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memorandum

DEC 10 1992

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DATE: December 1, 1992

REPLY TO ATTN OF: EH-25

SUBJECT: National Environmental Policy Act (NEPA) Determination for the Waste Receiving and Processing (WRAP) Facility Module 1 at the Hanford Site

TO: Leo P. Duffy,
Assistant Secretary for Environmental Restoration and Waste Management

This is in response to your request for a determination on the need for a supplement to the 1987 environmental impact statement (EIS) Disposal of Hanford Defense High-Level, Transuranic, and Tank Wastes (DOE/EIS-0113) before construction and operation of the subject WRAP Module 1 facility. On July 16, 1992, EM-341 sent EH-251 a revised Supplement Analysis (SA) in response to EH comments dated March 23, 1992, regarding the SA you originally submitted to me by memorandum dated January 14, 1992. EH-25 received further revisions from EM-341 on October 6, 1992. We have reviewed the SA, which compares the environmental impacts that would result from the proposed WRAP Module 1 to the originally proposed WRAP facility design impacts as described in the 1987 EIS, and have considered your recommendation that a supplemental EIS is not required. This review is in accordance with the provisions of Section 1502.9 of the Council on Environmental Quality (CEQ) regulations for implementing NEPA, Section 1021.314(c) of the DOE NEPA Regulations, and DOE Order 5440.1D, Section 7.d(17).

The proposed modifications to the WRAP facility were a result of engineering studies that indicated retrieval and cleanup activities could be expedited and conducted in a more cost effective manner through a modular approach to construction of the TRU waste processing facilities. Two separate waste processing systems called Module 1 and Module 2 are planned, with respective Tri-Party Agreement completion dates of September 1996 and September 1999. The proposed Module 1 would handle only certain types of contact-handled transuranic (CH-TRU) wastes that meet specific size and weight criteria. The remaining CH-TRU wastes originally envisioned for the WRAP facility (primarily oversized containers requiring size reduction) and remote-handled TRU wastes would be managed in a future Module 2 facility. The NEPA review for Module 2 will include an analysis of the cumulative impacts of both Module 1 and Module 2.

The proposed action is to design, construct and operate the Module 1 facility, which would provide capability for examining, processing, repackaging and certifying certain CH-TRU for shipment to the Waste Isolation Pilot Plant for disposal. Module 1 would also have the capability to decontaminate reusable overpack containers and items containing lead.

Our attached markup contains changes required to improve the accuracy and clarity of the SA. Based on our review of the SA as modified, we have determined, after consultation with the Office of General Counsel, that

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the impacts of the subject proposed action to construct and operate Module 1 are adequately covered in the HDW-EIS. The proposed action does not involve substantial changes to the original proposed action that are relevant to environmental concerns, and there is no significant new circumstance or information relevant to environmental concerns and bearing on the proposed action or its impacts, within the meaning of NEPA and CEQ regulations. Therefore, a supplement to the 1987 EIS is not required for the proposed action.

Based on our review of preliminary planning materials for Module 2, we have concluded that proceeding with Module 1 prior to considering the impacts of Module 2 would not be an inappropriate segmentation because the modules are not so closely related as to be a single course of action within the meaning of NEPA and CEQ regulations. In reaching this conclusion, we note the following: 1) construction and operation of either module would not automatically trigger construction and operation of, or force differences in, construction and operation of the other; 2) either module could proceed and would serve its useful function without the other; and 3) neither module is a dependent part of a larger action. We understand that you are contemplating for Module 2 changes from the waste management processes that were envisioned in the 1987 EIS. Please be advised that, if these contemplated changes are not adequately covered by the 1987 EIS, a supplemental EIS or a separate NEPA document would be required for Module 2.

A copy of this memorandum, together with the SA as modified, should be placed in your files as a record of the NEPA determination for this action. Additionally, please notify the State of Washington and the public of the availability of the SA, in accordance with the provisions of DOE Order 5440.1D, Section 7.a(17), and of the determination that a supplement to the EIS is not required.

If you have any questions regarding this matter, please direct them to Carol Borgstrom, Director, Office of NEPA Oversight, at 586-4600.

Paul L. Ziemer, Ph.D.
Assistant Secretary
Environment, Safety and Health

Attachment

cc: R. Scott, EM-20 NEPA Compliance Officer
P. Dunigan, RL NEPA Compliance Officer

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P. L. Ziemer, DOE-HQ	L. P. Duffy, DOE-HQ	INCOMING: 9208798

Subject: NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) DETERMINATION FOR THE WASTE RECEIVING AND PROCESSING (WRAP) FACILITY MODULE 1 AT THE HANFORD SITE.

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