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2. CATEGORICAL EXCLUSION BEING APPLIED:

10 CFR 1021, Appendix B 6.8: Minor operational changes at an existing facility to minimize waste generation and for reuse of materials. These changes include, but are not limited to, adding filtration and recycle piping to allow reuse of machining oil, setting up a sorting area to improve process efficiency, and segregating two waste streams previously mingled and assigning new identification codes to the two resulting wastes.

REGULATORY REQUIREMENTS IN 10 CFR 1021.410 (B):

1. The proposed action fits within a class of actions that is listed in Appendix B to Subpart D.

   For classes of actions listed in Appendix B, the following conditions are integral elements (i.e., to fit within a class), the proposal <u>must not</u>:

   a. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders;
   b. Require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities, but may include such categorically excluded facilities;
   c. Disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; or
   d. Adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B. (4)).

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

3. The proposal is not "connected" to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

3. NEPA COMPLIANCE OFFICER CLASSIFICATION/DETERMINATION:

This proposal is covered by 10 CFR 1021, Subpart D, Appendix B6.8 and meets the requirements of 10 CFR 1021.410 (b) listed above.

If changes are made to the scope of action so that it is no longer bounded by the action described in this memo, or it is changed to encompass other actions, NEPA requirements will need to be reassessed at that time and further analysis may be required.

Signature: George Rael **Date:** 5/17/11

George Rael, LASO NEPA Compliance Officer

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CATEGORICAL EXCLUSION

Operation of the CLEAR Line at TA-55-4
Los Alamos National Laboratory

1. DESCRIPTION OF PROPOSED ACTION:

DOE/LASO issued a categorical exclusion (LAN-95-122, 10 CFR 1021, Subpart D, Appendix B6.8) on December 29, 1995 for LANL to establish the Chloride Extraction and Acid Recovery (CLEAR) glovebox line at TA-55-4. The CLEAR line was proposed as an addition to the existing EXCEL hydrochloric acid recovery line, to remove actinides from process effluent that would be treated at the Radioactive Liquid Waste Treatment Facility (RLWTF). Appendix B6.8 covers 'minor operational changes at an existing facility to minimize waste generation and for the reuse of materials.' Operation of the CLEAR line was considered to be part of the background for the alternatives analyzed in both the 1999 and 2008 LANL Sitewide Environmental Impact Statements.

The CLEAR line has never been operated. LANL proposes to operate the CLEAR (now Chloride Extraction and Actinide Recovery) glovebox train to enhance the purification and optimize the throughput of actinides from current LANL aqueous chloride operations and stored actinide inventory that contains recoverable isotopes. The proposed operation would initially place more attention on the higher concentration feedstocks to maximize actinide recovery. By focusing on the higher concentration feedstocks, LANL would remove actinides from existing wastestreams and be able to provide actinides for reuse in TA-55's existing programs that are included in DOE's Record of Decision (ROD) for the 2008 LANL Sitewide Environmental Impact Statement (DOE/EIS-0380). In addition, LANL would provide actinide isotopes for DOE's isotope production and distribution program, which makes radioisotopes available for civilian and commercial uses (DOE/EIS 0310, *Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States*. A Record of Decision for the preferred alternative, use of existing facilities, was issued on January 26, 2001).

Operation of the CLEAR line would reduce both transuranic waste that would otherwise be shipped to the Waste Isolation Pilot Plant and the actinide load to RLWTF. Actual reduction in actinide concentrations in the liquid effluent stream to RLWTF will depend on a balance of actinide recovery activities versus waste minimization activities and on the technology employed.

Operation of the CLEAR line would entail internal glovebox modifications, such as changes in the number, arrangement, and operation of resin columns, to provide flexibility for the recovery of specific isotopes or to accommodate specific types of waste minimization. The CLEAR line may also be used to demonstrate additional technologies, such as ultrafiltration or evaporative treatments of process effluents, which could minimize contaminants in the RLWTF effluent.

No sensitive resources would be affected by the proposed activities.