Proposed Action Title:  Hot Work Operations and General Employee (Hands-on) Live Fire Extinguisher / Live Fire Training Evolutions (NV-2016-035)
Program or Field Office:  Nevada Field Office
Location(s) (City/County/State):  Nevada National Security Site (NNSS), Nye County NV

Proposed Action Description:

Primary Trainer Method: The Nevada National Security Site (NNSS) Fire & Rescue (F&R) is purchasing the renowned new BullEx Intelligent (Smart-Fire-Extinguisher) Training System. In this system, the training instructor uses a hand-held remote control device to release Propane (LP Gas) from a 20 lb. cylinder tank into the BullEx remote controlled open burn pan and lights the propane gas. The flames are then extinguished by the student using a (Plain Water/Compressed Air Only) BullEx Smart-Fire-Extinguisher; thereby aiming at flame sensors located in front of the burn pan. In lieu of burning open fuel mixtures, this (clean-air) BullEx Training System now becomes Fire & Rescue’s primary training method when conducting all required National Fire Code (NFC) Standards #10 for General Employee and 51-B, for Hot Work Operations Hands-on Live Fire Extinguisher Training. Each training session would require approximately 5 to 10 lbs. of Propane Gas.

The BullEx Intelligent (Smart-Fire-Extinguisher) Training System would be used at the following locations:
- Area 1 – U1A / UIH Complex (Near Air Building Ramp & Dirt Area)
- Area 5 – Bldg. 5-7 (RWMC Front Asphalt Parking Area)
- Area 5 – Bldg. 5-8 (NPTEC Near Pond Pump House Area)
- Area 6 – Bldg. 6-900 (North Pea-Gravel Compound Area)
- Area 23 – NNSS Fire & Rescue Training Center (Jackass Flats Road)
- Area 23 - Bldg. 23-114 (Across Street in Old Pea-Gravel Parking Lot Area)
- Area 24 – North Las Vegas (DOE/NSTec Compound Near A-11 Parking Lot Area)

Secondary (Backup) Trainer or Class-B Drill & Exercise Evolution Method: Open burns could also be conducted at the NNSS or at the North Las Vegas Facility (NLVF) by NNSS F&R personnel, for purposes of meeting NFC Standards #10 for General Employee and 51-B, for Hot Work Operations Hands-on Live Fire Extinguisher Training requirements. These fires would be extinguished by a student using a fire extinguisher containing ABC Dry Chemical agent. The length of each training session would be approximately 1 minute per student, with 30 to 40 students per class.

To meet NFC Standards #1403 for Vehicle Live-Fire Training Evolutions, NNSS F&R personnel would use live fire-hose line streams. One to three gallons of this fuel mixture would be used per training session. Approximately 60 F&R training sessions would be conducted per year.

This method would also be used for conducting NNSA/NFO drill and exercise, live-burn evolutions. For this, a small amount of gasoline/diesel fuel mixture dispensed from 5 gallon safety containers would be poured into an open burn pan and lit to simulate live fire and/or smoke. After lighting, the flames would be extinguished by F&R personnel using a fire extinguisher containing ABC Dry Chemical agent.

Note: Should the primary BullEx Trainer System be placed in “Out-Of-Service” status, this secondary (backup) trainer method would be used until the BullEx trainer system is repaired. After each live-burn session, using a gasoline/diesel fuel mixture, all unburned fuel would be completely burned off prior to burn pans transport from the training site. All carbon residue waste would be properly disposed of at the NNSS F&R Fire Training Center.

All fuel-burn training would be conducted at the locations listed in this document. A total of approximately 60 training sessions would be conducted each year using either a gasoline/diesel fuel mixture or propane gas. Since propane burns cleaner than gasoline/diesel fuel mixture, it is anticipated that the majority of burns would use Propane (LP Gas).

Categorical Exclusion(s) Applied:
10 CFR 1021: B1.2 Training Exercises and Simulations

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions including the full text of each categorical exclusion, see Subpart D of 10 CFR 1021. Regulatory Requirements in 10 CFR 1021.410(b): (Sec full text in regulation)

The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D.

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

The proposal has not been segmented to meet the definition of a categorical exclusion.

Based on my review of information conveyed to me and in my possession concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), I have determined that the proposed action fits within the specified class(es) of action and that other-regulatory requirements set forth above are met. Therefore, the application of a categorical exclusion is appropriate.