waste Management (capacity for normal operations to address TRU RNS waste drums); and Facility Accidents (radiological releases to involved workers, on-site workers, the public, and the environment from abnormal operations). Additional analysis of these areas was performed to consider current and relevant information available after the publication of the 2008 LANL SWEIS. The following is a discussion regarding the impacts of the newer information to the bounding conditions established in the existing NEPA analysis.

Human Health to Involved Worker: This section considered the potential impacts to the employee performing the waste management operations (involved worker) upon the TRU RNS waste drums. The analysis considered new information provided by LANS in its assessment of safety basis (ESS-14-002-R5) against the bounding conditions presented in the 2008 LANL SWEIS and the 1997 WIPP SEIS. Impacts to the public and the environment were considered; yet, the analysis was unchanged by the recent information. Therefore, human health impacts to the public (on-site and off-site) and the environment are not discussed in this SA.

Workers supporting the proposed actions would be drawn from the existing work force currently performing these duties at LANL. Worker doses are managed in accordance with "as low as reasonably achievable" (ALARA) principles. ALARA is achieved through the use and implementation of shielding, safe work practices, procedures, and personal protective equipment. Per 10 CFR 835, the DOE limit on annual worker radiation exposure is 5,000 millirem. DOE established an annual limit of 2,000 millirem per year (DOE 2009) to assist in achieving its goal to maintain radiological doses at or below as low as reasonably achievable (ALARA) levels. LANL established an action level at 1,000 millirem for the involved radiological worker to help identify and manage higher level worker dose, such as TRU operations. The average individual measurable dose for an involved worker was estimated to be 139 millirem in the 2008 LANL SWEIS. In calendar year 2013, LANS reported an average LANL individual worker dose of 81

millirem[5]. Exposures to workers at LANL have not exceeded 1,000 millirem for any operation (2013 SWEIS Yearbook). The anticipated dose to workers from implementation of the proposed action would not be additive to doses typically received by these workers, nor would the proposed operations expose a new population of workers to radiological doses. The dose to workers, the public and the environment from implementation of the proposed action is not anticipated to change from the analysis conducted in the 2008 LANL SWEIS.

LANL Senior Management and the Institutional Radiation Safety Committee have set performance expectations and administrative control policies to drive individual and collective doses ALARA. LANL's Radiation Protection Program implements ALARA in accordance with 10 CFR 835, including planning and design of controls for worker safety and protection across LANL. Activities include dose optimization during design and work control, ALARA goals, performance measurement, worker health and safety (in accordance with 10 CFR 851), line management engagement and oversight by the Institutional Radiation Safety Committee, LANL Senior Management and the DOE.

Implementation of the proposed action would be expected to increase protection of workers, members of the public, and the environment by enhancing facility safety equipment and increasing protective measures for safe handling, storage and processing studies on the TRU RNS waste drums. Proposed testing activities are minor and bounded by the analysis conducted in Chapter 5, Worker Radiological Exposure from the No Action Alternative (Table 5-25). Consequently, there are no substantial changes in the proposed action that are relevant to environmental concerns or significant new circumstances or information relevant to environmental concerns.

Facility Accidents: Facility accidents analysis are performed to assess the potential impacts from the occurrence of a large-scale release of materials stored/managed on-site to workers, the public and the environment. These releases are postulated to occur from abnormal conditions from naturally occurring hazards (e.g., wildfire) and from external hazards (e.g., airplane crash into a facility with material at risk (MAR) stored within). While the amount of waste considered in the 2008 LANL SWEIS is greater than the amount of waste considered in this SA, the waste characteristics differ due to incompatibilities. Frequency and consequence factors are used to determine probability and impacts of an accident occurrence; these results are used to evaluate accident impacts to workers, the public and the environment.

[5] Data in the 2013 SWEIS Yearbook indicates that approximately 80% of the site-wide total exposure dose was from TA-55 operations. Waste management activities at TA-54 and TA-50 were included in the site-wide count, but did not contribute significantly to the overall dose.

The frequency of a radiological release of the RNS TRU drums from a self-initiating event[6] are considered less likely to occur than a wildfire event. Thereby making the wildfire event a bounding condition. The potential quantity of radiological materials released from *unmitigated*[7] RNS TRU drums from a self-initiating event are likely to have a greater impact than those previously analyzed in the 2008 LANL SWEIS. However, DOE and LANS have implemented safety measures (i.e., isolation of the drums, storage configuration, cooled environment, routine monitoring, etc.) to prevent, identify and arrest a self-initiating event in the RNS TRU drums. With these safety actions implemented, the consequences of a self-initiated release from the TRU RNS drums are sufficiently mitigated to equal normal operating conditions described in the 2008 LANL SWEIS. Therefore, a release from the TRU RNS drums during an abnormal event would not be any greater than the release analyzed in the 2008 LANL SWEIS.

Representative and bounding accidents were presented in the 2008 LANL SWEIS and the 1997 WIPP SEIS for a range of potential accidents. The 2008 LANL SWEIS did not explicitly consider impacts of incompatible materials in waste operations; however, the SWEIS did consider impacts to involved workers and the public from a radiological release during TRU waste operations. In addition, the 1997 WIPP SEIS considered a scenario involving incompatible TRU waste. These analyses established bounding conditions for waste management and waste disposition operations at LANL. Further, LANS completed an updated safety analysis for TA-50 and TA-54 which considered impacts to the involved worker and the public contemplating the current site conditions. Comparison of the updated safety analysis results to the 2008 LANL SWEIS determined that the bounding conditions established by the 2008 LANL SWEIS are unchanged and the proposed action would have no additional impacts beyond those previously analyzed. Consequently, there are no substantial changes in the proposed action that are relevant to environmental concerns or significant new circumstances or information relevant to environmental concerns.

Waste Management: This section considered the impacts to waste management operations, including capacity and infrastructure, for performing the proposed action for the TRU RNS waste drums. Exposure to workers, the public and the environment are discussed previously in human health (normal operations) and facility accidents (abnormal operations).

For LANL operations at TA-54, adequate storage space exists to safely store the 60 TRU RNS drums. Waste management and operations considered in

[6] The drum breech incident that occurred at WIPP on February 14, 2014 was determined to be a self-initiating event (DOE, Accident Investigation Report Phase 2, April 2015).
[7] In this instance, *unmitigated* refers to RNS TRU drums in routine operations at LANL without any safety measures applied. The current configuration of the TRU RNS drums has a number of safety measures applied for the safety of workers, the public and the environment.

the 2008 LANL SWEIS included waste from legacy and mission operations, including TRU waste and RCRA waste. LANL currently performs waste management operations (including storage, processing, and packaging) for TRU and RCRA waste at existing facilities.

Proposed building modifications for storage of TRU RNS waste at TA-50 and TA-54 are minor and bounded by the analysis identified in Appendix L, Support Structure Activities of the 2008 LANL SWEIS. No additional impacts would be expected to occur to waste management operations from implementing the proposed action in this SA.

Changes to the HWFP would be required for treatment of the 60 TRU RNS drums. These permit changes will be submitted to NMED as the methods for treatment are finalized, following completion of the tests described in the proposed action. NEPA review to evaluate proposals for treatment is not considered in this SA and such actions may require additional NEPA analysis.

CONCLUSION

In this SA, DOE considered potential environmental impacts that could be affected by the proposed action, including: human health – radiological impacts to the worker; human health – radiological impacts to the public; and waste management. DOE also determined that there were no substantial changes relevant to environmental concerns or new circumstances or information that would significantly impact the analysis to other resource areas evaluated within the 2008 LANL SWEIS. Although the 2008 LANL SWEIS does not explicitly mention the activities as presently proposed to apply to TRU waste drums containing incompatible wastes, the 2008 LANL SWEIS did analyze the potential environmental impacts of actions similar to the presently proposed action under conditions that could result greater impacts. As a result, the potential environmental impacts associated with the proposed actions are within the bounds of potential impacts considered in the 2008 LANL SWEIS (ESS-14-002). In its analysis of radiological impacts to workers and the public from the venting operations and testing activities, the exposure rates from these did not exceed those identified in Chapter 5, Worker Radiological Exposure from the No Action Alternative (Table 5-25). In addition, potential impacts associated with the proposed facility modifications were bounded by the potential impacts considered by the exclusions identified in Appendix L (Support Structure Activities).

Routine waste management operations at LANL result in radiologic impacts to workers and the public well below exposure thresholds standards set by DOE[8]. Further, DOE would take appropriate precautionary measures to ensure that the workers, members of the public, and the environment are protected, including adherence to ALARA principles and implementation of 10 CFR 851 worker safety and health programs. DOE concludes that the proposed action would not increase

[8] Operational impacts reported annually in the SWEIS Yearbook. This SA used the data from the 2013 SWEIS Yearbook (LA-UR-15-22393).

potential impacts beyond those analyzed for LANL operations in the 2008 LANL SWEIS. The analysis of postulated accidents in the 2008 LANL SEIS resulted in projected doses to the public at less than regulatory thresholds (ESS-14-002). In addition, DOE's evaluation concludes that the proposed action are bounded by the potential environmental impacts identified by the accident analyses presented in the 2008 LANL SWEIS.

DETERMINATION

Based upon the analysis in this SA, DOE has determined that the agency is making no substantial changes in this proposed action relevant to environmental concerns and there are no significant new circumstances or information relevant to environmental concerns and bearing upon operational activities or their impacts. Accordingly, DOE determines that the environmental impacts of the proposed actions are sufficiently considered and bounded by existing NEPA analysis and there is no need to prepare a supplemental EIS. Therefore, in accordance with CEQ and DOE regulations, DOE determines that neither a supplement to the 2008 LANL SWEIS, nor new NEPA analysis, nor an amended record of decision are necessary. Based upon the analysis in this SA and review of the references, per 10 CFR 1021.114 (c)(iii), DOE determines that no further NEPA documentation is required to implement the proposed action.

APPROVAL

Approval:

Douglas E. Hintze, Manager
Environmental Management- Los Alamos
U.S. Department of Energy

11 May 2016
Date

Concurrence:

for B.U.

Ben Underwood, Legal Counsel
Environmental Management- Los Alamos
U.S. Department of Energy

5-11-2016
Date

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DOE, "Supplement Analysis for a Proposal to Temporarily Store Defense Transuranic Waste Prior to Disposal at the Waste Isolation Pilot Plant", DOE/EIS-0026-SA-09, March 2014

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- ROD 2: July 2009 (74 FR 33232)

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- 15P-0219 V1, Nitrate Salt Processing Resumption
- 14P-0213 V1, TA-54 Cold-Safing Project
- 15P-0247, WCCR Support Trailer Installation
- 16P-0080, WCCR TA-50 Freezer Install
- 16P-0081, 54-375 Wildfire mitigation w/fire suppression foam

LANS, "Technical Basis for the Addition of a Safety Class Pressure Relief Device, Supplemental Filtration, and Choice of Operational Temperature for Addition of the System: EM2016-5070

LANS, "Criticality Safety Evaluation for PRDwSF Installation in RNS-bearing Drums in Dome 375 at TA-54", NCS-CSED-16-031

LANS, "Potential Inadequacy of the Safety Analysis (PISA) – TRU Waste Drums Containing Treated Nitrate Salts May Challenge the Safety Analysis (ESS-14-002)", Safety of the Situation (ESS), March 2016

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LANS, "SWEIS Yearbook- 2013 Comparison of 2013 Data to Projections of the 2008 Site-Wide Environmental Impact Analysis for Continued Operation of Los Alamos National Laboratory", LA-UR-15-22393, Revision 2, May 26, 2015