Department of Energy
Chicago Operations Office
9800 South Cass Avenue
Argonne, Illinois 60439

Milton D. Johnson
Princeton Group Manager

SUBJECT: DELEGATION OF CATEGORICAL EXCLUSION (CX) APPROVAL AUTHORITY

Based on confirmation that you have designated a Princeton Group NEPA Compliance Officer, have prepared CX review procedures and a quality assurance plan, and have access to Department of Energy legal resources, I hereby delegate the requested authority to you, effective immediately.

Experiences with NEPA have shown that early and adequate project and facility planning is essential to a satisfactory NEPA program. Early planning will assure that environmental values are considered, potential conflicts are identified, and delays are avoided. Therefore, as you finalize your procedures for preparation, review, and approval of CXs, assure yourself that your procedures, policies, responsibilities, etc., adequately address early planning.

We will continue to provide information, training, and other types of support during your efforts to make the CX process more efficient and useful to your office. If problems arise or you have questions or concerns about any of your determinations, I expect you will contact us.

Cherri J. Langenfeld
Manager

cc: C. Borgstrom, HQ, EH-42/FORSTL
O. Lawrence, HQ, EE-64/FORSTL
M. Mazaleski, HQ, NN-12/FORSTL
R. Scott, HQ, EM-20/FORSTL
C. Hickey, HQ, ER-8.2/GTN
R. Sharma, HQ, NE-443/GTN

SEP 1 2 1995

W. Sedgefield White, Jr., TASG, NEPA Compliance Officer

SUBJECT: PRINCETON GROUP (PG) PROCEDURE NO. 2-12, "PREPARATION, REVIEW AND APPROVAL OF NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CATEGORICAL EXCLUSION (CX) DOCUMENTATION, REVISION 0

Enclosed is the subject procedure, which has incorporated your comments as well as comments generated during PG's internal review. This document has been modeled after Batavia Group's (BG) supporting documentation upon which you based your decision to recommend delegation approval of authority for Categorical Exclusions (CX) to BG. By copy of this letter we request that you recommend PG CX approval authorization by the CH Manager since we believe the subject procedure fully satisfies your delegation requirements as previously discussed with you and Mr. Allen Wrigley of my staff.

If you have any questions, please contact Juris Balodis of my staff at (609)243-3709.

Milton D. Johnson, Manager
Princeton Group

Enclosure:
As Stated

cc: M. Flannigan, TASG, w/o encl.
J. Levine, PPPL, w/o encl.
A. Wrigley, PG, w/o encl.

CONCUR
Wrigley/cg
9/27/95
Balodis
9/11/95
Faul
9/12/95
Johnson
MDJ
9/12/95

AHNEY-YURDIN
IA-Y
10/10/95

Department of Energy
Brookhaven Area Office
Building 464
P.O. Box 5000
Upton, New York 11973

Allen H. Wrigley
Princeton Group

SUBJECT: DELEGATION OF CATEGORICAL EXCLUSION (CX) APPROVAL AUTHORITY

Attached is the concurrence sheet for the CX delegation package. I've advised CH that legal review has been provided.

Irene Atney-Yurdin
Counsel

Enclosure:
As Stated

cc: V. Prouty, CH, w/o encl.

U.S DEPARTMENT OF ENERGY

CHICAGO OPERATIONS OFFICE

PRINCETON GROUP

ES&H PROCEDURE

PROCEDURE 2-12

PREPARATION, REVIEW, AND APPROVAL OF NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) CATEGORICAL EXCLUSION (CX) DOCUMENTATION

REVISION 0

Prepared By: Allen Wrigley, Environmental Engineer, PG

Approved By: Milton D. Johnson, Manager, PG

Date Issued: 09/95

ANNUAL REVIEW

Reviewer	DATE

Princeton Group (PG) Procedure for Preparation, Review and Approval of National Environmental Policy Act (NEPA) Categorical Exclusion (CX) Documentation

Table of Contents

Page

1.0 Purpose 3

2.0 Scope 3

3.0 Instructions 3

3.1 PG NEPA Coordinator (PG NC) 3

3.2 Documentation 3

3.3 Approval 4

3.4 Maintenance of Environmental Evaluation Notification Forms (EENFs) and CXs 4

Attachment 1 National Environmental Policy Act (NEPA) Review System, ESH-14, Rev.2

Attachment 2 PPPL Environmental Operating Procedure, Support Services Department, NEPA Review Process, EN-OP-007, Rev 3

Attachment 3 Princeton Group (PG) Quality Assurance Plan for Categorical Exclusion (CX) Documentation: Preparation, Review and Approval

Attachment 4 Excerpt from 10 CFR 1021, DOE NEPA Rule

Figure 1 - PPPL/PG NEPA Review Process Flow Chart

PG PROCEDURE FOR PREPARATION, REVIEW, AND APPROVAL OF NEPA CX DOCUMENTATION

1.0 PURPOSE

This procedure describes how the PG reviews and approves specific documentation required by the U. S. Department of Energy (DOE) for compliance with the National Environmental Policy Act (NEPA) at the Princeton Plasma Physics Laboratory (PPPL) operated by Princeton University under Contract DE-AC02-76-CH03073. Two PPPL procedures are appended to this PG procedure for reference: ESH-014 Rev.2, describing the NEPA screening process, and integration thereof into the PPPL Environmental, Safety, and Health oversight process, and; EN OP-007, Rev.3, describing the conduct of the PPPL ES&H review of the PPPL NEPA Planning Form. A flowchart (Figure 1) is also appended, which describes the PPPL and PG NEPA review process.

2.0 SCOPE

PPPL integrates NEPA requirements into its project planning process through the preparation of a PPPL NEPA Planning Form (Attachment 1, ESH-014 Rev.2), required for all activities conducted by any employee, subcontractor, visitor, or other person on site at PPPL (C and D sites), as well as all PPPL activities performed under contract to DOE on Forrestal Campus (A and B sites).

3.0 INSTRUCTIONS

3.1. PG NEPA Coordinator (PG NC)

The PG NC maintains ownership of the categorical exclusion (CX) process. The coordinator reviews all DOE-CH Environmental Evaluation Notification Forms (EENFs, Attachment 2) and supporting documentation prepared by PPPL to ensure that proposed PPPL projects fall clearly into one or more CX categories specified in 10 CFR 1021, DOE NEPA Guidelines, Appendix B to Subpart D (Attachment 3).

The PG NC will use DOE NEPA guidance, NEPA training, and the NEPA Quality Assurance Plan (Attachment 3) to ensure that successful, thorough reviews are conducted.

The PG NC will interact with the Manager, PG and/or PPPL NEPA Compliance Manager (NCM) if additional information is necessary prior to recommending approval by the Manager, PG.

3.2 Documentation

Documentation for proposed projects which fall under CX categories will be forwarded to the CH Legal Counsel at BHQ for review by either facsimile or E-mail.

BHG

3.3. Approval

The Manager, PG will approve PPPL proposed project CX determinations and EENF documentation thereof and notify PPPL by letter that such projects may proceed.

3.4. Maintenance of EENFs and CXs

The PG NC will maintain a list of EENFs which have been received and approved as CXs, as well as all EENF documentation and correspondence. A copy of approved CXs will be forwarded for informational purposes to the CH/Technical & Administrative Services Group (CH/TASG) NEPA Compliance Officer (NCO). The PG NC will periodically perform audits of the PPPL NEPA process.

PPPL	PRINCETON PLASMA PHYSICS LABORATORY	PROCEDURE	No. ESH-014 Rev 2 page 1 of 3
Subject: National Environmental Policy Act (NEPA) Review System		Effective Date: October 28, 1994	Initiated by: Associate Director ES&H/QA
		Supersedes: ESH-014, Rev. 1 Dated 10/29/93	Approved: Director

Applicability

This procedure applies to all activities conducted at PPPL's C and D sites; including those by subcontractors, visitors and other personnel performing work activities; and to PPPL activities at A & B sites of the Forrestal Campus.

Introduction

DOE ORDER 451.1, Sept 11, 1995 NEPA COMPLIANCE PROGRAM

This procedure is intended to assure compliance with the National Environmental Policy Act of 1969 (NEPA) through independent NEPA review of activities by technically competent ES&H personnel in order to satisfy the requirements in DOE Order 5440.1E, and to satisfy the Safety Analysis and Review System (SARS) requirements of DOE Order 5481.1B..

Some activities are inherently low hazard and are routinely encountered and/or accepted by the general public. They do not require NEPA review or classification. See Attachment 3 to determine if the activity in question falls into the low hazard activity categorization. Other generic and unique activities are also defined in Attachment 3.

Reference Documents

SUPERCEDED

A. National Environmental Policy Act (NEPA) of 1969 (PL91-190) and Amendments. — DOE ORDER 451.1 NEPA COMPLIANCE PROGRAM
B. DOE Order 5440.1E, National Environmental Policy Act Compliance Program.
C. DOE-CH Order 5440.1E, National Environmental Policy Act (NEPA).
D. DOE NEPA Guidelines, 10 CFR 1021.
E. SEN-15-90, National Environmental Policy Act, 2/5/90.
F. PPPL Policy P-002, Environmental Policy.
G. DOE Order 5481.1B, Safety Analysis and Review System.

Procedure

A. GENERIC ACTIVITIES

Responsibility	Action
Division Head	1. Completes NEPA Planning Form (Attachment 1) for generic activities. Typical generic activities are shown in Attachment 3.
	2. Forwards NEPA Planning Form to ES&H for review.
ES&H	3. Reviews Form in accordance with part C of this procedure.
	4. Returns certified NEPA Form to Division Head allowing continuation of generic activities.

Attachment 1

C. ES&H REVIEW OF NEPA PLANNING FORM

Responsibility	Action
ES&H	1. Assigns NEPA Planning Form Number and logs in the NEPA Planning Form upon receipt, forwards to the NEPA Compliance Manager or NEPA Administrator.
NEPA Compliance Manager or NEPA Administrator	2. Performs a NEPA evaluation of the package.
	3. Submits request for categorical exclusion or other determination from DOE if required.
	4. Forwards the NEPA Planning Form to appropriate ES&H personnel for recommendation of extent and complexity of SARS ES&H review and documentation, if necessary, based on responses to the NEPA form questions.
	5. Completes ES&H portion of NEPA Planning Form.
	6. Receives DOE determination, if required.
	7. Certifies NEPA Planning Form by signing and affixes start and end dates. Indicates recommendations regarding any additional ES&H review and documentation requirements consistent with SARS requirements (to be followed up by appropriate ES&H personnel).
ES&H	8. Sends copy of certified NEPA Planning Form for PPPL activities to Cognizant person and Division Head.
	9. Files package.
	10. Prepares a monthly report to the ES&H Executive Board showing a listing of all certified Forms, all pending certifications, and a listing of the status of PPPL NEPA activities, highlighting any problem areas.
	11. Three months prior to certification expiration, notifies Cognizant Individual/Division Head of impending certification expiration.
	12 Periodically discusses the implementation of this procedure with PPPL legal counsel.

ATTACHMENTS

1. NEPA Planning Form
2. Directions for completing NEPA Planning Form
3. NEPA Classifications
4. Map indicating floodplains and wetlands

pg 1 of 2

NEPA PLANNING FORM # _____ (by ES&H)

Applicability: this form shall be prepared as early as possible for each new or continuing activity at PPPL. Physical implementation of PPPL activities shall not proceed prior to NEPA certification of this form.

TO BE COMPLETED BY REQUESTOR

Originator: _____ CRB/Project #: _____

Project/Organization: _____ Total Estimated Cost: _____

Title of Activity/Change: _____

Description of Activity: [include physical description of activity, purpose, location, changes to any operating parameters or approved environmentally related limits, potential or actual environmental impact, as applicable. Attach additional sheets if needed] Circle one of these choices: GENERIC UNIQUE

Environmental Considerations: Will the change/activity, either individually or cumulatively with other known activities, result in changes and/or disturbances to the following entities (see Attachment 2 for directions on answering)*

	YES	NO		YES	NO
1: Air Emissions	____	____	13: Sewage System	____	____
2: Liquid Effluent	____	____	14: Water Use	____	____
3: Domestic Waste	____	____	15: Pesticide Use	____	____
4: Radioactive Waste	____	____	16: Chemical Use/Storage	____	____
5: Hazardous Waste	____	____	17: Petroleum Use/Storage	____	____
6: Mixed Waste	____	____	18: Radiation Exposure	____	____
7: Asbestos Waste	____	____	19: Impacts to Workers	____	____
8: Wetlands	____	____	20: Noise Levels	____	____
9: Floodplains	____	____	21: Pollution Prevention Applies	____	____
10: Clearing or Excavation	____	____	22: Stored Energy	____	____
11: Soil Movement	____	____	23: Fire Safety Issues	____	____
12: PPPL Water Systems	____	____	24: Electrical/RF/Lasers	____	____

* Provide any necessary explanations on a separate sheet attached to this form

The undersigned have reviewed the description and assessment of environmental considerations and state that they are accurate and complete.

Work will not proceed until NEPA certified form (page 2) is received by cognizant person.

COGNIZANT PERSON: _____ DATE: _____

DIVISION HEAD: _____ DATE: _____

1.	Air Emissions	Check yes if the activity would increase or decrease exhaust emissions from a building. Define characteristics & quantities to the extent possible.
2.	Liquid Effluent	Check yes if the activity would cause a liquid waste to be released to the offsite environment. Define characteristics & quantities to the extent possible.
3.	Domestic Waste	Check yes if there would be any waste put in a waste dumpster or if the activity would generate bulk amounts of debris and wastes.
4.	Radioactive Waste	Check yes if the activity would generate low level radioactive waste (LLW). Define characteristics & quantities to the extent possible.
5.	Hazardous Waste	Check yes if the activity would generate a hazardous waste as defined in ESH 5008, Section 8, Paragraph 3.2.4 (consult with ES&H Industrial Hygiene). Define characteristics & quantities to the extent possible.
6.	Mixed Waste	Check yes if the activity would generate a hazardous waste that is also LLW. Define characteristics & quantities to the extent possible.
7.	Asbestos Waste	Check yes if the activity would involve working with asbestos.
8.	Wetlands	Check yes if the activity would take place in or would impact identified wetlands areas within PPPL property or offsite (see attached PPPL map).
9.	Floodplains	Check yes if the activity would take place in or would impact identified areas within the 100-year or 500-year floodplains (see attached PPPL map).
10.	Clearing or Excavation	Check yes if the activity would require the use of mechanical equipment to move soil, structures, or vegetation.
11.	Soil Movement	Check yes if the activity would require digging with hand tools.
12.	PPPL Water Systems	Check yes if the activity would involve disturbing any part of the potable or canal water systems.
13.	Sewage System	Check yes if the activity would involve working on the PPPL sanitary sewage system, or would change current quantities or characteristics of waste sent to the offsite sanitary sewage treatment facility.
14.	Water Use	Check yes if the activity would use a large amount of water to facilitate the work.
15.	Pesticide Use	Check yes if the activity would involve the use of pesticides.

Low Hazard Activities

NOTE: The following activities are inherently low hazard, presenting hazards of a type and magnitude routinely encountered and/or accepted by the general public, or have been specifically excluded by DOE from NEPA review. They do not require independent NEPA review or classification. If the proposed activity is listed herein, and if there are no additional hazards, the activity need not be classified and independent ES&H NEPA review is not required.

1. Office work, including the use of common office machines, such as copiers, typewriters, personal computers, printers, etc. Also including reading, filing, typing.

2. Routine Control Room activities, including the use of consoles, terminals, printers, etc.

3. Routine technician hand work that is not part of a significant maintenance effort, including the use of hand tools, machine tools, etc. To qualify, this work must not involve any activity with potential environmental impacts.

4. Drafting activities, including the use of computer assisted design terminals and workstations, drafting tables, stick files, etc.

5. Meetings, classes, seminars, and colloquia, provided no hazards are introduced.

6. Administrative procurements, including but not limited to general administrative supplies and computer systems.

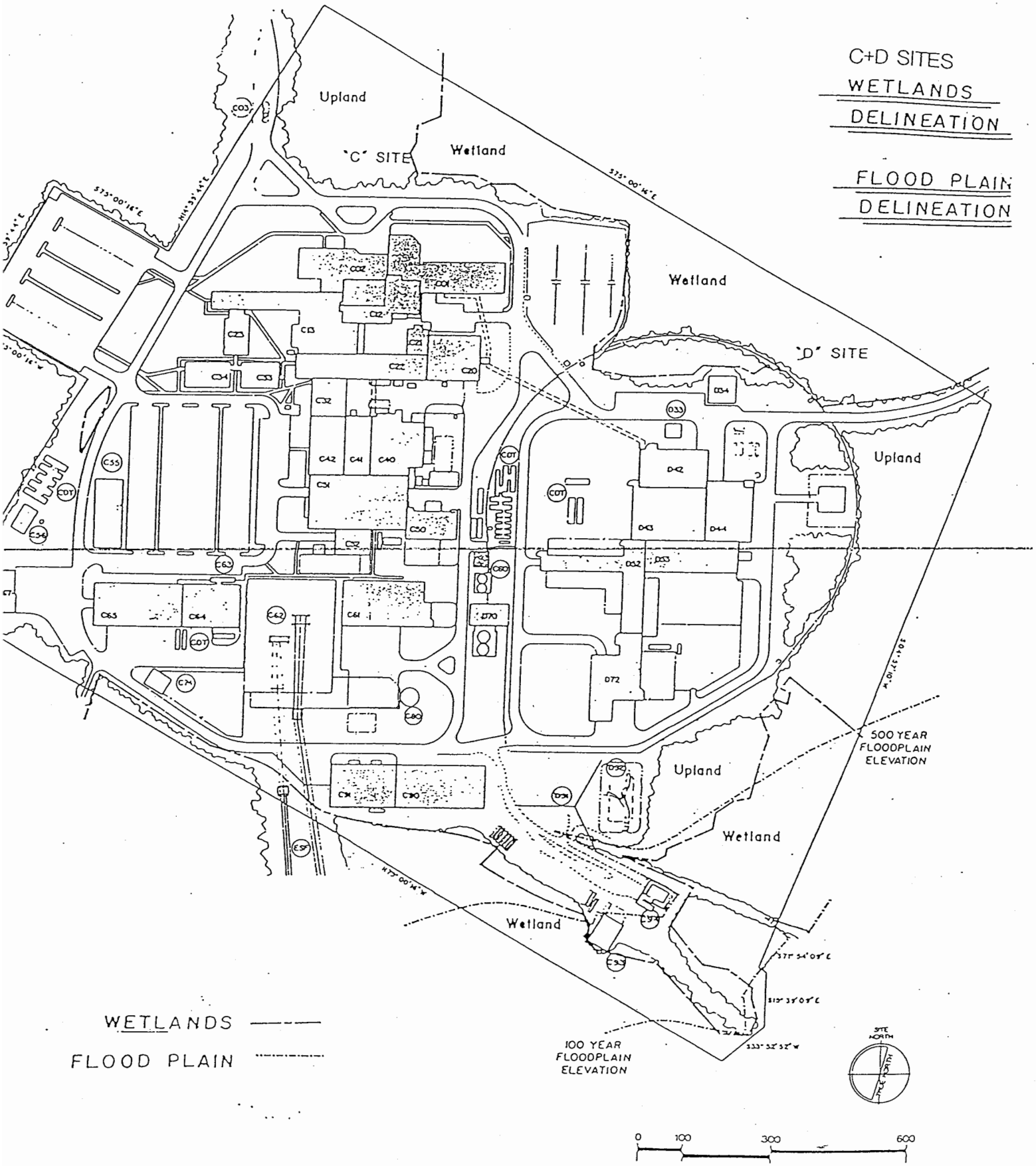
7. Personnel actions and contracts for personal services, including technical support contracts and contracts for management and operation.

8. Information gathering (including, but not limited to: literature surveys; inventories; audits), analysis (including computer modelling), and dissemination (including, but not limited to: document mailings; publication; and distribution).

9. Actions consisting solely of document preparation (including, but not limited to: conceptual design; feasibility, energy supply and demand, and other studies).

10. Materiel handling, storage, packaging, and transportation within the PPPL site in accordance with applicable regulations.

11. Routine offsite shipment and disposal of material and waste in accordance with applicable regulations.


C+D SITES
WETLANDS
DELINEATION
FLOOD PLAIN
DELINEATION
Upland
"C" SITE
Wetland
Wetland
"D" SITE
Upland
Upland
Wetland
Wetland
500 YEAR
FLOODPLAIN
ELEVATION
100 YEAR
FLOODPLAIN
ELEVATION
WETLANDS
FLOOD PLAIN
0
100
300
600
SITE PLAN
PRINCETON UNIVERSITY
PLASMA PHYSICS LABORATORY

PPPL ENVIRONMENTAL OPERATING PROCEDURE
SUPPORT SERVICES DEPARTMENT
NEPA REVIEW PROCESS

Procedure Number: EN-OP-007 Revision: 3

Effective Date: NOV 14 1994 Exp. Date: NOV 14 1996

Prepared By: Joanne V. Savino Date 11/14/94
J. Savino

Reviewed By: Virginia L. Finley Date 11-14-94
V. Finley

Approved By: Jerry D. Levine Date 11/14/94
J. Levine

UNCONTROLLED COPY

Attachment 2

1.0 PURPOSE/SCOPE

The purpose of this procedure is to document the activities required to be performed by the Support Services Department (SSD) in the implementation of PPPL procedure ESH-014, "NEPA Review System." This procedure elaborates on the steps described in part C of ESH-014.

2.0 REFERENCES

2.1 ESH-014- NEPA Review System
2.2 National Environmental Policy Act (NEPA) of 1969 and Amendments
2.3 DOE Order 5440.1E,"NEPA Compliance Program"
2.4 DOE-CH Order 5440.1C, "National Environmental Policy Act (NEPA)"
2.5 SEN-15-90 "National Environmental Policy Act"
2.6 PPPL Policy P-002, Environmental Policy
2.7 10 CFR 1021 - "DOE NEPA Guidelines"

3.0 Procedure

3.1 Upon receipt of a NEPA Planning Form, the NEPA Administrator checks the form for completeness. Under certain circumstances, (e.g., absence of signatures), an incomplete form may be returned to the cognizant person or Division Head to be adequately completed.

3.2 If the NEPA Planning form is complete, the NEPA administrator enters the activity into the "NEPA Form Log," including date received, and assigns a NEPA Planning Form number. This number is entered on the NEPA Planning Form. The status of ongoing NEPA reviews is recorded on the NEPA & Safety Analysis Review Status Form."

3.3 The NEPA Administrator and the NEPA Compliance Manager consult 10 CFR 1021, and other relevant documents, and characterize the activity as one of the following:

a. An activity included under a categorical exclusion (CX), Environmental Assessment (EA), or Environmmental Impact Statement (EIS) already approved for PPPL by DOE.

b. An activity apparently included under a CX not already approved for PPPL by DOE, and therefore requiring submittal of documentation for DOE determination.

c. An activity apparently requiring preparation of a new Environmental Assessment (EA) or Environmental Impact Statement (EIS).

3.4 For an activity included under a DOE-approved CX, EA or EIS, (See 3.3a), the following steps take place:

a. The NEPA Administrator completes the "Environmental Evaluation for PPPL Change Proposal" form and the "Environmental Evaluation Notification Form". If necessary, the NEPA Administrator makes changes to the NEPA Planning Form categories and initials such changes. The NEPA Administrator forwards a copy of the NEPA Planning Form to the appropriate ES&H professional (s) (i.e., within the SSD) when any of the safety analysis review questions (i.e., questions #16, #18, #19, #20. #22, #23, and #24 on the NEPA Planning Form in ESH-014) are answered "yes". The ES&H professional (s) will review the activity covered in the NEPA Planning Form, and will provide the NEPA Administrator or the NEPA Compliance Manager with recommendations as to the extent and complexity of the safety review and documentation required for the activity. The NEPA Administrator or NEPA Compliance Manager will advise the originator , cognizant individual, and Division Head as to the recommended safety review and documentation requirements. The ES&H professional (s) making these recommendations will follow up on these recommendations with the originator, cognizant person, and/or Division Head. The safety analysis review will be documented with a signed and dated form filled out by the appropriate ES&H professional (s), which will be filed with the NEPA package.

b. The NEPA Administrator or the NEPA Compliance Manager takes the NEPA review package to the PPPL Environmental Engineer (or designee) for review and signature.

c. The NEPA review package is given by the NEPA Administrator to the NEPA Compliance Manager for review and certification. Certification is granted for a two year period with the NEPA Compliance Manager's signature on page 2 of the NEPA Planning Form. The Manager then returns the NEPA review package to the Administrator.

d. The NEPA Administrator distributes copies of the completed NEPA review package to the following individuals:

1. The Originator
2. The Cognizant Individual (if different from the originator),
3. The Division Head,
4. ES&H Professionals (safety analysis reviewers)
5. QA Division
6. IH Group
7. ER/WM Hazmat Group if Hazardous Wastes are involved
8. ER/WM Radwaste Group if radioactive wastes are involved
9. Environmental Section if air emissions are involved
10. ESU if Hazardous materials are involved

e. The NEPA Administrator or the NEPA Compliance Manager notes the completion of NEPA review for the activity in the "NEPA Form Log" and "NEPA Status Log." The NEPA Administrator places the original NEPA review package on file.

3.5 For an activity that in the judgment of the NEPA Compliance Manager appears to be included under a CX not already approved by PPPL by DOE (See 3.3b), the following steps take place:

a. The NEPA Administrator completes the "Environmental Evaluation for PPPL Change Proposal" form and the "Environmental Evaluation Notification Form". If necessary, the NEPA Administrator makes changes to the NEPA Planning Form categories and initials such changes. The NEPA Administrator forwards a copy of the NEPA Planning Form to the appropriate ES&H professional (s) (i.e., within the SSD) when any of the safety analysis review questions (i.e., questions #16, #18, #19, #20. #22, #23, and #24 on the NEPA Planning Form in ESH-014) are answered "yes". The ES&H professional (s) will review the activity covered in the NEPA Planning Form, and will provide the NEPA Administrator or the NEPA Compliance Manager with recommendations as to the extent and complexity of the safety review and documentation required for the activity. The NEPA Administrator or NEPA Compliance Manager will advise the originator , cognizant individual, and Division Head as to the recommended safety review and documentation requirements. The ES&H professional (s) making these recommendations will follow up on these recommendations with the originator, cognizant person, and/or Division Head. The safety analysis review will be documented with a signed and dated form filled out by the appropriate ES&H professional (s), which will be filed with the NEPA package.

b. The NEPA Administrator or the NEPA Compliance Manager takes the NEPA review package to the PPPL Environmental Engineer (or designee) for review and signature.

c. The completed "Environmental Evaluation for PPPL Change Proposal" Form, and "Environmental Evaluation Notification Form" are formally transmitted via cover letter from the NEPA Compliance Manager to the DOE-PAO Manager, with a request for NEPA determination of the activity by DOE-CH. The NEPA Compliance Manager notes the status of the review in the "NEPA Status Log."

d. When the DOE-CH CX determination is received by the NEPA Compliance Manager, NEPA certification is completed in the following manner:

1. The NEPA review package is given by the NEPA Administrator to the NEPA Compliance Manager for review and certification.
2. Certification is granted for a two year period with the NEPA Compliance Manager's signature on page 2 of the NEPA Planning Form.
3. The NEPA Compliance Manager then returns the NEPA review package to the NEPA Administrator.

e. The NEPA Administrator distributes copies of the completed NEPA review package to the following individuals:

1. The Originator
2. The Cognizant Individual (if different from the originator),
3. The Division Head,
4. ES&H Professionals (safety analysis reviewers)
5. QA Department
6. IH Group
7. ER/WM Hazmat Group if Hazardous Wastes are involved
8. ER/WM Radwaste Group if radioactive wastes are involved
9. Environmental Section if air emissions are involved
10. ESU if Hazardous materials are involved

f. The NEPA Administrator or the NEPA Compliance Manager notes the completion of NEPA review for the activity in the "NEPA Form Log" and "NEPA Status Log." The NEPA Administrator places the original NEPA review package on file in the ES&H Division Office.

3.6 For an activity apparently requiring preparation of an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) (See 3.3c), the following steps take place:

a. Using supplementary information received from the cognizant person, including possibly an Action Description Memorandum (ADM), the NEPA Administrator or NEPA Compliance Manager performs the following steps. The NEPA Administrator or the NEPA Compliance Manager completes the "Environmental Evaluation for PPPL Change Proposal" form and the "Environmental Evaluation Notification Form". If necessary, the NEPA Administrator makes changes to the NEPA Planning Form categories and initials such changes. The NEPA Administrator forwards a copy of the NEPA Planning Form to the appropriate ES&H professional (s) (i.e., within the SSD) when any of the safety analysis review questions (i.e., questions #16, #18, #19, #20. #22, #23, and #24 on the NEPA Planning Form in ESH-014) are answered "yes". The ES&H professional (s) will review the activity covered in the NEPA Planning Form, and will provide the NEPA Administrator or the NEPA Compliance Manager with recommendations as to the extent and complexity of the safety review and documentation required for the activity. The NEPA Administrator or NEPA Compliance Manager will advise the originator, cognizant individual, and Division Head as to the recommended safety review and documentation requirements. The ES&H professional (s) making these recommendations will follow up on these recommendations with the originator, cognizant person, and/or Division Head.

The safety analysis review will be documented with a signed and dated form filled out by the appropriate ES&H professional (s), which will be filed with the NEPA package. The completed forms, and other pertinent information, are attached to the NEPA Planning Form to create a complete NEPA review package. Included on the "Environmental Evaluation Notification Form" is a recommedation regarding the need to prepare an EA or EIS.

b. The NEPA Administrator or the NEPA Compliance Manager takes the NEPA review package to the PPPL Environmental Engineer (or designee) for review and signature.

c. The completed "Environmental Evaluation for PPPL Change Proposal" form, and "Environmental Evaluation Notification Form" are formally transmitted via cover letter from the NEPA Compliance Manager to DOE PAO Manager with a request for NEPA determination of the activity by DOE-CH (and DOE-EH for EISs). The NEPA Compliance Manager notes the status of the review in the "NEPA Status Log."

d. An EA or EIS is prepared, reviewed, and approved in accordance with 10 CFR 1021, DOE 5440.1E, DOE-CH 5440.1E, and SEN-15-90. The NEPA Administrator and NEPA Compliance Manager participate in this process as required.

e. Following receipt by the NEPA Compliance Manager of a signed Finding of No Significant Impact (FONSI) for an EA, or Record of Decision (ROD) for an EIS, NEPA certification is completed in the following manner. The NEPA review package is given by the NEPA Administrator to the NEPA Compliance Manager for review and certification. Certification is granted for a two year period with the NEPA Compliance Manager's signature on page 2 of the NEPA Planning Form. The NEPA Compliance Manager then returns the NEPA review package to the NEPA Administrator.

f. The NEPA Administrator distributes copies of the completed NEPA review package to the following individuals:

1. The Originator,
2. The Cognizant Individual (if different from the originator),
3. The Division Head,
4. ES&H Professionals (safety analysis reviewers)
5. QA Department
6. IH Group
7. ER/WM Hazmat Group if Hazardous Wastes are involved
8. ER/WM Radwaste Group if radioactive wastes are involved
9. Environmental Section if air emissions are involved
10. ESU if Hazardous materials are involved

g. The NEPA Administrator or the NEPA Compliance Manager notes the completion of NEPA review for the activity in the "NEPA Form Log" and "NEPA Status Log." The NEPA Administrator places the original NEPA review package on file.

3.7 The NEPA Compliance Manager and the NEPA Administrator prepare a monthly NEPA Status report for the ES&H Executive Board and other interested parties. This report reflects the status of all PPPL NEPA activities. The report is issued around the 17th of each month.

3.8 Three months prior to expiration of the two year NEPA certification for an activity, the NEPA Administrator notifies Cognizant Individuals and/or Division Heads in writing of the upcoming expiration. The original "NEPA Form Log" data is sorted by certification dates in a "NEPA Recertification Log," which is updated and reviewed by the NEPA support person or the NEPA Administrator for recertification notification status. Once a month the NEPA support person generates notification letters, which are reviewed by the NEPA Administrator, and sent out to the Cognizant Individuals and/or Division Heads. A copy of the original first page of the NEPA Planning Form is included in this transmittal.

a. The Cognizant Individual checks off one of the following appropriate categories, and returns the NEPA Planning Form for recertification (or other action) to the NEPA Administrator:

1. Activity complete, no further review required;

2. Activity is ongoing and requires NEPA recertification. All environmental considerations remain unchanged from the original certification. The Cognizant Individual and the Division Head sign and date the form;

3. Activity is ongoing and requires NEPA recertification. Changes have taken place that would impact environmental considerations since the original certification. A new NEPA Planning Form is required for recertification.

b. Upon receipt of the signed and dated NEPA recertification form, the NEPA Administrator or the NEPA Compliance Manager updates the "NEPA Form Log" if the activity is complete. The "NEPA Recertification Log" is then updated by the NEPA support person OR the NEPA Administrator, and the NEPA recertification package is filed with the original NEPA Planning Form. If the activity is ongoing, the NEPA Administrator completes the recertification review process in the following manner:

1. Upon receipt of a recertification review with no environmental consideration changes, the NEPA Administrator attaches a copy of the original certification page, containing a recertification signature block. The package is presented to the NEPA Compliance Manager for signature, and 2 year recertification. The package is then returned to the NEPA Administrator. The NEPA Administrator or the NEPA Compliance Manager updates the "NEPA Form Log." The "NEPA Recertification Log" is updated by the NEPA support person or the NEPA Administrator, who then files the NEPA recertification package with the original NEPA Planning Form.

2. Upon receipt of a NEPA recertification package for an ongoing activity which has changes to environmental impacts, the NEPA review is performed in the usual manner. (See 3.0 - 3.6)

3.9 The NEPA Compliance Manager periodically discusses the implementation of procedure ESH-014 with PPPL and/or DOE legal counsel.

ATTACHMENTS

Att.1. NEPA and Safety Analysis Review Status Form
Att.2. Environmental Evaluation for PPPL Change Proposal Form
Att.3. Environmental Evaluation Notification Form
Att.4. NEPA Recertification Letter & Form

FIGURES

Fig.1. NEPA Review Process Flow Chart

ATT. #1
REVISED 10/26/94

NEPA & SAFETY ANALYSIS REVIEW STATUS FORM

ACTIVITY: _____

DATE RECEIVED & LOGGED IN: _____

READY FOR REVIEW: ❒

NEPA PROCESS ON HOLD: _____

_____
REASON

SAFETY ANALYSIS REVIEW

SAFETY ANALYSIS REVIEWER/DATE: _____

SAFETY REVIEW/DOCUMENT. REQTS _____

_____

_____

_____

_____

REVIEW COMPLETE ❒
ENV EVALUATIONS COMPLETED AND SIGNED BY
V. FINLEY OR ALTERNATE)

NEPA FORMS READY TO BE SENT OUT ❒
(NEPA PLANNING FORM CERTIFIED BY
NEPA COMPLIANCE MANAGER)

NEPA FORMS SENT OUT ❒

ONE COPY-ORIGINATOR
ONE COPY-COGNIZANT PERSON
ONE COPY-DIVISION HEAD
ONE COPY-W. SLAVIN
ONE COPY-J. MALSBURY (QA/R)
ONE COPY-J. SCOTT [IF HAZARDOUS WASTES ARE INVOLVED]
ONE COPY-R. LEUENBERGER [IF RADIOACTIVE WASTES ARE INVOLVED]
ONE COPY-M. WIECZOREK [IF AIR EMISSIONS ARE INVOLVED]
ONE COPY-T. CASHEL (ESU) [IF HAZARDOUS MATERIALS ARE INVOLVED]
ONE COPY-SAFETY ANALYSIS REVIEWER (IF APPLICABLE)
ORIGINAL-NEPA FILES)

ENVIRONMENTAL EVALUATION FOR PPPL CHANGE PROPOSAL

TITLE OF CHANGE/PROJECT

CRB/PROJECT NO. COGNIZANT PERSON

E V A L U A T I O N

Issue	Applicability A	Applicability NA	Potential Impact N	Potential Impact NAI	Potential Impact AI	Issue	Applicability A	Applicability NA	Potential Impact N	Potential Impact NAI	Potential Impact AI
Construction Activity						**Land Use Consideration**					
Dust	☐	☐	☐	☐	☐	Wetlands/ Floodplains	☐	☐	☐	☐	☐
Noise	☐	☐	☐	☐	☐	Critical Habitats	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	Archaeological Sites	☐	☐	☐	☐	☐
Effluents and Contaminants						**Facility Considerations**					
Solids	☐	☐	☐	☐	☐	Aesthetics	☐	☐	☐	☐	☐
Liquids	☐	☐	☐	☐	☐	Public Relations	☐	☐	☐	☐	☐
Gases	☐	☐	☐	☐	☐	Other	☐	☐	☐	☐	☐
Energy Emissions	☐	☐	☐	☐	☐	**Categorical Exclusion**		Yes	☐		
								No	☐		
Radiation	☐	☐	☐	☐	☐						
Other	☐	☐	☐	☐	☐						

Applicability: A- Applicable, NA - Not Applicable
Potential Impact: N - None, NAI - No Adverse Impact (Possible impact but not expected to be harmful), AI - Adverse Impact

C O M M E N T S & C O N C L U S I O N S

Any Applicable Issue Requires Comment Statement - Use Additional Pages if Necessary

EVALUATOR

EVALUATION DATE

PPPL ENVIRONMENTAL COORDINATOR (OR DESIGNEE)

APPROVAL DATE

ENVIRONMENTAL EVALUATION NOTIFICATION FORM

Grantee/Contractor Laboratory: Princeton University/Princeton Plasma Physics Laboratory (PPPL)

Project/Activity Title:_____

CH NEPA Tracking No.:_____ Type of Funding_____
B&R Code:_____Total Estimated Cost:_____

DOE Cognizant Secretarial Officer (CSO):__Martha Krebs_____

Contractor Project Manager:__Jerry D. Levine_____Signature:_____

_____

Date:_____

Contractor NEPA Reviewer:_____Signature:_____
Date:_____

I. **Description of Proposed Action:**

II. **Description of Affected Environment:**

III. **Potential Environmental Effects:** (Attach explanation for each "yes" response, and "no" responses if additional information is available and could be significant in the decision making process.)

A. Sensitive Resources: Will the proposed action result in changes and/or disturbances to any of the following resources?

Yes/No

1. Threatened/Endangered Species and/or Critical Habitats
2. Other Protected Species (e.g. Burros, Migratory Birds)
3. Wetlands
4. Archaeological/Historic Resources
5. Prime, Unique or Important Farmland
6. Non-Attainment Areas
7. Class I Air Quality Control Region
8. Special Sources of Groundwater
   (e.g. Sole Source Aquifer)
9. Navigable Air Space
10. Coastal Zones
11. Areas w/Special National Designation
    (e.g. National Forests, Parks, Trails)
12. Floodplain

B. Regulated Substances/Activities: Will the proposed action involve any of the following regulated substances or activities?

Yes/No

13. Clearing or Excavation (indicate if greater than 5 acres)
14. Dredge or Fill (under Clean Water Act section 404; indicate if greater than 10 acres)
15. Noise (in excess of regulations)
16. Asbestos Removal
17. PCBs
18. Import, Manufacture or Processing of Toxic Substances
19. Chemical Storage/Use
20. Pesticide Use
21. Hazardous, Toxic, or Criteria Pollutant Air Emissions
22. Liquid Effluent
23. Underground Injection
24. Hazardous Waste
25. Underground Storage Tanks
26. Radioactive (AEA) Mixed Waste
27. Radioactive Waste
28. Radiation Exposures

C. Other Relevant Disclosures. Will the proposed action involve the following?

Yes/No

29. A threatened violation of ES&H regulations/permit requirements
30. Siting/Construction/Major Modification of Waste Recovery, or TSD Facilities
31. Disturbance of Pre-existing Contamination
32. New or Modified Federal/State Permits
33. Public controversy
34. Action/involvement of Another Federal Agency (e.g. license, funding, approval)
35. Action of a State Agency in a State with NEPA-type law. (Does the State Environmental Quality Review Act Apply?)
36. Public Utilities/Services
37. Depletion of a Non-Renewable Resource

IV. **Section D Determination:** Is the project/activity appropriate for a determination by the OM under Subpart D of the DOE NEPA Regulations for compliance with NEPA?

Indicate the recommendation and specific class of action from Appendix A-D to Subpart D (10CFR1021).

A. **DOE-CH NEPA Coordinator Review:**

DOE-CH NEPA Coordinator Reviewer: _____

Signature:_____ Date:_____

B. **DOE CH NCO NEPA Review:**

NCO Concurrence with Proposed Class of Action Recommended

CX EA EIS

Category_____

DOE CH NCO Reviewer:_____

Signature:_____ Date:_____

DOE Recommendation Approvals:

CH PAO: Milton D. Johnson Signature:_____

Date:_____

CH NCO: W.S. White Signature:_____

Date:_____

CH GLD: Irene Atney-Yurdin Signature:_____

Date:_____

CH ESHD: Michael J. Flannigan Signature:_____

Date:_____

CH AMST: John P. Kennedy Signature:_____

Date:_____

Office Manager Subpart D CX Determination and Approval:
The preceding pages are a record of documentation required under DOE Final NEPA Regulation, 10 CFR Part 1021.400, and SEN-15-90 to establish that an action may be categorically excluded from further NEPA review. I have determined that the proposed action meets the requirements for the Categorical Exclusion referenced above. Therefore, by my signature below, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation.

CH Office Mgr: Cherri J. Langenfeld Signature:_____

Date:_____

ATT. #4
JVS-015

PRINCETON UNIVERSITY
Plasma Physics Laboratory-ES&H Division

TO:	**(Fill in Originator)**	**DATE:**	**Fill in Date, 1994**
FROM:	**J. Savino**	**SUBJECT:**	**NEPA Recertification** **Fill in NEPA Number**

FIRST NOTICE:
Our office files indicate that the NEPA two year recertification period for your attached NEPA Planning Form will expire on **(fill in date of expiration).** In accordance with PPPL procedure ESH-014, please let us know the future status of this activity by checking the appropriate category below.

_____ Activity completed.

_____ _____
Signature Date

_____ Activity is ongoing and requires NEPA recertification. All environmental considerations are unchanged from original certification. Cognizant person and Division Head must sign copy of original NEPA form (attached) with current date and return to me by **(fill in date- give two weeks to return the form).**

_____ Activity is ongoing and requires NEPA recertification. Changes have taken place to the environmental considerations since the original certification. **A new NEPA form is required for recertification; this new form must be submitted to me by (fill in date-give one month).**

In cases where a new form is required, please submit the signed form with all necessary information to me . You will receive a copy of the form after it has been certified. Any questions, or if you would like to see the original NEPA package, please call me at ext. 2622.

Thank you,
Joanne Savino

cc: Division Head

NEPA PLANNING FORM # _____ (by ES&H)

Applicability: this form shall be prepared as early as possible for each new or continuing activity at PPPL. Physical implementation of PPPL activities shall not proceed prior to NEPA certification of this form.

TO BE COMPLETED BY REQUESTOR

Originator: _____ CRB/Project #: _____

Project/Organization: _____ Total Estimated Cost: _____

Title of Activity/Change: _____

Description of Activity: [include physical description of activity, purpose, location, changes to any operating parameters or approved environmentally related limits, potential or actual environmental impact, as applicable. Attach additional sheets if needed] Circle one of these choices: GENERIC UNIQUE

Environmental Considerations: Will the change/activity, either individually or cumulatively with other known activities, result in changes and/or disturbances to the following entities (see Attachment 2 for directions on answering)*

	YES	NO		YES	NO
1: Air Emissions	____	____	13: Sewage System	____	____
2: Liquid Effluent	____	____	14: Water Use	____	____
3: Domestic Waste	____	____	15: Pesticide Use	____	____
4: Radioactive Waste	____	____	16: Chemical Use/Storage	____	____
5: Hazardous Waste	____	____	17: Petroleum Use/Storage	____	____
6: Mixed Waste	____	____	18: Radiation Exposure	____	____
7: Asbestos Waste	____	____	19: Impacts to Workers	____	____
8: Wetlands	____	____	20: Noise Levels	____	____
9: Floodplains	____	____	21: Pollution Prevention Applies	____	____
10: Clearing or Excavation	____	____	22: Stored Energy	____	____
11: Soil Movement	____	____	23: Fire Safety Issues	____	____
12: PPPL Water Systems	____	____	24: Electrical/RF/Lasers	____	____

* Provide any necessary explanations on a separate sheet attached to this form

The undersigned have reviewed the description and assessment of environmental considerations and state that they are accurate and complete.

Work will not proceed until NEPA certified form (page 2) is received by cognizant person.

COGNIZANT PERSON: _____ DATE: _____

DIVISION HEAD: _____ DATE: _____

Recertification Approval

Cognizant Person _____ Date _____

Division Head _____ Date _____

NEPA PLANNING FORM

TO BE COMPLETED BY ES&H

NEPA Evaluation: (attach "Environmental Evaluation for PPPL Change Proposal" and "Environmental Evaluation Notification Form")

	YES	NO
Covered by existing DOE approved categorical exclusion?	____	____

If yes, specify _____

Approval for categorical exclusion required from DOE?	____	____

DOE approval: _____ Date: _____

Other NEPA documentation required?	____	____

If yes, specify _____

NEPA Review for this Activity has been Completed :

_____

NEPA Compliance Manager (or designee) Date:

ACTIVITY IS NEPA CERTIFIED FROM:

_____

START DATE TO: END DATE

Distribution: Original to ES&H File
cc: Originator, Cognizant Person, Division Head

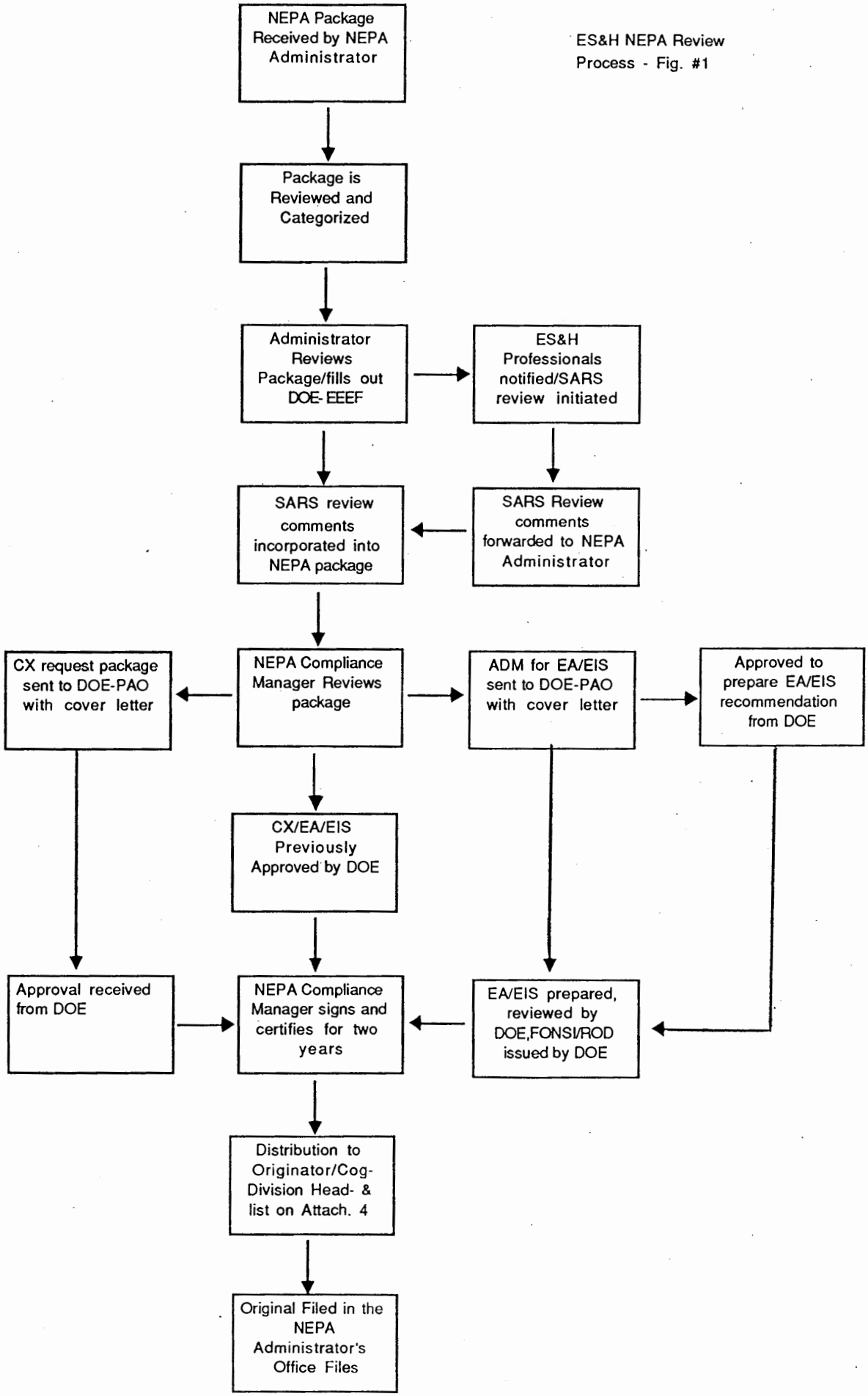
Recertification Approval

NEPA Compliance Manager (or designee)

_____ Date _____

Start Date _____ End Date _____

ES&H NEPA Review Process - Fig. #1



ATTACHMENT 3

PRINCETON GROUP (PG) QUALITY ASSURANCE PLAN FOR CATEGORICAL EXCLUSION (CX) DOCUMENTATION: PREPARATION, REVIEW, AND APPROVAL

1. BACKGROUND

The National Environmental Policy Act (NEPA) is the federal government's basic charter for protection of the environment. The NEPA process, therefore, enables the Department of Energy (DOE) to achieve the results, outcomes, and products that respond to the goals of the Act and the goals of the Council on Environmental Quality (CEQ) regulations: quality federal decisions that protect, restore, and enhance the quality of the human environment.

In complying with NEPA, PG will utilize the referenced regulatory and procedural drivers in Section 2 below. To ensure adequate review of EENFs and approval of CXs by PG, quality assurance (QA) planning is essential. The implementation of this QA plan for the conduct and management of the CX process assures the preparation and review of quality EENF/CX documentation leading to approval of proposed projects when appropriate as CXs.

2. REFERENCES OF SPECIFIC REGULATORY AND PROCEDURAL DRIVERS

2.1. Laws and Regulations

The National Environmental Policy Act of 1969, As Amended.

10 CFR 1500-1508, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act".

10 CFR 1021, "Department of Energy National Environmental Policy Act Implementing Procedures and Guidelines".

2.2. Policies, Procedures, and Guidance

2.2.1. Departmental and Secretarial

"Secretarial Policy Statement on the National Environmental Policy Act," Office of the Secretary, June 13, 1994.

2.2.2. Office of Environment, Safety and Health

"Draft NEPA Compliance Guide: Guidance Manual for Department of Energy Compliance with the National Environmental Policy Act and Related Federal Environmental Statutes," October 1988.

"Integrating Pollution Prevention with NEPA Planning Activities, October 15,1992.

2.2.3. Office of Energy Research

"Office of Energy Research NEPA Guidance and Procedures Handbook," November 1992 and subsequent updates.

"Office of Energy Research Statement of Goals and Objectives for Adherence to the Principles of the National Environmental Policy Act," November 11, 1992. (Section 1.2 in ER NEPA Guidance and Procedures Handbook).

"Office of Energy Research Draft Guidance on Early Timing and Implementation of the NEPA Process and Integration of the NEPA Process with the Project Management System", ER NCO Communication 94-01, February 1994. (Section 2.2 in ER NEPA Handbook).

2.2.4. CH Guidance

DOE-CH Order 5440.1E, NEPA Compliance Program (Currently Under Revision).

CH Procedures For EENF NEPA Determination Sheets (Attachment 2).

2.2.5. PPPL Guidance

ESH-014 Rev. 2, NEPA Review System.

EN-OP-007, Rev.3, PPPL Environmental Operation Procedure ES&H Division NEPA Review Process.

3.0 SCOPE AND APPLICABILITY

This QA plan addresses the requirements of DOE Order 5700.6C, "Quality Assurance", and implements a QA program for efficient and timely EENF/CX documentation review and approval for CXs in the DOE NEPA Rule, Appendix B to Subpart D, upon delegation to the Manager, PG by the CH Manager.

The PG NC named by the Manager, PG will apply this QA Plan to the review and recommendation for approval of CXs as appropriate, for projects proposed to PG by the Laboratory. The plan assists the Manager, PG in ensuring that quality, timely decisions are made, and that the goal of NEPA, protection of the environment, is met.

4.0 ORGANIZATIONAL ROLES AND RESPONSIBILITIES

4.1. Princeton Group (PG)

4.1.1 Manager

The Manager, PG is the line manager responsible for ensuring implementation of the Princeton University contract at PPPL. The Manager, PG is also responsible for assuring that: NEPA procedures are established; the NEPA process is integrated

into project planning and scheduling; there is appropriate level of NEPA review; and quality and adequacy of NEPA documentation is maintained.

4.1.2. PG NC

The PG NC receives and reviews NEPA documentation prepared by the PPPL NCM for all proposed projects. As required, the PG NC requests additional information about the proposed activity to support a recommendation to the Manager, PG for approval or disapproval of the NEPA CX submitted by the PPPL NCM.

NC provides the continuity in the organizational NEPA process and oversees the factual accuracy and quality of the EENFs. The Coordinator verifies the physical features and location of each proposed project area and has program responsibility for NEPA QA, seeking continuous improvement through application of Total Quality Management (TQM) and Quality Assurance (DOE Order 5700.6C) principles. The NC reviews and comments on all EENFs for CXs received at the Princeton Group Office and recommends approval or disapproval by the Manager, PG of all CXs submitted by the PPPL.

As needed, the PG NC consults with the CH Legal Counsel during the EENF review/ determination stage, in addition to the required legal review.

4.2. PPPL Organization

PPPL Responsibility for NEPA documentation resides in the PPPL Support Services Department's Environmental/ Nuclear Licensing/ Permitting (E/NL/P) Division. NEPA documentation for CXs is prepared by the NCM and staff and submitted to PG. PPPL insures that NEPA awareness training is conducted for all organizational levels which originate PPPL NEPA Planning Form (ESH-014, Rev. 2).

4.3. Technical & Administrative Services Group CH (TASG)

The CH NCO, provides CH oversight of NEPA compliance activities. EENFs for proposed projects for which CXs may not be an appropriate level of NEPA documentation (e.g., may require EAs) are forwarded by PG to the CH-NCO for review.

5.0 EENFs for CATEGORICAL EXCLUSION - DOCUMENT MANAGEMENT PROCESS

It is the goal of the Manager, PG and PG NC to ensure for all proposed projects completion of quality EENFs to assist in decision making. The PG NC is responsible for ensuring that the NEPA process is integrated into project planning and scheduling. The PG NC has responsibility for ensuring a thorough EENF/CX documentation review, managing the quality and adequacy of the EENFs/CX documentation, communicating the need for revisions and/or further informational needs on EENFs for proposed projects to the Laboratory NEPA Compliance Manager, and recommending to the Manager, PG approval or disapproval of the CX.

The roles and responsibilities of the Manager, PG and staff assigned by the Manager, PG to the PG CX document management process are specified in Section 4 above of this QA Plan. This process utilizes all of the QA elements necessary to assure timeliness, quality, and adequacy of the documentation in support of quality decision making by PG. The NEPA document preparation and review process are implemented as early as possible in the proposed project planning cycle. The required steps and milestones in the CX Document Management Process are summarized at 6.2.1 of this QA plan.

6.0 CATEGORICAL EXCLUSION QUALITY ASSURANCE

The Manager, PG assures that the Princeton Group Office has an adequate QA plan which addresses the technical and environmental requirements as stated in the references in Section 2 above.

Following are descriptions of the QA criteria identified in DOE Order 5700.6C for the PG NEPA EENF document review process, based on the principles and requirements in the May 1992 QA guidance document accompanying the order.

6.1. Management Criteria

6.1.1. Program:

The organizational structure of the Princeton Group, along with the roles and responsibilities of the Manager, PG and staff with authority for NEPA compliance relevant to CXs, are described in Section 4 above. The Manager, PG and PG NC manage, perform, and assess the adequacy of work and quality of EENF/CX documentation that supports the project and program decision making. These principals are responsible for the timing, scheduling, and adequacy of the PG CX review and approval process.

6.1.2. Personnel Training and Qualifications:

The PG NC shall be a qualified NEPA professional by background and experience. It is imperative that the Coordinator maintains current knowledge of all guidance from, and benefit of training by EH-25 and ER-8.2, through the CH NCO and HQ personnel, respectively. Since the PPPL NCM and PG NC work closely as a team, it is the responsibility of the Coordinator to communicate such information and training opportunities to the PPPL NCM and staff in a timely fashion, and factor training participation into PG audits of the PPPL NEPA program.

6.1.3. Quality Improvement:

CH provides continued encouragement to PG and PPPL NEPA staff to improve products and services through examination of past problems and successes in the NEPA process. PG management welcomes suggestions and innovative ways to improve quality, efficiency, and the effectiveness of environmental protection

as part of the scientific mission. Continued PG implementation of the NEPA QA program to detect and prevent quality problems in the EENF/CX documentation review and approval process ensures improvement in support of quality decision making. Periodic ES&H self-assessment includes assessment of continued progress in improvement of NEPA products and services, with communication of results to the Technical & Administrative Services Group (TASG)-CH. PG NEPA staff continue to utilize the NEPA Workshops at the Semiannual ES&H Coordination Meetings as a means to this end, and encourage the Laboratory to continue their contributing participation. All guidance and any lessons learned studies on preparation and review of EENF/CX documentation shall be utilized. The PG NC and PPPL NCM focus on proper issues and timely completion of EENF/CX documentation is key to the support of early decision making. The PG NC coordinates review of EENFs with CH Legal Counsel at BHO, concurrently if necessary, to ensure document quality and appropriate NEPA decisions. Maximum utilization of electronic mail for transfer of documents and comments enhances this effort.

6.1.4. Documents and Records:

Preparation, management and use of EENF/CX documentation according to headquarters and CH policies and requirements is utilized by staff to meet NEPA standards of review and decision making. The PG EENF/CX documentation management process shall be as summarized in Section 5. The PPPL NCM manages, and the PG NC has direct access to a computerized NEPA data base tracking system that incorporates information on CX determinations, preparation, review, and approval. That system addresses both active and inactive records, and is used to track all NEPA documents for PPPL proposed projects and activities. The NEPA data base tracking system enables the PG NC to produce and communicate analyses of metrics on the CX process, as part of the overall QA continuous improvement process.

6.2. Performance

6.2.1. Work Processes:

The process for initiation, review, comment, and approval of EENF/CX in support of quality decision making shall is specified throughout this QA plan. The documentation management processes involved use many approved standards, guidance, procedures, and instructions to assist in maintaining efficiency and assuring quality. Following is a summary of the specific steps and milestones in the PG process:

EENF Preparation - PG receives prepared EENFs from PPPL for proposed projects not covered by DOE's previously-approved EAs or generic CXs. The PG NC reviews the EENF and its

attachments, checking for accuracy, verifying that sufficient information is provided to evaluate the proposed project, and recommends an appropriate level of NEPA documentation to the Manager, PG which may be an informed decision to appropriately exclude a project from further NEPA review. The PG NC will coordinate completion of the EENF with the PPPL NCM if additional information or documentation is needed. EENF/CX documentation will be assessed against the conditions for approval specified in the DOE NEPA Rule, Appendix B to Subpart D (Attachment 4) during the review and approval process).

Determination Notification - The Manager, PGs letter approving a proposed project for categorical exclusion is forwarded to the Laboratory with the signed EENF, notifying the Laboratory of the CX determination, and stating that the proposed project may proceed without further NEPA review. If, after consultation with CH legal counsel, a proposed project does not clearly fall under a CX, it will be sent to the CH-NCO for a review prior to the CH Manager's determination of the appropriate level of NEPA review. Coordination through the use of conference calls with the NCO-CH and CH counsel facilitate resolution of such instances.

CX Quality - The quality and adequacy of each EENF/CX documentation package are assured by reviewing it against existing CEQ and DOE guidance and standards, as identified in Section 2 above of this QA Plan.

Process Tracking - The PG/PPPL NEPA data base tracking system is used to track the EENF/CX documentation package review and approval process.

Concurrences - Approved EENF/CXs bear the concurrence of the PG NC and Manager, PGs approving signature. PPPL procedures require the review of all actions with respect to NEPA. Personnel across the Laboratory, and in PPPL Support Services Department's E/NL/P Division are trained in their respective procedures, implement them, and have documentation to support decisions. DOE-EH and CH have approved for PPPL activities certain "generic" CX determinations "that cover multiple and/or repetitive actions conducted routinely at the Lab over a period of time and that set appropriate bounding criteria for their use." These specific CXs are listed in the PPPL NEPA Review policy and procedures and cover such activities as routine maintenance. Because the DOE has already made the determination that these specified activities can be categorically excluded, the Lab's environmental compliance personnel have only to verify that a proposed action falls within a "generic" CX. If these CXs apply to proposed projects, PPPL NEPA reviewers so indicate the specifically applicable, unique identification letter and description on the associated project paperwork, or otherwise list the specific CX number related to DOEs previously-approved CX, or EA in some cases, excluding that project from further NEPA review. The PG NC conducts PPPL NEPA audits on a periodic

basis (semi-annually) and documents the audits to verify that all proposed actions are being appropriately reviewed for NEPA.

6.2.2. Design: Not applicable.

6.2.3. Procurement:

PG ensures that the EENFs for proposed projects meet expectations by providing the Laboratory with all of the necessary references required to prepare quality EENFs for proposed projects. The PPPL NCM is involved at the start of the proposed project/ experiment so that the environmental impacts are considered early in the process (as per Criterion 5 above).

6.2.4. Inspection and Testing: Not applicable.

6.3. Assessment

6.3.1. Management Assessment:

PG Management and the PG NC continually assess the quality and effectiveness of the EENFs/CX documentation provided by PPPL, providing feedback to the PPPL NCM to effect quality improvements.

6.3.2. Independent Assessment:

CH-TASG performs independent assessment of the PG NEPA program, including the EENF/CX documentation review process, to assess the effectiveness of the program in meeting CH and DOEs NEPA objectives.

ATTACHMENT 4

(FROM 10 CFR 1021, DOE NEPA RULE)

Conditions that are Integral Elements of the Classes of Actions in Appendix B, [10 CFR 1021.410 lists the following conditions which would preclude applicability of the CX Categories listed in Appendix B, and warrant consideration for an elevated level of NEPA assessment].

The classes of actions listed below include the following conditions as integral elements of the classes of actions. To fit within the classes of actions listed below, a proposal must be one that would not:

Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE orders;

Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators and facilities for treating wastewater, surface water, and groundwater);

Disturb hazardous substances, pollutants, contaminants, or CERCLA- excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or

Adversely affect environmentally sensitive resources. An action may be categorically excluded if, although sensitive resources are present on a site, the action would not adversely affect those resources (e.g., construction of a building with its foundation well above a sole-source aquifer or upland surface soil removal on a site that has wetlands). Environmentally sensitive resources include, but are not limited to;

Property (e.g., sites, buildings, structures, objects) of historic, archeological, or architectural significance designated by Federal, state, or local governments or property eligible for listing on the National Register of Historic Places;

Federally-listed threatened or endangered species or their habitat (including critical habitat), Federally-proposed or candidate species or their habitat, or state-listed endangered or threatened species or their habitat;

Floodplains and wetlands;
Areas having a special designation such as Federally-and state-designated wilderness areas, national parks, national natural landmarks, wild and scenic rivers, state and Federal wildlife refuges, and marine sanctuaries;

Prime agricultural lands;

Special sources of water (such as sole-source aquifers, wellhead protection areas, and other water sources that are vital in a region); and

Tundra, coral reefs, or rain forests.

For actions for which there is no previously-approved NEPA documentation/ determination, PPPL submits EENF Forms to PG for review.

PPPL/PG NEPA REVIEW PROCESS

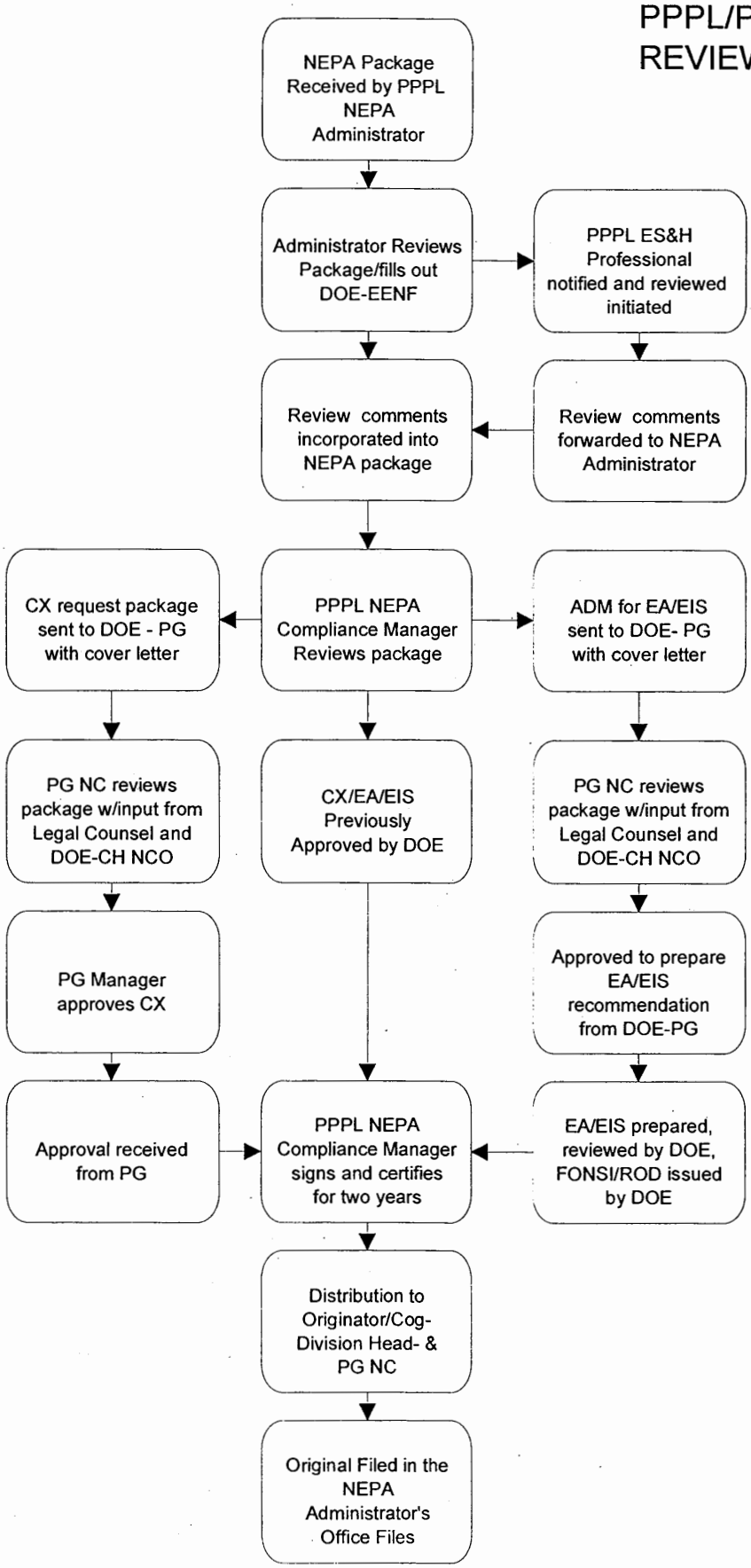


Figure 1

Applicability

This procedure applies to all activities conducted at PPPL's C and D sites; including those by subcontractors, visitors and other personnel performing work activities; and to PPPL activities at A & B sites of the Forrestal Campus.

Introduction

This procedure is intended to assure compliance with the National Environmental Policy Act of 1969 (NEPA) through independent NEPA review of activities by technically competent ES&H personnel in order to satisfy the requirements in DOE Order 5440.1E, and to satisfy the Safety Analysis and Review System (SARS) requirements of DOE Order 5481.1B..

Some activities are inherently low hazard and are routinely encountered and/or accepted by the general public. They do not require NEPA review or classification. See Attachment 3 to determine if the activity in question falls into the low hazard activity categorization. Other generic and unique activities are also defined in Attachment 3.

Reference Documents

A. National Environmental Policy Act (NEPA) of 1969 (PL91-190) and Amendments.
B. DOE Order 5440.1E, National Environmental Policy Act Compliance Program.
C. DOE-CH Order 5440.1E, National Environmental Policy Act (NEPA).
D. DOE NEPA Guidelines, 10 CFR 1021.
E. SEN-15-90, National Environmental Policy Act, 2/5/90.
F. PPPL Policy P-002, Environmental Policy.
G. DOE Order 5481.1B, Safety Analysis and Review System.

Procedure

A. GENERIC ACTIVITIES

Responsibility	Action
Division Head	1. Completes NEPA Planning Form (Attachment 1) for generic activities. Typical generic activities are shown in Attachment 3.
	2. Forwards NEPA Planning Form to ES&H for review.
ES&H	3. Reviews Form in accordance with part C of this procedure.
	4. Returns certified NEPA Form to Division Head allowing continuation of generic activities.

Division Head

5. Receives approved NEPA Planning Form from ES&H.

6. Commences/continues activity.

7. Retains NEPA Planning Form for life of the activity or two years, whichever is shorter.

8. Reviews, modifies as appropriate, and resubmits the NEPA Planning Form two months prior to the expiration of the NEPA certification, or any time changes or potential changes to the environmental considerations noted on the certified NEPA Planning Form are identified (return to step 2).

B. UNIQUE ACTIVITIES

Responsibility	Action
Cognizant Person	1. Checks generic activity list at start of activity planning to determine if activity is NEPA approved and then obtains Division Head concurrence and commences activity. If not covered as a generic activity, completes the NEPA Planning Form (Attachment 1) for unique activities. Examples of unique activities are shown in Attachment 3.
	2. Forwards Form to Division Head for review and concurrence.
	3. Refrains from engaging in the activity until the NEPA Certification is received.
Division Head	4. Reviews the NEPA Planning Form and approves.
	5. Forwards the Form to ES&H for review.
ES&H	6. Reviews Form in accordance with part C of this procedure.
	7. Returns certified Form to Cognizant Person allowing start of activity with copy to Division Head. (Note: For some activities, additional ES&H review and documentation may be necessary to satisfy SARS requirements.)
Cognizant Person	8. Receives certified NEPA Planning Form from ES&H.
	9. Commences activity (subject to completion of any required additional ES&H review and documentation to satisfy SARS requirements).
	10. Retains NEPA Planning Form for life of the activity or two years, whichever is shorter.
	11. Reviews, modifies as appropriate, and resubmits the NEPA Planning Form two months prior to the expiration of the NEPA certification, or any time changes or potential changes to the environmental considerations noted on the certified NEPA Planning Form are identified (return to step #2).

C. ES&H REVIEW OF NEPA PLANNING FORM

Responsibility	Action
ES&H	1. Assigns NEPA Planning Form Number and logs in the NEPA Planning Form upon receipt, forwards to the NEPA Compliance Manager or NEPA Administrator.
NEPA Compliance Manager or NEPA Administrator	2. Performs a NEPA evaluation of the package.
	3. Submits request for categorical exclusion or other determination from DOE if required.
	4. Forwards the NEPA Planning Form to appropriate ES&H personnel for recommendation of extent and complexity of SARS ES&H review and documentation, if necessary, based on responses to the NEPA form questions.
	5. Completes ES&H portion of NEPA Planning Form.
	6. Receives DOE determination, if required.
	7. Certifies NEPA Planning Form by signing and affixes start and end dates. Indicates recommendations regarding any additional ES&H review and documentation requirements consistent with SARS requirements (to be followed up by appropriate ES&H personnel).
ES&H	8. Sends copy of certified NEPA Planning Form for PPPL activities to Cognizant person and Division Head.
	9. Files package.
	10. Prepares a monthly report to the ES&H Executive Board showing a listing of all certified Forms, all pending certifications, and a listing of the status of PPPL NEPA activities, highlighting any problem areas.
	11. Three months prior to certification expiration, notifies Cognizant Individual/Division Head of impending certification expiration.
	12 Periodically discusses the implementation of this procedure with PPPL legal counsel.

ATTACHMENTS

1. NEPA Planning Form
2. Directions for completing NEPA Planning Form
3. NEPA Classifications
4. Map indicating floodplains and wetlands

pg 1 of 2 **NEPA PLANNING FORM #** _____ (by ES&H)

Applicability: this form shall be prepared as early as possible for each new or continuing activity at PPPL. **Physical implementation of PPPL activities shall not proceed prior to NEPA certification of this form.**

TO BE COMPLETED BY REQUESTOR

Originator: _____ **CRB/Project #:** _____

Project/Organization: _____ **Total Estimated Cost:** _____

Title of Activity/Change: _____

Description of Activity: [include physical description of activity, purpose, location, changes to any operating parameters or approved environmentally related limits, potential or actual environmental impact, as applicable. Attach additional sheets if needed] Circle one of these choices: **GENERIC** **UNIQUE**

Environmental Considerations: Will the change/activity, either individually or cumulatively with other known activities, result in changes and/or disturbances to the following entities (see Attachment 2 for directions on answering)*

	YES	NO		YES	NO
1: Air Emissions	____	____	13: Sewage System	____	____
2: Liquid Effluent	____	____	14: Water Use	____	____
3: Domestic Waste	____	____	15: Pesticide Use	____	____
4: Radioactive Waste	____	____	16: Chemical Use/Storage	____	____
5: Hazardous Waste	____	____	17: Petroleum Use/Storage	____	____
6: Mixed Waste	____	____	18: Radiation Exposure	____	____
7: Asbestos Waste	____	____	19: Impacts to Workers	____	____
8: Wetlands	____	____	20: Noise Levels	____	____
9: Floodplains	____	____	21: Pollution Prevention Applies	____	____
10: Clearing or Excavation	____	____	22: Stored Energy	____	____
11: Soil Movement	____	____	23: Fire Safety Issues	____	____
12: PPPL Water Systems	____	____	24: Electrical/RF/Lasers	____	____

* Provide any necessary explanations on a separate sheet attached to this form

The undersigned have reviewed the description and assessment of environmental considerations and state that they are accurate and complete.

Work will not proceed until NEPA certified form (page 2) is received by cognizant person.

COGNIZANT PERSON: _____ **DATE:** _____

DIVISION HEAD: _____ **DATE:** _____

TO BE COMPLETED BY ES&H

pg 2 of 2

NEPA PLANNING FORM

NEPA Evaluation: (attach "Environmental Evaluation for PPPL Change Proposal" and "Environmental Evaluation Notification Form")

	YES	NO
Covered by existing DOE approved categorical exclusion?	____	____

If yes, specify _____

Approval for categorical exclusion required from DOE?	____	____

DOE approval: _____ Date: _____

Other NEPA documentation required?	____	____

If yes, specify _____

NEPA Review for this Activity has been Completed :

_____

NEPA Compliance Manager (or designee) Date:

ACTIVITY IS NEPA CERTIFIED FROM:

_____

START DATE TO: END DATE

Distribution: Original to ES&H File
cc: Originator, Cognizant Person, Division Head

1.	Air Emissions	Check yes if the activity would increase or decrease exhaust emissions from a building. Define characteristics & quantities to the extent possible.
2.	Liquid Effluent	Check yes if the activity would cause a liquid waste to be released to the offsite environment. Define characteristics & quantities to the extent possible.
3.	Domestic Waste	Check yes if there would be any waste put in a waste dumpster or if the activity would generate bulk amounts of debris and wastes.
4.	Radioactive Waste	Check yes if the activity would generate low level radioactive waste (LLW). Define characteristics & quantities to the extent possible.
5.	Hazardous Waste	Check yes if the activity would generate a hazardous waste as defined in ESH 5008, Section 8, Paragraph 3.2.4 (consult with ES&H Industrial Hygiene). Define characteristics & quantities to the extent possible.
6.	Mixed Waste	Check yes if the activity would generate a hazardous waste that is also LLW. Define characteristics & quantities to the extent possible.
7.	Asbestos Waste	Check yes if the activity would involve working with asbestos.
8.	Wetlands	Check yes if the activity would take place in or would impact identified wetlands areas within PPPL property or offsite (see attached PPPL map).
9.	Floodplains	Check yes if the activity would take place in or would impact identified areas within the 100-year or 500-year floodplains (see attached PPPL map).
10.	Clearing or Excavation	Check yes if the activity would require the use of mechanical equipment to move soil, structures, or vegetation.
11.	Soil Movement	Check yes if the activity would require digging with hand tools.
12.	PPPL Water Systems	Check yes if the activity would involve disturbing any part of the potable or canal water systems.
13.	Sewage System	Check yes if the activity would involve working on the PPPL sanitary sewage system, or would change current quantities or characteristics of waste sent to the offsite sanitary sewage treatment facility.
14.	Water Use	Check yes if the activity would use a large amount of water to facilitate the work.
15.	Pesticide Use	Check yes if the activity would involve the use of pesticides.

16. Chemical Use/Storage	Check yes if the activity would involve use or storage of chemicals, including hazardous chemicals, as defined in ESH 5008, Section 8, Paragraphs 1.3.1 and 1.3.2 (consult with ES&H Industrial Hygiene).
17. Petroleum Use/Storage	Check yes if the activity would involve the use of petroleum products.
18. Radiation Exposure	Check yes if the activity would involve radiation exposure to personnel (consult with ES&H Health Physics, as necessary).
19. Impacts to Workers	Check yes if the activity may affect the health and safety of personnel.
20. Noise Levels	Check yes if the activity may expose personnel or the public to high levels of noise that can't be minimized through noise suppression (consult with ES&H Industrial Hygiene).
21. Pollution Prevention	Check yes if one or more of the following have been considered to reduce or prevent pollution: design changes; substitution or reduction of types and/or quantities of chemicals, solvents, or materials used; recycling of materials; reduction in toxicity and/or generation of waste products (consult with ER/WM pollution prevention representative).
22. Stored Energy	Check yes if the activity would or may involve significant stored energy, such as capacitor banks, pressurized gases or liquids, steam, cryogenics, high explosives, or other sources having explosive or unique high pressure rupture potential.
23. Fire Safety Issues	Check yes if the activity would or may involve changes to fire detection or suppression capabilities, fire barriers, life safety code concerns (e.g., emergency egress), emergency notification of personnel, or maximum credible fire loss (consult with ES&H Fire Safety Engineer).
24 Electrical/RF/Lasers	Check yes if the activity would involve working with energized circuits, radio frequency (RF) devices, or lasers.

Low Hazard Activities

NOTE: The following activities are inherently low hazard, presenting hazards of a type and magnitude routinely encountered and/or accepted by the general public, or have been specifically excluded by DOE from NEPA review. They do not require independent NEPA review or classification. If the proposed activity is listed herein, and if there are no additional hazards, the activity need not be classified and independent ES&H NEPA review is not required.

1. Office work, including the use of common office machines, such as copiers, typewriters, personal computers, printers, etc. Also including reading, filing, typing.

2. Routine Control Room activities, including the use of consoles, terminals, printers, etc.

3. Routine technician hand work that is not part of a significant maintenance effort, including the use of hand tools, machine tools, etc. To qualify, this work must not involve any activity with potential environmental impacts.

4. Drafting activities, including the use of computer assisted design terminals and workstations, drafting tables, stick files, etc.

5. Meetings, classes, seminars, and colloquia, provided no hazards are introduced.

6. Administrative procurements, including but not limited to general administrative supplies and computer systems.

7. Personnel actions and contracts for personal services, including technical support contracts and contracts for management and operation.

8. Information gathering (including, but not limited to: literature surveys; inventories; audits), analysis (including computer modelling), and dissemination (including, but not limited to: document mailings; publication; and distribution).

9. Actions consisting solely of document preparation (including, but not limited to: conceptual design; feasibility, energy supply and demand, and other studies).

10. Materiel handling, storage, packaging, and transportation within the PPPL site in accordance with applicable regulations.

11. Routine offsite shipment and disposal of material and waste in accordance with applicable regulations.

Other Activities

All other activities must be independently reviewed for NEPA compliance at the earliest possible time in the activity. It is the intent of NEPA to integrate environmental considerations into the planning process, hence eliminating false starts, delays, and added costs. Activities may fall into one of two categories: generic (ongoing activities) or unique (one of a kind) activities.

Generic Activities

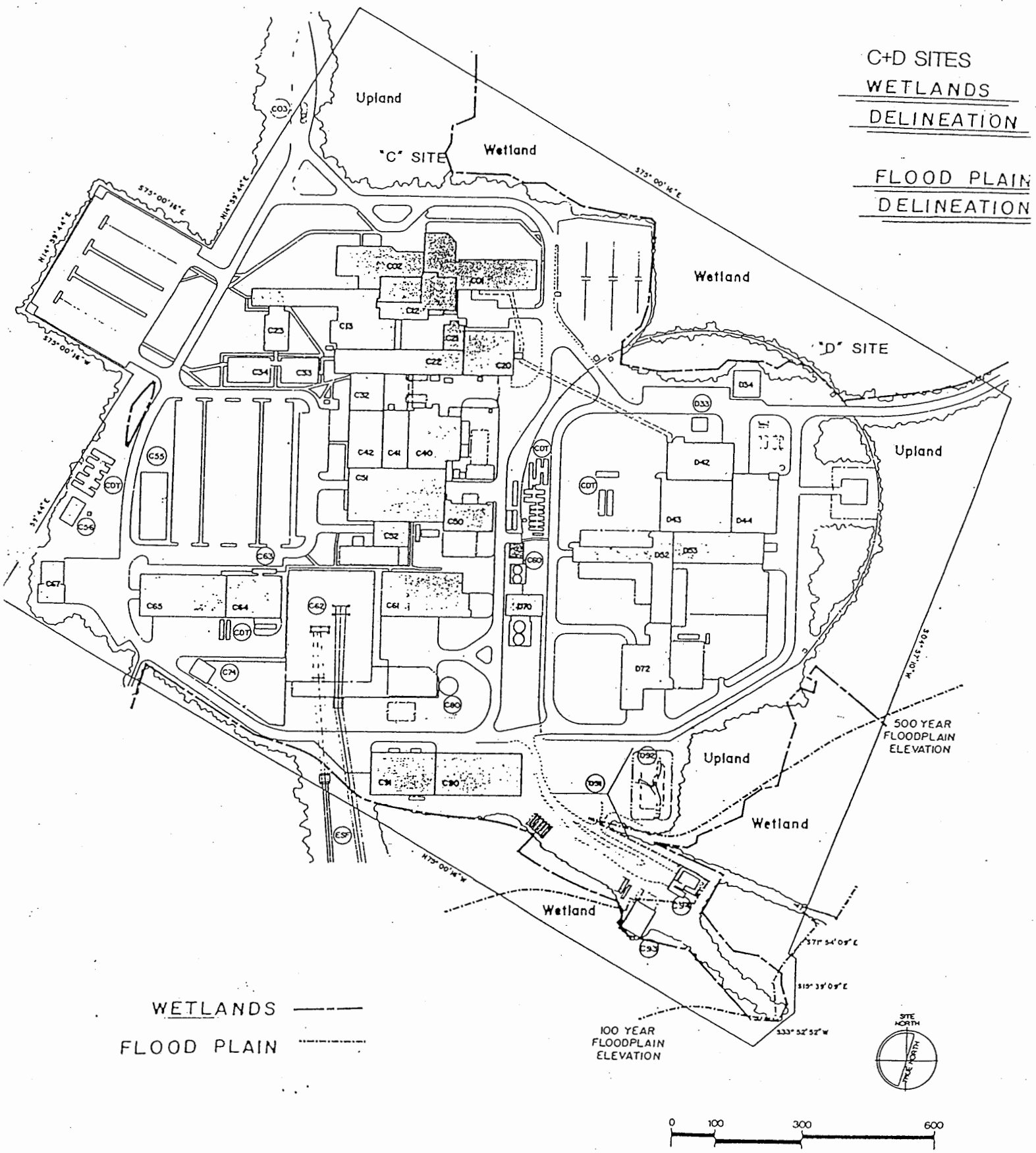
A generic, ongoing activity must be reviewed for NEPA compliance by ES&H and certified. Once reviewed and certified, the generic activities may be carried out for the duration of the certification, provided no changes are made which would significantly change the environmental impact. Such certification shall not exceed a period of two years from the date of the certification.

Generic activities include, but are not limited to the following:

Machine Shop
Weld shop
Electronics shop with soldering
Janitorial services
Warehouse
Stockroom
HazMat Facility
CASL
REML
Cooling Towers
TFTR Operations
PBX-M Operations
Experimental Projects Operations
Carpenter Shop

Unique Activities

Unique, one of a kind activities, such as the construction of an RF heating system, or excavation of an underground storage tank must be reviewed and certified for the specific environmental considerations presented by the work. Once reviewed and certified, the unique activities may be carried out for the life of the certification, provided no changes are made which would significantly change the environmental impact. Such certification shall not exceed a period of two years from the date of the certification.



SITE PLAN
PRINCETON UNIVERSITY
PLASMA PHYSICS LABORATORY

PPPL ENVIRONMENTAL OPERATING PROCEDURE
SUPPORT SERVICES DEPARTMENT
NEPA REVIEW PROCESS

Procedure Number: EN-OP-007 Revision: 3

Effective Date: NOV 14 1994 Exp. Date: NOV 14 1996

Prepared By: Joanne V. Savino Date 11/14/94
J. Savino

Reviewed By: Virginia L. Finley Date 11-14-94
V. Finley

Approved By: Jerry D. Levine Date 11/14/94
J. Levine

1.0 PURPOSE/SCOPE

The purpose of this procedure is to document the activities required to be performed by the Support Services Department (SSD) in the implementation of PPPL procedure ESH-014, "NEPA Review System." This procedure elaborates on the steps described in part C of ESH-014.

2.0 REFERENCES

2.1 ESH-014- NEPA Review System
2.2 National Environmental Policy Act (NEPA) of 1969 and Amendments
2.3 DOE Order 5440.1E,"NEPA Compliance Program"
2.4 DOE-CH Order 5440.1C, "National Environmental Policy Act (NEPA)"
2.5 SEN-15-90 "National Environmental Policy Act"
2.6 PPPL Policy P-002, Environmental Policy
2.7 10 CFR 1021 - "DOE NEPA Guidelines"

3.0 Procedure

3.1 Upon receipt of a NEPA Planning Form, the NEPA Administrator checks the form for completeness. Under certain circumstances, (e.g., absence of signatures), an incomplete form may be returned to the cognizant person or Division Head to be adequately completed.

3.2 If the NEPA Planning form is complete, the NEPA administrator enters the activity into the "NEPA Form Log," including date received, and assigns a NEPA Planning Form number. This number is entered on the NEPA Planning Form. The status of ongoing NEPA reviews is recorded on the NEPA & Safety Analysis Review Status Form."

3.3 The NEPA Administrator and the NEPA Compliance Manager consult 10 CFR 1021, and other relevant documents, and characterize the activity as one of the following:

a. An activity included under a categorical exclusion (CX), Environmental Assessment (EA), or Environmmental Impact Statement (EIS) already approved for PPPL by DOE.

b. An activity apparently included under a CX not already approved for PPPL by DOE, and therefore requiring submittal of documentation for DOE determination.

c. An activity apparently requiring preparation of a new Environmental Assessment (EA) or Environmental Impact Statement (EIS).

3.4 For an activity included under a DOE-approved CX, EA or EIS, (See 3.3a), the following steps take place:

a. The NEPA Administrator completes the "Environmental Evaluation for PPPL Change Proposal" form and the "Environmental Evaluation Notification Form". If necessary, the NEPA Administrator makes changes to the NEPA Planning Form categories and initials such changes. The NEPA Administrator forwards a copy of the NEPA Planning Form to the appropriate ES&H professional (s) (i.e., within the SSD) when any of the safety analysis review questions (i.e., questions #16, #18, #19, #20. #22, #23, and #24 on the NEPA Planning Form in ESH-014) are answered "yes". The ES&H professional (s) will review the activity covered in the NEPA Planning Form, and will provide the NEPA Administrator or the NEPA Compliance Manager with recommendations as to the extent and complexity of the safety review and documentation required for the activity. The NEPA Administrator or NEPA Compliance Manager will advise the originator , cognizant individual, and Division Head as to the recommended safety review and documentation requirements. The ES&H professional (s) making these recommendations will follow up on these recommendations with the originator, cognizant person, and/or Division Head. The safety analysis review will be documented with a signed and dated form filled out by the appropriate ES&H professional (s), which will be filed with the NEPA package.

b. The NEPA Administrator or the NEPA Compliance Manager takes the NEPA review package to the PPPL Environmental Engineer (or designee) for review and signature.

c. The NEPA review package is given by the NEPA Administrator to the NEPA Compliance Manager for review and certification. Certification is granted for a two year period with the NEPA Compliance Manager's signature on page 2 of the NEPA Planning Form. The Manager then returns the NEPA review package to the Administrator.

d. The NEPA Administrator distributes copies of the completed NEPA review package to the following individuals:

1. The Originator
2. The Cognizant Individual (if different from the originator),
3. The Division Head,
4. ES&H Professionals (safety analysis reviewers)
5. QA Division
6. IH Group
7. ER/WM Hazmat Group if Hazardous Wastes are involved
8. ER/WM Radwaste Group if radioactive wastes are involved
9. Environmental Section if air emissions are involved
10. ESU if Hazardous materials are involved

e. The NEPA Administrator or the NEPA Compliance Manager notes the completion of NEPA review for the activity in the "NEPA Form Log" and "NEPA Status Log." The NEPA Administrator places the original NEPA review package on file.

3.5 For an activity that in the judgment of the NEPA Compliance Manager appears to be included under a CX not already approved by PPPL by DOE (See 3.3b), the following steps take place:

a. The NEPA Administrator completes the "Environmental Evaluation for PPPL Change Proposal" form and the "Environmental Evaluation Notification Form". If necessary, the NEPA Administrator makes changes to the NEPA Planning Form categories and initials such changes. The NEPA Administrator forwards a copy of the NEPA Planning Form to the appropriate ES&H professional (s) (i.e., within the SSD) when any of the safety analysis review questions (i.e., questions #16, #18, #19, #20. #22, #23, and #24 on the NEPA Planning Form in ESH-014) are answered "yes". The ES&H professional (s) will review the activity covered in the NEPA Planning Form, and will provide the NEPA Administrator or the NEPA Compliance Manager with recommendations as to the extent and complexity of the safety review and documentation required for the activity. The NEPA Administrator or NEPA Compliance Manager will advise the originator , cognizant individual, and Division Head as to the recommended safety review and documentation requirements. The ES&H professional (s) making these recommendations will follow up on these recommendations with the originator, cognizant person, and/or Division Head. The safety analysis review will be documented with a signed and dated form filled out by the appropriate ES&H professional (s), which will be filed with the NEPA package.

b. The NEPA Administrator or the NEPA Compliance Manager takes the NEPA review package to the PPPL Environmental Engineer (or designee) for review and signature.

c. The completed "Environmental Evaluation for PPPL Change Proposal" Form, and "Environmental Evaluation Notification Form" are formally transmitted via cover letter from the NEPA Compliance Manager to the DOE-PAO Manager, with a request for NEPA determination of the activity by DOE-CH. The NEPA Compliance Manager notes the status of the review in the "NEPA Status Log."

d. When the DOE-CH CX determination is received by the NEPA Compliance Manager, NEPA certification is completed in the following manner:

1. The NEPA review package is given by the NEPA Administrator to the NEPA Compliance Manager for review and certification.
2. Certification is granted for a two year period with the NEPA Compliance Manager's signature on page 2 of the NEPA Planning Form.
3. The NEPA Compliance Manager then returns the NEPA review package to the NEPA Administrator.

e. The NEPA Administrator distributes copies of the completed NEPA review package to the following individuals:

1. The Originator
2. The Cognizant Individual (if different from the originator),
3. The Division Head,
4. ES&H Professionals (safety analysis reviewers)
5. QA Department
6. IH Group
7. ER/WM Hazmat Group if Hazardous Wastes are involved
8. ER/WM Radwaste Group if radioactive wastes are involved
9. Environmental Section if air emissions are involved
10. ESU if Hazardous materials are involved

f. The NEPA Administrator or the NEPA Compliance Manager notes the completion of NEPA review for the activity in the "NEPA Form Log" and "NEPA Status Log." The NEPA Administrator places the original NEPA review package on file in the ES&H Division Office.

3.6 For an activity apparently requiring preparation of an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) (See 3.3c), the following steps take place:

a. Using supplementary information received from the cognizant person, including possibly an Action Description Memorandum (ADM), the NEPA Administrator or NEPA Compliance Manager performs the following steps. The NEPA Administrator or the NEPA Compliance Manager completes the "Environmental Evaluation for PPPL Change Proposal" form and the "Environmental Evaluation Notification Form". If necessary, the NEPA Administrator makes changes to the NEPA Planning Form categories and initials such changes. The NEPA Administrator forwards a copy of the NEPA Planning Form to the appropriate ES&H professional (s) (i.e., the SSD) when any of the safety analysis review questions (i.e., #16, #18, #19, #20. #22, #23, and #24 on the NEPA Planning Form in ESH-014) are answered "yes". The ES&H professional (s) will review the activity covered in the NEPA Planning Form, and will provide the NEPA Administrator or the NEPA Compliance Manager with recommendations as to the extent and complexity of the safety review and documentation required for the activity. The NEPA Administrator or NEPA Compliance Manager will advise the originator, cognizant individual, and Division Head as to the recommended safety review and documentation requirements. The ES&H professional (s) making these recommendations will follow up on these recommendations with the originator, cognizant person, and/or Division Head.

The safety analysis review will be documented with a signed and dated form filled out by the appropriate ES&H professional (s), which will be filed with the NEPA package. The completed forms, and other pertinent information, are attached to the NEPA Planning Form to create a complete NEPA review package. Included on the "Environmental Evaluation Notification Form" is a recommedation regarding the need to prepare an EA or EIS.

b. The NEPA Administrator or the NEPA Compliance Manager takes the NEPA review package to the PPPL Environmental Engineer (or designee) for review and signature.

c. The completed "Environmental Evaluation for PPPL Change Proposal" form, and "Environmental Evaluation Notification Form" are formally transmitted via cover letter from the NEPA Compliance Manager to DOE PAO Manager with a request for NEPA determination of the activity by DOE-CH (and DOE-EH for EISs). The NEPA Compliance Manager notes the status of the review in the "NEPA Status Log."

d. An EA or EIS is prepared, reviewed, and approved in accordance with 10 CFR 1021, DOE 5440.1E, DOE-CH 5440.1E, and SEN-15-90. The NEPA Administrator and NEPA Compliance Manager participate in this process as required.

e. Following receipt by the NEPA Compliance Manager of a signed Finding of No Significant Impact (FONSI) for an EA, or Record of Decision (ROD) for an EIS, NEPA certification is completed in the following manner. The NEPA review package is given by the NEPA Administrator to the NEPA Compliance Manager for review and certification. Certification is granted for a two year period with the NEPA Compliance Manager's signature on page 2 of the NEPA Planning Form. The NEPA Compliance Manager then returns the NEPA review package to the NEPA Administrator.

f. The NEPA Administrator distributes copies of the completed NEPA review package to the following individuals:

1. The Originator,
2. The Cognizant Individual (if different from the originator),
3. The Division Head,
4. ES&H Professionals (safety analysis reviewers)
5. QA Department
6. IH Group
7. ER/WM Hazmat Group if Hazardous Wastes are involved
8. ER/WM Radwaste Group if radioactive wastes are involved
9. Environmental Section if air emissions are involved
10. ESU if Hazardous materials are involved

g. The NEPA Administrator or the NEPA Compliance Manager notes the completion of NEPA review for the activity in the "NEPA Form Log" and "NEPA Status Log." The NEPA Administrator places the original NEPA review package on file.

3.7 The NEPA Compliance Manager and the NEPA Administrator prepare a monthly NEPA Status report for the ES&H Executive Board and other interested parties. This report reflects the status of all PPPL NEPA activities. The report is issued around the 17th of each month.

3.8 Three months prior to expiration of the two year NEPA certification for an activity, the NEPA Administrator notifies Cognizant Individuals and/or Division Heads in writing of the upcoming expiration. The original "NEPA Form Log" data is sorted by certification dates in a "NEPA Recertification Log," which is updated and reviewed by the NEPA support person or the NEPA Administrator for recertification notification status. Once a month the NEPA support person generates notification letters, which are reviewed by the NEPA Administrator, and sent out to the Cognizant Individuals and/or Division Heads. A copy of the original first page of the NEPA Planning Form is included in this transmittal.

a. The Cognizant Individual checks off one of the following appropriate categories, and returns the NEPA Planning Form for recertification (or other action) to the NEPA Administrator:

1. Activity complete, no further review required;

2. Activity is ongoing and requires NEPA recertification. All environmental considerations remain unchanged from the original certification. The Cognizant Individual and the Division Head sign and date the form;

3. Activity is ongoing and requires NEPA recertification. Changes have taken place that would impact environmental considerations since the original certification. A new NEPA Planning Form is required for recertification.

b. Upon receipt of the signed and dated NEPA recertification form, the NEPA Administrator or the NEPA Compliance Manager updates the "NEPA Form Log" if the activity is complete. The "NEPA Recertification Log" is then updated by the NEPA support person OR the NEPA Administrator, and the NEPA recertification package is filed with the original NEPA Planning Form. If the activity is ongoing, the NEPA Administrator completes the recertification review process in the following manner:

1. Upon receipt of a recertification review with no environmental consideration changes, the NEPA Administrator attaches a copy of the original certification page, containing a recertification signature block. The package is presented to the NEPA Compliance Manager for signature, and 2 year recertification. The package is then returned to the NEPA Administrator. The NEPA Administrator or the NEPA Compliance Manager updates the "NEPA Form Log." The "NEPA Recertification Log" is updated by the NEPA support person or the NEPA Administrator, who then files the NEPA recertification package with the original NEPA Planning Form.

2. Upon receipt of a NEPA recertification package for an ongoing activity which has changes to environmental impacts, the NEPA review is performed in the usual manner. (See 3.0 - 3.6)

3.9 The NEPA Compliance Manager periodically discusses the implementation of procedure ESH-014 with PPPL and/or DOE legal counsel.

ATTACHMENTS

Att.1. NEPA and Safety Analysis Review Status Form
Att.2. Environmental Evaluation for PPPL Change Proposal Form
Att.3. Environmental Evaluation Notification Form
Att.4. NEPA Recertification Letter & Form

FIGURES

Fig.1. NEPA Review Process Flow Chart