Headend Processing Plant (CPP-640) Decontamination and Decommissioning

Remote Mixed Waste Treatment Facility

Radiological and Environmental Sciences Laboratory Replacement

5.0 NEPA REVIEWS AFFECTING THE INEEL

In order to understand the scope of operations that have been analyzed in NEPA documentation, the SA team reviewed a total of 61 EISs and EAs from the INEEL and from around the DOE Complex. A list of the INEEL related documents reviewed is given in Appendix 5-1. A summary was prepared for every document referencing INEEL operations. The summaries show the scope of each analysis, the portions of the INEEL operations analyzed, and the decisions made concerning that analysis. These are provided in Appendix 5-2. Appendix 5-3 shows the NEPA documents reviewed but were found to not address INEEL operations.

The primary source for documents on these lists (Appendix 5-1 and Appendix 5-3) was the EH web site (http://tis.eh.doe.gov/nepa). (note: this web site has been reduced since 9/11/01 for security reasons.) Documents are included that were completed from 1994 to the present. This was to ensure all documents that may have not been included in the 1995 EIS were addressed. The EH web site search engine was used to find all documents that reference INEEL operations. In addition, other NEPA analyses, which in-turn were referenced in these EISs, were reviewed to determine whether they analyzed or considered INEEL operations or INEEL as a location for proposed or alternative actions.

The summary statements are given for reference purposes to facilitate ongoing NEPA review. Any evaluation of the adequacy of existing NEPA analysis for specific projects should rely on the specific documents themselves and not on this summary information.

The results of this analysis of all INEEL related NEPA documents are reflected in Appendix 5-4 where the status of existing NEPA documentation is organized by INEEL program.

6.0 PROGRAM CHANGE ANALYSIS

6.1 Introduction to the Program Change Analysis

One of the major sections of the Supplement Analysis is the change analysis for the different programs addressed by the 1995 EIS. The change analysis is a disciplined approach to determining what has changed significantly over the last five years in each of the programs. These changes were then evaluated to determine whether they have resulted in, or are expected to result in, potential environmental impacts different from those reported in the 1995 EIS.

6.2 Methodology

The change analysis process considered four important pieces of information. First was a review of what portion of the program was covered by the 1995 EIS. Second was a review of

the current status of the program. Third was a description of the major changes in the program. And fourth was an evaluation of whether the environmental impacts of those changes have been or are expected to be significant. Environmental impacts were evaluated on a qualitative basis for each discipline (i.e. air, water, land use, etc.) because the need to look at context and intensity varies significantly with the setting of the implemented and proposed actions.

The change analysis was organized in a way to show the entire scope of each program and whether it was included in the 1995 EIS. First, each project that was analyzed in the 1995 EIS was addressed. Second, the balance of the program included in the 1995 EIS was analyzed. Third, current projects or program elements that were not previously addressed, if any, were analyzed. Fourth, any major projects that are forecast for the next five years were identified.

This approach was used to ensure the overall program description was robust enough to identify all the potential environmental impacts from any project within the program. The specific program change analysis documents are located in Appendix 6-1. Appendix 6-2 provides the methodology used to perform this evaluation.

6.3 Programs Analyzed

All programs analyzed in the 1995 EIS were included in this supplement analysis, with the exception of the High Level Waste program. Subsequent to the publication of the 1995 EIS, numerous substantive changes have been proposed in the HLW program, and those changes are analyzed in the HLW & FD EIS. However, each HLW project was addressed and the HLW program was considered in this SA from a cumulative impacts standpoint in conjunction with the balance of the INEEL in the Environmental Disciplines section.

Of the programs/projects evaluated in the 1995 EIS, the Infrastructure program included everything not included in ER, HLW, SNF, and WM programs. For consistency in analysis, this same approach was used in this SA.

6.4 Interaction Between the Program Change Analysis and the Environmental Discipline Change Analysis

While reviewing the program change analysis, it became apparent that a tool would need to be developed to allow a cross comparison between the programmatic changes that were identified and the environmental disciplines. Without this cross comparison, it may have been possible to miss cumulative impacts between programs and environmental disciplines. In addition, this allowed the different subject matter experts to compare their analysis with that of the program representatives to ensure that a complete picture is given of the state of the program and of each environmental discipline. The results are given in Appendix 6-3. It must be emphasized that this represents impacts of changes from what was previously analyzed and not a summary of the environmental impacts of each project or action.

The potential environmental impacts of the program changes were developed as part of three group sessions with the program representatives, the NEPA Compliance Officer, and legal counsel. The table represents the combined professional judgment of the individuals. The assessments are qualitative rather than quantitative.

6.5 Results of the Program Change Analysis

The results of the program change analysis were compared against the information in Appendix 5-4. Appendix 5-4 is a summary of the NEPA analysis that has been completed and organized by INEEL program to allow for a comparison of what has been analyzed vs. the scope of the current program.

The program change analysis documents are provided in Appendix 6-1. This shows each major activity of the respective program and the change in environmental impacts for each. A summary of these results is given below for the current state of each INEEL program. For consistency between documents, the project numbers that are used here and in Appendix 6-1 are the same project numbers that were used in the 1995 EIS.

6.5.1 Decontamination and Decommissioning (D&D)

6.5.1.1 Projects Analyzed in the 1995 EIS

There were nine Decontamination and Decommissioning (D&D) projects analyzed in the 1995 EIS: two ongoing projects and seven new projects. (The new projects were shown in the 1995 EIS as being Environmental Restoration projects. They are reported here for programmatic consistency.)

Ongoing Projects: The scope of the ARA-II project was to decontaminate and decommission the radiologically contaminated buildings, structures, utilities, and other miscellaneous items at ARA-II. This project had been previously evaluated in an EA and approved with a finding of No Significant Impact (Sept. 1993).

The scope of the BORAX-V project was to decontaminate and decommission the remaining BORAX-V facility by one of two alternatives: dismantlement or entombment. While fieldwork on this facility had not yet commenced when the 1995 EIS was prepared, it was scheduled to be initiated in June 1995 subject to the decisions of the 1995 EIS ROD.

Both of these projects have been completed.

C-2.5 Auxiliary Reactor Experiment (ARA-II) D&D	Completed
C-2.6 Boiling Water Reactor Experiment (BORAX-V) D&D	Completed

Planned Projects: Of the seven planned projects analyzed under the 1995 EIS, all were actions identified to be addressed in accordance with the CERCLA process (note: these projects no longer fall under the CERCLA process). Of these, additional analysis was completed on five of the seven projects using the normal NEPA process.

Two of the projects have been completed, three are currently planned, and two are unscheduled due to funding issues.

C-4.2.1 Central Liquid Waste Processing Facility D&D	Completed
C-4.2.2 Engineering Test Reactor (TRA-642) D&D	Unscheduled
C-4.2.3 Materials Test Reactor (TRA-603) D&D	Unscheduled
C-4.2.4 Fuel Processing Complex (CPP-601) D&D	Not initiated
C-4.2.5 Fuel Receipt and Storage Facility (CPP-603) D&D	Not initiated
C-4.2.6 Headend Processing Plant (CPP-640) D&D	Not initiated

C-4.2.7 Waste Calcine Facility (CPP-633) D&D Completed

6.5.1.2 Balance of the Program in the 1995 EIS

The 1995 EIS contains a general description of the D&D program. While there have been administrative changes, the program has not changed appreciably.

6.5.1.3 Other parts of the program not analyzed in the 1995 EIS

The D&D program was organizationally moved from the Environmental Restoration program and merged with the Infrastructure Deactivation program. This allows for a more integrated approach toward cleaning up and disposing of older facilities that no longer have a useful life.

The 1995 EIS did not address ground water impacts of D & D decisions because precise information was not available. The important aspects of these decisions are the cumulative impacts from the decision when combined with other current or planned actions that involve ground water impacts. Additional analysis may be required for future EIS level D & D decisions. D & D decisions made since the 1995 EIS and which left radioactive source term in the ground received additional NEPA analysis.

6.5.1.4 Planned major projects

The D&D program has a schedule for disposition of facilities through 2045. Each of these projects will be prioritized and undertaken based on risk and funding availability.

6.5.2 Environmental Restoration (ER)

6.5.2.1 Projects Analyzed in the 1995 EIS

There were three ongoing projects evaluated under the Environmental Restoration program. Of these, two were implemented as planned and are still ongoing. The third is ongoing but project definition is being combined with other cleanup activities. (The 1995 EIS showed seven new D & D projects assigned to Environmental Restoration. These are reported in this document under the D & D program.)

Remediation of Groundwater Contamination. The objective of the "Remediation of Groundwater Contamination Project" was to reduce contamination in the vicinity of an injection well that is located in the Test Area North Technical Support Facility. This project was planned to reduce the concentrations of trichloroethylene, tetrachloroethylene, dichloroethylene, lead, strontium-90, and other contaminants in the groundwater surrounding the TSF-05 injection well at the Technical Support Facility. A variation of the project described above has been implemented via an amendment to the CERCLA ROD.

Pit 9 Retrieval. This Pit 9 Interim Action was to have excavated and treated wastes contaminated with radioactive and hazardous substances disposed of at Pit 9 of the Subsurface Disposal Area of the RWMC. This project was expected to be operable as of August 1996. The impacts of implementing and managing the work from this project were analyzed based on the known scope in 1995.

The current scope of this activity has changed from the scope discussed in the 1995 EIS. The project described in the previous EIS is more accurately referred to today as CERCLA Operable

Unit 7-10. At this time it is not possible to forecast which wastes will be retrieved and which wastes will remain. Additional NEPA documentation could be required depending upon the results of discussions with the regulators and any new agreements on scope of work. The schedule for specific actions required by the Pit 9 CERCLA ROD is also under discussion.

Vadose Zone Remediation. The proposed general objective of the "Remediation of Organic Contamination of the Vadose Zone Project" is to prevent migration of volatile organic compounds (from the vadose zone beneath the subsurface disposal area of the RWMC) to the Snake River Plain Aquifer in concentrations exceeding established risk levels and/or Federal and State maximum contaminant levels.

The proposed general objective of the remediation has not changed from its description in the previous EIS, but it is now more accurately referred to as CERCLA OU 7-08.

C-2.2 Remediation of Groundwater Contamination	Ongoing
C-2.3 Pit 9 Retrieval	Ongoing
C-2.4 Vadose Zone Remediation	Ongoing

6.5.2.2 Balance of the Program in the 1995 EIS

CERCLA is a well-defined process for addressing environmental cleanup. Section 2.2.6.1 of 1995 EIS lays out the basic process for performing remedial actions under CERCLA. Four hundred and fifty nine (459) individual release sites were identified in Table A.2 of the Federal Facility Agreement/Consent Order. To provide for more efficient management of the remediation of these release sites, they were organized into 10 "Waste Area Groups" (WAGs), based on similarities in contaminant and/or media, and by geographic proximity.

DOE, in partnership with the State of Idaho and the EPA Region X, has identified remedial actions and is currently implementing them on areas at the INEEL site where hazardous substances have been or are suspected of having been released to the environment.

As of the cut-off date (Oct. 1, 2000) of this Supplement Analysis, a total of 593 suspected release sites have been identified at the INEEL site for investigation. Four hundred and twenty two (422) of the suspected release sites have either been remediated in accordance with a CERCLA ROD, designated as requiring no action, or as requiring no further action but with institutional controls established for the sites.

A complete description of the ER program is available in Appendix 6-1, Section 2.2, "Environmental Restoration Program Description."

6.5.2.3 Other Parts Of The Program Not Analyzed In The 1995 EIS

These program elements have evolved since the 1995 EIS and were not visualized. Similar projects such as the Low Level Mixed Waste Disposal Facility were analyzed in the 1995 EIS. Required analysis has been completed for each of these projects.

The INEEL CERCLA Disposal Facility (ICDF) is a low-level, hazardous, TSCA, and mixed waste disposal facility (landfill cell[s] and evaporation pond) with an authorized capacity of approximately 390,000 m^3 (510,000 yd^3). CERCLA-generated wastes within the INTEC facility will be removed and disposed in the ICDF. The evaporation pond will provide treatment/disposal capability for CERCLA-generated aqueous wastes.

6.5.2.4 Planned Major Projects

There are no planned major projects in the ER program that are not analyzed.

6.5.3 High-Level Waste

6.5.3.1 Projects Analyzed in the 1995 EIS

A total of seven HLW projects were analyzed in the 1995 EIS. Of these, three projects have been completed as analyzed. The remaining four projects were not completed and are being reevaluated as a part of the HLW & FD EIS.

C-2.7 High-Level Tank Farm Replacement - Upgrade Phase	Completed
C-4.3.1 Tank Farm Heel Removal Project	Not initiated
C-4.3.2 Waste Immobilization Facility	Not initiated
C-4.3.3 High-Level Tank Farm New Tanks	Not initiated
C-4.3.4 New Calcine Storage	Not initiated
C-4.3.5 Radioactive Scrap/Waste Facility	Completed
C-4.10.1 Calcine Transfer Project (Bin Set #1)	Not initiated

6.5.3.2 Balance of the Program in the 1995 EIS

Because significant changes to the HLW program are being analyzed in the INEEL HLW & FD EIS, this SA does not address this program element.

6.5.3.3 Other parts of the program not analyzed in the 1995 EIS

Significant changes to the HLW program are being analyzed in the INEEL HLW & FD EIS. This SA has determined that the analysis of the HLW program in 1995 was satisfactory to support the ROD.

6.5.3.4 Planned major projects

Because significant changes to the HLW program are being analyzed in the INEEL HLW & FD EIS, this SA does not address this program element.

6.5.3.5 Waste Treatment

Since 1995, the HLW program has calcined 272,500 gallons of high-level waste and 313,500 gallons of sodium-bearing waste. This took place under three treatment campaigns: one in 1997, one in 1999, and one in 2000.

6.5.4 Infrastructure

6.5.4.1 Projects Analyzed in the 1995 EIS

There were five projects analyzed as a part of the Infrastructure Program. Two of the five are ongoing. The other three projects were considered to be new.

Ongoing Projects - The HPIL project will provide a technologically up-to-date facility that safely accommodates the programmatic and operational needs of the health physics program at the INEEL. The Radiological and Environmental Sciences Laboratory (RESL) replacement project will provide updated analytical and support capabilities for the environmental, oversight, and standardization programs of DOE, the United States Geological Survey, and the INEEL.

Planned Projects – The remaining three projects analyzed in the 1995 EIS were listed in the ROD as planned. These projects are the Industrial/Commercial Landfill Expansion, the Gravel Pit Expansions, and the Central Facilities Area Clean Laundry and Respirator Facility.

C-2.11 Health Physics Instrument Laboratory	Ongoing
C-2.12 Radiological and Environmental Sciences Laboratory Replacement	Not initiated
C-4.9.1 Industrial/Commercial Landfill Expansion	Ongoing
C-4.9.2 Gravel Pit Expansions	Ongoing
C-4.9.3 Central Facilities Area Clean Laundry and Respirator Facility	Not Initiated

6.5.4.2 Balance of the Program in the 1995 EIS

There were three areas analyzed under the Infrastructure Program in the 1995 EIS balance-of-the-program category. Each of these areas is ongoing and consists of General Purpose Capital Equipment, environmental and Q.A. programs, and buildings and facilities.

The combined effects of these three areas show little or no change overall as compared to the effects analyzed under the scope of the 1995 EIS.

6.5.4.3 Other parts of the program not analyzed in the 1995 EIS

The parts of the program not analyzed in the 1995 EIS are outside the scope of the original EIS and are not addressed in this document.

6.5.4.4 Newly Planned Major Projects

There are a number of planned infrastructure upgrades that enhance existing capabilities including a proposed Subsurface Geoscience Laboratory.

6.5.5 Spent Nuclear Fuel (SNF)

6.5.5.1 Projects Analyzed in the 1995 EIS

There were nine projects analyzed under the Spent Nuclear Fuel (SNF) Program in this 1995 EIS project-specific *Projects Analyzed* category: one ongoing project, and eight new projects.

Ongoing Project: The scope of this project (C-2.1 Test Area North Pool Fuel Transfer) concerns the removal of all SNF within the TAN pool in TAN-607. These fuels are divided into two subprojects for: 1) TMI debris, and 2) LOFT and commercial SNF. Each of these fuels was subjected to selective destructive analysis and mounted with epoxy as a fixative agent. In one case, epoxy was used as a securing agent within its storage canister. All epoxied materials have been transferred to the LOFT and commercial SNF subproject.

Project-specific NEPA analysis was performed separately and prior to the development of the scope of this EIS. Thus far, all activities planned and carried out within the scope of this project have been within the bounds of existing NEPA analyses. (DOE/EA-1050 and DOE/EA-1217)

Planned Projects: Of the eight planned projects analyzed under the 1995 EIS: 1) four projects were implemented as a result of the ROD as described in the EIS or under reduced scope; 2) one project was not selected under the ROD, and 3) three were deferred. Of the three deferred projects, one was later implemented under the terms of separate NEPA analysis. The combined effects of these projects are reduced compared to the effects analyzed under the terms of the 1995 EIS.

C-4.1.1 Expended Core Facility Dry Cell Project	Ongoing
C-4.1.2 Increased Rack Capacity for CPP-666	Ongoing
C-4.1.3 Additional Increased Rack Capacity (CPP-666)	Deferred
C-4.1.4 Dry Fuel Storage Facility, Fuel Receiving, Canning/Characterization, and Shipping	Ongoing
C-4.1.5 Fort St. Vrain Spent Nuclear Fuel Receipt and Storage	Ongoing
C-4.1.6 Spent Fuel Processing	Not selected
C-4.1.7 Experimental Breeder Reactor-II Blanket Treatment	Initially Deferred, Ongoing
C-4.1.8 Electrometallurgical Process Demonstration	Deferred

6.5.5.2 Balance of the Program in the 1995 EIS

There were five programmatic elements analyzed under the SNF Program in the 1995 EIS *Balance of the Program* category. Of these five programmatic elements, one has been completed within the scope of the 1995 EIS, and the remaining four are planned to be or are being executed within the scope or reduced scope of the 1995 EIS. The combined effects of these projects are reduced compared to the effects analyzed under the terms of the 1995 EIS.

These programmatic elements are:

- Consolidation of Non aluminum-clad SNF at the INEEL
- Transfer of aluminum-clad SNF located at the INEEL to SRS
- Continued interim storage of naval SNF at the INEEL
- CPP-603 Basins Emptied of SNF
- Consolidation of INEEL SNF storage at the INTEC

6.5.5.3 Other parts of the program not analyzed in the 1995 EIS

There were no projects under the SNF Program in the 1995 EIS in this category.

6.5.5.4 Planned major projects

There were no projects under the SNF Program in the 1995 EIS in this category.

6.5.6 Waste Management (WM)

6.5.6.1 Projects Analyzed in the 1995 EIS

There were 16 projects analyzed under the Waste Management (WM) Program in this 1995 EIS project-specific projects-analyzed category, consisting of three ongoing projects and 13 new projects.

Ongoing Projects: The scope of project C-2.8 Transuranic Storage Area Enclosure and Storage Project, concerns the construction and operation of four elements: 1) a building over the top of transuranic waste in storage with an earthen covered berm, 2) multiple storage buildings, 3) support facilities, and 4) associated utility upgrades. The project completed construction of all elements as originally planned. All elements of the project are operational with the exception of the building over the berm covered transuranic waste. Operations will take place under a separate contract with the Advanced Mixed Waste Treatment Facility (AMWTF) project. A separate EIS provides the analysis of the impacts of the operation of this facility.

Neither the Waste Characterization Facility nor the Waste Handling Facility was completed. The Waste Characterization Facility was included as a part of the work scope of the AMWTF project and the new AMWTF facility was addressed under the project specific NEPA analysis. The Waste Handling Facility was not built and other buildings at ANL-W were modified to accommodate the work scope originally planned for this facility.

Planned Projects: Of the 13 planned projects analyzed under the 1995 EIS, four were implemented as a result of the ROD as described in the EIS or under reduced scope – one of which has been completed and one which has not been initiated; three were not selected under the ROD; and six were deferred. Of the six deferred projects, one has been implemented under the terms of separate NEPA analysis and another is still scheduled for completion under separate NEPA analysis currently being performed.

C-4.4.1 Private Sector Alpha-Contaminated Mixed Low-Level Waste Treatment	Initially Deferred/ Ongoing
C-4.4.2 Radioactive Waste Management Complex Modifications to Support Private Sector Treatment of Alpha-Contaminated Mixed Low-Level Waste	Deferred
C-4.4.3 Idaho Waste Processing Facility	Deferred
C-4.4.4 Shipping/Transfer Station	Not Selected
C-4.5.1 Waste Experimental Reduction Facility Incineration	Completed
C-4.5.3 Mixed Low-Level Waste Treatment Facility	Not Selected
C-4.5.4 Mixed/Low-Level Waste Disposal Facility	Deferred
C-4.6.4 Non-incinerable Mixed Waste Treatment	Ongoing
C-4.6.6 Remote Mixed Waste Treatment Facility	Initially Deferred/ EA being prepared
C-4.6.7 Sodium Processing Project	Ongoing
C-4.7.1 Greater-Than-Class-C Dedicated Storage	Not Initiated
C-4.8.1 Hazardous Waste Treatment, Storage, and Disposal Facilities	Not Selected
C-4.10.2 Plasma Hearth Project	Deferred

6.5.6.2 Balance of the Program in the 1995 EIS

Each of the major waste streams (transuranic, low-level waste, mixed low-level waste, greater-than-class-C low-level waste, special case waste, hazardous waste, and industrial waste) is addressed in this section. Each shows the state of the program for the particular waste stream as described in the 1995 EIS and its current state.

6.5.6.3 Other parts of the program not analyzed in the 1995 EIS

All portions of the WM program were addressed in the 1995 EIS.

6.5.6.4. Planned major projects

There are no planned major projects in the WM program that are not previously analyzed.

6.5.6.5 Waste Disposal

A review of the Waste Disposal Volumes table in Appendix 6-1, shows that the 1995 EIS was conservative regarding waste disposal volumes. The only item of note is that the LLW volumes have been over the projected annual volumes for the last three years. However, even if this trend continues, the result will be disposal of LLW offsite at an earlier time rather than disposal on the INEEL. The rate at which LLW is disposed will not affect the total amount of waste disposed at the RWMC. Environmental impacts of shipment and disposal of LLW offsite were analyzed in the WM Programmatic EIS.

DOE O 435.1, Radioactive Waste Management, was approved in July 1999. One of the significant changes in requirements by this new order is that long-term storage of radioactive waste now requires specific approval. As a result, additional efforts have been made to dispose of wastes that had been in storage facilities. This is reflected by the increased disposal volumes in the last three years.

6.6 Conclusions

6.6.1 Projects Summary

A total of 49 projects were analyzed in the 1995 EIS. Some of these projects received additional NEPA analysis. Of these projects:

- 8 have been completed,
- 17 are ongoing,
- 12 have not yet been initiated or are unscheduled,
- 6 have been deferred,
- 4 were not selected in the ROD for implementation, and
- 2 have been cancelled due to changing program needs.

For those projects that either have not been initiated or have been deferred, the D&D projects are still required, the HLW projects are being addressed under the HLW & FD EIS, the Infrastructure projects are still required, the SNF projects are no longer required, and the WM projects are no longer required. This leaves a list of the following projects that are still viable from a programmatic perspective.

C-4.2.2 Engineering Test Reactor (TRA-642) D&D

C-4.2.3 Materials Test Reactor (TRA-603) D&D
C-4.2.4 Fuel Processing Complex (CPP-601) D&D
C-4.2.5 Fuel Receipt and Storage Facility (CPP-603) D&D
C-4.2.6 Headend Processing Plant (CPP-640) D&D
C-2.12 Radiological and Environmental Sciences Laboratory Replacement
C-4.9.3 Central Facilities Area Clean Laundry and Respirator Facility

This review also indicated that decisions regarding the replacement of the RESL facility and disposition of the CFA Clean Laundry facility could be made pending funding priorities and project definition.

6.6.2 Balance of the Programs

For each of the programs analyzed in the 1995 EIS, the analysis shows no major changes in programmatic direction except for the HLW program. The programmatic changes that are being considered in the HLW program are analyzed in the HLW & FD EIS. Other than this change, all of the programs that were analyzed in the 1995 EIS are being implemented within the scope of the analysis.

6.6.3 Other Parts of the Program Not Analyzed in the 1995 EIS

The 1995 EIS did not address ground water impacts of D & D decisions. The important aspects of these decisions are the cumulative impacts from the decision when combined with other current or planned ground water impacts. Additional analysis will be required for future D & D decisions. D & D decisions made since the 1995 EIS and which left radioactive source term in the ground received additional NEPA analysis.

6.6.4 Planned Major Projects

The D&D program has a schedule for disposition of facilities through 2045. Each of these projects will be prioritized and undertaken based on risk and funding availability. There are a number of planned infrastructure upgrades that enhance existing capabilities including a proposed Subsurface Geoscience Laboratory. These projects will require specific NEPA analysis as each project reaches a decision point. No additional analysis is required at this time.

6.6.5 Program Change Analysis Summary

The majority of the programs and projects addressed in the 1995 EIS have NEPA documentation that addresses current and planned actions. A number of facilities and operations rely on NEPA documentation in addition to the 1995 EIS to provide complete representation of the environmental impacts of these actions. The only area for further analysis identified for projects in the 1995 EIS is in the D&D program. As stated in the ROD for the 1995 EIS, additional analysis will be required before making decisions for the D&D of these facilities.

The Supplement Analysis did not evaluate the adequacy of NEPA documentation for any of the national programs that are managed through DOE-ID or for the Grand Junction Field Office.

In making the determination that additional analysis is required, the baseline (Alternative B) against which this analysis was completed must be considered. Since Alternative D was the maximum impact case, it is important to understand whether the additional analysis was

unanalyzed (not in the 1995 EIS) or not a part of the ROD (a part of one of the other alternatives but not a part of Alternative B.) In this case, the additional analysis required is not included in any of the other alternatives in the 1995 EIS. Hence additional analysis is required.

7.0 ALTERNATIVE SELECTION

7.1 Scope of the 1995 EIS

The 1995 EIS identified four alternatives with respect to the INEEL:
1) Alternative A - No Action
2) Alternative B - Ten-Year Plan
3) Alternative C - Minimum Treatment, Storage, and Disposal
4) Alternative D - Maximum Treatment, Storage, and Disposal.

Under the No Action alternative existing environmental restoration and waste management operations, facilities, and projects would continue to be managed. This included continuing existing environmental restoration, waste management, decontamination and decommissioning, research and development, and infrastructure facilities and projects that support the Environmental Restoration and Waste Management Program at the INEEL. Naval spent nuclear fuel shipments were only allowed during a three-year transition period. No new major upgrades would be undertaken.

Under Alternative B, existing environmental restoration and waste management facilities and projects would continue to be managed. Besides existing facilities and projects, projects proposed to be built from 1995 – 2005 would be implemented. Environmental restoration, waste management, and spent nuclear fuel projects required to meet regulatory requirements would be performed. Also, increased decontamination and decommissioning activities would take place. Some spent nuclear fuel and waste management projects from other sites would be directed to the INEEL. Specific projects were analyzed through the life cycle of the project and the SNF program was analyzed through 2035.

Under Alternative C, ongoing INEEL spent nuclear fuel, waste management activities, and materials and waste would be transferred to other locations. Environmental restoration activities would be minimized by emphasizing institutional controls over treatment options.

Under Alternative D, to the extent possible, spent nuclear fuel and waste would be transferred from other DOE facilities to the INEEL site for management. Environmental restoration activities would include the maximum planned decontamination and decommissioning projects and would emphasize residential use as the preferred end land use, which potentially would result in maximum waste generation.

7.2 Changes to Alternatives Analyzed

The period of analysis used for INEEL programs (not including SNF) was from 1995 to 2005. The beginning position for the SA was that the validity of the 1995 EIS for possible impacts beyond the year 2005 cannot be verified without additional analysis for those projects that did not perform a longer term analysis.

As the analysis progressed, it became apparent that the analysis was not time frame sensitive for most projects. The following shows how each program analysis is not tied directly to the