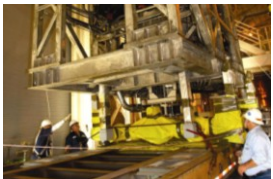




NEPA Process Integration into the Savannah River Site Environmental Management System



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Major Elements of SRS EMS

- **Environmental Policy**
- **Environmental Aspects**
- **Legal and Other Requirements**
- **Objectives, Targets and Environmental Management Programs**
- **Implementation and Operation**
- **Resources, Roles, Responsibility and Authority**
- **Competence, Training, and Awareness**
- **Communication**
- **Document and Record Control**
- **Operational Controls**
- **Emergency Preparedness / Response**
- **Monitoring and Measurement**
- **Evaluation of Compliance**
- **Non-Conformance, Corrective and Preventive Actions**
- **Audits**
- **Management Review**

National Environmental Policy Act (NEPA)

NEPA requires Federal agencies to identify and evaluate the potential environmental impacts of a proposed action (and reasonable alternatives) and to mitigate those impacts prior to project implementation.

The NEPA process of identifying and assessing environmental impacts is very similar to the EMS process of identifying and evaluating environmental aspects.

Major Elements of NEPA Process

- **Identification of the proposed action (i.e., what is it that the agency wants to do?).**
- **Determination of appropriate level of NEPA review.**
 - **Categorical Exclusion (CX): documents an action which does not incrementally or cumulatively impact the “human environment”.**
 - **Environmental Assessment (EA): evaluates impacts of proposed action to determine if they are significant enough to require an Environmental Impact Statement. If not, a Finding of No Significant Impact (FONSI) is issued.**
 - **Environmental Impact Statement (EIS): evaluates impacts of a major Federal action which can significantly impact the “human environment”. Final agency decision regarding project implementation and mitigation measures issued in a Record of Decision (ROD).**

Major Elements of NEPA Process

- DOE NEPA contractor prepares the required NEPA document.
- DOE reviews the NEPA document and issues final decision (FONSI or ROD).
- Project implementation.



NEPA Process at SRS

- **NEPA process at SRS is initiated by an Environmental Evaluation Checklist (EEC).**
- **An EEC briefly describes scope of the proposed action and identifies any potential environmental impacts and/or regulatory compliance issues associated with project implementation.**
- **An EEC is used by NEPA practitioners to assist in determining the level of NEPA review required (i.e., CX, EA, or EIS).**

NEPA/EMS Integration at the SRS

- **NEPA is a legal requirement that must be uploaded into the SRS EMS.**
- **EMS and NEPA elements possess common process that can complement and support each other, particularly in areas related to impact identification and environmental monitoring.**
- **Proper integration of NEPA into the EMS provides the agency with increased efficiency of EMS Processes and enhanced NEPA compliance.**

NEPA/EMS Integration at the SRS

- **The following areas present the greatest opportunity for productive integration of NEPA into the SRS EMS.**
 - **Environmental Aspects**
 - **Monitoring and Measurement**
 - **Resources, Roles, Responsibility and Authority**
 - **Communication**
 - **Operational Controls**

Environmental Aspects

- **This EMS element identifies and updates environmental aspects and impacts data for activities, products, and services that EMS controls and influences (i.e., ongoing and new projects). Similarly, NEPA identifies and evaluates potential environmental impacts associated with proposed (new) Federal actions.**
- **Good integration of the two processes. The EMS utilizes information from NEPA reviews to identify new or update environmental aspects data. NEPA reviews use existing environmental aspects data to identify compliance issues or significant environmental impacts associated with implementation proposed actions.**
- **No opportunities for improved process integration identified.**

Monitoring and Measurement

- **This EMS element includes procedures to monitor and measure key operational characteristics that can significantly impact the environment. NEPA calls for adoption of monitoring and enforcement program for mitigation measures identified in RODs.**
- **Satisfactory integration of the two processes. Existing EMS monitoring data is used to support and improve NEPA impacts analyses (EAs and EISs). Data generated by NEPA (e.g., effluent studies, biological evaluations) are used to update the EMS environmental database.**

Monitoring and Measurement

- **Opportunities for improved process integration**
 - **Commitments and mitigation measures established in NEPA documents are not consistently tracked/monitored as environmental objectives through the EMS.**
 - **EMS support for using NEPA's 'adaptive management' approach (i.e., predict, mitigate, implement, monitor, and adapt) is lacking.**
 - **There is no centralized, continuously updated comprehensive environmental database for use by NEPA and EMS practitioners.**

Resources, Roles, Responsibility and Authority

- **Management must ensure that resources are available to establish, implement, maintain EMS and NEPA processes. Roles, responsibilities, and authorities must be defined, documented, and communicated.**
- **Good integration of the two processes. The SRS EMS has clearly identified the resources and responsibilities necessary to implement and support NEPA implementation and compliance at SRS (e.g., maintain EEC database, prepare NEPA documentation)**

Resources, Roles, Responsibility and Authority

- **Opportunities for improved process integration**
 - **Resources necessary to support NEPA's 'adaptive management' approach have not been identified in the EMS.**
 - **Use of adaptive management would allow integration of NEPA into ongoing implementation and management of the project after final NEPA determination (i.e., verify/update accuracy of impact analyses, evaluate efficacy of applied BMPs).**

Communication

- **This EMS element includes procedures for communicating internally and documenting/responding to external communications. NEPA's goal is to communicate environmental information to decision makers and facilitate public involvement in agency's decision-making processes.**
- **Very good integration of the two processes. EMS objectives/policies and NEPA analyses are incorporated into EAs and EISs which receive extensive public exposure via NEPA's public participation process. NEPA/EMS matters are communicated externally through the SRS website, interaction with the Citizens Advisory Board, and publication of the Environmental Bulletin. Internal dissemination of NEPA/EMS matters is accomplished via internal websites and email (i.e., SRS Online).**
- **No opportunities for improved process integration identified.**

Operational Controls

- **In an EMS, operational controls (e.g., procedures) are established to ensure that operations related to significant aspects do not deviate from environmental policy, objectives, and targets.**
- **Very good integration of the two processes.**
 - **Procedures to implement and complement the NEPA process have been incorporated into the EMS.**
 - **New missions are required to go through formal site selection process early in the NEPA process.**
 - **Data generated by this EMS process assists in defining NEPA's 'affected environment' and helps to establish the environmental baseline required for impact analyses.**
 - **NEPA's EEC serves as a resource for identifying environmental aspects associated with a proposed action which may need to be addressed, monitored, or tracked through the EMS.**

Operational Controls

- **Opportunity for improved process integration**
 - **The requirement that major new missions go through the formal site selection process is not consistently implemented.**

This gap in EMS enforcement must be closed.

Summary

- **EMS/NEPA process integration in all program elements reviewed was determined to be at least satisfactory.**
- **Greatest opportunities for improved process integration in the following areas**
 - **Tracking/monitoring NEPA commitments and mitigation measures**
 - **Implementing NEPA’s “adaptive management” approach**
 - **Establishing centralized, continuously updated environmental database**