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**We make the world safer.**

# Implementation of NEPA at SRS

**Katie Davis**

Environmental Programs, Manager

*CAB Full Board Meeting – Tuesday, May 21, 2024*



CEQ – Council on Environmental Quality

CFR – Code of Federal Regulations

CX – Categorical Exclusion

D&D – Deactivation and Demolition

DOE – Department of Energy

EA – Environmental Assessment

EIS – Environmental Impact Statement

EEC – Environmental Evaluation Checklist

EMS – Environmental Management System

FONSI – Finding of No Significant Impact

ISO – International Organization for Standardization

NEPA – National Environmental Policy Act

R&D – Research and Development

SRS – Savannah River Site

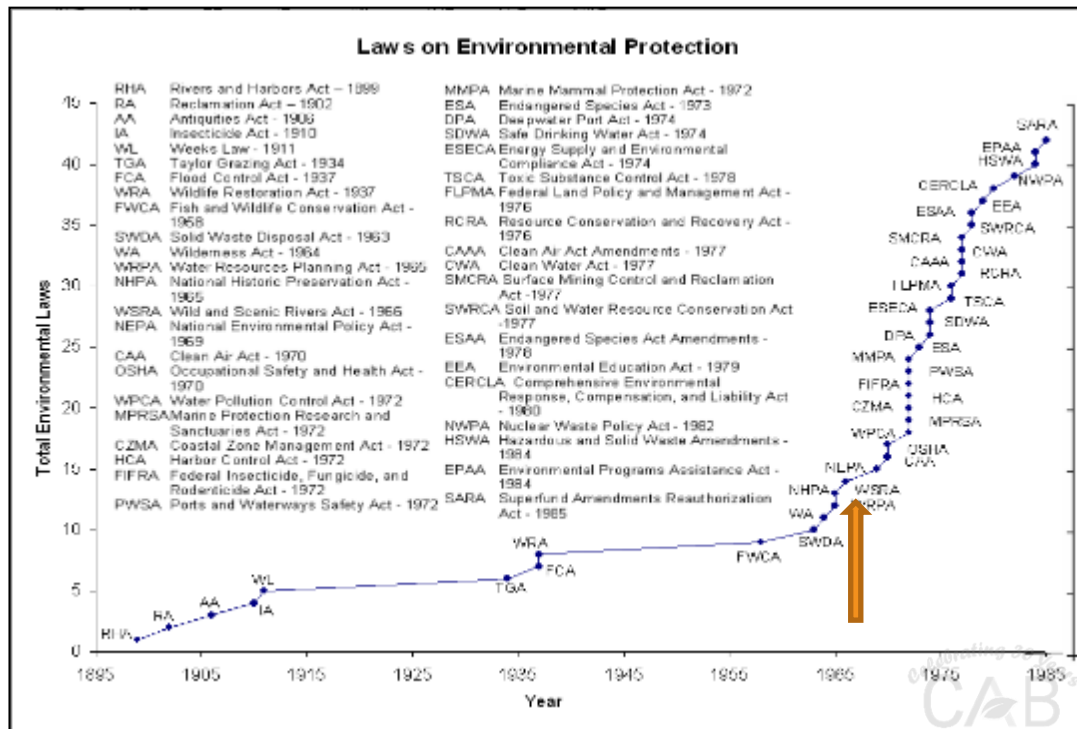
**Provide an overview of the National Environmental Policy Act (NEPA) and how NEPA is integrated into planning processes at the Savannah River Site**



# What is NEPA?



- **National Environmental Policy Act of 1969**
  - Signed into law by President Nixon on January 1, 1970
- **Promotes government transparency and gives the public a voice in government decision-making**



# What are the components of NEPA?



- **Title I:**
  - To declare a national policy which will encourage productive and enjoyable harmony between man and his environment;
  - To promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; and
  - To enrich the understanding of the ecological systems and natural resources important to the Nation.
- **Title II:**
  - To establish a Council on Environmental Quality (CEQ)



# What is CEQ's Role in NEPA



Issues NEPA procedural requirements, guidance, and interpretation

40 CFR  
1500-1508

Reviews and approves Federal agency NEPA procedures

DOE: 10  
CFR 1021



# What are the goals of NEPA?

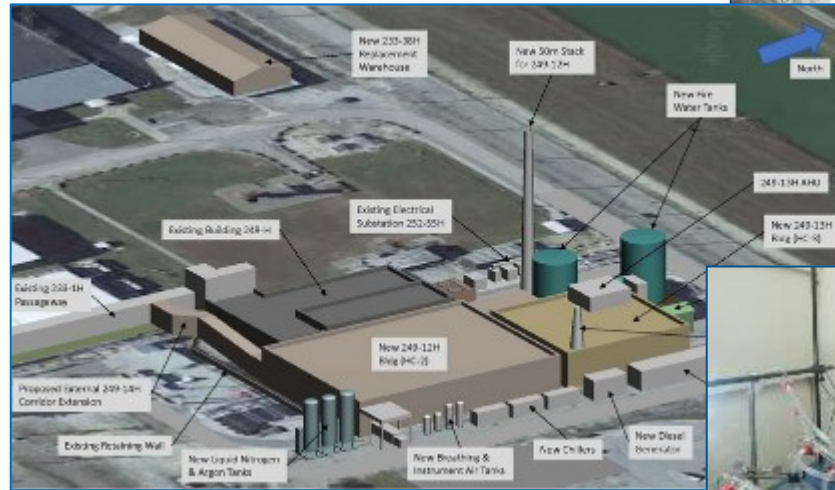




# What actions require NEPA?



- **A broad range of Federal actions are subject to NEPA:**
  - Proposed on or requires passage on Federal land
  - Funded by Federal money
  - Requires a Federal permit
  - A Federal Agency is a partner





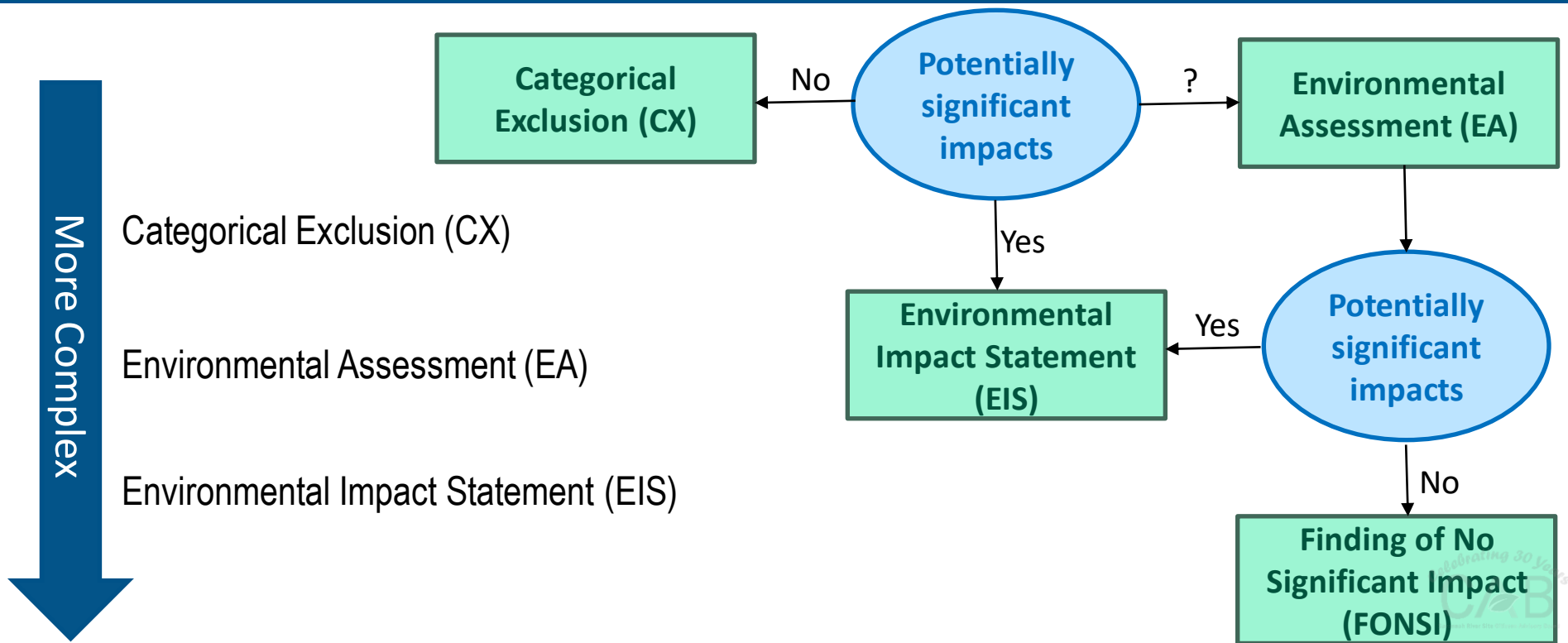
# When is NEPA implemented?



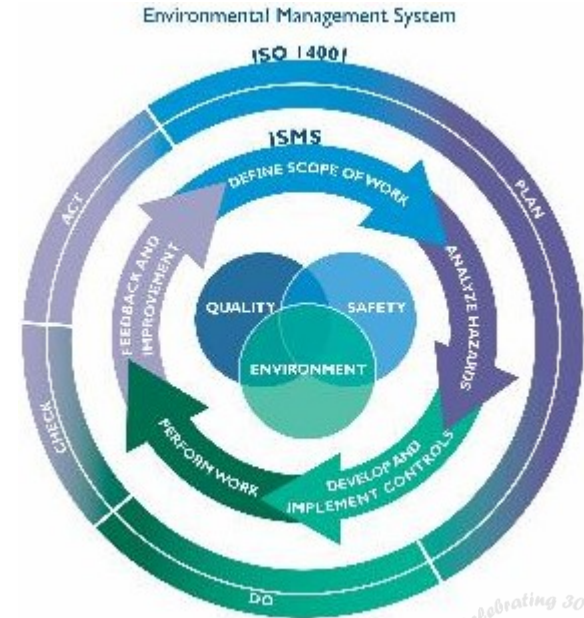
- **NEPA considerations commence when a Federal agency develops a proposal to address a need and:**
  - Has a goal
  - Is actively making a decision
  - Has one or more alternative ways of accomplishing the goal
  - Can meaningfully evaluate the effects of a proposed action



# Levels of NEPA Evaluations



- SRS implements an Environmental Management System (EMS) that conforms to ISO 14001:2015
- NEPA considerations are a key step in the PLAN phase of SRS's EMS
  - Site Use/Site Clearance
  - Work Package Development
  - Project Scoping Meetings
  - Environmental Evaluation Checklists (EECs)
    - *EECs document SRS's NEPA Evaluation Recommendations*



# Environmental Evaluation Checklist (EEC)



## Purpose

1. Documents the NEPA Evaluation (CX, EA, EIS)
2. Ensures regulatory and permitting requirements are identified
3. Identifies potential impacts to the environment

A screenshot of the "Environmental Evaluation Checklist (EEC)" web form. The title "Environmental Evaluation Checklist (EEC)" is at the top, with the subtitle "NEPA Review / Environmental Permits" below it. There are three icons (a folder, a right arrow, and a document) and a status indicator showing "Entered By: TBD", "Status: DRAFT", and "EEC Number: TBD". Below this, it says "Enter Date: 09/14/2022" and "REV Number: TBD". A note states: "\*Activity/Project Sponsor: Complete the Activity/Project information and the NEPA checklist. Contact your ECA for assistance." Another note says: "\*ECA: If the NEPA Checklist contains a 'Yes' answer, complete the Environmental Impacts and Environmental Permits sections of the EEC." A third note mentions: "\*Additional information is available in the NEPA and EEC Information Manual (SRNS IM 2021 00282)." The form has a tabbed interface with "GENERAL INFORMATION" selected. The tabs are: GENERAL INFORMATION, NEPA CHECKLIST, ENVIRONMENTAL PERMITS CHECKLIST, APPROVAL HISTORY, DOCUMENTS, and COLLABORATORS. The form fields include: "Activity Title" (text input with a question mark icon), "Project Number" (text input with a question mark icon), "Business Unit" (dropdown menu), "Role" (dropdown menu), "Activity Start Date" (calendar icon), "Activity End Date" (calendar icon), "Activity Location" (text input), "Sponsor" (text input), "Estimated Cost" (text input), "Project Contact" (text input with a person icon), and a blue "SELECT ECA" button. In the bottom right corner, there is a logo for "Celebrating 30 Years CAB" with the text "CAB" and "30 Years" and "Celebrating 30 Years" written around it.

# What are Categorical Exclusions (CXs)?

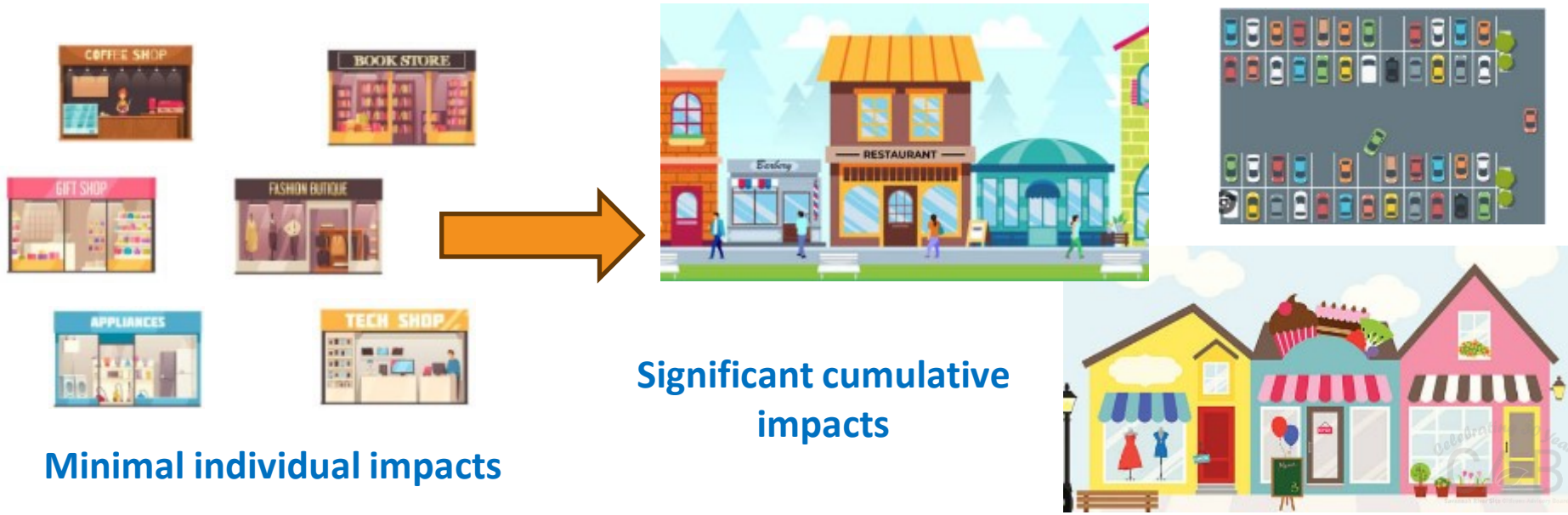


- **CXs are groups of actions that DOE has determined would not have a significant impact on the environment.**
- **2 groups of CXs identified in 10 CFR 1021:**
  - Appendix A – No external posting is required
    - *General Agency Actions – contracts, information gathering, technical advice, etc.*
  - Appendix B – External posting is required
    - *Maintenance, safety, and health improvements*
    - *D&D, remediation*
    - *R&D, sampling/monitoring, conservation research*



- If ***extraordinary circumstances*** are present or conditions of ***integral elements*** are not met, then the action will require additional NEPA evaluation beyond a CX.
  - *Extraordinary circumstances* – scientific controversy of impacts; uncertain effects; unique or unknown risks, etc.
  - *Integral Elements* – regulatory/permit violations; uncontrolled/unpermitted release of hazardous substance; threatened/endangered species impacts, unmitigated and non-permitted wetlands impacts, etc.

- No *segmentation* – breaking of an action/project into smaller pieces to avoid the appearance of significant impacts. Think about a shopping mall...





# Public Involvement



- CX Determination Form – posted for public information**



Office of Environmental Management  
U.S. Department of Energy  
Categorical Exclusion Determination Form

Proposed Action Title: Installation of BirdSlide Anti-Roosting Panels

Program or Field Office: Savannah River Site

Location(s) (City/County/State): Aiken/Aiken County/South Carolina

Proposed Action Description:

Installation of BirdSlide Anti-Roosting Panels at buildings, 731-N and 731-1N to decrease nesting in walkways, breezeways, and along buildings.

Categorical Exclusion(s) Applied:

B1.3 ROUTINE MAINTENANCE



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U.S. Department of Energy  
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B1.3 ROUTINE MAINTENANCE

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions, including the full text of such categorical exclusions, see Subpart D of [10 CFR Part 1021](#).

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

☒ The proposed activity falls within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D. To fit within the class of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Federal contractors; (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 at facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-eligible petroleum and natural gas products that present in the environment such that there would be uncontrolled or unpermitted release; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated native plants, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

☒ There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

☒ The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.25(a)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1031.211 concerning limitations on actions during preparation of an environmental impact statement.

Based on my review of the proposed action, I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer:  
Digitally Signed By: ARLIAMS, TRACY L. - 16280 "CA/EEC Certificate"  
Date: 2024.03.01 11:15:46 -05'00'

Date Determined: 03/01/2024

Comments EEC No: AM&DO-N-2024-00002 Rev No: 0



**SRS.gov**

## Categorical Exclusion (CX) Determination Forms

CLICK LINKS BELOW TO VIEW PDF DOCUMENT  
This list of CX Forms was last updated: 4/2/24

### 2024

[03-01-2024-AM&DO-N-2024-00002-0-CXForm](#)  
[03-01-2024-CBU-H-2017-0035-1-CXForm](#)  
[03-01-2024-OBUE-A-2024-00009-0-CXForm](#)  
[03-01-2024-OBUE-H-2024-00017-0-CXForm](#)  
[03-01-2024-OBUE-N-2024-00007-0-CXForm](#)  
[03-01-2024-PBU-N-2024-00008-0-CXForm](#)  
[03-01-2024-SREL-G-2024-00001-0-CXForm](#)  
[03-01-2024-TC-A-2023-00016-1-CXForm](#)  
[03-01-2024-TC-A-2024-00012-0-CXForm](#)  
[03-04-2024-CBU-G-2024-00004-0-CXForm](#)  
[03-04-2024-OBUE-A-2024-00006-0-CXForm](#)  
[03-04-2024-OBUE-H-2019-0019-1-CXForm](#)  
[03-04-2024-OBUE-H-2019-0272-2-CXForm](#)  
[03-04-2024-OBUE-H-2024-00009-0-CXForm](#)  
[03-04-2024-OBUE-H-2024-00008-0-CXForm](#)

**Energy.gov**

## Categorical Exclusion Determinations: Savannah River Operations Office

Office of NEPA Policy and Compliance

January 31, 2024

### **CX-029847: Repair Ceilings in Rooms 1, 2, 10, 10A, 9 and 9A and Replace Doors where Needed in 711-1N**

This EEC covers the repair of ceilings in rooms 1, 2, 10, 10A, 9 and 9A in 711-1N and replacing doors where needed....

January 31, 2024

### **CX-029846: Install Digital Imaging and Measurement System (DIMS) in Building 234-H**

Provide and install a new Digital Imaging and Measurement System (DIMS). It will be installed on a table within a lead shielded cabinet in the room...



# Summary of CX Determinations



2021

875  
CXs

B1.3 = 368

B3.6 = 167

2022

817  
CXs

B1.3 = 408

B3.6 = 149

2023

843  
CXs

B1.3 = 465

B3.6 = 140

2023 –  
913 NEPA  
Evaluations

**B1.3 – Routine maintenance**

**B3.6 – Small-scale R&D and  
lab operations**

*Celebrating 30 Years*  
**C&B**  
Southern River Site Offshore Activity Board

- **NEPA is a federal requirement.**
- **Public involvement is a key component of NEPA.**
- **NEPA is part of the planning process and guides DOE in decision making.**
- **There are 3 major levels of NEPA evaluations – CXs, EAs, and EISs.**
- **The vast majority of NEPA evaluations conducted at SRS result in CXs.**

- **Categorical Exclusion Postings:**
  - SRS.gov ([https://www.srs.gov/general/pubs/envbul/nepa1.htm#cx\\_forms](https://www.srs.gov/general/pubs/envbul/nepa1.htm#cx_forms))
  - Energy.gov (<https://www.energy.gov/nepa/categorical-exclusion-determinations-savannah-river-operations-office>)
- **Monthly NEPA Status Report**
  - <https://www.srs.gov/general/pubs/envbul/nepa1.htm>

# Questions?



*Celebrating 30 Years*  
**CAB**  
Sacramento River Water Utilities Advisory Board



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# SRNS

**Savannah River Nuclear Solutions**

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