INL/RPT-23-75727
Revision 1

Idaho National Laboratory Site Cultural Resource Management Annual Report for Fiscal Year 2023

January 2024

Cultural Resource Management Office Staff

Idaho National Laboratory

INL is a U.S. Department of Energy National Laboratory operated by Battelle Energy Alliance, LLC

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Cultural Resource Management Annual Report for Fiscal Year 2023

Cultural Resource Management Office Staff

January 9, 2024

Idaho National Laboratory
Cultural Resource Management Office
Idaho Falls, Idaho 83415

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ABSTRACT

This report describes the cultural resource activities of the Idaho National Laboratory's (INL) Cultural Resource Management Office (INL CRMO) during fiscal year 2023 (FY2023), including Section 110 research, annual monitoring, and compliance efforts associated with Section 106 of the National Historic Preservation Act (NHPA). The INL Archives and Special Collections is recognized for its numerous accomplishments that provide the support documentation necessary to accurately assess the historic significance of the INL Site.

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FIGURES

TABLES

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ACRONYMS

ACHP	Advisory Council on Historic Preservation
AIP	Agreement-in-Principle
AMS	Accelerator Mass Spectrometry
APE	area of potential effect
ARPA	Archaeological Resources Protection Act
ASI	Archaeological Survey of Idaho
ATR	Advanced Test Reactor
ATRC	Advanced Test Reactor Critical
BEA	Battelle Energy Alliance, LLC
BLM	Bureau of Land Management
BORAX	Boiling-Water Reactor Experiment
BP	Before Present
CCC	Civilian Conservation Corps
CDRL	Contract Data Requirements List
CEMML	Center for Environmental Management of Military Lands
CFA	Central Facilities Area
CFPP	Carbon Free Power Project
CITRC	Critical Infrastructure Test Range Complex
COLA	Combined License Agreement
COP	Community of Practice
CPP	Chemical Processing Plant
CRC	Cultural Resource Coordinator
CRM	cultural resource management
CRMO	Cultural Resource Management Office
CRDB	Cultural Resource Database
CRMP	Cultural Resource Management Plan
CRR	Cultural Resource Review
CRWG	Cultural Resource Working Group
CX	Categorical Exclusion
DD&D	deactivation, decontamination, and decommissioning/demolition
DOE	U.S. Department of Energy
DOE-HQ	U.S. Department of Energy, Headquarters
DOE-ID	U.S. Department of Energy, Idaho Operations Office

DOME	Demonstration of Microreactor Experiments
EA	Environmental Assessment
EBR-I	Experimental Breeder Reactor-I
EBR-II	Experimental Breeder Reactor-II
EC	Environmental Checklist
ECP	Environmental Compliance Permit
EDMS	Electronic Document Management System
EH	Early Holocene
EHSS	Environment, Health, Safety, and Security
EIS	Environmental Impact Statement
EML	Electron Microscopy Laboratory
ERAP	Emergency Response Assessment Plan
ERP	Environmental Review Process
ESRP	Eastern Snake River Plain
ETR	Engineering Test Reactor
EV	Electric Vehicle
F&SS	Facilities and Site Services
FHBC	Fort Hall Business Council
FMF	Fuel Manufacturing Facility
FONSI	Finding of No Significant Impact
FRM	Form
FY	fiscal year
GBAC	Great Basin Anthropological Conference
GDE	Guide
GPS	Global Positioning System
HALEU	high assay low enriched uranium
HALS	Historic American Landscape Survey
HeTO	Heritage Tribal Office (Shoshone-Bannock Tribes)
HFEF	Hot Fuel Examination Facility
HVAC	heating, ventilating, and air conditioning
ICPP	Idaho Chemical Processing Plant (now INTEC)
ICRIS	Idaho Cultural Resource Information System
IEC	Idaho Environmental Cleanup
IHSI	Idaho Historic Sites Inventory
IMNH	Idaho Museum of Natural History

INL	Idaho National Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center (formerly ICPP)
ISU	Idaho State University
LI	Laboratory Instruction
LOFT	Loss-of-Fluid Test
LOTUS	Laboratory for Operation and Testing in the United States
MCP	Management Control Procedure
MCRE	Molten Chloride Reactor Experiment
M&O	Management and Operating
MFC	Materials and Fuels Complex
MH	Middle Holocene
MOA	Memorandum of Agreement
MOI	Museum of Idaho
MOU	Memorandum of Understanding
N&HS	National and Homeland Security
NAGARA	National Association of Government Archives and Record Administration
NAGPRA	Native American Graves Protection and Repatriation Act
NARA	National Archives Records Administration
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NOTF	Naval Ordnance Test Facility
NPS	National Park Service
NRB	National Register Bulletin
NRC	Nuclear Regulatory Commission
NRF	Naval Reactors Facility
NRHP	National Register of Historic Places
NRIC	National Reactor Innovation Center
OCTA	Oregon California Trails Association
PA	Programmatic Agreement
PBF	Power Burst Facility
PCC	Precontact Context
PEL	Program Environmental Lead
PI	Principal Investigator
PLN	Plan

REC	Research and Education Campus
RLWTF	Radioactive Liquid Waste Treatment Facility
ROW	right(s)-of-way
RRTR	Radiological Response Training Range
RWMC	Radioactive Waste Management Complex
SHPO	State Historic Preservation Office
SMC	Specific Manufacturing Capability
T&E	Threatened and/or Endangered
TAN	Test Area North
TP	Terminal Pleistocene
TRA	Test Reactor Area
TREAT	Transient Reactor Test (facility)
US	United States
WERF	Waste Experimental Reduction Facility
WTB	Wireless Test Bed
WWII	World War II
XRF	X-Ray Fluorescence Spectrometry
ZPPR	Zero Power Physics (Plutonium) Reactor

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KEY INFORMATION

Project Name: Idaho National Laboratory Site Cultural Resource Management Annual Report for Fiscal Year 2023

Project Number: INL/RPT-23-75727

Location: Butte County

USGS Quads: Idaho 7.5′ quadrangles – Circular Butte 3 SE and Circular Butte 3 SW

Legal Location of Surveys:

BEA-21-28 R3 Township 03N Range 30E Section 8
BEA-21-31 R1 Township 03N Range 29E Section 25
BEA-21-31 R1 Township 03N Range 30E Section 30
BEA-23-10 Township 03N Range 30E Section 34
BEA-23-19 Township 03N Range 30E Section 20
BEA-23-21 Township 02N Range 30E Sections 1

Project Area: For FY2023, the area of new survey for individual projects was recorded and geospatial information is provided with this annual report. For undertakings that were reported separately throughout FY2023, the locational and geospatial information was submitted concurrently with those cultural resource reports. Those projects that remain in progress as of the end of FY2023 are not included as they will be reported in FY2024.

Area Surveyed: 1,970.96 acres surveyed in FY2023
☒ Intensive Survey: 1,734.99 acres surveyed for 15 Section 106 projects and two Section 110 projects.

- 257.17 acres of intensive survey in support of Section 106 projects:
  - 86.25 acres reported for five projects in this annual report
  - 93.64 acres reported with three FRM-3006 Short Report
  - 77.30 acres reported in an individual full cultural reports in FY2023 – 77.3 acres.
- 1,033.82 acres of intensive survey conducted for Section 106 projects currently in progress or cancelled and will be reported in FY2024
- 444.97 acres of intensive survey in support of Section 110 projects
  - 0.97 acres for one built environment project that will be reported in FY2024
  - 444 acres for one on-going multi-year Section 110 project that will be reported in the future, when complete

☒ Reconnaissance Survey: 235 acres for one Section 110 project (built environment)

Project Data:
☒ Previously Recorded Cultural Resources:
Cultural resources that have been monitored as part of FY2023 Section 110 activities are tabulated and appropriate forms are attached (Appendix A - Annual Monitoring Forms and Results (FRM-3001) - Official Use Only – FOIA Exempt 3 (see Table 7).

☒ Newly Recorded Cultural Resources:
No newly recorded or updated cultural resources are listed in Appendix B (Appendix B - ASI Site Forms, ASI Isolate Forms, and IHSI Forms - Official Use Only – FOIA Exempt 3), as any that were recorded were submitted to SHPO as part of project-specific consultation.

A list of historic built environment resources is included in Appendix C - INL Site Building Inventory - as part of FY2023 activities, however all IHSI forms have already been submitted and concurred upon.

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1. Fiscal Year 2023 Idaho National Laboratory Site Historic Preservation Program Accomplishments

1.1 Overview

The Idaho National Laboratory (INL) Site is an 890 square mile federal reserve covering portions of five counties on the northeastern edge of the Snake River Plain in southeastern Idaho. Lands included within INL Site boundaries are under jurisdiction of the United States (U.S.) Department of Energy (DOE) Idaho Operations Office (DOE-ID) and have been set aside since the 1940s to support many kinds of scientific and engineering research (Figure 1).

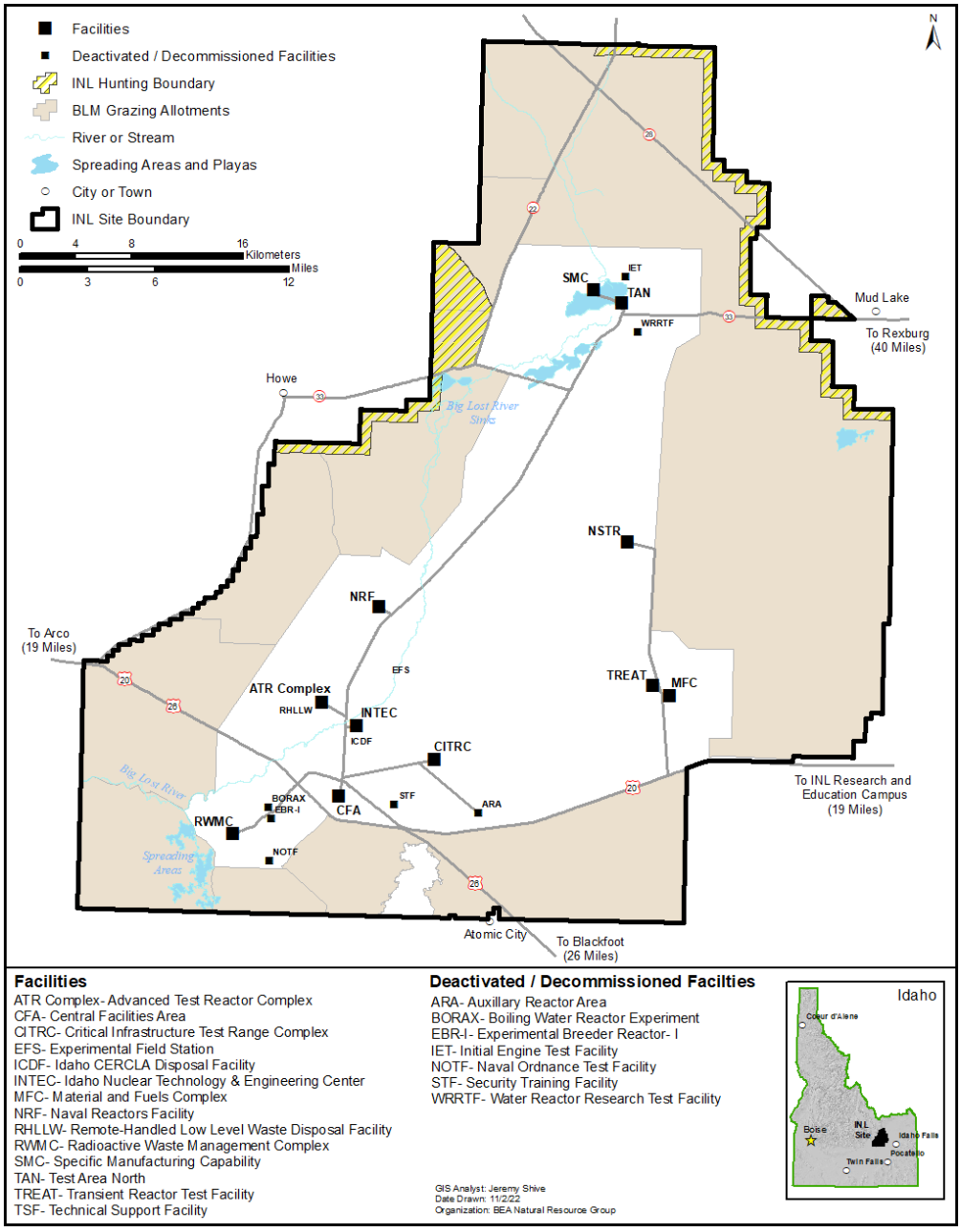

Figure 1. Idaho National Laboratory Site.

Currently, two main contractors perform work for DOE-ID at the INL Site. Battelle Energy Alliance, LLC (BEA), is DOE-ID's primary INL management and operating (M&O) contractor, where the INL Cultural Resource Management Office (INL CRMO) is based. Idaho Environmental Coalition (IEC) manages the Idaho Cleanup Project operations at the INL Site. The Naval Reactors Facility (NRF) is under jurisdiction of the U.S. DOE Office of Naval Reactors and is currently managed and operated by Fluor Marine Propulsion, LLC.

Public access to the INL Site has been restricted since the land was initially set aside for government use in the 1940s and an active security force has always patrolled the lands and facilities. When encountered, trespassers are removed immediately, and violators can be served official citations. Largely because of long-term access restrictions, many cultural resources on the INL Site are relatively undisturbed. Vandalism is also reduced by ongoing security patrols and outreach programs that are intended to educate the public and INL Site employees regarding the importance of leaving artifacts in place and the laws that protect these irreplaceable resources.

The INL Site Cultural Resource Management Program is maintained through the mandates of the National Historic Preservation Act (NHPA), Section 110, which requires all federal agencies to maintain historic preservation programs for identification, evaluation, and protection of historic properties, including nomination of historic properties to the National Register of Historic Places (NRHP). The Site Cultural Resource Management Program, as defined by Section 110, ensures that historic preservation is fully integrated into ongoing programs and projects by fulfilling DOE's responsibility for identifying, protecting, and avoiding unnecessary damage to historic properties. Section 110 also charges federal agencies with the affirmative responsibility for considering projects and programs that further the purposes of the NHPA, for undertaking planning and actions as necessary to minimize harm to historic properties and declares that the costs of preservation activities are eligible project costs in all undertakings conducted or assisted by a federal agency. As the prime contractor for INL, BEA is obligated under the M&O contract (DOE-ID 2018) to maintain the historic preservation program housed in the INL CRMO, established under DOE-ID through consultation with the Idaho State Historic Preservation Office (SHPO).

Section 110 defines specific benchmarks for the INL Site historic preservation program including:

- Historic properties under the jurisdiction or control of DOE are to be managed and maintained in a way that considers preservation of their historic, archeological, architectural, and cultural values.
- Historic properties not under DOE jurisdiction or control but potentially affected by INL Site actions are to be fully considered in agency planning.
- DOE preservation related activities are to be carried out in consultation with other federal, state, and local agencies, the Shoshone-Bannock Tribes, and the private sector.
- INL Site and DOE procedures for compliance with Section 106 of NHPA are to be consistent with policies issued by the Advisory Council on Historic Preservation (ACHP).
- DOE may not grant assistance or a license or permit to an applicant who damages or destroys historic property with the intent of avoiding the requirements of Section 106 unless specific circumstances warrant such assistance.

The preservation and use of historic properties and their careful consideration in planning and decision making are in the public interest, are consistent with the declaration of policy set forth in the NHPA and must be a fundamental part of the INL mission. The INL Site Historic Preservation Program housed in the INL CRMO is fully integrated into both general and specific INL operating procedures through the INL Cultural Resource Management Plan (CRMP) and environmental management system and adheres to the standards for federal agencies set forth in Section 110.

1.2 The Secretary of the Interior's Standards for Federal Agency Historic Preservation Programs

Section 110 of the NHPA of 1966, as amended, establishes Federal agency responsibilities for the preservation of historic properties (16 U.S.C. 470h-2, Historic properties owned or controlled by Federal agencies).

- Standard 1: Each federal agency establishes and maintains a historic preservation program that is coordinated by a qualified preservation officer, and that is consistent with and seeks to advance the purposes of the NHPA. The head of each federal agency is responsible for preservation of historic properties owned or controlled by the agency [NHPA, Sections 110(a)(1), 110(a)(2), 110(c), and 110(d)].
- Standard 2: An agency provides for the timely identification and evaluation of historic properties under agency jurisdiction or control and/or subject to effect by agency actions [NHPA, Sections 110(a)(2)(A) and 112].
- Standard 3: An agency nominates historic properties under the agency's jurisdiction or control to the NRHP [NHPA, Section 110(a)(2)(A)].
- Standard 4: An agency gives historic properties full consideration when planning or considering approval of any action that might affect such properties [NHPA, Sections 110(a)(2)(B), 110(a)(2)(C), 110(a)(2)(E), 110(f), and 402 (16 U.S.C. 470a 2)].
- Standard 5: An agency consults with knowledgeable and concerned parties outside the agency about its historic preservation related activities [NHPA, Section 110(a)(2)(D)].
- Standard 6: An agency manages and maintains historic properties under its jurisdiction or control in a manner that considers preservation of their historic, architectural, archeological, and cultural values [NHPA, Sections 110(a)(1), 110(a)(2)(B), and 110(b)].
- Standard 7: An agency gives priority to the use of historic properties to carry out agency missions [NHPA, Section 110(a)(1)].

The top priorities of the INL CRMO are proactive management of DOE-ID's historic properties (archaeological and architectural) which are eligible for listing on the NRHP cultural resources on INL Site lands, as well as the museum collections and data associated with these resources. Federal funding for the INL CRMO is provided to support proactive management of historic properties.

1.3 Fiscal Year 2023 INL Site Historic Preservation Program Accomplishments

In 2023, the INL CRMO performed a variety of INL Site Historic Preservation Program responsibilities on behalf of DOE-ID, including, but not limited to: maintaining working and consultation relationships on behalf of DOE-ID with Shoshone-Bannock Tribes, revising, and updating procedural documents that outline the INL Site Historic Preservation Program, and conducting and seeking training opportunities for the INL CRMO staff. INL CRMO assisted DOE-ID with continued negotiations and finalization of the Programmatic Agreement (PA) (DOE-ID 2023) with SHPO, ACHP, the Shoshone-Bannock Tribes, and other consulting parties during fiscal year (FY)2023. The ACHP provided the fully executed PA to the DOE-ID on May 8, 2023.

Section 110 activities included but were not limited to: annual monitoring and site updates; conducting proactive Section 110 Class III inventories of targeted embayment sites as selected by Shoshone-Bannock Tribes; restoration actions at the Birch Creek site; continued progress on updating the

built environment inventory for INL Site facilities at Specific Manufacturing Capability (SMC); submitting final built environment inventory update reports to SHPO for concurrence (received May 23, 2023); continued progress on the Precontact Context; data collection and analysis on the Pre-World War II (WWII) Historic Contexts pertaining to historic migration, transportation and trade (c. 1852-1942) and homesteading and agriculture (c. 1952-1942); performing public and educational outreach activities; and, conducting active research. The INL CRMO also performed Section 106 reviews supporting a variety of projects, contributed to environmental documents, and continued to fulfill stipulations outlined in Memoranda of Agreement (MOA).

The INL CRMO is also making continual progress in the establishment of the INL Site Archives and Special Collections and improving accessioning processes, storage, and accessibility of the records through Plan (PLN)-5920 revisions. Furthermore, BEA completed physical remodel and improvements to the archives space to meet National Archives and Records Administration Act (NARA) requirements. The INL CRMO also worked to update the forms and Management Control Procedure (MCP) documents, discussed later in Procedure Issuance and Revisions (Section 1.3.3).

1.3.1 Staffing

In FY2023, the INL CRMO added five archaeological technicians, one technical lead, and hired one architectural historian for a vacant position. In addition, the INL CRMO was proud to host two interns. One intern was dedicated to assisting in Archives and Special Collections and one was an archaeological intern supporting Section 110 and Section 106 efforts at the INL Site.

- Alana Haack was retained as an intern and continues to work with INL Archivist, Austin Schulz, with improving the INL Site Archives and Special Collections program by assisting with attaining records that fit into the scope of the INL Site Archives and furthering the collection of Laboratory's living history program.
- During the summer of 2023, the INL CRMO hosted an undergraduate intern from Idaho State University (ISU). Ms. Kailey Pease participated in numerous surveys for both Section 106 and Section 110 projects. In addition, Ms. Pease conducted background research and full recordation of five Civilian Conservation Corps (CCC) snow fences on the INL Site. These data contributed to a project in which Ms. Pease developed a poster for the INL Site summer intern poster presentation. The background research, site forms, and additional data gathered by Ms. Pease contributes to the development of the currently ongoing Pre-WWII historic context on the INL Site.

1.3.2 Shoshone-Bannock Tribes

For more than two decades, DOE-ID and the INL CRMO have participated in an important partnership with the Shoshone-Bannock Tribes with commitment detailed in the Agreement-in-Principle (AIP). This partnership enables tribal and INL CRMO staff to jointly conduct many general and project-specific activities including archaeological surveys and site evaluations, identification of and protective strategies for tribally sensitive resources, recommendations for cultural resource protection and/or mitigation, educational outreach and tours, tribal access to and use of significant areas and resources on the INL Site, and general planning and feedback on INL Site activities. The AIP was revised and reissued in late September 2022.

Regular, face-to-face meetings of the INL Cultural Resources Working Group (CRWG), with representatives from DOE-ID, the INL CRMO, the Shoshone-Bannock Tribes, and INL Site Project Managers facilitate this important partnership and foster an atmosphere of mutual respect that is conducive to open communication and effective consideration of tribal views in decisions regarding INL Site cultural resources and overall land management.

In FY2023, nine meetings of the CRWG were held. These meetings occurred approximately once a month and were held at several locations depending on the topics, including but not limited to Fort Hall, DOE-ID offices, and INL CRMO offices. Regular attendance at these meetings includes the Shoshone-Bannock Heritage Tribal Office (HeTO) staff, DOE-ID staff, INL CRMO staff, and depending on the topics, NRF, Bureau of Land Management (BLM), or Idaho Museum of Natural History (IMNH) staff are also involved.

In FY2023, HeTO staff contributed to 937.18 acres of Section 106 surveys over 16 days, during 10 of which more than two HeTO staff members were present. During these surveys, 23 resources were identified and recorded. They also participated in the survey of 444 acres to meet Section 110 requirements and assisted in the recording of 28 sites and 12 isolates, over the course of 11 days. In June of 2023, HeTO staff accompanied INL CRMO staff to revisit two sites within the Precontact Context study area and provided essential information regarding what kinds of activities likely occurred at these locations. Flake City (10PR880) and Holiday Inn (10PR841), located in the Upper Snake Field Office, were chosen based on the presence of rock writing and density of surface artifacts. Both sites were re-recorded over the course of two days.

In total, the HeTO staff contributed to a minimum of 46 person days during FY2023.

1.3.2.1 Shoshone-Bannock Tribal Tours and Events

Earth Day Celebration: On April 19, 2023, INL CRMO staff participated in an Earth Day celebration for students from the Shoshone-Bannock Junior-Senior High School. The event was organized by the INL K-12 STEM Education Program and the HeTO with logistical support from the INL CRMO and INL Facilities and Site Services (F&SS). Activities included a morning visit to the Pioneer and the *Pewaishe Suakiga* sites for tribal students, followed by a ceremony for tribal members and DOE-ID and INL staff at Central Facilities Area (CFA). Over fifty students were able to visit the *Pewaishe Suakiga* site, where Shoshone-Bannock Tribal Elder, Ladd Edmo, offered a prayer and Leela Abrahamson (Shoshone-Bannock Air Quality), Co-Lead for the Tribal Long-Term Stewardship Program provided a speech on how the lands and ecology of the INL Site were important to the Shoshone-Bannock Tribes. After the site visits, the group gathered at the INL Site Fire Station and performed dances and invited DOE-ID and INL staff to join in the Friendship or Round dance.

1.3.2.2 Fort Hall Business Council Meetings Specific to Cultural Resources

On November 7, 2022, DOE-ID presented to the Fort Hall Business Council (FHBC) on the 2023 Programmatic Agreement and updates on the Middle Butte MOA for access to cultural resource sites on the INL Site.

On June 29, 2023, INL CRMO and DOE-ID representatives presented major program accomplishments and activities in 2023 which included: Section 110 survey results, annual monitoring, and Shoshone-Bannock Tribal involvement in the INL Site Cultural Resource Management Program.

On August 14, 2023, INL CRMO and DOE-ID representatives presented the status of the Precontact Context and updates of the collaborative work accomplished since the introductory presentation to the FHBC in 2022. BLM partners were in attendance. Furthermore, ethnohistorians from the American West Center were present to discuss their upcoming ethnohistory project with the Tribes.

1.3.2.3 Shoshone-Bannock Tribes Ethnohistorical Study

In FY2023, DOE-ID awarded a cooperative agreement to the University of Utah American West Center to perform and document an ethnohistorical study of the Shoshone-Bannock Tribes' relationships to DOE lands in southeast Idaho. The study was requested by Larae Bill of the Shoshone-Bannock HeTO because the INL Site is within Shoshone and Bannock ancestral territory and holds unique resources and history significant to the Tribes. Data will be collected through archival reviews and literature searches of existing Tribal and non-Tribal research, and oral history interviews with Tribal members. Principal

Investigators (PI) with the American West Center will work side-by-side with the Tribes' Language and Culture Preservation Department and HeTO to perform the study. The study is sponsored by three DOE Offices: Environmental Management's Idaho Cleanup Project, Naval Reactors' Idaho Branch Office, and Nuclear Energy's Idaho Operations Office. Work on the study will continue and is expected to be completed in FY2024.

1.3.3 Procedure Issuance and Revisions

In FY2023, seven internal INL CRMO MCPs were updated and re-issued that pertain to the comprehensive INL Historic Preservation Program, including Section 106 and Section 110 responsibilities (Table 1). In addition to the seven MCPs, 13 associated forms (FRMs) were issued or revised in conjunction with procedural updates.

MCP-8008 - *Section 106 Compliance* and associated FRMs documenting the Section 106 process were revised for consistency with the fully executable 2023 PA. These revisions focused on Stipulation IV. Approach to Section 106 Compliance and Appendices C and D of the 2023 Programmatic Agreement. Please refer to Section 6.1 for more details about the specifics of the tailored Section 106 approach as outlined in the 2023 PA.

Based on the results of two FY2022 assessments conducted by INL CRMO, revisions of MCP-8011 – *Documentation of a Cultural Resource* and MCP-8012 – *Preparation of the Annual Report, Contract Data Requirements List (CDRL F.46)* were undertaken and completed in July 2023 and August 2023, respectively. Revisions to MCP-8011 included emphasis on tribal participation and collaboration, as well as guidance on development of well-justified significance and integrity evaluations. Toward this end, is also an emphasis on evaluations across similar site types being consistent, to the degree this is possible when resources are similar in terms of cultural material expression, setting, and function. Likewise, revisions to MCP-8011 included enhancing the inventory and assessment practices for built environment resources (buildings, structures, objects) including detailed descriptions and robust evaluations. MCP-8012 was revised to update the format based on the 2023 PA template and better address SHPO comments on previously submitted Annual Reports.

When the Cultural Resource Database (CRDB) went into production in May 2023, Guide (GDE)-895 – *CRDB Field Client Guide* was not up to date with modifications made to the CRDB since issuance of the procedural document in September 2021. INL CRMO Staff created FRM-3313 – Cultural Resource Database Checklist as a stop gap feature to utilize until the CRDB procedure is revised in FY2024.

The INL Archives & Special Collections procedures went through a major revision due to the previous procedures being written without being fully educated in archival practices. The revisions now reflect proper NARA regulations and Certified Archivists creating policies and procedures that allows the INL Archives & Special Collections to function effectively. PLN-5920 *INL Archives and Special Collections Management Plan,* which was issued originally in 2020, went through a comprehensive rewrite and revision process. As a result, additional procedures were created, MCP-4373 *INL CRMO Archives and Special Collections Procedure*, Laboratory Instruction (LI)-1195 – *Historical Document Handling*, Guide (GDE)-55079 *Archives Scanner Use & Drawing Identification Guide* as well as eight forms (FRMs) that were issued concurrently with procedure updates in January 2022. Please refer to Section 7 for more information.

MCP-8009 – *Visual Effects Analyses* was assessed during FY2023 (Section 8.1.1). The assessment recommended revisions to bring this document into compliance with MCP-8008 Revision 1. These revisions are scheduled for FY2024. An assessment for MCP-8016 – *Management and Curation of DOE Administered Archaeological Collections* is scheduled to occur within FY2024 and will likely result in revisions.

Also planned for FY2024, the INL CRMO will proactively revise three procedures related to new information on processes for LI-1017 – *Field and Benchtop Use of the Olympus Vanta X-Ray Fluorescence Spectrometer (XRF)*, to clarify responsibilities in a revision to MCP-8003 – *Native American Grave Protection and Repatriation Act (NAGPRA) Inadvertent Discoveries*, based on the proposed rule change for the NAGPRA, 43 CFR 10; and, *MCP-8005 – Managing Paleontological Resources* to establish a more robust procedure and database for tracking purposes. Furthermore, INL CRMO will issue an Emergency Action Plan for INL CRMO Fieldwork activities and update Section 106 and Section 110 monitoring forms (FRM-2898 and FRM-3001) to align with the CRDB.

Table 1. Procedure Revisions in FY2023 and proposed for FY2024.

Procedure Number*	Title	Associated Procedures and forms
PDD-8000	INL Historic Preservation Program	
MCP-4373	INL CRMO Archives and Special Collections	
MCP-8003	NAGPRA Inadvertent Discoveries	FRM-3010 – INL CRMO Inadvertent Discovery Report
MCP-8004	Archaeological Resources Protection Act	FRM-3011 – ARPA Violation Data Form
MCP-8005	Managing Paleontological Resources Administered by DOE	FRM-3007 – INL Paleontological Locality Form
MCP-8006	Subsurface Investigation Plans and Reports	LI-1011 – INL CRMO Subsurface Investigation (field work) FRM-2896 – INL CRMO Unit Summary Form FRM-2896A – INL CRMO Level Record FRM-2869B – INL CRMO Excavation Unit Profile FRM-2896C – INL CRMO Field Specimen Form for Subsurface Investigations
MCP-8007	Geospatial Data Management	
MCP-8008	Section 106 Compliance	LI-1014 – Architectural Properties Section 106 Reconnaissance Level Survey and Monitoring FRM-2898 – INL CRMO Section 106 Monitoring Form FRM-3004 – INL CRMO NHPA Section 106 Cultural Resource Review (CRR) FRM-3006 – INL Archaeological and Historical Properties Inventory Record – No Historic Properties Affected
MCP-8009	Section 106 Visual Effects Analysis	FRM-3005 – Visual Contrast Rating Worksheet
MCP-8010	Section 110 Compliance	LI-1015 – Archaeological Section 110 Survey Monitoring (Fieldwork) LI-1016 – Architectural Properties Section 110 Monitoring Field Procedure FRM-3001 – INL CRMO Section 110 Monitoring Form
MCP-8011	Documentation of a Cultural Resource	
MCP-8012	CDRL F.46 Annual Report	
MCP-8013	Post-Review Discoveries	
MCP-8015	INL CRMO Subsurface Investigations	
MCP-8014	INL Section 106 Process for Emergency Actions	
MCP-8016	Management and Curation of DOE Administered Archaeological Collections	FRM-3008 – INL CRMO Chain of Custody FRM-3009 – INL CRMO Collection Use Log
MCP-8017	Section 106 Report Preparation	

Procedure Number*	Title	Associated Procedures and forms
MCP-8018	Section 106 Agreements	
MCP-8019	CDRL F.45 Secretary of Interior Report	
MCP-8020	CDRL F.49 Preserve America Report	
LI-1017	Field and Benchtop Use of the Olympus Vanta X-Ray Fluorescent Spectrometer	
LI-1195	Historical Document Handling	
FRM-2897	INL CRMO Photograph Catalog	
FRM-2894	INL CRMO Field Readiness Form	
GDE-893	Historic Context Preparation	
GDE-894	Creating ASI and IHSI Site Maps in ArcGIS Pro	
GDE-895	CRDB Field Client Procedure	FRM-3313 – Cultural Resource Database Checklist
GDE-943	Global Positioning Satellite Guide	
GDE-958	Photograph Labeling	
GDE-55076	Archives Scanner Use & Drawing Identification Guide	
PLN-5920	Idaho National Laboratory Archives and Special Collections Management Plan	Form 412.49 – INL Archives and Special Collections Accession Form Form 412.50 – INL Archives and Special Collections Purchase or Deed of Gift Form 412.51 – INL Archives and Special Collections Record Inventory Form Form 412.67 – INL Archives and Special Collections Oral History Interview Information Form 412.68 – INL Archives and Special Collections Oral History Interview Questions Form 412.69 – INL Archives and Special Collections Oral History Interview Release Form 412.70 – INL Archives and Special Collections Records Use Form Form 412.71 – INL Archives and Special Collections Researcher Registration Form
PLN-6200	Cultural Resources Projects, Reporting, and Recordkeeping	

***PDD – Program Description Document; MCP – Management Control Procedure, LI – Laboratory Instructions, FRM – Forms, GDE – Guides, PLN – Plan.**
Revised, Drafted, Implemented in FY2023
Proposed Revisions for FY2024

1.3.4 Programmatic Agreement

Consultation on a new PA (PA 2023) was initiated in FY2021. DOE-ID, SHPO, ACHP, the Shoshone-Bannock Tribes, Bingham County, Butte County, U.S. Bureau of Land Management, U.S. Department of Energy Headquarters Office, Museum of Idaho, and Preservation Idaho: The Idaho Historic Preservation Council completed consultation on the new PA in late FY2022. The PA was executed pursuant to ACHP review and signature on May 8, 2023. Several successful improvements were made to clearly delineate roles and responsibilities, define the Section 106 process, and commit to Section 110 deliverables. The new PA can be accessed at https://www.id.energy.gov/insideNEID/commitme.htm.

Consistent with Stipulation VII, Consultation Procedures, section VII.C.3, Accelerated Reviews, in the new PA, DOE-ID entered into an MOA with the SHPO on September 19, 2023. The purpose of the MOA is to delineate the technical assistance SHPO will provide to DOE-ID in carrying out its federally-mandated NHPA responsibilities at the INL Site. DOE-ID awarded a grant to SHPO to support the scope delineated in the MOA. The MOA and the grant will be in effect for three years to support the increased workload to complete reviews of documents and data that DOE-ID will submit to SHPO as required by PA Stipulation III, Program Documents and Data.

1.3.5 Training and Development

1.3.5.1 Development

During FY2023, INL CRMO manager and staff, and INL training staff, continued to develop in-depth content for Section 110 and Section 106 courses. This content will be fully developed into virtual and/or in-person training and implemented for current staff and incoming staff in FY2024-FY2025. While the comprehensive course work is being designed, the INL CRMO manager is performing tailgates focused on Section 106 procedures by working through scenario driven exercises for determining undertakings, developing an area of potential effects (APE), assessing visual effects, evaluating eligibility, and determining effects. The INL CRMO manager and staff will continue to perform tailgates and workshops for INL CRMO staff.

1.3.5.2 INL CRMO Training, Refreshers, Tailgate Sessions

- November 8, 2022: INL CRMO Manager and staff provided training on classification of sites to precontact property types to approximately 14 INL CRMO staff.
- January 9, 2023: INL CRMO Manager and staff presented training on how to assess cultural resources for eligibility to the National Register of Historic Places (NRHP) pursuant to Criterion D to approximately 14 INL CRMO staff.
- January 10, 2023: INL CRMO Architectural Historians and one archaeologist attended an ISU workshop, "*Becoming Productive with ArcGIS Pro*," to further develop ArcGIS Pro skills.
- March 6, 2023: INL CRMO Architectural Historian presented Pushing the Limits presentation on the history of microreactors to approximately 14 INL CRMO staff.
- March 2, 2023: INL CRMO staff attended a Society for American Archaeology webinar "*Assessing Significance and Integrity to Establish the National Register Eligibility of Archaeological Sites [Deeper Digs]"*. The webinar focused attention of how to apply the NRHP criteria to archaeological sites and approaches to explaining context, significance, and integrity and why the relationship of the three is important to establishing integrity or justifying lack thereof, as well as relaying how important it is to adhere to the guidance provided in various National Register Bulletins (NRBs) published by the National Park Service (NPS). Approximately 15 INL CRMO staff attended.
- March 9, 2023: three INL CRMO staff participated in webinar hosted by the NPS. The webinar concerned solicitation of comments and questions regarding proposed changes to NRB 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties* to that of *Guidelines for Evaluating and Documenting Traditional Cultural Places*. This webinar presented the nuanced changes that would occur with the re-release of the bulletin, anticipated in late 2023.
- March 21, 2023: INL CRMO Architectural Historian attended Association for Preservation Technology webinar "*More than Mold: The Other Fungi*."
- March 27, 2023: INL CRMO staff attended a refresher training on the development and implementation of the CRDB (see Section 3.2.3). Approximately 17 INL CRMO staff were in attendance.
- March 27, 2023: INL CRMO Architectural Historian presented on Performing Visual Analyses to five INL CRMO staff members.

- April 4, 2023: INL CRMO staff participated in annual practice-based INL refresher training for Annual Fireline Safety. This training relayed safe practices, including communication and mobilization during wildfires. Participants were taught and practiced deployment of individual fire shelter blankets. Participants were also educated on how resource advisors are incorporated into the process and who to contact in environmental (including cultural resources) should they encounter a resource issue during a fire. Five INL CRMO staff attended.
- April 9, 2023: INL CRMO staff gathered to discuss inventory, classification, recordation, and assessment of significance for rock features (e.g., rock piles, rock cairns, and Stoneboys). Approximately eight INL CRMO staff attended.
- April 12 and April 19, 2023: INL CRMO Architectural Historian attended an Association for Preservation Technology webinar "*Concrete Preservation, Repair, and Re-investment*," which presented strategies to identify concrete deterioration, address material failures, and execute preservation positive repairs.
- May 1, 2023: A refresher training was performed by INL CRMO Manager on the execution of the 2023 PA and revisions to MCP-8008. This training served as a collaborative discussion regarding execution of the PA within the INL CRMO program. Approximately 17 INL CRMO staff attended.
- May 4, 11, and 18, 2023: INL CRMO staff participated in the Spring 2023 Section 106 Webinar Series for Beginners as introduction to the regulation for new hires and as refresher for more seasoned staff. This was a three-part webinar hosted by the ACHP: *What is Section 106? Questions and Answers*; *Defining the Area of Potential Effects in Section 106*; and *Planning to Involve the Public in Section 106*. Approximately 14 INL CRMO staff attended.
- May 23, 2023: INL CRMO Architectural Historian attended a National Trust for Historic Preservation webinar, "*Using the CARE Tool to Calculate Carbon Savings from Reuse*."
- May 30, 2023: A field recalibration day was conducted for the INL CRMO staff. During this time, the INL CRMO Manager and staff visited one historic homestead site that warranted a rerecord. INL CRMO utilized MCP-8011 *Documentation of a Cultural Resource* to recalibrate the group to fieldwork. INL CRMO discussed details about the newly released CRDB on new tablets, Global Positioning System (commonly referred to as GPS) recording, and how to record historic homesteads and associated artifacts. Approximately 16 INL CRMO staff attended.
- September 11 and 18, 2023: two INL CRMO staff presented *Stop the Bleed* training to the rest of the INL CRMO staff. This training included classroom and practice-based training regarding stopping bleeding by wrapping and packing of wounds and use of tourniquet when faced within in-field emergencies. Also included was introduction and orientation to new First Aid kits included in every field vehicle. Approximately 17 INL CRMO staff attended one of the offered trainings.

1.3.5.3 INL CRMO Training Presentations

During FY2023 INL CRMO determined a need for a refresher training on cultural resources and the Section 106 review processes due to new INL Site environmental staff. Additionally, discussions of the recent Center for Environmental Management of Military Lands (CEMML) building inventory updates specific to each INL Site facility and organization was prioritized.

- December 6 and 13: INL CRMO Manager presented to all environmental staff and environmental and lab leadership the upcoming Programmatic Agreement.
- January 24, 2023, and March 7, 2023: INL CRMO Architectural Historians presented "*Section 106 Overview*" to Advanced Test Reactor (ATR) Complex environmental and facility staff to introduce them to the Section 106 process and the changes that would be coming with the PA.
- March 16, 2023: INL CRMO staff presented "*Section 106 Overview*" to IEC environmental staff to introduce them to the Section 106 process and the forthcoming PA.

- June 26, 2023: INL CRMO Architectural Historians presented the eligibility recommendations from the first three volumes of the Built Environment Inventory Update, including MFC, ATR Complex, CFA, Critical Infrastructure Test Range Complex (CITRC), Idaho Nuclear Technology and Engineering Center (INTEC), and Experimental Breeder Reactor (EBR)-I, to INL Campus Development and discussed how the PA could offer streamlining capabilities to future INL development plans.
- July 11, 2023: INL CRMO Manager and Technical Lead attended a meeting with environmental staff regarding Engineering Changes and Cultural Resource Review. The purpose of this discussion was to raise awareness within the MFC environmental staff regarding the types of materials required for INL CRMO to conduct efficient Section 106 reviews. Topics covered included need for adequate scopes of work, construction drawings, photographs, and simulations (when available), as well as timely response to communication and outreach. This was a successful engagement as environmental staff are working together to support project needs, while remaining within regulatory space of Section 106 and the National Environmental Policy Act (NEPA).

2. Section 110 Accomplishments

INL CRMO Section 110 activities are detailed below within the discussions for historic contexts, cultural resource monitoring, active research, public outreach and education, partnerships, and stabilization of cultural resources.

2.1 INL Site Historic Contexts

2.1.1 Shoshone and Bannock Precontact Context (PCC)

In adherence with commitments outlined in the 2023 PA, as well as the *Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation* (Federal Register, Vol. 48, No. 190, 1983), the INL CRMO in partnership with the Shoshone-Bannock Tribes is currently developing a context to address the Precontact period. The Shoshone and Bannock PCC will span the vast time frame between 13,000 and 200 years ago, when the ancestral Shoshone and Bannock people first encountered Euroamerican explorers and fur traders in their territory. A proposal outlining the PCC themes, research and draft property types was submitted to SHPO for review on January 24, 2023. DOE-ID and INL CRMO provided a PCC progress briefing to the Language and Cultural Committee on March 14, 2023. In addition, a meeting with the BLM was hosted by DOE-ID on April 21, 2023. DOE-ID hosted a PCC briefing and discussion with INL CRMO and SHPO staff on May 12, 2023. In June 2023, HeTO staff Anna Bowers and Kyle Denny accompanied INL CRMO and BLM staff to revisit two sites within the Precontact Context study area located in the Upper Snake Field Office. The sites were chosen based on the presence of rock writing and density of surface artifacts (See Section 1.3.2).

The Shoshone and Bannock PCC represents an organizational framework for the identification of Precontact archaeological resources within the 8-million-acre study area, with the understanding that the Eastern Snake River Plain (ESRP) and surrounding regions were included in the ancestral seasonal round of the Northern Shoshone and Bannock people spanning millennia. Although there is the possibility that other tribes visited the ESRP, the site types identified in this document were developed in collaboration with the Shoshone-Bannock Tribes and directly reflect ancestral Northern Shoshone and Bannock land use patterns, as evidenced by oral histories, oral traditions, historic documents, and ethnographic information.

The final document will serve as a framework for: 1) the identification and characterization of Shoshone and Bannock Precontact archaeological resources/properties within the study area; 2)

guidelines regarding the criteria used to evaluate their NRHP significance; and 3) comprehensive preservation planning at the INL Site.

The "*Assessing*, *Synthesizing* and *Identification*" phase of the PCC is nearly complete. Roughly 4,000 archaeological localities in the study area have been characterized based on the Shoshone and Bannock seasonal round. Roughly 2,000 diagnostic volcanic glass projectile points housed in the IMNH have been analyzed via XRF and assigned a source attribution and twenty-five bone samples were submitted to an Accelerator Mass Spectrometry (AMS) laboratory to refine the regional cultural chronology. Phase II (Characterization) will begin in early FY2024 and include a comprehensive analysis of geospatial data to address research questions and predictions outlined in the PCC proposal. Although the INL CRMO staff is already utilizing relevant themes and research questions to evaluate NRHP eligibility under Criterion D, formal eligibility, and integrity guidelines (Phase III) will be developed in early spring of 2024.

2.1.2 Pre-WWII Historic Contexts at INL

As part of DOE-ID's commitments to strengthen the INL Site Historic Preservation Program in the 2023 PA, the INL CRMO and DOE-ID initiated efforts to create the pre-WWII historic context in FY2023. A proposal was completed and submitted by DOE-ID to SHPO on April 30, 2023. A virtual brief to SHPO was completed on May 12, 2023. To represent the breadth and depth of historic activities at the INL Site during the 1852-1942 period, two context statements were outlined: *Historic Networks: Migration, Transportation, and Trade across the Eastern Snake River Plain, 1852-1942* and *Home on the Plain: Homesteading and Agricultural Settlement on the Eastern Snake River Plain, 1855-1942*. Definition of the context statements and associated time periods included establishing a six-million-acre study area, including the INL Site. Since submission of the proposal, work towards the completion of the context statements includes a record review of the current inventory of archaeological resources at the INL Site for the context time periods, re-recording of six historic archaeological sites, and research supporting the historic narratives of the context statements.

Review of the current inventory of historic resources at the INL Site allowed for the summation of site types applied in recording historic archaeological resources to-date, as well as identifying possible type sites to re-record. The record review found 245 archaeological sites previously recorded at the INL Site in the context time periods, not including linear resources. Based on previously assigned site types and descriptions for these resources, 33 site types were identified from the current inventory of historic archaeological resources, with one additional category for those resources where no type was given (n=1).

The six historic archaeological sites re-recorded as part of the pre-WWII historic context in FY2023 include three homesteads, a canal construction camp, a ranching site, and a CCC snow fence (Figure 2). Multiple homesteads were recorded to represent the different legal instruments driving settlement at the site, namely two Carey Act irrigation projects on the INL Site – the Big Lost River Irrigation Project and the Second Owsley Project. Also, resources relevant to the Homestead Act, representing settlement associated with natural water courses and dryland farming are also present in the study area The re-recorded resources establish the locations, artifact assemblages, and features for site types reflective of those defined as part of the context statements. The six historic sites were chosen with the intent to help define the characteristics in classifying the property types and to create guidelines to help evaluate their integrity and significance to the NRHP. The site forms will be included with the historic context, when complete.

Figure 2. Cerro Grande CCC snow fence at INL Site.

The initial research for historic narratives has focused on the acquisition of primary sources from libraries, archives, and special collections relevant to the study area and period of interest. So far, collections held by the following repositories have been reviewed:

- Idaho State University Archives and Special Collections, Pocatello, Idaho
- Bingham County Historical Society, Blackfoot, Idaho
- Brigham Young University – Idaho, Archives and Special Collections, Rexburg, Idaho
- Boise State University Archives and Special Collections, Boise, Idaho
- Idaho State Historical Society Archives, Boise, Idaho

In addition, research continues to utilize and request items from digital and physical collections, including historic photographs, land entry records, and company minutes (Utah Construction Company), from the following institutions:

- The Library of Congress
- NARA
- Weber State University
- University of Idaho
- University of Utah.

As work on the historic contexts for the Pre-WWII period continues in FY2024, research will inform historic narratives and ensuing site records for the re-recorded resources. Together, narratives and field data will be utilized in refining site types and their archaeological correlates with the goal of providing a framework for application in evaluation of eligibility and integrity of the relevant resources under the NHPA.

2.2 Active Research

There are currently five active multi-year Section 110 research proposals including: *Pluvial Lake Terreton: Building a Multidisciplinary Dataset to Understand Human Land Use During the Terminal Pleistocene* (INL/EXT-17-41959), *Decoding the Southern Idaho Cultural Landscape Through Volcanic Glass Source Analysis* (INL/MIS-17-41305), *Examining the Chronology, Distribution and Source Attributions of Volcanic Glass Haskett Point in the Pioneer Basin of Idaho* (INL/PRO-23-71899), *Mobility on the Eastern Snake River Plain During the Early Holocene/Middle Holocene Transition: Obsidian Conveyance and Spatial Analysis of Early Holocene and Northern Side-notched Projectile Points* and *Pewaishe suakiga/Pekwanishu songaha - It Still Breathes, 10BT1449* (INL/RPT-22-65966). All these proposals will contribute to with the Precontact Context efforts.

2.2.1 Pluvial Lake Terreton: Building a Multidisciplinary Dataset to Understand Human Land Use During the Terminal Pleistocene

To better understand the land use practices of the ancestral Shoshone and Bannock people during the Late Pleistocene, the INL CRMO continues to investigate Lake Terreton and the Big Lost River Trough. Analyses are on-going and will be integrated with the PCC. The existing collections for Owl Cave (10BV30), now curated at the Museum of Idaho (MOI), are also being utilized to address research questions related to the PCC. In FY2023, a total of 15 bone samples from Owl Cave were dated using AMS by the University of Georgia Center for Applied Isotope Studies. These data will be used to refine the regional projectile point chronology, as well as advance our understanding of bison procurement on the ESRP during the past 13,000 years.

2.2.2 Decoding the Southern Idaho Cultural Landscape Through Volcanic Glass Source Analysis

To fully characterize the geographic distribution of Southern Idaho obsidian source groups, the INL CRMO has compiled a comprehensive Idaho Obsidian Reference Collection. The current dataset contains over 2,000 samples of geologic obsidian from 155 locations that correspond to 30 geochemically distinct source groups, a few of which have not been previously defined or recognized by archaeologists and produce a technical report categorizing this collection. In FY2024, DOE will submit the technical report to cooperating agencies in an MOU, including the Idaho Falls District Bureau of Land Management (BLM) and the Caribou-Targhee National Forest. The technical report will also be submitted to SHPO and the Shoshone-Bannock Tribes.

2.2.3 Pewaishe suakiga/Pekwanishu songaha – It Still Breathes, 10BT1449

Site 10BT1449, located near the Radioactive Waste Management Complex (RWMC), was originally recorded in 1989 by ISU. During a 1993 monitoring visit, the INL CRMO staff encountered Folsom points and possible channel flakes on the ground surface, in addition to the extensive flake scatter documented during the original recording. In early May of 1993, over 2,000 waste flakes, 11 bifaces, 20 channel flakes and four Folsom points were collected during these efforts. The site was given Shoshone and Bannock names and fully re-recorded in 2022. The site represents a Folsom surface campsite with a complement of tools and debitage, allowing for a rare comparison with widely recognized Folsom technological patterning (see INL/PRO-22-65966). Dr. Daron Duke is collaborating with Dr. Suzann

Henrikson (INL CRMO) to characterize the Folsom assemblage recovered from *Pewaishe Suakiga* (10BT1449). This research was approved by DOE-ID and HeTO in February 2022. A detailed analysis is currently underway and should be completed in December 2023. Dr. Duke has confirmed that 10BT1449 represents the only known Folsom manufacturing site in the Desert West. A co-authored manuscript for peer-review will be completed in early 2024.

2.2.4 Examining the Chronology, Distribution and Source Attributions of Volcanic Glass Haskett Points in the Pioneer Basin of Idaho

Richard Rosencrance (University of Nevado, Reno) includes Haskett projectile points from the INL Site in a geospatial analysis of Haskett projectile points across the Far West (see INL/PRO-23-71899). DOE-ID and HeTO staff approved this research on July 13, 2023. This project represents a collaboration with Joshua Clements and Taylor Haskett (INL CRMO) to examine whether the distribution of this point type reflects a form of land use and mobility distinct from foragers utilizing fluted technology during the same period. Mr. Rosencrance will present the preliminary results of the research at the 38th Great Basin Anthropological Conference (GBAC) in Bend, Oregon (October 2023). The results of the research will be included in a co-authored manuscript for peer-review and incorporated with Mr. Rosencrance's dissertation research.

2.2.5 Mobility on the Eastern Snake River Plain During the Early Holocene/Middle Holocene Transition: Obsidian Conveyance and Spatial Analysis of Early Holocene and Northern Side-notched Projectile Points

Jennifer Finn (Utah State University) is performing a geospatial analysis to examine whether Precontact mobility patterns on the ESRP were influenced by climatic events during the Early Holocene/Middle Holocene (EH/MH) transition. This project is being completed as a graduate thesis. Ms. Finn is utilizing proxy archaeological data from an eight-million-acre study area to test Long's (2007) hypothesis that the ancestral Shoshone and Bannock people remained in highly productive resource patches (such as Lake Terreton and river corridors) during the Terminal Pleistocene (TP) and EH. However, Long (2007) argues that, with the disappearance of Lake Terreton roughly 8,000 years ago, foraging return rates within this patch diminished, prompting the utilization of small, productive resource patches spread across the open ESRP landscape. This hypothesis will be tested against the distribution of projectile points spanning the TP/EH, along with associated volcanic glass source attribution data. DOE-ID and the HeTO staff approved this research on July 13, 2023, and Ms. Finn received geospatial INL Site data the following month. Preliminary results of this research will be presented at the 38th GBAC in Bend, Oregon. Ms. Finn hopes to complete her thesis in spring 2024. The results of her research will be integrated with the Shoshone and Bannock PCC.

2.3 Public Outreach and Education

2.3.1 Public Outreach and Education

Public outreach and education are fundamental components to the INL Cultural Resource Management Program. The INL CRMO staff are constantly mindful of the local community, public, INL employees, and key stakeholders such as the SHPO and the Shoshone-Bannock Tribes. Public outreach and education with these groups and stakeholders are facilitated through presentations, newspaper articles and interviews, periodic tours, regular face-to-face meetings, and various INL Site-specific media outlets such as the INL Site Public Outreach Program, external web page (www.inl.gov) and internal intranet, employee training, and iNotes, an email-based internal communication tool.

Educational exhibits at the EBR-I Visitor's Center, a National Historic Landmark (NHL), and the Big Lost River Rest Area on U.S. Highway 20/26 within the boundaries of the INL Site are important tools for public outreach. Face-to-face employee and public tours at these facilities were conducted in FY2023,

with a total of 12,653 visitors. In addition to in person tours, visitors could download a free app that provided a virtual tour of the EBR-I museum.

The following activities were the highlights of the FY2023 public outreach and education opportunities:

- October 1, 2022: INL CRMO members Suzann Henrikson, Reese Cook, Joshua Clements, and Marie Holmer gave a field tour to members of the Oregon California Trails Association (OCTA) in coordination with Shelly Norman, Tours Team Lead for Communications and Outreach at INL. Sixteen OCTA members, including OCTA President, John Briggs, and Idaho Chapter President, Jerry Eichorst, were in attendance. The tour of the Jeffrey-Goodale Cutoff of the Oregon Trail began at the southern INL Site boundary, where extant trail trace crosses present-day T-1 on the route from Big Southern Butte to the Big Lost River. Unfortunately, weather, and associated road conditions did not permit the tour to continue to view the trail along T-1 and instead included a visit to the Big Lost River, a potential campsite location on the cutoff, and the trail trace in the vicinity.
- October 3, 2022: INL CRMO Archaeological field technician, Josh Clements, provided a brief bus tour to a visiting delegation from Alaksa (20 attendees). The topics covered were the precontact period on the INL, Jeffery Goodale's Cutoff, and initial homesteading attempts.
- November 3, 2022: INL CRMO visited the Madison Middle School in Rexburg. Christa White discussed the historic Zero Power Physics/Plutonium Reactor (ZPPR) sign. She also presented a stereoscope and photos of the top of the ATR reactor core. The stereoscope was passed around to each student so that they could experience 3D visualization of the reactor core. Austin Schulz spoke about issues archivists encounter when preserving historic items. One of the issues discussed was "vinegar syndrome", or acetate film base degradation whereby the film deteriorates. Such degradation may cause blemishes, crystallization and bubbling of the film, as well as a vinegar odor. Additionally, Austin spoke about the challenge coins related to the Mars Rover and the Loss-of-Fluid Test (LOFT) facility. Also presented was the original ETR reactor audio recording, discussion regarding cask transport via semi-truck, and textile care (e.g. an Engineering jean jacket archived at INL). Joshua Clements spoke about XRF analysis, obsidian sources, and precontact artifacts. There were approximately 30 attendees.
- January 18, and March 1, 6 and 21, 2023: INL CRMO Architectural Historian, Jon Grams presented *Pushing the Limits*. This was a PowerPoint presentation on legacy gas-cooled advanced reactor designs. The presentation was tailored for each organization according to their focus areas January 18, 2023, for the C120 division of Nuclear Science & Technology (15 attendees); March 1, 2023, for BWX Technologies, Inc. (25 attendees); March 6, 2023 , for INL CRMO (15 attendees); March 21, 2023, for the Nuclear Regulatory Commission, or NRC (75 attendees).
- February 8, 2023: Following the success of the virtual tours of the EBR-I museum, the INL CRMO developed a virtual archaeology tour and conducted (in coordination with DOE-ID and HeTO staff) two tours for approximately 100 INL employees and members of the public. These tours included a detailed history of the precontact period on the ESRP and was co-presented by INL CRMO and HeTO staff members with Tribal perspectives interwoven with the archaeological information. The virtual tours were held on February 8 and May 10, 2023. Due to the overwhelming response to these opportunities, INL CRMO staff continued working on creating additional topical virtual tours. A virtual tour was developed in FY2023 that covers Pre-WWII era history including fur traders, emigrant trails, and homesteads.
- March 16, and August 4 and 5, 2023: Suzann Henrikson gave a presentation entitled, "*Secrets of the Owl Cave Bone Bed: Revealing an Ancient Bison Drive in Southern Idaho*" to the MOI Museum Club on March 16, and hosted an Owl Cave Tour on August 4 and 5.
- April 3, 2023: Archaeologist Reese Cook, Archivist Austin Schulz, Archives Intern Alana Haack, and Architectural Historian Libby Cook participated in the District 91 Career Fair. Students from

five local high schools (Compass, Career Technical Education Center, Skyline, Emerson, and Idaho Falls) attended and INL CRMO staff discussed career opportunities in their respective fields and at the INL.

- April 22, 2023: INL CRMO participated in the Earth Day Ceremony (see Section 1.3.2.1).
- April 19, 2023: Night at the Museum – Austin Schulz and Alana Haack hosted grade school students (3rd-6th) to STEAM (science, technology, engineering, arts, and mathematics) activities. Archives Staff created an activity packet to explain what Archives do, how to utilize an archive, and an activity at the end where the kids got to repair their own archival record.
- May 3-5, 2023: Archivists Austin Schulz, Alana Haack, and Christa White attend the Northwest Archives Conference in Salem, Oregon. Alana and Christa were on the planning committee for the event, and Austin presented on addressing legacy metadata Issues to increase accessibility and rediscovering collections. The conference reached approximately 120 people.
- May 5, 2023: Marie Holmer presented on the Jeffrey-Goodale Cutoff of the Oregon Trail as the guest speaker at the 46th Actinide Separations Conference banquet, hosted by INL. The banquet, held at the Downtown Event Center in Idaho Falls, was attended by 160 conference participants. The presentation focused on the two men credited with the two openings of the cutoff and the experience of travelling the trail as they traversed what would become the INL Site.
- June 6, 2023: Archaeologist Nicholas Holmer and Architectural Historian Libby Cook hosted a tour for DOE-ID Facility Representatives, including stops at the CFA Concussion Wall, EBR-I, and the Heat Transfer Reactor Experiment Engines, Powell Stage Station, Goodale's Cutoff, and the B-24 Bomber Crash Site.
- July 5 and August 2, 2023: Architectural Historian Libby Cook participated in an informal "*Ask an Architectural Historian*" program at EBR-I. Guests were informed by tour guides that they were free to ask any questions as they saw her working throughout the building. Approximately a dozen guests took the opportunity to do so each day. The program was repeated without advertising on August 16 and August 31, as additional time permitted.
- July 18-21, 2023: Austin Schulz and Alana Haack attended the National Association of Government Archives and Record Administration (NAGARA) Conference in Cincinnati, Ohio. Austin presented on two topics: recording archival records on obsolete media formats and mentorship in Archives and Records Management. Alana presented inclusivity in descriptions, metadata, and captions. The conference had approximately 400 people in attendance. As a result of the successful presentations, Archives staff have been asked to present to other audiences throughout the year utilizing the same presentations.
- July 25, 2023: Archaeologist Nicholas Holmer, Architectural Historian Jon Grams, and INL CRMO intern Kailey Pease, hosted a tour for INL Site summer interns. The tour visited the CFA Concussion Wall, CCC Snow Fence Big Lost River headgates, and Jeffrey-Goodale Cutoff.
- August 17, 2023: Archaeologists Joshua Clements and Marie Holmer presented an hour-long talk accompanied by PowerPoint to MOI Museum Club members. In attendance were 16 individuals in addition to a live broadcast over Zoom. The topic was the early historic period on the INL Site between 1805 and 1905, covering topics from early exploration and fur trapping in eastern Idaho to stage roads, railroads, and homesteading at the future INL Site. A recording of the presentation is available online for museum members to view at any time.
- September 21, 2023: Marie Holmer presented on the Jeffrey-Goodale Cutoff of the Oregon Trail to members of the MOI Museum Club. The hour-long presentation was attended by 31 patrons, six of whom viewed the live broadcast on Zoom. Topics included the two openings of the trail by John T. Jeffrey and Tim Goodale, as well as the experience of the emigrants on the cutoff, as illustrated by newspaper and journal accounts. A recording of the presentation is available online for museum members to view at any time.

2.4 Partnerships

Partnerships have long been an important component of cultural resource management (CRM) at the INL Site. In FY2023, the INL CRMO program continued to participate in long term relationships with the Shoshone-Bannock Tribes, federal agencies, and other entities involved in work activities on or near the INL Site including the BLM and MOI. The INL CRMO continues its partnership with other Battelle-managed National Labs by hosting monthly Community of Practice meetings for Cultural Resource Managers and staff.

Portions of undeveloped range lands within the boundaries of the INL Site are under joint administration by DOE-ID and the Idaho Falls District of the BLM. In addition, the Idaho Transportation Department, Idaho Power, and Rocky Mountain Power maintain rights-of-way along public roads and power line utilities that pass through the INL Site. INL CRMO staff have established productive working relationships with cultural resource managers and other personnel in these organizations and routinely share information for cultural resource identification, assessment, and protection.

Specific partnership accomplishments during FY2023 are highlighted below. The long-term relationship and partnership with Shoshone-Bannock Tribes is discussed in Section 1.3.2.

2.4.1.1 Museum of Idaho

Museum of Idaho - Way Out West Exhibit

INL CRMO and DOE-ID support of the MOI Way-Out West exhibit continued in FY2023 with a display of archaeological and historic artifacts. The MOI receives approximately 90,000 visitors each year.

Museum of Idaho - Wasden Public Tour

The MOI, in collaboration with INL CRMO staff, hosted a public outreach event at the Wasden Site (Owl Cave), located west of Idaho Falls on August 4 and 5, 2023. The site is currently owned and managed by The Archaeological Conservancy. The event included presentations by Suzann Henrikson (INL CRMO) and Kristina Fransden (MOI), a viewing of Wasden artifacts currently housed at MOI, and a field visit to the site. The event was attended by thirty members of the public with an interest in local archaeology.

2.4.2 DOE – Bureau of Land Management (BLM) Memorandum of Understanding

Efforts to renew an existing 2016 Memorandum of Understanding (MOU) between DOE and BLM Upper Snake Field Office began in 2021 and continued in 2023. The existing MOU discusses a cooperative management approach to certain lands within the INL Site, including but not limited to grazing and range improvements, predator control, noxious weeds and insect infestations, rights-of-way (ROW), mineral and material exploration and disposal, and fire suppression management. A meeting was held on August 17, 2021, to discuss adequacy of the MOU, and areas to cover or expand upon, including cultural resource management.

The renewed MOU will include a cultural resources management section, where BLM and DOE define the cooperative process to determine the Lead Federal Agency for Section 106 undertakings; denotes the frequency and topics of reoccurring meetings; encourages joint Section 110 projects; issues a standardized data-sharing agreement; and the ability for assistance in NAGPRA, Archaeological Resources Protection Act (ARPA), paleontological resources, and wildland fire resource advising expertise held with either DOE-ID and INL CRMO or BLM. The updated MOU is anticipated to be signed in FY2024.

Joint efforts with BLM in FY2023 included the following:

- To support the PCC efforts, BLM attended meetings with DOE, INL CRMO, and HeTO staff on the selecting of sites to revisit. BLM was an active participant during fieldwork and rerecording sites within the study area. BLM requested use of collections at IMNH to select projectile points for XRF analysis.

2.4.3 Battelle Energy Alliance Cultural Resource Community of Practice

The INL CRMO continued to host monthly meetings of the BEA Cultural Resources Community of Practice (COP). Participating laboratories include Idaho National Laboratory, Los Alamos National Laboratory, Pacific Northwest National Laboratory, National Renewal Energy Laboratory, Oakridge National Laboratory, Brookhaven National Laboratory, and Sandia National Laboratory. The mission statement is as follows:

> *The Battelle Cultural Resources Community of Practice will share knowledge, resources, expertise, success stories and lessons learned. Agenda items will focus on ways to creatively address common issues or complexities within cultural resource management at highly technical facilities and working with Federal Agencies, Native American Tribes, and State Historic Preservation Offices.*

In FY2023, a total of four successful discussions and workshops on a variety of issues have proved fruitful for participants. Topics have included PAs, NRHP Historic Districts, creative mitigation strategies, sharing process and procedures, and discussing strategies for MOAs. Together, as a COP, we share ideas, guidance, and lessons learned to inform and establish streamlined, compliant, and efficient ways to fulfill cultural resource management (CRM) responsibilities at national laboratories.

2.4.4 Department of Energy Complex-wide Cultural Resource Management Initiatives

The Department of Energy Headquarters' (DOE-HQ) Office of Environment, Health, Safety, and Security (EHSS) is responsible for policy development and technical assistance and advises DOE Senior Leadership on all matters related to environment, health, safety, and security across the DOE complex. DOE's Federal Preservation Officer and cultural resource management responsibilities reside within the EHSS. EHSS provides assistance to the field to implement DOE directives, to resolve issues, and to provide feedback to enhance performance throughout DOE. The overarching DOE policy governing cultural resource management, DOE Policy 141.1, Department of Energy Management of Cultural Resources, identifies how DOE addresses cultural resources and requires DOE offices and managers to comply with all cultural resource laws, regulations, and executive orders. It details DOE's commitment to be a good steward of these resources on behalf of the public through consultation with Native American tribes, State Historic Preservation Offices, and the general public.

DOE-ID personnel participated in the following initiatives led by the EHSS in FY2023:

- Betsy Holmes, DOE-ID Cultural Resource Coordinator, presented INL Site Section 110 accomplishments at the EHSS Complex-wide Cultural Resource Management quarterly webinar on January 18, 2023. The presentation summarized proactive Section 110 archaeological inventories performed by INL CRMO and Shoshone-Bannock Heritage Tribal Office personnel of the Big Lost River Spreading Areas; Section 110 annual monitoring of seven sites by INL CRMO and the Tribes; the built environment inventory update performed by the Center for Environmental Management of Military Lands; and education, public, and Tribal outreach activities.

- Nicole Hernandez, DOE-ID Environment and Sustainability Director, and Betsy Holmes, DOE-ID Cultural Resource Coordinator, participated in the Historic Preservation Review Team led by the DOE Federal Preservation Officer to perform an extensive review of historic programs at DOE, including cultural resource management, historic preservation, and history program activities. Through reviews of current practices at DOE sites, interagency benchmarking, and reviews of regulatory requirements and best practices, the Team is developing recommendations for program improvements. The Team will complete its work in FY2024 and the DOE Federal Preservation Officer will share the recommendations with DOE Senior Leadership.

2.5 Section 110 Archaeological Inventory

To satisfy annual Section 110 Survey requirements, the INL CRMO conducted a Class III archaeological inventory of 444 acres near Lincoln Boulevard northeast of NRF in June of 2023. These surveys were planned and conducted in coordination with the Shoshone-Bannock HeTO. The survey location was selected by HeTO staff to explore the area specifically surrounding 10BT0121, a culturally sensitive and significant site. The survey was designed to relocate and rerecord sites along with examining the surrounding area for additional sites. Ten sites, including 10BT0121, had been previously recorded in the 1970s but the nearby area had not been subject to previous archaeological inventory.

2.5.1 Lake Terreton Embayments Section 110 Inventory

Work for *The Lake Terreton Embayments Section 110 Inventory* was initiated as a proactive Section 110 inventory in FY2023. The Embayments are located on the southern fringe of Lake Terreton located in Butte County, Idaho. Lake Terreton was a large body of water fed by glacial runoff at the end of the TP, around 15,000 years ago. Seasonal settlement in the area spans the last 13,000 years and a few tools belonging to the Haskett tradition (12,500 - 10,900 Before Present (BP)) have been recovered in this area. The ancestral bands of Shoshone and Bannock people who now comprise the Shoshone-Bannock Tribes used the area as hunting grounds, and it was part of their seasonal round. Several rock cairns of varying size are situated along prominent basalt ridges that provide a generalized Lake Terreton high-stand boundary, and their function is currently being investigated.

The Section 110 survey identified 12 isolates and 28 sites. An additional 2,000 acres are being proposed for investigation over the next four years. These next survey phases are currently being identified by the INL CRMO staff in coordination with the Shoshone-Bannock Tribes HeTO. A Section 110 cultural resources report and associated site and isolate forms will not be submitted until the completion of the project.

All the sites are unevaluated for the NRHP given the ongoing nature of the study and to prevent resource evaluation in a vacuum. Thus, they are statused as Insufficient Information to Evaluate for the National Register. This is a temporary designation while additional information is acquired in collaboration with the HeTO. Such information will aid is assessing the sites for eligibility under Criteria A, B, or C, in addition to Criterion D. Critical to this approach are the future Section 110 surveys areas as they will aid in addressing whether additional sites are located further along the Embayments and ridge system. This research will utilize the Shoshone and Bannock PCC as a framework to help identify and characterize archaeological resources within the study area and as guidelines regarding the criteria used to evaluate their NRHP eligibility.

2.6 Annual Monitoring and Site Revisits/Updates

The purpose of the comprehensive INL Site cultural resource monitoring program is to identify, track, and reduce impacts to known resources throughout the INL Site. The INL CRMO conducts monitoring activities for DOE-ID to determine the effectiveness of DOE-ID and contractor policies and to safeguard cultural resources from destruction and deterioration caused by natural or human processes. Each year, the INL CRMO selects a few locations for monitoring based on such factors as DOE-ID and Tribal input, stakeholder feedback, NRHP status/eligibility, ease of public access, history of adverse effects, and proposed INL Site project activities. Certain localities are routinely monitored as part of the AIP between the Shoshone-Bannock Tribes and DOE-ID (DOE-ID 2022).

During monitoring of project activities in FY2023, no impacts to historic properties were observed. In FY2023, INL CRMO staff conducted monitoring of 11 sites. Results of these monitoring efforts are discussed in Appendix A - Annual Monitoring Forms and Results (FRM-3001) - Official Use Only – FOIA Exempt 3.

2.7 Site Stabilization, Restoration, Preservation

2.7.1 Birch Creek Soil and Vegetation Restoration

Discussions between DOE-ID, INL (Natural Resources, F&SS, CRMO), HeTO, and BLM staff continued regarding the restoration efforts at the Birch Creek site (10BT0051). In fall 2021, the group met on site and discussed the proposal, including techniques, strategies, and timing of restoration to areas that have been denuded of vegetation due to past grazing trailing and bedding patterns. The grazing allotment was converted from sheep to cattle, and cattle are now trailed approximately two miles away from this site location. Stabilization of the soils and vegetation in the area will reduce the impacts currently noted at the site including deflation, erosion, and exposure of artifacts from subsurface contexts.

In FY2023, INL completed soil testing, identification of seed and plant mixes for restoration, and strategies to increase revegetation success, as well as identification of seed and plant mixes for restoration, and strategies to increase revegetation success. Application of phosphate and elemental sulfur was conducted in the spring following the results of soil testing. Preparation of environmental documents in collaboration with HeTO to support the work is ongoing. During these activities, it was decided that the Birch Creek Site, 10BT0051, required re-recording in addition to preparation of an Annual Monitoring Form 3001. This site record will be prepared in FY2024, in conjunction with the preparation of environmental documents, to include the results of hydroseeding and vegetation activities planned for late fall 2023 (FY2024). The site form and report are anticipated for completion in FY2024.

2.7.2 NOTF Gun Display Project Initiation

In order to prepare for the possibility of a future naval gun installation and rehabilitation of the Naval Ordnance Test Facility (NOTF) site, the following actions have been taken. A working relationship has been established with Naval Surface Warfare Center Dahlgren, which is willing to donate a 16-inch naval gun and mounting components. Preliminary investigative work has been done to determine what components are necessary for such a display and logistical requirements. INL has given the go-ahead for a project cost-study, and subsurface investigations at the NOTF will take place in the spring of 2024 to determine the condition of the original gun mount base and related infrastructure.

2.8 Oral Histories

No oral history interviews were conducted in FY2023. Three interviews are scheduled for FY2024.

2.9 EBR-I National Historic Landmark

In FY2023, consistent engagement was necessary with the recently reestablished preservation committee and working group comprised of INL staff and managers for project planning at the EBR-I NHL. The care of the property is shared by Facilities and Site Services (F&SS), which has responsibility for all maintenance activities, and Communications, which operates the property as a publicly accessible site each summer and offers guided tours throughout the year on request, as well as the INL CRMO, which implements programs in compliance with the NHPA. A strategic approach to planning routine and preservation maintenance is on-going. Conversations between the INL CRMO and facility managers, as well as project managers, occur often.

Two projects were proposed for EBR-I during FY2023 and reviewed under Section 106. The first was a repair to a leaking water fountain on the mezzanine and the second was a request to change non-historic light bulbs. The first was reviewed under project number BEA-23-H039 and the latter was determined to be an undertaking that did not rise to the level of having any potential to affect the property and therefore did not receive a formal review.

To assist in collaborative long-term preservation planning, the EBR-I Preservation Plan was updated for the first time since 2006. Fieldwork identified several conditions that require either additional assessment, on-going monitoring, or preventative maintenance.

Additionally, a technical amendment was prepared to update the NRHP nomination form for EBR-I. The current form was prepared in 1976 to document the boundaries of the NHL, identifies only the reactor as a historic property, and provides little in the way of context or the relationship of contributing resources to the NHL. The technical amendment includes a comprehensive historic context for the design and operation of the EBR-I reactor, and documents the reactor, the reactor building, and the guardhouse as contributing resources to the NHL.

2.10 Built Environment Inventory Update

In FY2023, the INL CRMO continued its efforts to update the Built Environment Inventory on the INL Site. Inventory updates for the ATR, CFA (or CF), CITRC, EBR-I and Boiling Water Reactor Experiment (BORAX) Facilities, Idaho Nuclear Technology and Engineering Center (INTEC), and the Materials and Fuels Complex (MFC) were completed by the CEMML, with final revisions made by the INL CRMO staff. DOE-ID submitted these inventories to the SHPO on April 30, 2023. Concurrence was received on May 23, 2023.

The following historic properties were recommended individually eligible:

- CF-638: High Explosives Magazine/Dosimetry Calibration Lab, Criterion A
- CF-642/CF-720: Pump House, CFA Well No. 2), Criterion A
- CF-651/CF-719 (Pump House, CFA Well No. 1), Criterion A
- CF-704: Concussion Wall (CF-633), Criterion A
- TRA-670: ATR Reactor Building, Criterion A
- EBR-601: Experimental Breeder Reactor I (EBR-I), Criterion A
- Chemical Processing Plant (CPP)-659: New Waste Calcining Facility, Criterion A
- MFC-720: Transient Reactor Test (TREAT) Reactor Building, Criterion A
- MFC-724: TREAT Control Building, Criterion A
- MFC-765: Fuel Conditioning Facility, Criteria A and C
- MFC-767: EBR-II Reactor Plant Building, Criterion C
- MFC-768: Power Plant, Criterion A

- MFC-775: ZPPR Vault Work/Equipment Room, Criterion C
- MFC-776: ZPPR, Criterion C
- MFC-785: Hot Fuel Examination Facility (HFEF), Criteria A and B.

Additionally, potential historic districts were evaluated and three were recommended eligible under Criterion A:

- ATR Historic District, contributing properties:
  - TRA-625, TRA-634, TRA-640, TRA-670, TRA-671, TRA-770, TRA-771
- TREAT Historic District, contributing properties:
  - MFC-720, MFC-721, MFC-722, MFC-723, MFC-724
- ZPPR Historic District, contributing properties:
  - MFC-774, MFC-775, MFC-776, MFC-777, MFC-784, MFC-792

INL CRMO Architectural Historians completed a draft of the SMC and Test Area North (or TAN) Built Environment Inventory Update during FY2023. The research design drew upon feedback received from the SHPO during consultation on the previous inventories, including a programmatic approach to periods of signifance based on active research programs rather than arbitrary cut-off dates. To this end, the staff identified buildings, structures, linear features, and objects built during or prior to 1986 based on current documentation. Each resource was recorded per SHPO *Guidelines and Procedures for Cultural Resource Review and Consultation in Idaho* (Vihlene 2015). The majority of the resources were recorded using reconnaissance-level standards. The properties recommended eligible at the national level were recorded using intensive-level standards where possible to ensure appropriate documentation. In total, 18 buildings, three structures, one linear resource, three objects, and three historic districts were recorded and evaluated.

3. Data and Collections Management

3.1 Curation of DOE-ID Owned Collections

DOE-ID's permanent archaeological collections are curated at the Earl H. Swanson Archaeological Repository in the IMNH, on the ISU campus in Pocatello, Idaho. A MOA between DOE-ID and the IMNH provides specific requirements for management of the permanent collections according to the requirements of 36 CFR Part 79 and DOE-ID's overarching policy for cultural resource management. No collections were made in FY2023. Tracking, inventory, and documentation for DOE-ID curated collections is ongoing. DOE-ID issued a new five-year contract to IMNH on April 1, 2023, to continue to provide curation services.

DOE-ID conducts yearly inspections of the repository and visited the facilities on January 12, 2023. Specific agenda topics included progress on collections works, access to collections and loans, and future work to be completed on the Aviator's Cave collections. Additional interactions between INL CRMO and IMNH in FY2023 included the loan of diagnostic artifacts from Bureau Land Management and Bureau of Reclamation in support of the Precontact Context. It is anticipated that this will continue in FY2024.

3.2 Records and Data Management: Archaeology, Architectural History, and Paleontology

The INL CRMO currently manages, updates, and ensures security of all DOE-ID archaeological and paleontological geodatabases, as well as Federal records associated with management of cultural resources on INL. In conjunction with DOE-ID cultural resource data reconciliation activities, a

subcontractor is in the process of digitizing all paper copies of legacy records. The INL CRMO also continues to improve the CRDB, initially launched in FY2020, containing digital data collection that conforms to Federal archival and records management standards. Paleontological data is continuing to be managed by INL CRMO staff. Revisions to MCP-8005 – *Managing Paleontological Resources* were initiated in 2023 and are expected to be complete in FY2024. No paleontological resources were identified in FY2023.

3.2.1 Reconciliation Process

An agreed upon reconciliation process between DOE-ID and SHPO in 2019 continued in FY2023. The reconciliation process includes reconciling the SHPO data provided to DOE-ID and INL CRMO in 2019 with the information currently available for the INL Site. There were discrepancies in the number and location of sites. Therefore, a full review of the site forms, databases, and geospatial data was conducted and updated with the most current and accurate information available.

The data were gathered from an extensive review of the INL CRMO records and used to create a new geospatial database for all archaeological resources as well as a corresponding archaeological site database from existing digital and paper records. The SHPO geospatial database, several previous versions of an INL master geospatial database, project specific locational data, and paper records were simultaneously compared to determine the original or most accurate locational information which was utilized to create the geometry. After the compilation of the locational data, all SHPO required information fields were completed in addition to several administrative fields for INL CRMO purposes. All decisions made during this process were reviewed and tracked for quality assurance. To avoid similar problems of multiple datasets in the future, the current means of collecting geospatial data has been adjusted to mirror this new master geospatial database facilitating locational data standardization and management.

Efforts to compile the most up-to-date and accurate site, or Archaeological Survey of Idaho (ASI) databases also occurred during FY2023, which included INL CRMO working with computer programmers to ensure merging, compilation, and creation of a database that contains all required and useful information to compile into ASI site databases and records. Both comprehensive ASI and geospatial databases will represent the most up-to-date data INL CRMO has on every known resource. However, it should be noted that many previously unsubmitted site records do not meet current recording standards as full site re-records were outside the scope agreed upon with SHPO and DOE-ID. Reconciliation of the archaeological geospatial and site databases was completed, and DOE-ID submitted these to SHPO on March 2, 2023.

3.2.2 Cultural Resources Legacy Scanning Project

The INL CRMO currently manages, updates, and ensures security of all DOE-ID archaeological and paleontological geodatabases, as well as federal records associated with management of cultural resources on the INL Site. Currently, as a portion of DOE-ID cultural resource data reconciliation activities, a subcontractor is in the process of digitizing all paper legacy records. At the end of FY2023, a total of 12,000 records were entered into the restricted cultural section of the Electronic Document Management System (EDMS) and included, but are not limited to: project files, correspondence files, cultural resource reports, photo files, ASI and Idaho Historic Sites Inventory (IHSI) forms, and memoranda of agreement/understanding (MOA/MOU) documents. Although the subcontractors completed their tasks as part of the statement of work at the end of FY2023, ongoing efforts will continue in FY2024 for INL CRMO staff to review and vet records prior to being uploaded into EDMS.

3.2.3 Cultural Resources Database Development and Progress

Since March 2023, creation and management of digital project and resource data has been consolidated in the INL CRMO CRDB. Two integrated applications form the structure of the CRDB: a

web application, available to authorized users on the INL network, and a Field Client, installed locally on a device for use when disconnected from the INL Site network during fieldwork. Using the Field Client, resource data can be collected on site with multiple devices, reconciled and uploaded to the database server, and accessed by all INL CRMO staff in the web application. A 'history' for each field within the web application provides a record of all changes made to project and resource data in the CRDB. With import and export capabilities, resource data can be moved between SHPO ASI and IHSI Access databases and the CRDB for consultation and review as required. Due to the launch of Idaho Cultural Resource Information System (ICRIS), by the SHPO in FY2024, the INL CRMO anticipates changes in submission guidelines.

As phased development of the CRDB continues, the following are the planned additions to functionality of the database applications:

- **Reporting**. The CRDB is designed to collect key information about projects undertaken as part of Section 106 and Section 110 of the NHPA. Reporting capability for both benchmarks and internal tracking is among the functionality planned for the next development phase.
- **Environmental Review Process (ERP) integration**. The ERP system provides for the implementation of National Environmental Policy Act (NEPA) at the INL. Since 2022, Section 106 review conducted by the INL CRMO has been integrated into the ERP system and, by extension, the NEPA process. As a result, INL CRMO staff are notified of projects entered in the ERP for environmental and cultural review by email. Future capabilities for the CRDB will include integration with the ERP system, allowing INL CRMO staff to be notified, review, and respond to ERP entries without leaving the CRDB.
- **Cultural Resource Review (CRR) completion**. The CRR FRM-3004 documents a Section 106 review completed by the INL CRMO. The currently implemented version of the CRDB was designed to collect information required to complete the CRR. A third development phase is dedicated to the automatic generation of the CRR from the project level data entered by the Principal Investigator (PI).

As part of the 2023 launch of the CRDB, a Cultural Resource Database Checklist (FRM-3313) was issued, along with a workshop held for all INL CRMO staff on March 27, 2023, to aid in the adoption of the database. In FY2024, a full user guide for the CRDB (GDE-895) will be issued for use by the INL CRMO staff and additional training offered, as required.

4. Archaeological Resources Protection Act (ARPA)

Efforts to improve protection of archaeological sites at the INL Site are ongoing. An active security force monitors INL Site lands through ground patrols and security surveillance of public points of access. Yearly on-line training modules remind INL Site employees of prohibitions on disturbing archaeological sites. Targeted training is also conducted by INL CRMO staff and in coordination with Shoshone-Bannock Tribes for INL Site employees likely to encounter archaeological sites during their work activities. INL CRMO staff and the DOE-ID Cultural Resource Coordinator have enlisted the help of DOE-ID Physical Security officers and U.S. federal agents experienced in the ARPA to assist in addressing these issues.

No new potential ARPA violations were discovered in FY2023.

5. Native American Graves Protection & Repatriation Act

The following guidelines from the AIP between the Shoshone-Bannock Tribes and DOE-ID (DOE-ID 2022:6) outline specific requirements for inadvertent discoveries as follows:

> *In the event that human remains or burial sites are inadvertently discovered, accidentally exposed, or potentially threatened, DOE agrees to contact the Tribes immediately and initiate consultation following DOE/INL consultation procedures.*
>
> *DOE agrees that Tribal representatives will be permitted to view any discoveries or remains and cultural artifacts, will be authorized to do site inspections of any archaeological discovery or excavation, and will be permitted to be present during any archaeological excavation, survey, study, or testing on the INL site.*

There were no inadvertent discoveries on the INL Site in FY2023.

6. Section 106 Review

Section 106 of the NHPA requires Federal agencies to consider the effects of their undertakings on historic properties and afford the ACHP a reasonable opportunity to comment on such undertakings (36 CFR §800.1). Actions proposed within the INL Site must meet the requirements of the National Environmental Policy Act (NEPA). Most of these activities meet the criteria of previously approved Categorical Exclusions, commonly referred to as CX, which do not exhibit the potential to have a significant environmental impact; however, these actions may still require a cultural review to determine whether there is any potential to affect historic properties. A Section 106 review is initiated when a project scope is submitted through the Environmental Review Process (ERP) or through other processes by Idaho Environmental Coalition (IEC) and Naval Reactors Facility (NRF). The INL CRMO and environmental and NEPA staff analyze the proposed action and anticipated environmental impacts. An undertaking is reviewed by both the archaeological and the architectural staff to determine whether the proposed action meets the definition of a federal undertaking (36 CFR §800.16(y)) and whether built environment properties, archaeological properties outside facility fences, or both are involved. Reviews are identified by unique project identifiers beginning with the BEA acronym followed by the two-digit fiscal year, and the sequential number.

In certain circumstances, the proposed actions may meet the threshold of an environmental assessment (EA) or an environmental impact statement (EIS) and are reviewed outside of the ERP system. The INL CRMO is well-integrated with NEPA staff and is involved in early planning efforts to ensure the timely completion of the Section 106 process prior to the signing of NEPA decisions.

Until the 2023 PA was fully executed on May 8, 2023, DOE-ID was performing Section 106 responsibilities according to the 2004 Programmatic Agreement (PA) and the INL Cultural Resource Management Plan (CRMP) (DOE-ID 2016). As outlined in the CRMP, DOE-ID has adopted a tailored approach to the NHPA Section 106 process in consultation with the SHPO, the ACHP, the NPS, and the Shoshone-Bannock Tribes.

As a result of the implementation of the 2023 PA the INL CRMO revised MCP-8008 (MCP-8008 Revision 1) to better guide the project review process within the one-stop, multi-disciplinary, ERP system. The review process includes analysis for possible exclusions for activities and property types that do not have the potential to affect historic properties. These exclusions are listed in Appendices C and D of the PA (2023) and implemented as part of MCP-8008 Revision 1 (Appendices A, B, and C). The tables below (Tables 2, 3, and 4) correlate with the exclusion number in the appropriate appendix in MCP-8008 Revision 1. Additionally, unless a property exhibits extraordinary significance, the NRHP has established 50 years as the threshold a cultural resource must reach for its historic significance to be

evaluated and for the cultural resource to be eligible for the NRHP (Little, et al. 2000:9). To allow for the time necessary to plan projects and prepare the necessary NEPA and NHPA documents, SHPO suggests buildings and structures to be evaluated for potential effects when they reach 45 years of age (Vihlene 2015:33-34).

Appendix A in MCP-8008 Revision 1 includes those actions which to do not meet the threshold of a federal undertaking with the potential to affect historic properties according to the ACHP's 1991 *Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities* (Table 2). INL CRMO staff document these actions within the ERP system and on the INL CRMO ERP Tracking Worksheet.

Table 2. *INL Site Actions that do not require Section 106 review (MCP-8008 Rev. 1 – Appendix A, 2023 PA,).*

#	Action Description
A1	Computer, 3D, or mathematical modelling
A2	Theoretical computation and modelling
A3	Materials analysis using existing infrastructure
A4	Fuels and materials testing in existing reactors
A5	Materials analysis using existing laboratory equipment in their current state, orientation, and functional capacity
A6	Research performed on firewalls, data security, etc., and only computers, servers, and networks are utilized
A7	All standard operation activities and procedures (i.e., day-to-day use of existing buildings and equipment) which continue to utilize existing infrastructure for their original purposes
A8	Moving or assembly of interior furnishings.
A9	Maintaining grounds, such as lawn mowing, grass trimming, and shrub and tree pruning
A10	Maintaining paved areas, including, but not limited to, parking lots, sidewalks, and roads and adding or removing hard surface paving and hardstands on previously paved areas
A11	Applying approved pesticides, herbicides, and rodenticides
A12	Interior cleaning, housekeeping, and janitorial activities
A13	Shoveling, plowing, and removing snow
A14	Routine load testing of lifting equipment
A15	Performing periodic wildlife management activities (e.g., trapping or relocating wilding, removing, or relocating bird nests, sampling, monitoring, etc.)

Appendix B includes those undertakings that are excluded from project-specific consultation with the SHPO, provided the activity does not affect or have the potential to affect those qualities or settings that make a historic property eligible for the NRHP (Table 3). INL CRMO staff review project scopes of work and proposed activities and recommend the applicability of these activity type exclusions on a case-by-case basis. INL CRMO staff document their review and recommendation for each project within the ERP system and on the INL CRMO ERP Tracking Worksheet. Note: all activities under these exclusions are subject to the INL Timeout and Stop Work Authority should cultural resources be unexpectedly encountered at any time. No activities at EBR-I are excluded except as noted in Activity 7.

Table 3. *INL Site Activities that are excluded from project-specific consultation with the SHPO (MCP-8008 Rev. 1 – Appendix B, 2023 PA).*

#	Activity Type	Activity Description
B1	Routine Maintenance Activities (Interior and Landscaping)	
	A	Minor modifications to or removing of components to increase effective use of space (e.g., interior door, ceiling, wall, broken windowpanes, stairs, or platforms and ramp. repositioning)
	B	Installation or repair of electrical (including lighting) and plumbing systems.
	C	Routine facility landscaping and maintenance involving minimally disturbing activities such as replacement of existing barriers or signs.

#	Activity Type	Activity Description
	D	Replenishing of gravel on roads and parking areas when original gravel is not removed.
	E	Cleaning storm water drainage systems (e.g., ditches, catch basins, etc.).
	F	General maintenance of fences.
	G	Grading and repairing drainage and culverts and cleaning up sediment.
	H	Routine revegetation and erosion control activities.
	I	Routine or preventive operation and maintenance activities outside of fenced areas of INL facilities that do not affect historic structures or previously undisturbed ground.
	J	Calibrating, repairing, and replacing radiation monitoring equipment, including portal monitors, continuous air monitors, and ambient air monitoring stations.
	K	Routine decontamination (through such activities as wiping down with rags, using strippable latex, and minor vacuuming, but excluding scabbing) of the surfaces of equipment, rooms, or other interior surfaces.
	L	Establishing storage areas within buildings for maintenance tools, equipment, and supplies.
	M	Handling, storing, and removing or disposing of recyclables, industrial, hazardous, mixed hazardous, and radioactive wastes.
	N	Installing non-skid surfaces on steps, ramps, and other well-traveled areas.
	O	Other routine maintenance and/or custodial activities that do not significantly alter or detract those qualities that make the property eligible for listing in the National Register of Historic Places.
B2	**Preservation and Replacement in-kind Materials**	
	A	Mitigation of wear and deterioration of a historic property to protect its exterior condition without altering its historic character (e.g., roof repair/replacement, brick repointing).
	B	Stabilization to protect damaged materials or features from additional damage.
	C	Replacement of fixtures or components of a property with in-kind materials, such as matching paint with existing or similar paint color, refinishing materials with existing or similar colors, or replacing or installing carpeting with water-soluble glue.
B3	**Energy Conservation Measures**	
	A	Modifications to heating, ventilation, and air conditioning systems.
	B	Insulation to roofs, crawl spaces, walls, and floors.
	C	Caulking and weather stripping that are not visible or do not significantly alter or detract from those qualities that make the property eligible for nomination to the NRHP.
	D	Other energy conservation measures that are not visible or do not alter or detract those qualities that make the property eligible for listing to the NRHP.
B4	**Security and Safety Systems**	
	A	Installation, maintenance, or repair of security systems, including computer security, detection, monitoring, surveillance, and alarm systems.
	B	Installation, maintenance, and repair or modification of personnel safety systems and devices within the built environment, such as radiation monitoring devices; emergency exit lighting systems; protective additions to electrical equipment; improvements to walking and working surfaces; and installation of protective railings, guards, or shielding; and any other safety mechanisms or features that are deemed necessary for public and worker safety.
B5	**Asbestos Abatement**	
	Removing or fixing asbestos for safety and health concerns, including lagging, insulating, painting, pipe and duct work, and panel removal. None of these activities may cause structural modifications or alter character-defining features. Asbestos abatement activities strictly associated with the deactivation, decontamination, and demolition (DD&D) of properties and that result in permanent, significant structural modification or alteration of the property are not included in this exclusion, as they would	

#	Activity Type	Activity Description
	require individual consultation with SHPO.	
B6	**Internal Reconfiguration**	
	Changes to the internal configuration of existing facilities within the built environment. Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and internal room configuration), provided that uses of the installed or relocated elements are consistent with the general use of the receiving structure. In some cases, visible external components accompany internal modifications. Under this exclusion, these external components need to be of similar scale to existing external infrastructure with consideration given to visuals on component location. Covered actions include modifications within an existing building and minor external components (if necessary), and do not alter or detract those qualities that make the property eligible for listing in the National Register of Historic Places.	
B7	**Ground Disturbances within Facility Fence Perimeters**	
	TAN/SMC	Modifications to the ground surface within fenced perimeter of the Test Area North/Specific Manufacturing Capability facility.
	EBR-I	Modifications to the ground surface within fenced perimeter of the Experimental Breeder Reactor – I facility.
	WRRTF	Modifications to the ground surface within fenced perimeter of the Water Reactor Research Test facility.
	ATR	Modifications to the ground surface within fenced perimeter of the Advanced Test Reactor Complex.
	INTEC	Modifications to the ground surface within fenced perimeter of the Idaho Nuclear Technology and Engineering Center facility.
	RWMC	Modifications to the ground surface within fenced perimeter of the Radioactive Waste Management Complex.
	MFC	Modifications to the ground surface within fenced perimeter of the Materials and Fuels Complex.
	<50-ft CFA	Modifications to the ground surface within 50-feet of existing buildings in the unfenced Central Facilities Area.
	<50-ft ARA	Modifications to the ground surface within 50-feet of existing buildings in the unfenced Auxiliary Reactor Area.
	<50-ft BWRE	Modifications to the ground surface within 50-feet of existing buildings in the unfenced Boiling Water Reactor Experiment facility.
	<50-ft REC	Modifications to the ground surface within 50-feet of existing buildings in the unfenced Research and Education Campus.
B8	**Vegetation Management**	
	A	Any revegetation by broadcast seeding that does not involve ground disturbance other than the minor disturbance of placing seeds on the ground, where access is by foot or air.
	B	Manual planting using hand-held augers or planting bars if no known historic properties occur within the planting area.
	C	Hand cutting of young (less than 100 years old) or burned trees, where access is by foot and limbs are hand scattered across the landscape.
	D	Hazard tree removal utilizing chainsaws, woodchippers, and other power and hand tools.
	E	Burning of tree or shrub piles created during fuels management or reduction activities in areas where the potential to affect historic properties is negligible (e.g., no burnable cultural materials or features, structures), where burning will be conducted in a manner designed to minimize potential for sub-surface soil impacts (i.e., low-intensity heat, jackpot burning).
	F	Herbicide application by foot or air where it would be unlikely to affect rock art or traditional Native American plant gathering areas.
B9	**Road Maintenance/Construction NOTE: Exclusions apply to the following INL roads:**	

#	Activity Type	Activity Description
	• ***Priority 1 - Emergency Evaluation/Security Roads: Maintained as graded and graveled. Regularly plowed during snowy season. Serves as evacuation and security road and as defensible space for wildland fires.*** • ***Priority 2 – Project Access Road: Maintained as passable; graveled, plowed, and spot-graded as needed. Serves as a project access road.*** • *Priority 3 – Wildland Fire Access: Maintained passable to 4x4 vehicles, not graded, dump and level allowed. Serves as wildland fire access.*	
	A	Adding or leveling fill within the constructed prism of existing roads (priority 1, 2, and 3) where no disturbance will occur outside of the disturbed prism and no evidence of sites or site elements (as exposed by use and maintenance) occur within the prism (e.g., lithic concentrations, hearths as evidenced by ash/charcoal, features, etc.).
	B	Installation of road and safety signs where disturbance is limited to post holes.
	C	Snow removal, resurfacing, blading, or maintenance (including mowing shoulder berms) of existing roads (priority 1, 2, and 3). Disturbance outside the existing constructed prism or tread and existing alignment will not occur. The repair or resurfacing cannot exceed the area of the existing road surface and cannot exceed the depth of existing disturbance.
	D	Projects such as installation, repair, or replacement of cattle guards, gates, culverts, bridge abutments where the Area of Potential Effect does not extend beyond the vertical and horizontal limits of previous construction or disturbance (e.g., priority 1, 2, and 3 roads).
B10	**Monitoring/Staging Stations**	
	A	Placement of temporary monitoring stations where negligible ground disturbance (i.e., placed on surface with no heavy machinery) is involved (e.g., temporary radio repeaters, wind, and weather stations, portable trailers, temporary vehicles). Temporary means there is a specified end-date for removal.
	B	Replacing or removing equipment in areas that have been previously disturbed due to the installation of that equipment (e.g., gaging stations, well pads, weather stations, etc.).
B11	**Infrastructure Management**	
	A	Authorizing new lines on existing overhead structures when there is no change in pole or tower configuration, no off-road vehicle traffic and no new surface disturbance or access road improvements are necessary.
	B	Replacement or repair of existing water lines, buried utility lines, tank replacement of water-collector systems and pipelines or similar underground improvements, in previous locations when no additional ground disturbance occurs (including staging areas).
	C	Emplacement of buried utility lines, pipelines, telephone lines, and similar linear features where disturbance will not extend beyond the vertical and horizontal limits of previous construction or disturbance (e.g., roads).
	D	Use of existing roads, facilities, improvements, or sites for the same or similar purposes for which they were originally constructed where no additional improvements or new ground disturbance is authorized.
	E	Use of existing borrow pits and spreading areas where no horizontal expansion of the pit will occur.
	F	Fence construction and maintenance (where posts are pounded into the ground) and that does not require blading for the fence line or that does not create an area for livestock congregation and heavy trampling and there are no adverse effects to historic properties. Congregation areas will be surveyed.
B12	**Land Acquisition, Easements, or Transfers**	
	A	Acquiring lands and easements that do not entail any ground disturbing activities. Subsequent to acquisition, all future undertakings would be subject to the National Historic Preservation Act Section 106 process.

#	Activity Type	Activity Description
	B	Transferring lands or interest in lands to other federal agencies where future management will be subject to the National Historic Preservation Act Section 106 process.
B13	Ecological and Archaeological Monitoring/Management	
	A	One-time pass of off-road vehicles or passenger vehicles for the survey, collection, and tracking of sensitive plant and animal species (may include one-time helicopter/aircraft landings) to only occur when soils are dry.
	B	One-time pass of off-road vehicles or passenger vehicles for herbicide application to only occur when soils are dry.
	C	One-time pass of off-road vehicles or passenger vehicles to convey Shoshone-Bannock Tribal members to otherwise inaccessible important cultural sites to only occur when soils are dry.
	D	Installation of bird nesting deterrents.
B14	Cadastral	
	Conducting cadastral survey, boundary marking and establishment of section corners.	
B15	Seismic Surveys	
	Seismic surveys conducted on existing priority 1, 2, and 3 roads will occur and no known standing historic or pre-Contact structures or rock art sites are within 300 meters. Depending on the type of surface seismic survey (reflection, refraction, Spectral Analysis of Surface Waves, or Multichannel Analysis of Surface Waves), most receivers are placed on the surface, using a spike attached to the receiver to push it into the ground surface for coupling. Most surveys are conducted in straight lines. If along a roadbed, then likely a short distance from the road to avoid slopes if roadbed is built up and to generally make a straight line.	
B16	Minor Exterior Modifications	
	To support changing mission needs and/or safe operations, minor modifications that would not substantially alter the exterior appearance of the building or structure may be performed. Activities would include new equipment installation outside of, or on top of, the building and connections penetrating the exterior of the building.	
B17	Location Qualified	
	A	Interior activity that is limited to:
	A1	the interior of a building or structure that is less than 45 years old and is not potentially eligible under criterion consideration G.
	A2	a building that has been determined to be ineligible to the NRHP.
	A3	a building/structure identified as an excluded property type in Appendix C. These undertakings do not have the potential to cause effects to historic properties.
	B	Types of activities occurring solely on pavement, asphalt, laid gravel areas, within existing road prisms that include but are not limited to: driving on existing roads during tests, experiments, or training exercises; or placing temporary equipment, portable trailers, tents, or other temporary shelter, etc. on pavement, asphalt, or laid gravel areas. Temporary means not to exceed three years.

Appendix C pertains to property types excluded from NRHP evaluation. These property types typically do not exhibit significant architectural or engineering features (Table 4). INL CRMO staff document proposed activities and reviews that involve certain existing property types for applicability of Appendix C exclusions. INL CRMO staff document their review and recommendation for each project within the ERP system and on the CRMP ERP Tracking Worksheet. However, if these property types are associated with an NRHP-eligible site or district, the INL CRMO staff will document the property and submit a CRR and associated ASI and/or IHSI from to the INL CRMO Manager and DOE for review and concurrence.

Table 4. Property types which are excluded from NRHP evaluation (MCP-8008 Rev. 1 – Appendix C, 2023 PA).

#	Property Type	Property Type Description
C1	Subsurface Structures	These structures have minimal or no visible surface manifestations and include earthen and concrete-lined trenches, French drains, underground tanks, vaults, underground pipelines, sewer lines, wastewater disposal ponds, runoff collection ponds, and buried material disposal areas other structures that are typically located below ground and were never intended to be routinely accessed by people.
C2	Storage Tanks	These structures include surface and subsurface utility tanks used in routine facility operations. Associated concrete slab foundations, scaffolding, piping, or spill-management retaining walls are also included.
C3	Wells and Boreholes	These structures include characterization wells, monitoring wells, drinking water wells, industrial water wells, injection wells, and various types of test wells and boreholes. Wells associated with homesteading and other early historic uses of the area are not included.
C4	Utility Poles and Towers	These structures include power lines, microwave towers, meteorological towers, seismic data collection and transmission facilities, and other types of communication towers.
C5	Utility Structures	These structures provide housing or control of utility equipment or access to underground utility equipment, such as pump houses, electrical substations, transformers, pressure relief valves, condensation traps, boiler tanks, or equipment monitoring shacks.
C6	Mobile Trailers	These structures are used for temporary office space and/or storage, typically placed in existing parking areas.
C7	Safety and Security Barriers	These include roadblocks, security, jersey, radiological, safety, construction barriers.
8	Historic Artifact Scatters	Small (<50 items) historic can dumps that are homogeneous and have no other associated historic features, including recent (45 years old) trash. Short-term, mobile camps with no, to limited, cultural constituents, associated with livestock grazing or recreation that provide no significant information beyond that which is available in written or oral histories. Unassociated historic artifact scatters that cannot be definitively tied to a specific historic theme as defined in the Idaho Comprehensive Historic Preservation Plan. This includes items such as fencing material and piles of barbed wire.
C9	Prospects/Exploratory Pits	Gravel mining prospects that have no other associated historic features, artifacts, or adjacent features with which to date the prospects, including prospects that have been dug by a backhoe.
C10	Rock Piles/Concentrations	Rock piles near agricultural fields that are the obvious result of field clearing, or rock removal associated with recent construction activities.
C11	Powerlines, Roads, and Trails	Power poles and lines that research shows have no historic importance or significant association to a historic event or district. Unnamed roads and trails that do not appear on General Land Office (GLO) plats and for which no information regarding origin is available.
C12	Cadastral Markers	Brass caps, rock piles or other features constructed by cadastral surveyors to mark section corners.
C13	Flood Control Features	Flood control berms, run-off ditches and ponds, etc.
C14	Pre-fabricated Structures	Comfort stations, sheds, etc.
C15	Concrete Pads	Concrete pads used to set equipment, storage items, display items, or other miscellaneous purposes.

If an action rises to the level of an undertaking or does not meet one of the exclusions outlined in the 2023 PA), then the project is subject to Section 106 review and an APE is determined. The NHPA implementing regulations provide the following definition [36 CFR §800.16(d)]:

> *The area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.*

When determining the APE, a consideration of the full range of effects must be applied to the undertaking. Access to the project area, vehicle parking, and laydown areas must be considered in addition to the primary activity area. If the proposed actions would only occur within the interior of a building, the APE would be confined to the building itself. However, modifications to the exterior of a building would affect the appearance of the building as well as the view or setting of neighboring buildings or structures and these effects must also be evaluated.

A review of INL CRMO literature and records is conducted to determine if the APE was previously surveyed, partially surveyed, or was originally surveyed using methods that do not meet current SHPO and the Secretary of Interior's standards. Previously recorded sites are reviewed to determine documentation completeness and accuracy. If necessary, a field survey of the APE is conducted with newly identified cultural resources documented and previously recorded sites updated on an ASI or IHSI form depending upon the property type and following the SHPO guidelines (Vihlene 2015). Documented properties are evaluated for their significance and whether they meet the established criteria for inclusion in the National Register (36 CFR 60).

The NHPA implementing regulations address two results from the identification and evaluation of historic properties within the APE and the results of the assessment of affect pursuant to 36 CFR §800.4(d)(1) No Historic Properties Affected and 36 CFR §800.4(d)(2) Historic Properties Affected.

The regulations specify that for a No Historic Properties Affected (36 CFR §800.4(d)(1) finding,

> *"…either there are no historic properties present or there are historic properties present but the undertaking will have no effect upon them as defined in §800.16(i)[a], the agency official shall provide documentation of this finding, as set forth in §800.11(d)[b], to the SHPO/THPO. The agency official shall notify all consulting parties, including Indian tribes and Native Hawaiian organizations, and make the documentation available for public inspection prior to approving the undertaking."*

In the CRR, these types of situations as described above and in keeping with the regulations, are documented as No Historic Properties Affected. If there are no cultural resources identified or no eligible cultural resources identified in the APE, these undertakings will be reported in the Annual Report to SHPO. If there are historic properties in the APE but will be avoided or otherwise not affected by the undertaking (including avoidance and other minimization conditions), DOE-ID will submit FRM-3006 Historic Properties Present Short Report form to SHPO no later than 60 calendar days after making the finding, *No Historic Properties Affected*.

If there are historic properties in the APE and they may be affected, INL CRMO staff will move to assessing the criteria of adverse effect as defined in CFR §800.5(a)(2). In situations where historic properties will be affected by the undertaking, but the characteristics of the property that qualify it for

[a] 36 CFR §800.16(i): ***Effect*** means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

[b] 36 CFR §800.11(d): ***Finding of no historic properties affected.*** Documentation shall include:
(1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, drawings, as necessary; (2) A description of the steps taken to identify historic properties, including, as appropriate, efforts to seek information pursuant to § 800.4(b) [Identify Historic Properties); and (3) The basis for determining that no historic properties are present or affected.

NRHP inclusion are not altered or diminish the integrity then the finding is No Adverse Effect. Avoidance and minimization measures may be included as conditions to the undertaking to ensure the character defining features and integrity of the historic properties in the APE are not being affected. An annual report, such as this document, is prepared that summarizes the information on the CRRs that result in a No Historic Properties Affected or No Adverse Effect finding and is provided to the SHPO, Shoshone-Bannock Tribes, and available to the public.

If Adverse Effects to historic properties are identified in the APE and cannot be avoided, the finding is Adverse Effect. A full report of the cultural review is prepared and submitted to SHPO which initiates consultation regarding measures to minimize, mitigate, and resolve the adverse effects. The ACHP is also provided a copy of the report and is invited, along with the Shoshone-Bannock Tribes, other interested parties, and stakeholders to participate in developing a MOA. An MOA outlines the stipulations to be followed to resolve an Adverse Effect finding for an undertaking.

6.1 Reviewed FY2023 Undertakings

Cultural resources review project numbers were issued for 60 projects in FY2023; 39 built environment and 21 archaeological (See Table 5). One of the archaeological projects and two of the built environment projects are Section 110 efforts and are not included in Table 5. Four archaeological reviews were conducted for actions proposed at NRF. Four proposed FY2023 actions were revised following their initial review which resulted in revisions to the cultural resource review record. These were reviewed under the same project numbers followed by the "R#" designation. The individual reviews for FY2023 projects and previous fiscal years' projects that were finalized in FY2023 are provided below:

- One built environment review pertained to the need for purchase of equipment in advance of scope of work. A hold point was established to continue Section 106 once an adequate scope of work was received. (BEA-23-H031).
- One FY2020 built environment project included a scope change necessitating a revised review (BEA-20-H048 R1).
- Two FY2021 built environment projects were completed (BEA-21-H231 and BEA-21-H232 R1).
- One FY2021 built environment project included an expanded scope of work necessitating separate reviews under the same parent project number (BEA-21-H029/BEA-21-H029 R1).
- One FY2021 built environment project included three expanded scopes of work (BEA-21-H205/ R1/R2/R3). R1 was finalized 11/1/2022. R2 and R3 were included as part of Environmental Compliance Permit (ECP) INL-19-175 and did not require cultural review but were summarized in the R1 in order to provide a comprehensive project overview.
- One built environment project is part of a larger in progress EA and did not warrant Section 106 review at this time (BEA-23-H016).
- One built environment project was cancelled (BEA-23-H028).
- One built environment project is in progress as of 9/30/2023 with anticipated completion in early FY2024 (BEA-23-H040).
- One built environment project was placed on-hold (BEA-23-H033).
- One built environment project resulted in a finding of no adverse effect, as original equipment was removed from a building, and architectural historians determined the equipment was not historically significant (BEA-23-H001).
- One archaeological project determined to have No Historic Properties Affected was not concurred with by the SHPO, who rendered a No Adverse Effect finding (BEA-23-16).
- One archaeological project in progress since FY2018 was completed in FY2023 (BEA-18-37 R7), but subsequently cancelled.
- One archaeological project in progress since FY2020 was completed in FY2023 (BEA-20-33 R1).
- One archaeological project in progress since FY2022 was completed in FY2023 (BEA-22-54).

- Three archaeological projects (BEA-21-28 R3; 21-31 R1; 21-47-R1/R2) and 15 built environment projects (BEA-21-H143; H188; H192; H198; H205 R1/2/3; H212; H215 R1; H218 R1; H223; H226; H227; H231; H232 R1) in progress at the end of FY2021, were completed in FY2023.
- Two archaeological projects in progress since FY2022 were completed in FY2023 (BEA-22-28; 22-47.
- One archaeological project in progress since FY2022 was cancelled (BEA-22-49).
- One archaeological project begun in FY2022 remains ongoing following scope of work modifications (BEA-22-58 R1).
- One built environment project was in progress at the end of FY2022, pending adequate design scope (30% needed), and was completed in FY2023 (BEA-22-H120). This project was assigned a new project number once the appropriate level of design scope was received (BEA-23-H032).

In FY2023, 257.19 acres of intensive survey supported 9 Section 106 projects:

- 86.25 acres reported for five projects in this annual report
- 93.64 acres reported with three FRM-3006 Short Report
- 77.30 acres reported in one individual full cultural report.

Intensive surveys of 1,033.82 acres were conducted for six Section 106 projects currently in progress or cancelled and will be reported in FY2024.

6.1.1 Compiled List of Reviews

Table 5 discusses the individual review of the FY2023 projects, and FY2018, FY2020, FY2021, and FY2022 projects that were finalized in FY2023, as well as those still in progress, or pending. Only historic properties within the APE are included in the IHSI/ASI column. The column header includes a double-asterisk, as all of the buildings previously identified as historic properties were based on CRMP (DOE-ID 2016) information. Subsequent evaluations by CEMML have been concurred with by SHPO (May 2023) and can be found in Appendix C - INL Site Building Inventory. Findings of effect as well as any hold points or project specific instructions are included in the "Notes/Remarks" column. In addition, those projects reviewed under original issuance of MCP-8008 or the INL CRMP prior to the 2023 PA implementation and subsequent revision to MCP-8008 (MCP-8008 Revision 1) in May 2023, are identified with an asterisk (project number and exclusions columns). If additional details are warranted to explain the undertaking and effect finding, the table will point to the appropriate section in the report. Built environment projects are followed by archaeology projects. Some sequential numbering will be missing due to errors in assigning project numbers or assigning project numbers to Section 110 projects.

Table 5. Section 106 reviews for FY2023, including those carried over from FY2018, FY2020, FY2021, and FY2022.

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
BEA-20-H048 R1	**N/A**	Fire Barrier Repairs - Nuclear Facilities	Replace windows in MFC-765A and MFC-785 for fire safety.	11-17985 (MFC-765A)	N/A	*B: 6	No Historic Properties Affected	N/A	11/23/2022 J. Grams	This project is a revision to address a scope change to an earlier project. The project proposes to replace a window in MFC-765A with a fire safe window. This proposed action falls under Excluded Activity Type 6: Safety Systems (MCP-8008, Appendix B) as it includes replacement of a window for current fire safety requirements. Additional consideration was given to the potential effects of replacing original period windows. The window is located on the 2nd floor of the annex (just north of the FCF truck lock) looking east. It is not visible from the ground level outside the building. Given that the MFC-765A is not eligible under Criterion C for architectural significance, the INL CRMO recommends the proposed project will have No Historic Properties Affected because the window does not contribute to MFC-765A's eligibility.	MFC
BEA-21-H029 *	**N/A**	Flash Neutron Radiography at the TREAT to Examine Two-Phase Flow	This project proposes to conduct research and development at the NRAD reactor, located within MFC-785 to produce an operational flash neutron radiography system. After conceptual testing and planning, the newly developed flash neutron radiography system will be installed at MFC-720.	11-17954 (MFC-720) 11-17957 (MFC-785)	N/A	*B: 6 *B: 8	No Historic Properties Affected	N/A	11/1/2022 L. Cook	As all elements of the proposed project fall under Excluded Activity Types 6 and 8 (MCP-8008, Appendix B), there will be No Historic Properties Affected as a result of this undertaking.	MFC
BEA-21-H029 R1*	**N/A**	Flash Neutron Radiography at the TREAT to Examine Two-Phase Flow	The proposed radiography system includes the following work: (1) Design, fabricate and install additional shielding west of the TREAT reactor, near the existing radiography stand and a shielding cap to sit on the top opening of the radiography stand; (2) Design, fabricate and install a new shield plug which replace the existing shield plug in the radiography stand; (3) Design, fabricate and install a new imaging system which consists of a high speed camera, mirror box (to remove camera from beam line) and a control laptop connected via the TREAT private network. None of the installation work will require any removal of existing concrete or excavation. Some elements will require fastening to existing structures (concrete floor) with most of the items free standing and removable as needed.	11-17954 (MFC-720)	N/A	*B: 6 *B: 8	No Historic Properties Affected	N/A	11/7/2022 L. Cook	As all elements of the proposed project fall under Excluded Activity Types 6 and 8 (MCP-8008, Appendix B), there will be No Historic Properties Affected as a result of this undertaking.	MFC
BEA-21-H143*	**N/A**	In-Vivo Detection Facility	Construct a new in-vivo detection facility at the rear of CFA-1612.	23-9981 (CFA-676) 23-9992 (CFA-695) 23-9993 (CFA-698)	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	11/1/2022 L. Cook S. Plager	Based on the results of the GIS viewshed analysis, the proposed In-Vivo Detection Facility will be visible from CF-676, CF-695, and CF-698. CF-676 is approximately 955 feet southwest of the proposed facility and CF-695 is approximately 1,782 feet southwest. CF-698 is 2,060 feet to the south-southwest. While the proposed facility will be visible to these three historic properties, it will only be visible viewed from a secondary side of the properties or when viewed from the primary side at an extreme oblique	CFA

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										angle. Given the spatial relationships and the distances between the historic properties and the proposed In-Vivo Detection Facility, there will be no visual effects to the historic properties within the APE.As the proposed facility will be constructed as an addition to the rear of CF-1612 (CFA Medical Facility, built 1996), it does not have the potential to physically, or visually, affect any historic properties. The proposed action is a federal undertaking defined in 36 CFR 800.16(y), and although it is the type of activity that has the potential to cause effects to historic properties, it is excluded from Section 106 review per MCP-8008, Appendix B. The proposed action is excluded under Activity Type 9 (Ground disturbance within fenced facility perimeters), because the proposed undertaking will occur within 50 feet of a building. There will No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	
BEA-21-H188*	**N/A**	MFC-1729 Repair Broken Sewer Line	Excavate area around perceived leak area, diagnose and repair leak, backfill.	N/A	N/A	*B: 2 *B: 9 *C: 1	No Historic Properties Affected	No Historic Properties Affected	10/27/2022 L. Cook S. Plager	The proposed project falls under Excluded Activity Type 2, Routine Maintenance activities, and 9, Ground Disturbance Within a Fenced Facility Perimeter (MCP-8008, Appendix B). Furthermore, MFC-1729 is an excluded property type (Appendix C 1. Post-1980 Buildings, with exceptions). There will be No Historic Properties Affected as a result of this undertaking***.	MFC
BEA-21-H192*	**N/A**	HFEF Second Manipulator Repair Glovebox	Reconfigure Rooms 314 and 315 to support another glovebox, includes removing walls.	11-17957 (MFC-785)	N/A	*B: 8	No Historic Properties Affected	N/A	9/27/2022 L. Cook	Several actions included within the proposed project fall under MCP-8008, Appendix B, Excluded Activity 8: Internal Reconfiguration of Active Laboratories, including: rerouting electrical power, rerouting the HFEF ventilation system, renovating the air conditioning system, and modifying/upgrading the Hot Repair Area crane and will have no effect to MFC-785. Given the considerations discussed above (negligible impact to integrity, continuity of use, and direct support of the mission), the proposed removal of interior walls will have no effect to the integrity or the significance of MFC-785. There will be No Historic Properties Affected as a result of this undertaking.	MFC
BEA-21-H198*	**N/A**	IF-606 Fiber Optic Cable Installation	Install new conduit, fiber optic cabling, junction boxes, and fiber termination for security systems.	N/A	N/A	*C: 1	No Historic Properties Affected	N/A	11/29/2022 J. Grams	IF-606 (INL Administration Building) built in 1985, does not meet the 50-year threshold for eligibility in the National Register of Historic Places and does not meet exceptional historical significance under Criteria Consideration G and is an Excluded Property Type (MCP-8008, Appendix C 1). No further Section 106 review is required. Consequently, there will be No Historic Properties Affected as a result of this undertaking.	REC
BEA-21-H205 R1*	**N/A**	Dynamic Energy Transport and Integration Laboratory, R2 and R3	R2: construction and operation of high temperature electrolysis demonstration systems; R3 install a test stand for the existing test bed.	N/A	N/A	*C: 1	No Historic Properties Affected	N/A	11/1/2022 L. Cook	This Cultural Resource Review (CRR) covers actions described in ECP INL-19-175 Revision 2 and 3. The undertaking proposed in the original EC INL-19-175 did not trigger a Section 106 review, as the proposed activities were limited to experimentation only. INL-19-175 R1 was reviewed under BEA-20-H033. INL-19- 175 R2 was not reviewed for cultural effects at the time the EC was issued. The review of the actions proposed in Revision 2 are included here (BEA-21-H205 R1) as they are connected to the actions proposed in Revision 3.	REC

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										The actions proposed in EC INL-19-175 R2 and R3 would occur inside and outside the Energy Systems Laboratory building. IF-685, built in 2012, is not eligible for listing on the NRHP as it is an MCP-8008, Appendix C, Excluded Property Type 1. Activities that are limited to the interior of excluded properties do not require further cultural resource review (INL 2021:25; INL CRMO 2016:47). The proposed actions would have no visual impacts as the placement of the cargo container on the northern exterior of IF-685 would not be within view of any historic properties. There will be No Historic Properties Affected from this undertaking.	
BEA-21-H212 R1*	**N/A**	IF-655 IRC Heating Ventilation and Air Conditioning (HVAC) Replacement	Replace IF-655 HVAC system at end of its useful life.	N/A	N/A	*B: 4 *B: 9 *C: 1	No Historic Properties Affected	No Historic Properties Affected	11/1/2022 J. Grams N. Holmer	Updates to the IF-655 HVAC system fall under Excluded Activity 4: Energy Conservation Measures (MCP-8008, Appendix B). The project is exempt from further archaeological review under Appendix B Excluded Activity 9: Ground Disturbance Within 50 ft of an Existing Building. There are no historic properties present within the APE as the buildings meet Appendix C Excluded Property Type 1; therefore, the proposed installation of new HVAC equipment will not affect the built environment. There will be No Historic Properties Affected as a result of this undertaking***.	REC
BEA-21-H215 R1*	**N/A**	TRA-718 Vault Lid Replacement and Foundation Repair	Install new access lid and guard rail for TRA-718 vault, and repair foundations for TRA-718 legs.	N/A	N/A	*B: 2 *B: 6 *B: 9 *C: 2 *C: 3	No Historic Properties Affected	No Historic Properties Affected	11/1/2022 L. Cook S. Plager	The replacement of the vault lid and the foundation repairs qualify as MCP-8008, Appendix B, Excluded Activity 2: Routine Maintenance Activities. Installation of the guardrails around the new vault lid qualifies under Excluded Activity 6: Safety Systems. While the new guardrails will introduce a new vertical element to the landscape, the visual lightness of their construction is unlikely to introduce any visual effects into the already industrial and utilitarian setting surrounding TRA-718. The TRA-718 vault is a subsurface structure and qualifies as an Appendix C, Excluded Property Type 2. TRA-718 (Overhead Raw Water Storage) was constructed in 1952 as part of the initial development of the Test Reactor Area (TRA) (now ATR Complex) to support the Materials Test Reactor. It is an above ground storage tank and qualifies as Excluded Property Type 3. This activity also qualifies as Excluded Activity 9 as the associated ground disturbance will occur within the fenced facility perimeter. Lastly, TRA-718 has been determined to be ineligible for the NRHP. There will be No Historic Properties Affected as a result of this undertaking***.	ATR
BEA-21-H218 R1*	**N/A**	IF-688 (EIL), IF-685 (ESL), IF-616 (WCB) Electric Roof Hatch Installation	Install safer roof hatches with automatic openers.	N/A	N/A	N/A	No Historic Properties Affected	N/A	11/1/2022 J. Grams	IF-616 (Willow Creek Building) was constructed in 1979. IF-685 (Energy Systems Laboratory) was constructed in 2012. IF-688 (Energy Innovation Laboratory) was constructed in 2013. None of these buildings meet the 50-year threshold for evaluation to the National Register of Historic Places, nor do they possess the extraordinary significance required under Criteria Consideration G. These buildings do not qualify as historic properties. No further Section 106 is required. There will be No Historic Properties Affected as a result of this undertaking***.	REC
BEA-21-H223*	**N/A**	MCRE (Molten Chloride Reactor Experiment)	Southern Company Services, Inc. (Southern Company) and TerraPower, LLC (TerraPower) and other industry partners endeavor to design, construct, and operate a liquid fueled, fast	11-17993 (MFC-776)	N/A	*B: 2 *B: 9 *C: 1	No Historic Properties Affected	No Historic Properties Affected	2/13/2023 S. Plager J. Grams	Section 106 review to support MCRE EA and Finding of No Significant Impact (FONSI) resulted in a finding of No Historic Properties Affected (See Section 6.1.3.3)***.	MFC

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
			spectrum, chloride salt fueled experimental reactor called the MCRE. MCRE is a crucial step toward commercial deployment of TerraPower's Molten Chloride Fast Reactor (MFCR) technology.								
BEA-21-H226*	**N/A**	Install Rain gutter and Heat trace on MFC 768E	Installation of rain gutter on the east side of MFC-768E over the sidewalk.	11-17988 (MFC-768E)	N/A	*B: 2	No Historic Properties Affected	N/A	11/1/2022 L. Cook	The installation of the gutter and heat trace falls under MCP-8008, Appendix B, Excluded Activity Type 2: Routine Maintenance, as guttering is routinely installed to safely direct water away from building foundations and walking surfaces as a form of preventative maintenance, and heat traces prevent ice damming and subsequent water inundation. The rain gutter will not introduce any visual effects. Consequently, there will be No Historic Properties Affected as a result of this undertaking.	MFC
BEA-21-H227*	**N/A**	Real Time Monitor Replacement	Replace ATR Real Time Monitor with commercially available hardware and software.	23-10276 (TRA-670)	N/A	*B: 6	No Historic Properties Affected	N/A	10/28/2022 L. Cook	The proposed action, replacement of a radiation monitoring system, falls underMCP-8008, Appendix B, Excluded Activity 6: Safety Systems. The ATR Real Time Monitor was installed in the early 1980s and does not constitute an original piece of equipment. Its removal will not impact any aspect of integrity or character-defining feature of TRA-670. There will be No Historic Properties Affected as a result of this project. Also see BEA-22-H010 (FY2022) as this is a duplicate scope of work.	ATR
BEA-21-H231*	**N/A**	CFA-609 Wall Repair	Repair exterior wall of CFA-609, including demolition of existing wall, removal of components for reinstallation, install new metal stud wall.	N/A	N/A	*C: 1	No Historic Properties Affected	N/A	10/27/2022 J. Grams	CFA-609 (Security Headquarters) built in 1983, does not meet the 50-year threshold for eligibility in the National Register of Historic Places and is therefore an MCP-808, Appendix C, Excluded Property Type 1 and also is not significant under Criteria Consideration G. Consequently, there will be No Historic Properties Affected as a result of this undertaking.	CFA
BEA-21-H232 R1*	**N/A**	Industrial Waste Flow Meter Flume and Sample Upgrade	Replace existing industrial wastewater pipeline fume with a new flume designed for accurate measurements over the entire range of expected flows within the pipeline.	N/A	N/A	*B: 3 *B: 9 *C: 1 *C: 6 *C: 7	No Historic Properties Affected	N/A	11/1/2022 L. Cook S. Plager	The proposed undertaking meets the criteria of MCP-8008, Appendix B, Excluded Activities 3 and 9. The construction of a new shed will be visible to four buildings and one structure, none of which meet the 50-year threshold for inclusion in the National Register (Excluded Property Type, Appendix C 1). Three of these properties meet the criteria of Excluded Property Types 6 or 7. Therefore, none of the properties qualify as a historic property. Consequently, no further Section 106 review is required, and the activity may proceed as described. There will be No Historic Properties Affected as a result of this undertaking***.	MFC
BEA-22-H120		MFC-1758 General Use Office Building (GUOB)	Construction of a new office building to replace MFC-713 which is suffering from structure failure.	N/A	N/A	N/A	N/A	N/A	N/A	This project was placed in a pending status in FY2022 as necessary 30% construction design was needed for cultural review. When the construction design package was received the project was assigned a new number. See BEA-23-H032.	MFC
BEA-23-H001*	**N/A**	HFEF Transfer Lock System Improvement (Project #32922)	Upgrade HFEF (MFC-785) transfer door control system, including network cabinet, power supply, conduit, and PLC system with HMI.	11-17957 (MFC-785)	N/A	*B: 2	No Adverse Effect	N/A	11/01/2022 L. Cook	Elements of this proposed action fall under MCP-8008, Appendix B, Excluded Activity Type 2: Routine Maintenance Activities, as they include electrical installation and replacement of components at the end of their design life. Additional consideration was given to the potential effects of removing two original control panels that operate the system, as original equipment is considered a character-defining feature of this historic property. Given their small	MFC

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										scale, their lack of unique design or engineering features, and the integral role the transfer lock control system plays in transfer of materials, there will be No Adverse Effect to historic properties. A Form 3006 was prepared.	
BEA-23-H002*	**N/A**	Integrated Waste Treatment Unit (IWTU) Sound Barrier	Construction of a sound barrier, requiring excavation.	N/A	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	11/07/2022 L. Cook N. Holmer	As there are no built environment historic properties within the APE and the proposed activity falls under MCP-8008, Appendix B, Excluded Activity 9: Ground Disturbance within Fenced Facility Perimeters, there will be No Historic Properties Affected as result of this undertaking***.	MFC
BEA-23-H003*	**N/A**	CF-1611 Fire Station Concrete Work	Replace concrete sidewalks, install xeriscape, stamped concrete, lunch area fence.	N/A	N/A	*B: 2 *B: 9 *C: 1	No Historic Properties Affected	No Historic Properties Affected	11/11/2022 L. Cook R. Cook	The project proposes several activities, including replacing concrete sidewalks, installing xeriscaping and stamped concrete, and installing an 8-foot privacy fence meets MCP-8008, Appendix B, Excluded Activity Type 2: Routine Maintenance Activities. The proposed action is excluded under Appendix B, Activity Type 9: “Ground disturbance within fenced facility perimeters,” and therefore this undertaking is exempt from archaeological review. These actions will take place around buildings that are not eligible for listing on the National Register and are Appendix C, Excluded Property Types (Property Type 1: Post-1980 buildings, with exceptions). Visual effects were considered in regard to the 8-foot privacy fence, and an APE was established to account for potential impacts. There are no historic properties identified within the APE, therefore, there will be No Historic Properties Affected as a result of this undertaking***.	CFA
BEA-23-H004*	**N/A**	Spill Bucket	Replace the spill bucket on the underground diesel fuel storage tank VES-WSC-106	N/A	N/A	*B: 9 *C: 1 *C: 3	No Historic Properties Affected	No Historic Properties Affected	12/8/2022 L. Cook R. Cook	The proposed actions will directly impact a structure and may impact a building that are considered Excluded Property Types (MCP-8008, Appendix C). Diesel storage tank VEW-WCS-106 falls under Property Type 3: Storage Tanks. CPP-1684, built in 2000, falls under Property Type 1: Post-1980 Buildings, with exceptions. The proposed action is an Appendix B Activity Type 9: Ground Disturbance within Fenced Facility Perimeters,” and therefore this undertaking is exempt from archaeological review. There will be No Historic Properties as a result of this undertaking***.	INTEC
BEA-23-H005	**N/A**	N/A	Project number issued in error.	N/A	N/A	N/A	N/A	N/A	N/A	See BEA-20-H048 R1.	
BEA-23-H006*	**N/A**	EROB Motor Coach Charging Station	Install three EV charging stations for motor coaches in NE corner of parking lot.	N/A	N/A	*B: 9 *C: 1	No Historic Properties Affected	No Historic Properties Affected	12/08/2022 L. Cook	The APE includes one INL-owned building, which has not yet reached the 50-year threshold required for evaluation to the National Register of Historic Places, nor does it possess the extraordinary significance required for listing prior to the 50-year threshold under Criteria Consideration G (MCP-8008, Appendix C, Excluded Property Type 1). It is not a historic property. The APE includes two privately-owned parcels with built environment resources of historic age that cannot be evaluated by INL CRMO. An extant plank fence and mature trees will provide visual screening of the charging stations from these resources. Therefore, the project will not introduce any physical or visual effects to any known historic-age resources. The ground disturbance activities are excluded from review under Appendix B 9 (Ground disturbance within fenced facility perimeters). There will be No Historic Properties Affected as a result of this undertaking***.	REC

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										A Form 3006 was prepared to address the two off-Site privately owned historic buildings.	
BEA-23-H007*	**N/A**	Nuclear Materials Inspection Storage (NMIS) Building Security Enhancements	Install 8 tetrapods around TRA-621; remove two trench boxes.	23-10396 (TRA-605) 23-10397 (TRA-607) 23-10399 (TRA-609) 23-10405 (TRA-615) 23-10410 (TRA-622) 23-9940 (TRA-641) 23-10265 (TRA-652) 23-10415 (TRA-653) 23-9941 (TRA-660) 23-10272 (TRA-666) N/A (TRA-666A)	N/A	N/A	No Historic Properties Affected	N/A	12/8/2022 L. Cook	The historic resources within the APE no longer retain their integrity of setting, of feeling, or of association. The installation of the security bollards and tetrapods around TRA-621 will not introduce any visual effects into the built environment. The removal of the trench boxes will have no effects, as those structures are temporary and intended to be relocated as needed. There will be No Historic Properties Affected as a result of this undertaking. A Form 3006 was prepared.	ATR
BEA-23-H008*	**N/A**	INTEC Fire Main Blockage Repair	Excavate to investigate and repair a blockage in the INTEC Fire Water Main in the NE portion of INTEC.	N/A	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	12/12/2022 L. Cook R. Cook	The proposed activities have no potential to cause effects to built environment historic properties. They are excluded under MCP-8008, Appendix B, Activity Type 9 because the ground disturbing activities are within the INTEC fenced facility perimeters. Therefore, there are no further obligations under Section 106. The INL CRMO recommends there will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H009*	**N/A**	CPP-689 Water Line Excavation and Repair	Excavate to investigate and repair a blockage in the CPP-689 Potable Water Line.	N/A	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	12/13/2022 J. Grams N. Holmer	The proposed activities have no potential to cause effects to built environment historic properties. They are excluded under MCP-8008, Appendix B, Activity Type 9 because the ground disturbing activities are within the INTEC fenced facility perimeters. Therefore, there are no further obligations under Section 106. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H010*	**N/A**	INTEC Cathodic Protection Repair	Excavate to repair a broken underground cable between Bin Set 4 and IWTU.	N/A	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	12/14/2022 L. Cook N. Holmer	The proposed activities have no potential to cause effects to built environment historic properties. They are excluded under MCP-8008, Appendix B, Activity Type 9 because the ground disturbing activities are within the INTEC fenced facility perimeters. Therefore, there are no further obligations under Section 106. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H011*	**N/A**	FCF Cooling Water Return Above Ground Piping Reroute	Reroute Fuel Conditioning Facility (MFC-765) cooling water return to void Demonstration of Microreactor Experiments (DOME) slabs and facilitate maintenance.	11-17955 (MFC-765) 11-17986 (MFC-768)	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	4/3/2023 J. Grams N. Holmer	Although this undertaking is excluded from Section 106 review per MCP-8008, Appendix B, Activity Type 2: Routine Maintenance because the FCF cooling water supply reroute is to address maintenance issues; INL CRMO staff conducted a full review because of the potential effects to the external aspects of the buildings. The proposed water pipe installation will have no effect on the qualities or setting of the historic properties because the proposed piping is to be run alongside existing piping and is of like-size and material. There will be No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	MFC

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BEA-23-H012*	**N/A**	Electric Vehicle (EV) Charging Station Installation and Operations	Install three EV charging stations at INTEC and three at REC.	N/A	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	3/14/2023 L. Cook N. Holmer	There are no built environment historic properties that were identified within the APE. Furthermore, the proposed action is excluded under MCP-8008, Appendix B, Activity Type 9. “Ground disturbance within fenced facility perimeters” and therefore this undertaking is exempt from further archaeological review***.	INTEC and REC
BEA-23-H012 R1*	**N/A**	INTEC EV Charging Station Installation	Install concrete pad for chargers at new location west of CPP-1707.	N/A	N/A	*B: 9 *C: 1 *C: 7	No Historic Properties Affected	No Historic Properties Affected	4/19/2023 L. Cook N. Holmer	There are no built environment historic properties within the APE. The resources within the APE primarily fall under exempt MCP-8008 Appendix C Property Type 1: Post-1980 Buildings, with exceptions, and Property Type 7: Mobile Trailers. One property is recommended for reassessment, which is currently infeasible due to lack of historical perspective. With respect to archaeology, the activity is exempt under Appendix B, Activity Type 9: Ground Disturbance within Fenced Facility Perimeters as the ground disturbing activities are within the INTEC fenced facility. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H013*	**N/A**	TR-79 to CPP-659 Sidewalk	Install a new sidewalk between TR-79 and CPP-659.	N/A	N/A	*B: 6 *B: 9	No Historic Properties Affected	No Historic Properties Affected	2/15/2023 L. Cook R. Cook	The project proposes to install a new sidewalk between TR-79 and CPP-659. The proposed action is excluded under MCP-8008, Appendix B, Activity Type 6: Safety Systems, because it will improve walking and working surfaces, and Activity Type 9: Ground Disturbance within Fenced Facility Perimeters.” There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H013 R1	**N/A**	TR-79 to CPP-659 Sidewalk	Extends sidewalk construction 55 feet north.	N/A	N/A	B: 7	No Historic Properties Affected	No Historic Properties Affected	7/6/2023 L. Cook R. Cook	The project proposes to extend construction of a new sidewalk approximately 55 feet to the north of the previously reviewed sidewalk construction area. This action is an Excluded Activity per MCP-8008 Revision 1, Appendix B, Activity Type 7: Ground Disturbance within Fenced Facility Perimeters (INTEC). The project proposes no activities that would impact historic built environment or archaeological historic properties. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H014*	**N/A**	TAN - OU 1-07B CERCLA Operations at TAN	Operational Unit 1-07B to remedy injection well remediation.	N/A	N/A	*A: 7 *B: 2	No Historic Properties Affected	No Historic Properties Affected	2/23/2023 L. Cook Reese Cook	The project proposes to operate the OU1-07B action at TAN. The proposed action has no potential to affect built environment historic resources, as per MCP-8008, Appendix A, Activity Type 7: Standard operating procedures. The proposed action has the potential to cause effects to archaeological historic properties but is excused from Section 106 review per MCP-8008, Appendix B, Activity Type 2: Routine maintenance activities. There will be No Historic Properties Affected as a result of this undertaking***. This cultural review assesses the activities proposed in the scope of work described in the Environmental Checklist (EC) ICP-23-004. If any additional activities not described in the scope of work are needed to complete this action, those activities will require additional review and a revision to this document.	TAN
BEA-23-H015*	**N/A**	INTEC Direct Drilling Fire Water Replacement	Repair three legs of fire water piping, including excavating nine holes and install new pipe via directional drilling.	N/A	N/A	*B: 2 *B: 9	No Historic Properties Affected	No Historic Properties Affected	2/27/2023 L. Cook R. Cook	The proposed activities are excluded under MCP-8008, Appendix B, Activity Type 2: Routine Maintenance and Activity Type 9: Ground Disturbance within Fenced Facility Perimeter. Therefore, there are no further obligations under Section 106. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H016	**N/A**	DOME Test Bed Operations	DOME Test Bed Operations.	N/A	N/A	Pending	Pending	Pending	N/A J. Grams	Pending: DOE-ID will determine the level of NEPA review for the project in FY2024 and a Section 106 review will be	MFC

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										completed in conjunction with the development of a NEPA document.	
BEA-23-H017*	**N/A**	CPP-2707 Stair Installation	Install a stair unit to improve access to CPP-749 to CPP-2707 to provide an alternative to employees traveling over loose gravel.	N/A	N/A	*B: 6 *B: 9	No Historic Properties Affected	No Historic Properties Affected	3/20/2023 L. Cook N. Holmer	The proposed activities are excluded under MCP-8008, Appendix B, Activity Type 6: Safety Systems and Activity Type 9: Ground Disturbance within Fenced Facility Perimeter. Therefore, there are no further obligations under Section 106. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H018*	**N/A**	CPP-749 Grading	Grade and level in the gravel area around the 1st generation vaults in CPP-749 to establish level ground for equipment transport	N/A	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	3/20/2023 L. Cook N. Holmer	The proposed activities have no potential to cause effects to built environment historic properties. The proposed activities are excluded under MCP_8008, Appendix B, Activity Type 9 because the ground disturbing activities are within the INTEC fenced facility perimeters. Therefore, there are no further obligations under Section 106. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H020*	**N/A**	INTEC Firewater Distribution Activities R1	Investigate and upgrade the INTEC firewater distribution system to establish a reliable and adequate system.	N/A	N/A	*B: 9 *C: 2	No Historic Properties Affected	No Historic Properties Affected	3/28/2023 L. Cook N. Holmer	The proposed activities have no potential to cause effects to built environment historic properties, as the activity is limited to Excluded Property Type 2 (MCP-8008, Appendix C): Subsurface Structures. With respect to archaeology, the activity is excluded under Appendix B, Activity Type 9: Ground Disturbance within Fenced Facility Perimeters as the ground disturbing activities are within the INTEC fenced facility. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H021*	**N/A**	Cement Pad Removal East of CPP-663	Remove bucked concrete pad east of CPP-663 and replace with clean gravel fill.	N/A	N/A	*B: 6 *B: 9	No Historic Properties Affected	No Historic Properties Affected	3/28/2023 L. Cook N. Homer	The proposed activities have no potential to cause effects to built environment historic properties, as they are excluded under MCP-8008, Appendix B Activity Type 6: Safety Systems, as they will improve walking and working surfaces. With respect to archaeology the proposed activities are excluded under Activity Type 9: Ground Disturbance within Fenced Facility Perimeters because the ground disturbing activities are within the INTEC fenced facility perimeter. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H022*	**N/A**	INTEC Utility Tunnel Hatch #3 Repairs	Excavate and repair utility tunnel near Hatch #3 and install new hatches.	N/A	N/A	*B: 2 *B: 9 *C: 2	No Historic Properties Affected	No Historic Properties Affected	3/28/2023 L. Cook R. Cook	The proposed activities have no potential to cause effects to built environment historic properties, as the activity is excluded under Activity Type 2 (MCP-8008, Appendix B): Routine Maintenance Activities and is limited to Excluded Property Type 2 (Appendix C): Subsurface Structures. With respect to archaeology, the activity is exempt under Appendix B, Activity Type 9: Ground Disturbance within Fenced Facility Perimeters as the ground disturbing activities are within the INTEC fenced facility. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H023*	**N/A**	ATR West Sidewalk Lighting Project	Install walkway lighting, duct bank, connectors, and poles on Swordfish Blvd.	23-10403 (TRA-614) 23-10408 (TRA-620) 23-9941 (TRA-641) 23-10268 (TRA-662) 23-10276 (TRA-670)	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	4/7/2023 J. Grams R. Cook	Based on the results of the potential visual effect considerations that established the APE, there were five eligible properties within the APE**. The most recent evaluations result in only one historic property within the APE: TRA-670. As of the date of this review, the CEMML report has been submitted to Idaho SHPO, but has not been concurred upon, and therefore CRMO will treat all five eligible buildings as historic properties for this project. The proposed poles are analogous to the extant ones in height, width, and the use of LED lamps. The proposed poles fit within the industrial aesthetic that dominates the ATR facility and so will not impact the integrity of setting,	ATR

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										of feeling, or of association. This action will not have any impact on the NRHP characteristics, which makes these historic properties eligible for inclusion to the NRHP. Furthermore, the activity is excluded from Section 106 under MCP-8008, Appendix B, Activity Type 9: Ground Disturbance within Fenced Facility. There will be No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	
BEA-23-H024*	**N/A**	MFC-781 Loading Dock Modification	Create functional approach path and dock parking area on an east-west layout.	11-17996 (MFC-780) 11-17997 (MFC-781) 11-17998 (MFC-783)	N/A	*B: 2 *B: 9 *C: 3	No Historic Properties Affected	No Historic Properties Affected	4/11/2023 J. Grams R. Cook	Aspects of this undertaking are excluded from review under MCP-8008, Appendix B, Activity Type 2: Routine Maintenance and 9: Ground Disturbance within Fenced Facilities. There is also an Appendix C Excluded Property Type 3 in the APE. Three historic properties are located within the APE for the undertaking. However, the removal of the pole will have no visual effects to historic properties within the APE**. Furthermore, although the loading dock is increasing in size there would be no effect to MFC-781. There will be No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	MFC
BEA-23-H025*	**N/A**	MFC-713 Demolition and Utility Upgrades	Demolish MFC-713 relocate sewer mains, electrical, piping, and communication services.	11-17977 (MFC-751) 11-17983 (MFC-759) 11-17955 (MFC-765) 11-17986 (MFC-768) 11-18009 (MFC-788)	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	4/5/2023 J. Grams R. Cook	Based on the results of the potential visual effect considerations that established the APE, there were five eligible properties within the APE**. The most recent evaluations result in only two historic properties within the APE: MFC-765 and MFC-768. As of the date of this review, the CEMML report has been submitted to Idaho SHPO, but has not been concurred upon. However, the project review moved forward under the assumption SHPO concurrence would be received. The proposed activity has no potential to cause effects to built environment historic properties. MFC-713 is a modular trailer constructed in 1992 and is not historic. The removal of MFC-713 will not affect those characteristics which make the historic properties within the project's APE (MFC-765 and MFC-768) eligible for the NRHP; relationships and key roles at MFC (Criterion A), and architectural elements (Criterion C). There will be No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	MFC
BEA-23-H027*	**N/A**	ATR Radio Tower Replacement	Replace existing temporary tower behind TRA-652 with a permanent structure.	23-10396 (TRA-605) 23-10397 (TRA-607) 23-10262 (TRA-649) 23-10265 (TRA-652) 23-10415 (TRA-653) 23-9941 (TRA-660) 23-10268 (TRA-662)	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	5/17/2023 J. Grams R. Cook	The project involves the installation of a new radio tower at the Advanced Test Reactor Complex. This activity falls under MCP-8008, Appendix B, Activity Type 9: Ground Disturbance within Fenced Facilities. The tower is replacing a temporary tower that is of the same height and general configuration (self-supporting tower). While the new tower is of monopole (as opposed to lattice steel) construction, the overall massing is the same and the new tower still fits into the general industrial aesthetic of the ATR Complex. There will be No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	ATR

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
				23-10272 (TRA-666) 23-10538 (TRA-666A)							
BEA-23-H028	**N/A**	INL Hydrogen Technology Proving Center (HTPC)	Design, procure, and construct a high temperature electrolysis demonstration test bed at CFA, known as the INL Hydrogen Technology Proving Center (HTPC).	Cancelled	Cancelled	Cancelled	Cancelled	Cancelled	Cancelled	This project was cancelled in the ERP system.	CFA
BEA-23-H029*	**N/A**	MFC-720 Generator Replacement	Replace aging generators, panels, and tanks in Room 112 with an exterior mobile generator in Transient Test Reactor (TREAT) facility (MFC-720).	11-17954 (MFC-720) 11-17965 (TREAT Historic District)	N/A	*B: 2 *B: 3 *B: 4 *B: 9	No Historic Properties Affected	No Historic Properties Affected	4/20/2023 L. Cook N. Holmer	Many of the activities proposed by the project fall within excluded activity types enumerated in MCP-8008 Appendix B, including Routine Maintenance Activities, Replacement in Kind, and Energy Conservation Measures. Additional consideration was given to the generators to be removed, as they were installed during MFC-720's period of significance (1958-1994). They are widely available commercial units and will not alter any character-defining features which make MFC-720 eligible for the National Register. Similarly, modifications to the building envelope that will result from closing penetrations following the removal of ducting and piping will not alter any character-defining features, as the closures will use materials that match existing materials and will be made on a secondary elevation of the building. Installation of the generator, load bank, electrical support board, and guard posts does introduce new vertical elements to the landscape. These elements fit within the existing scale and character of the storage area in which they will be installed and will not introduce any visual effects to either MFC-720 or the TREAT Historic District. With respect to archaeology, the activity is excluded under Appendix B, Activity Type 9: Ground Disturbance within Fenced Facility Perimeters. There will be No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	MFC
BEA-23-H030*	**N/A**	INTEC CERCLA Pond Liner Replacement	Replace torn primary liner in CPP-1793, INTEC CERCLA Evaporation Pond	N/A	N/A	*B: 9 *C: 1	No Historic Properties Affected	No Historic Properties Affected	5/2/2023 L. Cook	The proposed activities have no potential to cause effects to built environment historic properties, as the activity is limited to a property identified as an Excluded Property Type 1: Post-1980 Buildings, with Exceptions (MCP-8008, Appendix C). With respect to archaeology, the activity is exempt under Appendix B, Activity Type 9: Ground Disturbance within Fenced Facility Perimeters as the ground disturbing activities are within the INTEC fenced facility. Therefore, there are no further obligations under Section 106. There will be No Historic Properties Affected as a result of this undertaking**.	INTEC
BEA-23-H031	**N/A**	High Assay Low-Enriched Uranium (HALEU) Glovebox Polishing	Purchase and install glovebox in former FCF (MFC-765) Mockup Shop	11-17995 (MFC-765)	N/A	In Progress	In Progress	In Progress	N/A L. Cook	5/8/2023: Hold point established to require review of plans for the glovebox installation, when available. The purchase of the glovebox was authorized as project planning phase due to long-lead procurement needs. As of 9/30/2023 no progress toward description of an undertaking has been developed.	MFC
BEA-23-H032	**N/A**	MFC West Campus Office Building	Construction of a building will be located inside the MFC campus at the	11-17995 (MFC-765) 11-17986	N/A	B: 7	No Historic Properties Affected	No Historic Properties Affected	6/27/2023 J. Grams N. Holmer	The proposed activity has no potential to cause effects to built environment historic properties as the action, construction of MFC-1758, will not affect those	MFC

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
			former location of MFC-713 and just south of MFC-768.	(MFC-768)						characteristics which make the historic properties within the project's APE (MFC-765 and MFC-768***) eligible for the NRHP; relationships and key roles at MFC (Criterion A), and architectural elements (Criterion C). The construction is excluded from archaeological review under MCP-8008, Revision 1, Appendix B, Activity Type 7: Ground Disturbance within Fenced Facilities. There will be No Historic Properties Affected as a result of this undertaking***. A Form 3006 was prepared.	
BEA-23-H033	**N/A**	IRA Projects Affecting Red Rock Area at ATR	TBD	Project on hold	Project on hold	Project on hold	Project on hold	Project On hold	N/A J. Grams	As of 9/30/2023 the project remains on hold, pending scope.	ATR
BEA-23-H034	**N/A**	Naval Ordnance Test Facility (NOTF) Site Excavation	The proposed excavation operations are strictly exploratory with the goal of determining what is left of the condition of the existing portions of the NOTF rail supports, mount base and concussion wall.	23-010432	N/A	B: 7	No Historic Properties Affected	No Historic Properties Affected	7/17/2023 J. Grams N. Holmer	The proposed excavation operations are strictly exploratory with the goal of determining what is left of the condition of the existing portions of the NOTF rail supports, mount base and NOTF Concussion Wall (23-010432). This will ultimately inform the decision and planning process for restoration of the NOTF facility to its original configuration. As a result of the imposed conditions, there will be No Historic Properties Affected as a result of this undertaking. Conditions required***: ▪ Site characterization operations must be monitored by an INL CRMO architectural historian. Please contact INL CRMO to coordinate activities. (Monitoring is scheduled to occur in spring FY2024). ▪ Inadvertent and Late Discoveries***. A Form 3006 was prepared.	NOTF
BEA-23-H035	**N/A**	INL Engineering Demonstration Facility (IEDF) Bay E1/E2 Expansion	Extension of the E2 highbay roof by approximately 20 feet in height, and installation of a new overhead door.	N/A	N/A	B: 1B B: 3A B: 4 B: 6 B: 17A	No Historic Properties Affected	No Historic Properties Affected	8/24/2023 J. Grams N. Holmer	Aspects of the undertaking are excluded from review under MCP-8008, Revision 1, Appendix B Activity Types 1B, 3A, 4, 6, and 17A. The new exterior modifications, while rising 20 feet above the building's east roof, rises only 10 feet above the west roof, significantly reducing its impact. LiDAR data is not available for INL in-town facilities. Visibility of the proposed modifications were estimated, based on mass and height. There are no historic properties within the APE, and the nearest eligible INL property is approximately 30 miles distant. As such, it was determined a visual effects analysis was not warranted. There will be No Historic Properties Affected as a result of this undertaking***.	REC
BEA-23-H036	**N/A**	INTEC CPP-606 Subsidence Exploratory Evaluation	Excavate to investigate cause of subsidence south of CPP-606.	N/A	N/A	B: 7	No Historic Properties Affected	No Historic Properties Affected	6/6/2023 L. Cook N. Holmer	The proposed actions do not include activities that may impact buildings and there are no new vertical elements proposed, thus there is no potential for visual effects. The undertaking is limited to excavation within the fenced perimeter of INTEC. The project proposes to excavate approximately 3.6 yds^3 (96 ft^3) of soil in order to investigate potential causes of recent subsidence. This action is an Excluded Activity per MCP-8008 Revision 1, Appendix B, Activity Type 7: Ground Disturbance within Fenced Facility Perimeters (INTEC). There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
BEA-23-H038	**N/A**	CPP-749 Entry Upgrade	Upgrade CPP-749 south entrance, level surface for equipment transport.	N/A	N/A	B: 7	No Historic Properties Affected	No Historic Properties Affected	6/13/2023 L. Cook R. Cook	The proposed actions do not include activities that may impact buildings and there are no new vertical elements proposed, thus there is no potential for visual effects. The undertaking is limited to excavation within the fenced	INTEC

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										perimeter of INTEC. The project proposes to excavate approximately 65 yd^3 of soil in order to upgrade the south entrance of CPP-749, Peach Bottom Fuel Storage Facility. This action is an Excluded Activity per MCP-8008 Revision 1, Appendix B, Activity Type 7: Ground Disturbance within Fenced Facility Perimeters (INTEC). There will be No Historic Properties Affected as a result of this undertaking***.	
BEA-23-H039	**N/A**	EBR-I Drinking Fountain	Replace leaking drain trap under second floor drinking fountain.	23-00790 (EBR-I)	N/A	N/A	No Historic Properties Affected	N/A	6/19/2023 L. Cook	The project proposes to replace a chrome drain trap and piping within an interior wall associated with the second-floor drinking fountain of EBR-I. These elements are not original to the period of significance for the property (1951-1966). Though no record of the water fountain's installation could be found, it was likely installed c. 1974-1980, the period during which the NPS operated EBR-I as a visitor-accessible historic site. As such, the replacement of the degraded piping will have no physical effect on the characteristics that make EBR-I eligible for the NRHP or its status as an NHL. The pipes proposed for replacement with PVC are not readily visible to the public and will not introduce visible discontinuity. Furthermore, replacing the degraded materials with longer-lived PVC will require less intrusion into the fabric of the building over time, thereby helping to prolong the integrity of the materials related to the period of significance and the overall health of the building. The repair of the drain trap and interior piping and its replacement with PVC will not have an effect on EBR-I. There will be No Historic Properties Affected as a result of this undertaking. A Form 3006 was prepared.	EBR-I
BEA-23-H040	**N/A**	CFA Salt and Sand Shelter	Construction of new shelter.	23-9966 (CF-651) 23-9958 (CF-704)	In Progress	In Progress	In Progress	In Progress	In Progress J. Grams N. Holmer	In progress. As of 9/30/2023, this project remained in progress, and will be reported in FY2024 (See Section 6.1.4.5).	CFA
BEA-23-H041	**N/A**	Bollard Removal	Removal and replacement of damaged bollard near CPP-1631.	N/A	N/A	B: 7	No Historic Properties Affected	No Historic Properties Affected	9/27/2023 L. Cook R. Cook	The project proposes to remove and replace a damaged bollard northeast of CPP-1631. The replacement-in-kind has no potential to affect surrounding cultural resources, as the bollard is not physically connected to a building and is within the INTEC fenced facility perimeter. It is excluded from review under MCP-8008 Revision 1, Appendix B Activity Type 7: Ground Disturbance within Fenced Facilities. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
N/A	**BEA-18-37 R7***	Electrical Resistivity and Multi-channel Analysis of Surface Waves (MASW) Surveys	The latest revision to the Environmental Compliance Permit (INL-19-067 R5) for the Utah Associated Municipal Power Systems (UAMPS) Carbon Free Power Project (CFPP) site characterization program has proposed supplemental electrical resistivity assays, multi-channel analysis of surface waves (MASW) surveys, and topographic survey work at the CFPP site. This work is planned to be completed in the spring/early summer of 2023.	N/A	N/A	N/A	N/A	No Historic Properties Affected	4/3/2023 R. Cook	The entire APE was previously inventoried for cultural resources in 2019 (BEA-18-37 R3) which resulted in identification of no historic properties within the current APE. The previous inventory and results are adequate to assess effects for the current undertaking. Therefore, the CRMO recommends there would be no effect to historic properties as a result of the undertaking***. Note: The CFPP Combined License Application Support project was cancelled (See BEA-22-49).	INL Site

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
N/A	**BEA-20-33 R1***	USG #52	Added locations for the ongoing wireless test bed radio frequency research. The activities associated with USG 52 include the set up and use of antennas ranging in size from small omni multiband antennas to half size cellular directional antennas and associated vehicle mount, trailer-mount 55KW diesel generator, rack mount, manpack or handheld transceivers / radios / servers. The project plans to utilize established INL paved and T-roads for testing activities and use the same roads to access their test locations. One or two vehicles may be parked along the shoulder of the road at the test locations when needed. They also may place temporary porta potties at remote and portable Wireless Test Bed (WTB) work locations where wastewater utilities are not available.	N/A	N/A	N/A	N/A	No Historic Properties Affected	2/20/2023 R. Cook	INL-15-031 R4 (OA 24) received added scope of work through email. There is no current exclusion for these activities in Management Control Procedure MCP-8008, in the 2004 PA between DOE and SHPO, nor the CRMP. However, the INL CRMO considers the activities described in the scope of work to be a minimal, non-invasive, and a limited action that has no potential to impact cultural resources given the temporary nature of the activities. If this project had been reviewed post-2023 PA issuance, these activities would merit application of Appendix B exclusion 17B (Location Qualified) due to the use and set up of temporary wireless antennas, porta potties, and activities taking place on existing roads. There will be No Historic Properties Affected as a result of the undertaking***.	INL Site
N/A	**BEA-21-28 R3***	Unmanned Aerial System Testing	The undertaking proposes to build a new 50 ft by 100 ft gravel pad immediately southeast of the UAV runway.	N/A	N/A	N/A	N/A	No Historic Properties Affected	11/29/2022 R. Cook J. Grams	Class III intensive field survey performed on 11/03/2022 found no cultural resources in the project APE. The proposed pad will be built at or slightly above the current and natural grade. As such, no visual effects to historic properties are anticipated. Based on the size, position (with respect to grade) and location of the new gravel pad, no visual or physical effects to built environment historic properties are anticipated. There will be No Historic Properties Affected as a result of this undertaking***.	0.11 INL Site
N/A	**BEA-21-31 R1**	ICDF Expansion	Creation of a new Idaho CERCLA Disposal Facility (ICDF) landfill immediately south of the existing ICDF landfill. In 2021, the project originally reviewed an area designated by the project as the preferred location. In 2023, that area was expanded south and east to accommodate additional areas for construction (soil amendment area, overburden area, and geotechnical survey)	N/A	N/A	C: 1 C: 12	No Historic Properties Affected	No Historic Properties Affected	5/24/2023 N. Holmer J. Grams	The original Section 106 review, completed in 2021, contained a historic linear resource that is not eligible for the NRHP. In 2021, a Class III intensive field survey of the original 139.03-acre APE (Holmer and Grams 2021) identified one linear historic canal (IHSI# BLRIP-SC) that is not eligible for listing on the National Register of Historic Places. The review completed in 2023 (Revision 1 to FRM-3004) and the Class III intensive field survey of the 83.73-acre APE expansion identified no historic properties. With respect to the existing structures within the APE, the property type falls under MCP-8008 Revision 1, Appendix C Property Type 1: Subsurface Structures and C-12: Flood Control Features, as the facility includes runoff collection ponds and buried material disposal areas. The undertaking proposed construction of a 12 foot tall earthen berm surrounding a new disposal area which is identical to that surrounding the existing adjacent ICDF disposal area. The proposed earthen berm is compatible in terms of scale, contrast, and character to the existing earthen berm and will not introduce visual effects to the surrounding built environment. There will be No Historic Properties Affected as a result of this undertaking***.	83.73 INTEC
N/A	**BEA-21-47 R1***	Natural Resources Sagebrush Planting	Planting of 1,200 acres of sagebrush seedlings (41,300 containers, 13,700 seedlings)	N/A	BEA-05-41-10 BEA-05-41-11 BEA-07-32-104 BEA-07-30-03	N/A	N/A	No Historic Properties Affected	10/11/2022 R. Cook	In September and October of 2021, the INL Environmental Surveillance, Education, and Research Program (ESER) and the Idaho Department of Fish and Game (IDFG) planted sagebrush seedlings in seven areas of a recently burned area	INL Site

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
					BEA-20-26-TH04					on the eastern INL Desert Site to stabilize soils and restore sage-grouse habitat. Most of the previous APE had not been inventoried for cultural resources, however it was determined that manually planting sagebrush would result in a disturbance of less than a fraction of a percent (0.06%) of the project APE, and conditions would avoid or minimize effects. Therefore, the project resulted in no potential to affect historic properties for BEA-21-47. In October of 2022, the INL Natural Resources group and Desert Sage Farms LLC. plan to plant 41,300 containerized sagebrush seedlings along T-3 inside burn scar of the telegraph fire and an additional 13,700 seedlings along T-4 between middle and east butte to stabilize soils and restore sage-grouse habitat. Approximately 1,200 acres will be planted with sagebrush seedlings. The area near T-4 between Middle Butte and East Butte measures approximately 3,000 by 1,420 meters and totals about 900 acres (Figure 1). The area near T-4 was not recently affected by a range fire but will extend the adjacent Sagebrush habitat and support active Sage-grouse leks. Areas near T-3 are four irregularly shaped that total approximately 300 acres inside burn scar of the telegraph fire. The disturbance within the APE is identical to the original project scope (BEA-21-47): "*Within each area, sagebrush seedlings will be planted by hand at a density of 80 seedlings per acre (198 seedlings/ha) to maximize spatial coverage of the project. Seedlings will be planted using a hoedad forest planting tool. The hoedad is used to strike the ground to create a hole just large enough to fit the root structure of the plant. This disturbs an area less than 20 cm in diameter to a depth of 20 to 25 cm. This would amount to 6.2 m2 of disturbance per hectare, or 0.06% of the area of potential effect. According to the planting plan (Kramer et al. 2021), 'this concentration is not designed to create densities that typify sage-grouse habitat, but rather to establish sagebrush seed sources over larger priority areas to shorten the time interval between a fire and the reestablishment of sagebrush habitat'.*" Travel within the planting site will be limited to foot traffic and the use of a UTV for transporting seedlings to sites further from the road. UTVs will be limited to a single time pass across a particular area to avoid additional disturbance resulting from repeated passes. Additionally, UTVs will only be utilized if soils are dry and stable. Five previously recorded sites were identified in the current APE: BEA-05-41-10 (recommended eligible), BEA-05-41-11 (unevaluated), BEA-07-32-104 (unevaluated), BEA-07-30-03 (recommended eligible), and BEA-20-26-TH04 (unevaluated). Because manual planting of sagebrush results in disturbance of less than a fraction of a percent of the project APE (0.06%), this activity will not affect the integrity or NRHP eligibility of any historic properties present. Additionally,	

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										since sagebrush planting is conducted with the intent of restoring habitat and stabilizing soils, the project will lessen the ongoing post-fire erosion and deflation to archaeological resources (known and unknown) within the project area and create long-term benefits in soil stabilization. The CRMO recommends the project proceed with the following conditions: (1) All vehicles will remain on established and approved roads except when traveling on UTV where a single time pass across a particular area is permitted when soils are dry and stable; (2) Prior to planting, all workers will be given a pre-job briefing by a member of the CRMO staff (in English and Spanish) on how to recognize Precontact and Historic artifacts that are common on the INL (3) Inadvertent and Late Discoveries. Planting will be permitted within the boundaries of archaeological sites, both known and unknown, but workers will be instructed not to disturb artifacts such as "arrowheads", flakes of obsidian, or historic debris. Workers will be further instructed to report any observed artifacts to project managers, who will record and transmit the location of such late discoveries to CRMO staff. While the majority (95.1%) of the project APE has not been inventoried for cultural resources, only five archaeological sites have been previously recorded within the APE. Other cultural resources are likely present, however, given the conditions listed above, the low density of sagebrush planting, and the project's potential to stabilize soils (including within known and unknown historic properties), the proposed actions will have no effect on historic properties.	
N/A	**BEA-21-47 R2***	Natural Resources Sagebrush Planting	Planting of 1,200 acres of sagebrush seedlings (41,300 containers, 13,700 seedlings)	N/A	BEA-05-41-10 BEA-05-41-11 BEA-07-32-104 BEA-07-30-03 BEA-20-26-TH04	N/A	N/A	No Historic Properties Affected	10/12/2022 R. Cook	Modification to the scope of work clarified UTV travel: The scope for the current project (BEA-21-47 and 21-37 R1) included UTV off-road travel. Modification of the scope includes travel off-road from the T-roads (T-3 and T-4) to some of the remote planting locations. The UTVs will be limited to a single time pass across a particular area to avoid additional disturbance resulting from repeated passes. To avoid any additional disturbances to resources, UTVs will only be utilized if soils are dry and stable. Transport of the seedlings to their individual planting locations from the UTV will be limited to foot traffic. The remainder of the project scope and finding of effect remains unchanged. Five previously recorded sites were identified in the current APE: BEA-05-41-10 (recommended eligible), BEA-05-41-11 (unevaluated), BEA-07-32-104 (unevaluated), BEA-07-30-03 (recommended eligible), and BEA-20-26-TH04 (unevaluated). Because manual planting of sagebrush results in disturbance of less than a fraction of a percent of the project APE (0.06%), this activity will not affect the integrity or NRHP eligibility of any historic properties present. Additionally,	INL Site

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										since sagebrush planting is conducted with the intent of restoring habitat and stabilizing soils, the project will lessen the ongoing post-fire erosion and deflation to archaeological resources (known and unknown) within the project area and create long term benefits in soil stabilization. The UTV used to transport the seedlings from the T-roads to the planting locations is a lightweight vehicle with rubber tires and will have no effect to historic properties when the soil conditions are dry and stable. Additionally, limiting off-road traffic to a single pass out to the planting location and returning along another path will minimize any disturbance and avoid the formation of a new two-track road. The INL CRMO recommends the following conditions: ▪ All vehicles will remain on established and approved roads except when traveling on UTV where a single time pass across a particular area is permitted when soils are dry and stable. ▪ Prior to planting, all workers will be given a pre-job briefing by a member of the INL CRMO staff (in English and Spanish) on how to recognize Precontact and Historic artifacts that are common on the INL. ▪ Project managers will alert INL CRMO staff of any inadvertent or late discoveries. ▪ Inadvertent and Late Discoveries***. Planting will be permitted within the boundaries of archaeological sites, both known and unknown, but workers will be instructed not to disturb artifacts such as “arrowheads”, flakes of obsidian, or historic debris. Workers will be further instructed to report any observed artifacts to project managers, who will record and transmit the location of such late discoveries to CRMO staff. While the majority (95.1%) of the project APE has not been inventoried for cultural resources, only five archaeological sites have been previously recorded within the APE. Other cultural resources are likely present, however, given the conditions listed above, the low density of sagebrush planting, and the project’s potential to stabilize soils (including within known and unknown historic properties), the proposed actions will have no effect on historic properties. INL CRMO Staff delivered the cultural resource awareness training in English and Spanish on October 17, 2022.	
N/A	**BEA-22-28**	Wildland Fire Mitigation and Recovery Plans	F&SS proposes to upgrade many of the T-roads to improve access for Wildland Fire (WLF).	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress N. Holmer	As of 9/30/2023, this project remained in progress and will be reported in FY2024 (Section 6.1.4.1).	INL Site
N/A	**BEA-22-47**	Gravel Borrow Pits Expansion	The annual ECP covers typical gravel/borrow source activities within the INL approved boundaries of active sources. Areas not previously surveyed within the administrative boundaries of the Adams and Rye Grass borrow sources were examined.	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress R. Cook	As of 9/30/2023, this project remained in progress and will be reported in FY2024 (Section 6.1.4.2).	INL Site
N/A	**BEA-22-49**	CFPP Combined Licensed	FLUOR requested an inventory of the CFPP construction footprint and the	N/A	N/A	Cancelled	Cancelled	Cancelled	Cancelled R. Cook	This project was cancelled (Section 6.1.4.3).	INL Site

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
		Application (COLA) Support	power corridor for the Combined Licensing Application.								
N/A	**BEA-22-54**	NRF Expansion projects	Reroute and installation of utilities from Substation #4 to Substation #6.	N/A	N/A	N/A	N/A	No Historic Properties Affected	3/8/2023 R. Cook	The previous Class III inventories completed within the APE of the proposed NRF Utility Reroute Project are adequate to assess effects for the current undertaking. There are no historic properties in the current APE. There will be No Historic Properties Affected as a result of this undertaking***.	NRF
N/A	**BEA-22-58***	Power Management West Loop Gravel Dump-Road Maintenance	Placement of gravel material where needed along T-2 to enable passage of their vehicles.	10BT1380 10BT1383 10BT1403	BEA-18-20-35 BEA-21-24-RA4 BEA-21-24-RA3	N/A	N/A	No Historic Properties Affected	11/15//2022 R. Allen	In FY2022, six historic properties were identified in the APE. However, as of 9/30/2023 no project activities have been undertaken and the CRMO is aware of pending changes to the scope of work to modify the APE (See BEA-22-58 R1). As such, the CRR will be revised in FY2024 to reflect the new scope of work, reassess for presence of historic properties in the APE, and record or re-record as needed.	INL Site
N/A	**BEA-22-58 R1***	Power Management West Loop Gravel Dump-Road Maintenance, R1	Placement of gravel material at nine locations along the West Loop Powerline Road.	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress R. Allen	As of 9/30/2023, this project remained in progress and will be reported in FY2024 (Section 6.1.4.4).	INL Site
N/A	**BEA-23-01***	Power Management Bird Nest Removal	Removal of migratory bird nests on power pole structures.	N/A	N/A	N/A	N/A	No Historic Properties Affected	1/18/2023 R. Allen N. Holmer	A Class I records review indicated that the entire 3.81-acre APE has been previously inventoried under BEA-18-20. No historic properties were found in the APE for the current undertaking. Therefore, previous inventories are adequate to assess effects for the current undertaking. There will be No Historic Properties Affected as a result of this undertaking***.	INL Site
N/A	**BEA-23-03**	Waterline CFA to Live Fire Range	Installation of a waterline to service the Live Fire Range, runs from CFA fire station to Live Fire Range.	N/A	BEA-23-03-01	N/A	N/A	No Historic Properties Affected	8/4/2023 R. Allen	A Class III cultural resource inventory was conducted for 22.16 acres. One isolated find was documented (See Appendix B). The project APE was redesigned to avoid one historic property (10BT1448). With the redesign of the APE, there are no historic properties present. There will be No Historic Properties Affected as a result of this undertaking***. Form 3006 was prepared.	22.16 CFA
N/A	**BEA-23-04***	West CFA Power Infrastructure Improvements	The project is proposing to install several power poles and transformer upgrade adjacent to CF-686.	23-9981 (CF-676) 23-9992 (CF-695) 23-9993 (CF-698)	N/A	*B: 2 *C: 1	No Historic Properties Affected	No Historic Properties Affected	3/28/2023 R. Allen J. Grams	Based on a records search, previous Class III inventories, a GIS exercise for visual considerations, and application of activities excluded from further Section 106 review (MCP-8008 Appendix B, Activity Type 2 and Appendix C, Property Type 1. There are three historic properties within the APE. However, the installation of nine new poles has no effect to the NRHP characteristics or integrity of the historic properties within the APE. There will be No Historic Properties Affected as a result of this undertaking***.	CFA
N/A	**BEA-23-05***	SMC Sign Installation	Installation of a facility sign for the SMC/TAN complex.	N/A	N/A	*B: 9	No Historic Properties Affected	No Historic Properties Affected	2/27/2023 R. Cooke J. Grams	The project is excluded from Section 106 review under MCP-8008, Appendix B, Activity Type 9: Ground Disturbance within Fenced Facilities. There are no historic properties in the APE. No visual effects are anticipated as the sign design and size is consistent with similar informative signage across INL Site facilities. There will be No Historic Properties Affected as a result of this undertaking***.	TAN

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
N/A	**BEA-23-06***	Lighting for NRF and INTEC Intersections at Lincoln Blvd	Relocating two light pole and installing 18 Street lights along Lincoln Blvd. at NRF and INTEC.	N/A	N/A	*B: 6 *C: 5	No Historic Properties Affected	No Historic Properties Affected	3/30/2023 R. Cook J. Grams	The previous Class III inventories within the APE are adequate to assess effects for the current undertaking to archaeological historic properties as there are none in the APE. Although the relocated utility/light poles are excluded from Section 106 review perMCP-8008, Appendix B, Activity Type 6: Safety Systems, as the lights are intended to improve visibility at this intersection, and Appendix C #5 Utility Poles and Towers, the INL CRMO determined potential visual effects as a result of the relocation and installation of new light poles warranted a Section 106 review. The visual effects anticipated with respect to the two relocated light poles determined that their relative size and visibility is consistent with the scale and character of the light poles across the street at the Lincoln Road/INTEC intersection. Furthermore, viewshed analysis indicates that the light poles will not be visible from any built environment properties. With respect to the installation of the 18 new light poles at the Lincoln Road/NRF “Y”, viewshed analysis indicates that the poles will not be visible from any built environment properties and are of similar design to street lighting systems across the INL facilities complex. There will be No Historic Properties Affected as a result of this undertaking***.	NRF INTEC
N/A	**BEA-23-07***	MFC and CFA Swallow Nesting Structures	The project is proposing to install two 8' x 12' animal shelters outside the northwest MFC facility fence line and two southeast of the CFA area to provide nesting habitat for two species of swallow.	N/A	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	4/19/2023 R. Allen L. Cook	The proposed actions will not introduce physical effects to any built environment historic resource. The structures are small compared to existing facilities at MFC and CFA, will have similar coloration to the area in which they will be placed, and are located on the outskirts of the respective facilities. With respect to archaeology, the results of a Class I Existing Information Inventory found that the entire project APE has been previously inventoried (and no historic properties are present. There will be No Historic Properties Affected as a result of this undertaking***.	MFC CFA
N/A	**BEA-23-08**	AMEDD RDD IND Material Training Activities and Evaluations	The project is proposing to train Army medical staff in radiological detection using handheld and technology. This revision (R9) adds additional locations for the testing, more notably taking soil samples to perform additional test training activities.	N/A	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	6/12/2023 N. Holmer L. Cook	A Class III cultural resource inventory was completed for 7.97 acres. No cultural resources were identified. As described in the project scope, the training materials placed within Power Burst Facility (PBF)-612 are temporary. A Class I existing information inventory identified that all areas of the APE have been previously inventoried for cultural resources and at current standards. Those surveys identified no historic properties. Given recent wildland fire events a Class III intensive field survey was performed of the area added in Revision 9 of INL-12-087 in the south corner of the CITRC facility as this area has not been surveyed since those fires. The result of this Class III inventory identified one historic property in the survey area (BEA-23-08-01/10BT1223). The APE was modified to avoid the historic property. As such, there are no historic properties within the APE. However, the CITRC area is a culturally sensitive area for the Shoshone-Bannock Tribes. As a result, the following stipulations are required to be completed during project implementation: ▪ All project personnel participating in the training exercises will be required to complete the online	7.97 CITRC

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										cultural resource awareness training (OINL1705) prior to participation in project activities. ▪ All soil sampling along the east side of the pavement at PBF-622 & PBF-623 will require on-site monitoring by an INL CRMO archaeologist and a member of the Shoshone-Bannock HeTO, if available. ▪ Inadvertent and Late Discoveries***. ▪ In order to prevent project delays, the project manager must contact the INL CRMO to schedule monitoring at least four (4) working days in advance to allow proper time to schedule with the Shoshone-Bannock Tribes. Therefore, there will be No Historic Properties Affected as a result of this undertaking. During implementation of the undertaking, no work occurred in areas that required archaeological monitoring.	
N/A	**BEA-23-09***	SMC Satellite Office Specification	Geotech drilling for SMC office building in the REC complex.	N/A	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	4/11/2023 R. Cook L. Cook	A Class III inventory of 1.8 acres was conducted and no historic properties were identified. The proposed drilling/excavation and subsequent backfilling actions will have no physical effect on the surrounding built environment which consists of less-than 50-year-old buildings ineligible under Criterion G and remain unevaluated at this time. There will be No Historic Properties Affected as a result of this undertaking***.	1.8 REC
N/A	**BEA-23-09 R1**	SMC Satellite Office Specification	Construction of a new office building for the SMC satellite office at the REC. Includes installation of power, communications, water, sewer, slab-on-grade foundation, relocation of existing gravel road, and grading.	N/A	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	6/6/2023 R. Cook J. Grams	Previous Class III inventory conducted for BEA-23-09 resulted in no historic properties identified in the APE. There are no built environment resources in the APE. There will be No Historic Properties Affected as a result of this undertaking***.	REC
N/A	**BEA-23-10**	Telephone Post Removal, CITRC	Removal of several old telephone poles between PBF-707/608 and an existing line near PBF-768.	N/A	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	5/24/2023 R. Allen J. Grams	No archaeological or built environment historic properties have been noted by previous surveys in the current APE, and the current survey of 1.11 acres noted no historic properties. Although there are no historic properties in the APE, the project is located inside CITRC, an area of cultural sensitivity on the INL Site. The following conditions were applied to this undertaking: ▪ Inadvertent and Late Discoveries***. ▪ INL CRMO staff will monitor the removal of the telephone posts due to the project being located inside CITRC, an area of cultural sensitivity. ▪ In order to prevent project delays, the project must contact the INL CRMO to schedule monitoring at least four (4) working days in advance to allow proper time to schedule with the Shoshone-Bannock Tribes. Monitoring took place on 5/24/2023 by INL CRMO staff. HeTO staff were unable to attend during the project monitoring activities.	1.11 CITRC
N/A	**BEA-23-11**	Power Management, NRF to TAN Maintenance	Maintenance of hardware on power poles and power pole replacements.	N/A	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	5/24/2023 R. Allen J. Grams	Although two historic properties were identified within the APE, as originally designed (10BT1403 and BEA-18-20-32 are near poles 102 and 105), the project was modified to reconfigure the APE to completely avoid them. As a result, there are no historic properties within the APE. Thus, there will be No Historic Properties Affected as a result of this undertaking***. The following conditions were applied to this undertaking:	NRF TAN

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										▪ Inadvertent and Late Discoveries***. ▪ INL Power Management will advise the INL CRMO when it plans to work on poles 102 and 105. Two historic properties will be flagged for avoidance prior to work commencing around these work locations. A Form 3006 was prepared.	
N/A	**BEA-23-12**	New Light Pole at SMC for Facility and Safety Improvements	The construction of a new light tower to support facility safety and security near the Specific Manufacturing Capability facility.	N/A	N/A	B: 4A B: 4B	No Historic Properties Affected	No Historic Properties Affected	6/29/2023 R. Cook J. Grams	Previous Class III inventories performed within the APE are adequate to assess effects to archaeological resources for the current undertaking. With respect to the built environment, the activity is excluded from Section 106 review per MCP-8008 Rev 1., Appendix B. The proposed action is excluded under MCP-8008, Revision 1, Activity Type 4-A and 4-B, Security and Safety Systems because the purpose of the light is for safety and security of personnel in the area. There will be no visual effects as an existing light tower of the same design is centrally located in the historic part of the complex in proximity to the hanger. While the new light tower is somewhat taller, it is located over a quarter mile from the historic part of the complex in an area of new construction, rendering its visual impact less than that of the existing tower. There will be No Historic Properties Affected as a result of this undertaking***.	TAN
N/A	**BEA-23-13**	NRF Reactors Facility South and West Boundary Wall	This is the last undertaking to complete the southern and western perimeter walls for the NRF facility.	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress R. Cook J. Grams	As of 9/30/2023, this project remained in progress and will be reported in FY2024 (See Section 6.1.4.6).	NRF
N/A	**BEA-23-15**	Sinks Grazing Roads Rehabilitation	Rutted ranching roads will be filled in avoid vehicles creating new tracks	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress R. Allen	As of 9/30/2023, this project remained in progress and will be reported in FY2024 (See Section 6.1.4.7).	INL Site
N/A	**BEA-23-16**	Pad A Site Characterization at CITRC for Project Pele	This project involves site characterization at Pad A and the INL borrow pit that will be used as the basis for designing the shielding structure for the mobile microreactor. Site characterization work typically includes drilling several small-diameter bore holes to depths of 20 to 100 feet at the site, collecting samples of the cuttings for analysis, and performing other subsurface measurements in the borings as part of a typical geotechnical investigation. Furthermore, Project Pele proposes to utilize Pad A and this information will be included in a Supplemental Section 106 report to previous submissions to support Project Pele EIS.	N/A	N/A	A: 7 B:10 B:14	N/A	No Historic Properties Affected	6/15/2023 S. Plager	The soil characterization studies proposed within the gravel pits are not the type of activity that has the potential to cause effects to archaeological historic properties and do not trigger Section 106 review. These actions are considered standard operations as listed under MCP-8008, Revision 1 Appendix A No. 7. The methods employed during the geographical survey would be similar to those employed during Cadastral Survey, MCP-8008 Appendix B No. 14. No ground disturbance is authorized with the geographical survey, and it is considered an excluded activity. The APE has been intensively surveyed in conjunction with four previous investigations and no cultural resources have been recorded within its boundary. The review of the undertaking proposed to conduct site characterization at CITRC Pad A resulted in a finding of no historic properties affected. The proposed undertaking would take place within CITRC, an area highly sensitive to the Shoshone and Bannock people. The following conditions are required: ▪ All researchers, customers, subcontractors, and construction and baseline project personnel directly or indirectly associated with Project Pele activities at CITRC are required to take the INL Cultural Resource Awareness Training. ▪ LWP-8000 requires all ground disturbance within CITRC to be monitored by an archaeologist meeting the Secretary of Interior's qualifications and, if available, a member of the Shoshone-Bannock HeTO.	CITRC

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										▪ In order to prevent project delays, the project manager must contact the INL CRMO to schedule monitoring at least four (4) working days in advance to allow necessary time to schedule with the Shoshone-Bannock Tribes. ▪ Inadvertent and Late Discoveries***. The review of the undertaking proposed to conduct site characterization at CITRC Pad A and the Section 106 review of the proposed use of Pad A for Project Pele resulted in a finding of No Historic Properties Affected. SHPO did not concur with No Historic Properties Affected and rendered a finding of No Adverse Effect. DOE-ID intends to further consult with SHPO to resolve this difference in FY2024 according to 36 CFR 800.4(d)(1)(ii), as a No Historic Properties Affected finding was adequately documented and is appropriate according to Stipulation V.B.2.a.3. of the 2023 Programmatic Agreement.	
N/A	**BEA-23-18**	INTEC Power and Water Upgrade	Installation of the new electrical line and will consist of an 800 ft linear excavation. Approximately 650 ft of the excavation is between CPP-1711 (Well Pump #4) and the northern INTEC fence and the remaining 150 ft is within the INTEC fence. Additionally, a new concrete duct bank will be placed directly over the existing direct buried feeder cable which is being abandoned in place.	N/A	N/A	N/A	No Historic Properties Affected	No Historic Properties Affected	7/12/2023 R. Cook L. Cook	Previous Class III inventories performed within the APE are adequate to assess effects to archaeological resources for the current undertaking. There are no historic properties in the APE for the proposed undertaking. There will be No Historic Properties Affected as a result of this undertaking***.	INTEC
N/A	**BEA-23-19**	National and Homeland Security (N&HS) Testing Training and Demonstrations	This tent ECP of the N&HS Wireless Testbed project locations and actions is all the future and past locations and actions for WTB projects.	N/A	N/A	B: 7 B: 10A B: 10B	N/A	No Historic Properties Affected	8/15/2023 R. Cook	There are 163 locations for the proposed 27 activities associated with the WTB projects. A Class I existing information search identified 38 previous surveys that partially inventoried the current project APE. No historic properties were identified in the current APE as part of the previous surveys. The remaining 0.06-acre area of the current APE previously surveyed was inventoried for cultural resources in a Class III intensive field survey which resulted in no historic properties identified. There will be No Historic Properties Affected as a result of this undertaking***. However, the following conditions apply: ▪ Inadvertent and Late Discoveries***. ▪ All ground disturbing activities near the CITRC area and outside of any of the designated test locations requires the presence of an archaeologist at all times while ground disturbance is occurring. Contact the INL CRMO for applicability.	0.06 INL Site
N/A	**BEA-23-20**	Fire Alarm Panel Upgrades at PBF	The project is proposing to replace the fire alarm panels, power supplies, and battery boxes at PBF-613, PBF-612, PBF-622, and PBF-623. The project is also proposing to install a single power pole southeast of PBF-TR-04 in order to run cable on additional existing poles between buildings PBF-622, PBF-623, and PBF-TR-04.	N/A	N/A	B: 4B B: 17A	No Historic Properties Affected	No Historic Properties Affected	8/2/2023 N. Holmer J. Grams	A records search identified three recent cultural resource inventories that cover the entire project APE and that meet current standards. These inventories identified no historic properties within the current project APE and no further surveys were required. As a result, the INL CRMO recommendation is no historic properties present, no historic properties affected. However, given the sensitive nature of the immediate surrounding area, on site monitoring during the placement of the new pole is required. Conditions required: ▪ On site monitoring during ground disturbance by an INL CRMO archaeologist. Ground disturbance	CITRC

Built Environment Project Number	Archaeology Project Number	Project Name	Project Description/Summary	IHSI Number ASI Number**	New Resource Number	Exclusions (Appendix: A, B, C)	Built Environment Finding	Archaeology Finding	Finalized Date Reviewer	Notes/Remarks	Acres Location
										includes the digging of the hole for the new pole, placement of the new pole, and backfilling of the new pole. ▪ Contact the INL CRMO at least four (4) working days in advance of ground disturbing activities to provide adequate time for scheduling. ▪ Inadvertent and Late Discoveries***. As of 9/30/2023, ground disturbing activities are in the planning phase at this time and anticipated to begin in early FY2024.	
N/A	**BEA-23-21**	Cell Site 6 Expansion	The project is proposing to expand the Cell Site #6. This includes expanding the gravel pad, expanding the fence, adding an egress road, adding a snow removal area, providing ISO shelter, adding communications equipment, and installing concrete pads on the new gravel expansion.	N/A	N/A	NA	No Historic Properties Affected	No Historic Properties Affected	8/8/2023 N. Holmer J. Grams	The records search identified two previous inventories that meet current survey and reporting standards and cover 1.36 acres of the 2.59-acre project APE. An additional 1.23 acres of the APE were surveyed on August 3, 2023; no cultural resources were identified. In addition, the ISO shelter height of 8 feet is under the height limit of 15 feet that would require a visual effects analysis historic properties. There will be no effect to historic properties as a result of this undertaking***.	1.23 INL Site
N/A	**BEA-23-21R1**	Cell Site 6 Expansion	The project has revised the scope of communications equipment proposed for installation, adding a 25ft (7.5m) spherical dome with a 5ft (1.5m) lightning spike atop.	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress N. Holmer J. Grams	In progress. As of 9/30/2023, this project remained in progress and will be reported in FY2024 (See Section 6.1.4.8).	INL Site
N/A	**BEA-23-22**	Upgrade to CITRC Pad D	Grubbing and de-vegetating the access road and the Pad D parking area, placing/compacting a gravel pad for parking and placing/compacting gravel along the access road from the southwest edge of the concrete apron of PBF-613 to the Pad D parking area.	In Progress	In Progress	In Progress	In Progress	In Progress	In Progress N. Holmer	In progress. As of 9/30/2023, this project remained in progress and will be reported in FY2024 (See Section 6.1.4.9).	CITRC

** - Denotes those projects reviewed pursuant to the standards of the CRMP (DOE-ID 2016) and MCP-8008 (Project Nos.) as well as the reconciled exemptions and exclusions found in the 2023 Programmatic Agreement and flowed down to MCP-8008 Revision 1 (Exempt App: A, B, C). See Appendix D for the previously implemented exclusions pursuant to the INL Cultural Resource Management Plan.*
*** - For Section 106 reviews conducted prior to issuance of the 2023 PA, those buildings listed in this column as historic properties were based on the CRMP (DOE-ID 2016) information. Subsequent evaluations (post issuance of the 2023 PA) by CEMML and their eligibility or lack thereof have been concurred with by SHPO (May 2023). As a result, some of the historic properties listed in this column may have been determined ineligible as a result of the formal CEMML evaluation. The list of current historic properties can be found in Appendix C - INL Site Building Inventory.*
****- NOTE to Project Managers on Inadvertent and Late Discoveries: If at any time during project implementation cultural resources (i.e., bones, flakes of obsidian, "arrowheads" or other stone tools, bottles, tin cans, etc.) are discovered, all work in the area must cease until a CRMO Staff Archaeologist can evaluate the resources.*

6.1.2 Additional Detail for Completed FY2023 Reviews

6.1.2.1 BEA-22-45-Power Management FY2023 Annual Maintenance

Each fiscal year the INL Power Management group identifies activities and pole locations that need some level of maintenance action performed for the current fiscal year. The activities that may occur include applying fire retardant to power poles, the visible evaluation of structures, the inspection and replacement of other powerline components (e.g., anchors, insulators, cross-arms, wire, etc.), the installment of ground rods, ground plates, and avian protection devices, the installment and repair of air switches, the removal and replacement of gravel at established pads, the removal and replacement of deficient powerlines and power poles, and the testing and treatment of power poles. Maintenance includes a varying number of poles each fiscal year and is typically over 200 in total, although the actual number worked on is often much less.

To expedite the annual cultural review of Power Management activities as well as any potential emergency actions that may result from fires or extreme weather, a master list of all known power poles on the INL and their locations was compiled by the INL CRMO in FY2019. A 200-foot radius was established around each pole location to identify cultural resources. This area has been determined as the maximum area needed for all work on power poles by the Power Management group. Each pole was assigned a color code based on the level of cultural review required: Red = pole has cultural resources within the working area or is in a culturally sensitive location (CITRC); Yellow = the pole area has either not been surveyed or needs to be re-surveyed; Green = the pole area has been intensively surveyed and does not contain cultural resources.

In FY2023, Power Management proposed maintenance on 49 poles. Applying the code system, two were designated as ‘Red’, zero were designated as ‘Yellow’, and 47 were designated as ‘Green’. A total of five reviews were prepared to document the FY2023 Annual Maintenance for Power Management (Table 6) that included scraping of swallow nest from five poles (BEA-23-01), nine pole replacements and 20 cross-arm replacements (BEA-23-11), nine new poles (BEA-23-04), and six telephone pole removals (BEA-23-10). For these reviews, there were no historic properties affected. Two historic properties (BEA-23-11) were flagged for avoidance and therefore removed the potential impact from the undertaking."

Table 6. Power Management Reviews in FY2023

INL CRMO Project No.	Date Signed	Effect Determination	Recommendations
BEA-22-58	11/15/2022	No Historic Properties Affected	Accompany PM as they decide which areas to spot level and avoid artifacts and cultural resources (the project has yet to be performed by Project Management).
BEA-23-01	1/18/2023	No Historic Properties Affected	None
BEA-23-04	3/23/2023	No Historic Properties Affected	None
BEA-23-10	5/24/2023	No Historic Properties Affected	Monitoring (CITRC location)
BEA-23-11	5/24/2023	No Historic Properties Affected	Flagging for avoidance on poles 102, 105 (Work has yet to be performed).

6.1.3 FY2023 Reviews and Activities Supporting EA/EIS (New or Previous)

For projects that supported EAs or EISs, there were two finalized Section 106 reviews in FY2023 (MCRE and HALEU). Project Pele – Pad A Supplemental Section 106 review was submitted to SHPO in

FY2023; however, additional consultation is anticipated to resolve a difference of opinions in effect findings. Continued progress on the Section 106 review of the proposed action for the Wildland Fire EA continued in FY2023. .

6.1.3.1 BEA-20-36/BEA-20-H188 R1 Project Pele Addendum 2: Addition and Selection of CITRC Pad A

The DOE-ID submitted INL/LTD-20-60577, Cultural Resource Investigations for the Construction and Demonstration of a Prototype Advanced Mobile Nuclear Reactor (Project Pele), for SHPO review via correspondence dated April 19, 2021. The cultural report provides a description of the undertaking and identifies three outdoor locations, Pads B, C, and D at INL's PBF/CITRC for potential placement and testing of the prototype mobile microreactor. Pad A at CITRC was not included in the EIS or cultural review because it was unavailable for use by the project. Since the publication of the EIS, Pad A has become available and is now considered the best siting for the demonstration of the microreactor in an outdoor location.

An addendum cultural report to INL/LTD-20-60577 was prepared, INL/RPT-23-72985, which provides the results of a review of the proposed undertaking to install and operate a prototype mobile microreactor at Pad A and to install support services at the PBF Control Center Area. It includes the results of an intensive cultural survey to identify cultural resources within the APE at Pad A. Three new cultural resources were recorded which are recommended as not eligible for inclusion in the NRHP. A review of previously recorded resources within the discontinuous APE found one archaeological historic property and one culturally sensitive location; both would be avoided by project construction and operation activities. As required by implementation of the activities proposed for Project Pele and ground disturbance within CITRC, all personnel are required to receive cultural resource awareness training and an archaeologist must monitor all ground disturbing activities. These conditions ensure that the historic property and the site of cultural significance will be avoided and afford recognition of cultural materials in the event of inadvertent discoveries such that no historic properties would be affected. SHPO reviewed the addendum report and concurred on the ineligible determinations recommended for the new cultural resources but determined the undertaking would result in no adverse effect to historic properties with avoidance measures. Additional consultation is ongoing and is anticipated to be completed in FY2024.

6.1.3.2 BEA-22-28 Wildland Fire Environmental Assessment

INL CRMO staff participated in internal scoping to prepare the proposed action for the Wildland Fire EA throughout FY2023. The proposed action contains information regarding restoration and rehabilitation efforts; however, those efforts are not being assessed at this time and will be done on a case-by-case basis. The EA also contains an aspect of proactive fuel management including road improvements and mowing. Class III inventories for the fuel management aspect of the undertaking began in August 2022 and continued into FY2023. A total of 1,573.33 acres were inventoried and along with previous inventories, a total of 3,366.52 acres were assessed for the current project. A total of 23 previously recorded historic properties were revisited and updated, and 42 newly recorded sites, six linear resources, and 55 isolated finds were identified. DOE anticipates discussions with the SHPO and Tribes in the winter/spring 2023/2024 on proposed project design features to avoid or minimize potential adverse effects to historic properties. A full report and ASI/IHSI site and isolate forms are anticipated to be submitted to the SHPO and Shoshone-Bannock Tribes in FY2024.

6.1.3.3 BEA-21-H223 MCRE (Molten Chloride Reactor Experiment)

The MCRE EA was initiated in July 2021. MCRE is a first-of-its-kind fast-spectrum molten salt reactor. The proposed experiment will be done in collaboration with industry partners. The INL Site's role includes assembling safety information and analysis, synthesizing fuel-salt for experiments, developing measurement procedures, and providing a test bed for installation of the reactor. A proposed action was initiated in January 2022, identifying the Laboratory for Operation and Testing in the United

States (LOTUS) as the potential test bed for MCRE. INL CRMO focused on completing the Section 106 for BEA-21-H105 LOTUS Test Bed prior to assessing effects from the proposed actions related to MCRE. The INL CRMO completed evaluation of the MCRE undertaking in FY2023 and received concurrence with a finding of No Historic Properties Affected (March 15, 2023).

6.1.3.4 HALEU (High Assay Low Enriched Uranium)

See Section 6.5.2 for details.

6.1.4 FY2023 Outstanding Reports in Progress

6.1.4.1 BEA-22-28 Wildland Fire EA

Please see Section 6.1.3.2.

6.1.4.2 BEA-22-47 Gravel Borrow Pits Expansion

The proposed action includes the use of the active gravel or borrow pits (Adams Blvd., Lincoln Blvd., Monroe Blvd., Ryegrass Flats, T-12, T-28 South) for construction and operations activities and corrective, preventative, and predictive maintenance-related activities. A records search was performed for the boundaries of the gravel pits, which includes areas of active borrow sources, but also non-disturbed areas that have been delineated for expansion. The INL CRMO conducted a Class III inventory on 194 acres in FY2022 for those areas that have not been subject to previous Class III inventories. Two historic properties were identified within the APE. However, during this process, the INL CRMO was informed the official boundaries may change. The report is pending until further information is received and the INL CRMO will redefine their APE, identify historic properties and assess effects as necessary.

6.1.4.3 BEA-22-49 Carbon Free Power Project (CFPP) Combined License Application (COLA)

Previous activities supporting the site's characterization activities were reported during annual reporting in FY2018-FY2021 under BEA-18-37 and subsequent revisions. In FY2022 and FY2023, those activities shifted to preliminary information gathering to support environmental documentation to be included in the COLA and reported under BEA-22-49. A total of 545 acres were inventoried between May 8th to 19th 2023, which resulted in the identification and documentation of five isolated finds. Class III inventories continued into FY2023 as additional scope was added. Although there is no proposed undertaking nor NEPA initiated, the Class III inventories and cultural resources will be reported.

In early FY2024, DOE was notified that this project had been terminated. INL CRMO will develop a report and DOE-ID will submit the report and all remaining ASI site and isolate forms recorded during the site characterization studies (BEA-18-37) and COLA support (BEA-22-49) to SHPO and Shoshone-Bannock Tribes in FY2024.

6.1.4.4 BEA-22-58 R1 Power Management West Loop Gravel Dump – Road Maintenance, R1

Initially, Idaho National Laboratory Power Management proposed to perform maintenance on the West Loop Grid powerline roadway (see EC INL-20-007) in support of their mission to provide power to the various facilities in a safe and efficient manner. The powerline 2-track along the West Loop (a Priority 3 roadway) had become rutted in several locations, putting Power Management bucket trucks at risk of becoming high centered or damaging the undercarriage of their vehicles. Power Management planned to dump gravel material where needed, fill holes and ruts, and compact the repair locations via vehicle. Six previously recorded cultural resources, treated as NRHP eligible historic properties, were identified

within the APE (10BT1380, 10BT1383, 10BT1403, BEA-18-20-35, BEA-21-24-RA4, and BEA-21-24-RA3).

Power Management recently narrowed the scope of work to nine locations along the West Loop powerline road. For convenience these locations are specified based on the nearby power pole numbers. The locations, numbered from south to north are as follows: Leveling location 1, between poles 43-56, Leveling location 2, near railroad and powerline road south of NRF; Leveling location 3, between poles 92-93; Leveling location 4, between poles 103-105; Leveling location 5, between poles 155-157; Leveling location 6, between poles 158-159; Leveling location 7, between poles 170-171; Leveling location 8, between poles 181-182; Leveling location 9, between poles 183-184.

INL CRMO conducted a review of the project and identified prior adequate survey coverage and no historic properties within the APE. As of 9/30/2023, a CRR is in progress. The Section 106 review process is anticipated to be complete early FY2024.

6.1.4.5 BEA-23-H040 CFA Salt and Sand Shelter

The CFA Roads and Grounds crews are in need of a bigger structure to store sand and salt for winter road applications. This project proposed constructing a new structure next to the existing structure, B21-622, just to the to the south-west of the CFA landfill. The selected location is currently a graveled lot and no native vegetation will be disturbed. INL CRMO conducted a review of the project and identified historic properties within the APE. As of 9/30/2023, a CRR is in progress and Section 106 review process is anticipated to be complete early FY2024.

6.1.4.6 BEA-23-13 Naval Reactors Facility South and West Boundary Wall

The South and West Area Boundary Wall, or SWAB project, has proposed the installation of a 10-foot concrete perimeter wall and road around the south and west portions of the NRF. The perimeter wall is a continuation of the current concrete wall and road that were constructed on the east and north sides of the facility. The site preparation efforts will require grubbing and clearing of vegetation, along with leveling and excavation. Mowing and some grade leveling may occur on the interior of the proposed wall which would extend inward. The wall footing excavation will be approximately 50 feet wide by 12 inches deep and run the remaining length around the facility footprint (approximately 9,000 feet). The excavated soil will later be backfilled with structural material and capped with road base and a concrete duct bank, and buried conduits will travel along the interior of the proposed wall.

An entrance to access the NRF interior will open to Washington Blvd. and will have multiple lanes and guard booths with lift-arm gates to control traffic. Electrical, potable water, and sewer lines are proposed to run to the entrance to support the guard booths and a restroom. In addition, security equipment will be installed on the perimeter wall to support security operations. Three gates will also be constructed in the perimeter wall for railroad access with an accompanying guard booth. The guard booth footings will require 4 feet deep excavations, and bollards will be located at the booths that will also have footings 2 feet in diameter by 5 feet deep. All soil is expected to remain on site and be used for fill material or spread along the travel path. The intent for excavation is to be minimal and only affect the area under construction to minimize any revegetation.

INL CRMO conducted a review of the project and identified three cultural resources, two of which are Historic Properties, within the original APE. The APE was modified to exclude the Historic Properties. The Section 106 review process is anticipated to be completed early FY2024.

6.1.4.7 BEA-23-15 Sinks Grazing Roads Rehabilitation

The access areas near Mays Ranch, and those immediately surrounding them, are most often used by BLM grazing permittees to access established grazing allotments on the INL Site. These access areas have been degraded by frequent off-road vehicle use and the project proposes repairs to maintain acceptable access. Repairs will include stabilizing the areas with soil/fill material where off-road vehicle

use has occurred, adding gravel to portions of the road that have been rutted, and establish/stabilize clear access points in the problem areas to prevent future ground disturbing off-road vehicle use. It was also identified that signs and fencing may be added as necessary.

INL CRMO review identified two previous surveys (SJM-84-01 and ISU-89-02) partially covered the project area but were not adequate in terms of current reporting standards. INL CRMO performed a Class III cultural resource inventory of the APE on 6/15/2023 and 6/16/2023. Larae Bill, Anna Bowers, and Kyle Denny from the Shoshone-Bannock HeTO were present and helped with the survey. The inventory surveyed the complete APE—totaling 56.25 acres. A total of nine cultural resources were recorded, six of which are sites. None of which were determined to be historic properties. Thus, there are no historic properties within the APE. The INL CRMO review process was completed on 9/7/2023 and pending DOE-ID concurrence with the finding of No Historic Properties Affected as of 9/30/2023. The Section 106 review process is anticipated to be completed early FY2024.

6.1.4.8 BEA-23-21 R1 Cell Site #6 Expansion

Originally, the project proposed expanding the existing Cell Site #6 footprint to the east in support of upcoming projects. This included multiple activities inclusive of: extending the existing gravel pad and security fence 100’ to the east and provide a vehicle gate; installation of new concrete pads for communications equipment on the existing and gravel pad extension; providing electrical power to equipment, shelters, restrooms, and all necessary components; providing a portable restroom trailer; providing grounding for all new installations; providing communication and network connections; providing an ISO shelter approximately 16 feet x 40 feet; extending existing ARA-III road for secondary egress to pad extension, and; establishing a snow removal area east of the pad extension to allow for year-round access and use. In addition, following the completion of the expansion, annual vegetation mowing may be performed on an as needed basis to provide an up-to-50-foot fire defensible space surrounding the entire Cell Site #6. Shortly thereafter, Revision 1 scope of work was added, to include the installation of communication equipment – a 25 foot spherical dome with 5 foot lightning rod.

INL CRMO completed their review for the original and proposed project scope. With respect to the initial scope of work, a records search identified five previous cultural resource inventories that intersect the current project APE (BEA-07-33, BEA-10-11, BEA-19-37, BEA-22-32, and BEA-18-20). Of these five, only two meet current survey standards and reporting standards (BEA-18-20 and BEA-19-37) and cover 1.36 acres of the 2.59-acre project APE. These projects identified no historic properties in the western half of the current project APE. The remaining 1.23 acres of the APE required additional intensive field survey. On August 3rd, 2023, Richard Allen of the INL CRMO surveyed the 1.23 acres of the current project APE that lacked previous inventories. The survey identified no cultural resources.

The revised scope of work necessitated visual analysis, which was conducted in ArcGIS pro, with the observer height set to 25’ to capture the full height of the structure and the surface height set to 5 feet to mimic a human sightline. The lightning spike was not included in the total height of the structure as, due to its slender nature, it will visually diminish quite quickly. However, it was noted that buildings 50 feet tall are visible from approximately five-miles away, depending on environmental conditions. The presumed viewable distance was reduced proportionally to 2.5-miles. Assuming a light-colored surface with some degree of reflectivity, the APE was expanded another half mile. A 3-mile buffer was created around the project area. INL CRMO’s viewshed analysis identified 17 cultural resources, none of which are Historic Properties, within the original APE. The INL CRMO review process was completed on 9/26/2023 and pending DOE-ID concurrence with the finding of No Historic Properties Affected as of 9/30/2023. The Section 106 review process is anticipated to be completed early FY2024.

6.1.4.9 BEA-23-22 Upgrade to CITRC Pad D

The proposed scope of work includes grubbing and de-vegetating the access road and the Pad D parking area, placing/compacting a gravel pad for parking and placing/compacting gravel along the access road from the southwest edge of the concrete apron of PBF-613 to the Pad D parking area. The proposed gravel placement is intended to be about 12 inches thick and will mitigate rutting in the access road and keep the parking area for Pad D free of mud. Additionally, a 30 foot buffer around the parking area and the access road is needed to accommodate mowing of vegetation for a fire "Defensible Space." As a result, the APE is irregularly shaped and measures approximately 264 feet (north/south) x 215 feet (east/west for a total of 0.98 acres. INL CRMO identified previous and adequate survey coverage, and no historic properties within the APE. The INL CRMO review process was completed 9/29/2023 and pending DOE-ID concurrence with the finding of No Historic Properties Affected as of 9/30/2023. The Section 106 review process is anticipated to be completed early FY2024.

6.2 Legacy Section 106 Reviews

6.2.1 Legacy Projects and Section 106 Reviews Completed in FY2023

6.2.1.1 BEA-19-32 2019 INL Wildland Fire Assessment: Effects of Emergency Response to Cultural Resources

A cultural resource report documenting the results of the 2019 Class III inventories and post-fire rehabilitation of containment lines because of four wildfires (Sheep Fire, Howe Fire, Monroe I Fire and Monroe II Fire) was completed and is currently in review by DOE-ID. It is anticipated to be submitted to SHPO and Shoshone-Bannock Tribes in FY 2024. The Sheep Fire burned an estimated 112,162 acres and was the largest wildfire to impact the INL in recent history. The other three were minor fires with a combined acreage of less than 50 acres. Sixty-one cultural resources were identified and documented through a Class III intensive inventory of areas of disturbance associated with suppression of the 2019 wildfires. Sixty resources were recorded through a survey of areas affected by emergency response to the Sheep Fire (112,162 acres burned; 1,868 acres surveyed), including 29 archaeological sites, two linear resources, and 27 isolated finds. One Precontact isolated find was recorded through survey of areas affected by emergency response to the Monroe II Fire (47.5 acres burned; 44.6 acres surveyed). Five sites are recommended eligible to the NRHP: BEA-19-32-JP02; BEA-19-32-JP08; BEA-19-32-JP16; and BEA-19-32-JP18; and BEA-19-32-SP04 (ISU-03-01-P24). One site, BEA-19-32-JP19, requires additional information to evaluate. The remaining 23 sites are recommended ineligible for the NRHP. An Emergency Response Assessment Plan, or ERAP of 2019 wildland fire suppression efforts has shown that while most sites documented for this project were impacted by the emergency response, there was finding of No Adverse Effect to historic properties. The report and site forms are currently under review by DOE-ID and will be submitted to SHPO and Shoshone-Bannock Tribes in FY2024.

6.2.1.2 BEA-17-33 North Boundary Fence

In FY2022, ASI site and isolate forms associated with the 2017 fieldwork covering approximately 12 miles of fence were completed. When informed that the undertaking was being reinitiated in 2020, the INL CRMO provided DOE-ID and BLM with a map of the approved APE (area surveyed) and associated geospatial data to ensure that all fence construction activities were restricted to this area. As a result, this undertaking had no effect on historic properties. The ASI forms were finalized, and the forms and report transmitted to the BLM in October 2022. The forms and report will be submitted by BLM.

6.2.1.3 BEA-18-H008 DD&D of CF-688/689

The Engineering Building and CFA Technical Center (adjoining buildings CF-688 and CF-689) were identified for deactivation, decontamination, and demolition (DD&D) in EC INL-13-075 (Shirley, Winn, and Lord 2013:2). Both buildings were constructed in 1963 and demo-ed May 29, 2018.

The buildings were initially recorded by Braun in 1995 in conjunction with the Idaho National Engineering Laboratory (now INEEL) Historic Building Survey. She recommended that the buildings were not eligible and that they did not contribute to a potential district but could be part of a multiple property study. She noted that their "use was accessory only" and that they were "not highly significant for science and engineering."

The buildings were part of the 1997 reconnaissance efforts of the Arrowrock Group conducted in preparation of their *INEEL, A Historical Context and Assessment, Narrative, and Inventory* (2003). They did not evaluate the buildings for their individual significance but determined they would contribute to a potential district under Criterion A (association with a significant event) and Criterion C (distinctive characteristics). As the buildings had not reached 50 years of age, they indicated that the buildings may meet Criterion Consideration G; however, they did not provide any justification for the buildings' extraordinary importance.

CF-688 (IHSI #23-9987) and CF-689 (IHSI #23-9988) are listed as eligible Category 3[c] properties in the INL CRMP (DOE-ID 2016:348). Table 2 of the FY2018 Annual Report provides an adverse effect finding for the proposed demolition; however, evaluations of the buildings' significance are imperative prior to determining the effect finding, particularly considering the conflicting determinations made previously.

Both resources were evaluated during FY2023 and ultimately recommended eligible under Criterion A: Science for their associations with the development of nuclear technology, specifically the SPERT reactor tests. As per the CRMP, both CF-688 and CF-689 were considered Category 3 Historic Properties, "contributing INL properties not directly associated with signature or key individual properties" (INL CRMP 2016: 160). Appropriate mitigation was recommended as reconnaissance-level photographs and completion of an IHSI form. The mitigation report, *Category 3 Historic Property Mitigation for Excess Facilities Deactivation and Demolition of Engineering Building and CFA Technical Center (CF-688/689),* with a finding of Adverse Effect to CF-688 and CF-689. The report and updated IHSI forms are currently under review by DOE-ID and will be submitted to SHPO in FY2024.

6.2.1.4 BEA-18-H012 CF-664 Fire Water Upgrade and Building Modifications

EC INL-18-015 proposed removal of the catwalk ladder, and steam lines in Room 114 to allow for truck parking. In October 2018, the EC was revised to include fire water system upgrades and replace Overhead Door 10 and its frame. In April 2019, the scope expanded again to include the design and installation of a new fire suppression system.

Review of the initial project scope in 2018 included an Adverse Effect finding for the proposed upgrades and repairs; however, at that time a full evaluation of the building's significance and integrity had not been completed. The CEMML recorded CF-664 in FY2021 and recommended the building as not individually eligible. SHPO concurrence was received May 23, 2023 (SHPO Revision No. 2023-556). Given the complex evolution of the project, the incomplete report started as mitigation of the original project review's adverse effect finding, Category 3 Historic Property Mitigation for CF-664 Fire Water Upgrade and Building Modifications, was completed and submitted to DOE-ID for review. The report documented both the changing scope of the project, as well as the updated evaluation of CF-664 and included appropriate supporting documentation, including an updated IHSI form. DOE-ID will submit the report and supporting documentation to SHPO in FY2024.

[c] Under the CRMP (DOE-ID 2016: 160), a Category 3 property is a contributing INL property not directly associated with signature or key individual properties, such as cafeterias and warehouses.

6.2.1.5 BEA-18-H045.01 Advanced Test Reactor Complex Excess Facilities/Structures Deactivation and Demolition

EC INL-18-088 proposes the DD&D of surplus vacant, inactivated or soon to be inactivated facilities and structures to reduce lifecycle costs associated with surveillance and maintenance. The proposed action would return the locations to near original condition. There is limited risk to site personnel posed by remaining hazards within the buildings and structures. Principal hazards are asbestos, lead-based paint, polychlorinated biphenyl, or PCBs, small quantities of hazardous materials and waste, confined spaces, and possible residual radiological contamination.

The FY2018 cultural review addressed the proposed demolition of what was formerly the ATR Mock-up Building in the ATR Complex but is now used for storage TRA-673. TRA-673 (IHSI #23-10278) consists of a silo approximately 26 feet in diameter and 61 feet in height. A single story, rectangular storage building is immediately adjacent. The silo and storage building were initially recorded by Braun in 1995, who did not evaluate the individual significance of the building and structure but recommended that they were contributing to a potential district and could be included in a multiple property study. The Arrowrock Group reexamined TRA-673 in 1997 and determined it was eligible for inclusion in the NRHP. The INL CRMP lists TRA-673 as only the storage building and does not include the silo; therefore, the listing of not eligible is inaccurate (DOE-ID 2016:366). Arrowrock's site form suggests that TRA-673 would be classified as a Category 2[d] property.

Table 2 of the FY2018 Annual Report provides an adverse effect finding for the proposed demolition. Due to concerns for sensitive information, photos of the interior of the TRA-673 were not possible, therefore standard mitigation for Category 2 properties could not occur.

An updated site form was finalized in FY2023, which fully evaluated the significance and integrity of the ATR Mockup, the silo, and the storage building as a single resource under the designation TRA-673. TRA-673 was recommended not eligible as the ATR Mockup had only a short use life before it was technically obsolete and was replaced by the ATR Critical (ATRC) reactor; however, it would have contributed to the ATR Historic District. A CRR was completed in January 2023 to document a finding of No Adverse Effect. The ISHI site record and CRR are currently under review by DOE-ID. DOE-ID will submit the updated ISHI record to SHPO in FY2024.

6.2.1.6 BEA-18-H059.01 Removal of Obsolete Equipment in ZPPR

EC ICP-18-012 proposed removal of the contaminated waste characterization glove box, two fume hoods, and ancillary equipment located in the Fuel Manufacturing Facility (FMF, MFC-704); removal of the control consoles and ancillary equipment located in the ZPPR control room within the ZPPR Support Wing, MFC-774, now referred to as the Electron Microscopy Laboratory (EML); and removal of the Developmental Glove Box, hood and ancillary equipment in MFC-787, the Fuels and Applied Science Building (FASB, formerly the Fuel Assembly and Storage Building). A review of the equipment removal was conducted under project number BEA-18-H059 with the following results:

- MFC-704/FMF was constructed in 1986 and is not eligible for listing on the National Register.
- MFC-774/EML is listed as a Category 3 historic property in the INL CRMP (DOE-ID 2016:339). "The control consoles and panels to be removed are original features of the ZPPR, integral to the historic significance of the building. To mitigate the adverse effect created by removal of these features, the control console and panels should be preserved as much as possible and transferred to the INL Archives and Special Collections storage at West One in Idaho Falls. The console and panels may be used later for public exhibit and interpretation of INL history."
- MFC-787/FASB is listed as a Category 3 historic property in the INL CRMP (*ibid*.) The described project activities fall under exemption 8, internal reconfiguration of active laboratories

[d] Under the CRMP (DOE-ID 2016: 160), a Category 2 property is a contributing INL property directly associated with signature or key individual properties, such as control buildings and hot shops.

(DOE-ID 2016:51).

The Adverse Effect finding was based on information in the INL CRMP. At the time of this proposed undertaking, MFC-774 had not been recorded nor evaluated to determine what characteristics might qualify the building for listing in the NRHP. In FY2023, CEMML evaluated MFC-774. While the property retained significance under Criterion A for its association with the ZPPR and Argonne Fast Source Reactor, due to the removal of the original control equipment, it no longer retains its ability to convey that significance and so it is not eligible under Criterion A. The control console and panels have been removed and transferred to the INL Archives and Special Collections at West One. A report, *Category 3 Historic Property Mitigation for the Deactivation, Decontamination, and Decommissioning of ZPPR Obsolete Equipment*, was completed to document the adverse effect and was submitted to DOE-ID for review. DOE-ID will submit the report and supporting documentation to SHPO in FY2024.

6.2.1.7 BEA-21-H029 Flash Neutron Radiography at the Transient Reactor Test Facility (TREAT) to Examine Two-Phase Flow

This project proposes to conduct research and development at the NRAD reactor, located within MFC-785 (Hot Fuel Examination Facility, considered eligible under Criterion A: Science), to produce an operational flash neutron radiography system. After conceptual testing and planning, the newly developed flash neutron radiography system will be installed at MFC-720 (TREAT Reactor Building, considered eligible under Criterion A: Science). The research and development activities will utilize MFC-785 as intended with no modifications to the building, and therefore has no potential to introduce effects. However, the installation of the new system within MFC-720 may require modifications to the building. Until the system has been designed (projected in FY 2022), it is impossible to know how its installation may impact MFC-720. Therefore, the INL CRMO determined that the research and development activities would have no effect on historic properties but included a stipulation that once the system design is finalized and potential modifications are known, those modifications must be reviewed by the INL CRMO prior to implementation.

The project provided the modifications include the design, fabrication, and installation of additional shielding west of the TREAT reactor, a new shield plug to replace the extant shield plug in the radiography stand, and a new imaging system to include a high-speed camera, a mirror box, and a control laptop. Installation of these elements requires fastenings to existing structures where necessary. Most of the items are freestanding and can be removed as needed. There will be no removal of concrete or excavation. A CRR was completed in November 2022 to document a finding of No Historic Properties Affected, as the proposed activities fell under Excluded Activities.

6.2.1.8 BEA-18-20 Power Management Pole Maintenance

A cultural resources report documenting the results of the 2018-2021 Class III inventories and site updates was completed in FY2023. DOE-ID will submit the report and supporting documentation to SHPO and Shoshone-Bannock Tribes in FY2024.

6.2.1.9 BEA-19-H081/BEA-19-35 Sample Preparation Laboratory

EC INL-16-075 and its two subsequent revisions proposed the construction of the Sample Preparation Laboratory (SPL) at MFC to provide needed post-irradiation examination capabilities with a functionally focused building dedicated to non-alpha emitting sample preparation to support deployment of equipment to study fuel and material performance in the nuclear environment at the micro, nano, and atomic scale.

The CRRs prepared in FY2019 identified adverse visual effects to the surrounding built environment. Reconnaissance architectural and intensive archeological surveys were conducted in FY2019, and additional analysis was conducted to assess visual effects in September 2021. A report,

Cultural Resource Investigations for the Construction of the Sample Preparation Laboratory (SPL), was completed in December 2022, documenting a revised finding of No Adverse Effect. This report was submitted to DOE-ID for comment prior to submission to SHPO in February 2023.

6.2.2 Legacy Projects and Section 106 Reviews Still in Progress

6.2.2.1 BEA-18-H054 2018 CFA Excess Facilities Deactivation and Demolition

EC INL-18-086 proposes the DD&D of two CFA buildings, CF-638 and B25-601, to reduce lifecycle costs associated with surveillance and maintenance. Building B25-601 is the Subsurface Disposal Area (SDA) Engineered Barriers Test Facility. It is a concrete, earthen covered bunker constructed in 1996. Building CF-638, the Dosimetry Calibration Lab, was constructed in 1943. It is a 2,366-square foot, reinforced concrete, earthen covered bunker that DOE-ID's Radiological and Environmental Sciences Laboratory used to calibrate dosimetry. CF-638 has not been demolished, however it is planned for demolition in FY2024.

B25-601 has not reached 50 years of age. It has not achieved exceptional importance and is not eligible for inclusion in the National Register. Demolition of this property would have no effect.

CF-638 (IHSI #23-9938) was initially recorded by Braun in 1995. The recording did not evaluate the individual significance of the property but recommended that it could contribute to a potential district and could be included in a multiple property study. Revisiting the bunker in 1997, the Arrowrock Group also did not evaluate the property for its historic significance. The INL CRMP lists CF-638 as an eligible Category 2 property. Based on this listing, the finding of effect was listed as adverse in Table 2 of the FY2018 Annual Report. It also states that mitigation for CF-638 was completed with Historic American Landscape Survey (HALS) ID-1.

The HALS titled *Idaho National Engineering Laboratory Arco Naval Proving Ground (Idaho National Laboratory)* was prepared when the demolition of vacant Arco Naval Proving Ground buildings was proposed. Buildings proposed for demolition were CF-606, CF-607, CF-613, CF-632, and CF-633. There were no plans to demolish CF-638 and the HALS document provides very little information regarding the building. The document cannot be used to mitigate the effects of currently proposed demolition; however, prior to determining the finding of effect, the property must be evaluated as to whether it qualifies for NRHP inclusion and under which of the criteria.

An updated IHSI form was prepared for CF-638 which provides a historic context and a justification for its NRHP eligibility, as part of the CEMML report. SHPO concurrence was received May 23, 2023 (SHPO Revision No. 2023-556). INL CRMO staff continues to work with the project managers to determine the timing and scope of the demolition work and will consult with SHPO to memorialize all necessary mitigation actions in an agreement document when project details have been finalized.

6.2.2.2 BEA-19-17 Radiological Response Training Range (RRTR)

A report covering the 2019 field work verifying the results of 1986 and 2010 survey seasons is in preparation. Nine archaeological sites and two isolate forms were drafted to support FY2023 Section 106 reports. The cultural resource investigation report will be completed in FY2024 and submitted to DOE-ID for review.

6.2.2.3 BEA-20-26 FY2020 Fire Rehabilitation

A report documenting the 2020 Class III inventories and post-fire rehabilitation of containment lines is under development and will be submitted to DOE-ID for review in FY2024.

6.2.2.4 BEA-21-02 Proposed INL Power Grid Connections: Option 2 (RWMC to ATR) and Option 4 (ATR to MFC)

The FY2021 conceptual project was born out of recently planned infrastructure upgrades at the INL Site. On August 15, 2019, the DOE announced the launch of the National Reactor Innovation Center (NRIC). NRIC, led by the INL Site, is authorized by the Nuclear Energy Innovation Capabilities Act to provide private sector technology developers access to the strategic infrastructures and assets of the national laboratories. NRIC plans to support demonstrations of microreactor concepts within the next five years (Office of Nuclear Energy 2019). Evaluations of the INL Site's current electric power infrastructure and operation have demonstrated that there will be a deficit of electric power needed to operate the critical infrastructure if these improvements are made. Current power demands on the INL Site's electric grid are barely met. Additional capacity and redundancy to the power grid at the site is needed to meet the needs of imminent projects as well as to meet future growth at the INL Site. In 2020, Power Management evaluated their power infrastructure and made recommendations that outlined improvements to the power grid which will be needed to meet future electrical capacity needs.

Power Management identified four separate upgrades to the system which are individually needed to increase electricity capacity at the site. These infrastructure upgrades have been called "options" by the project team. Power Management has identified these upgrades as the most reliable means to increase power capacity at the site. In FY2021, the upgrades were in the conceptual phase, and the INL Site decided to carry out preliminary studies to help assess the viability of two of these upgrades to the INL power grid system. The most urgent piece of infrastructure that the system would require is a transmission line from RWMC to ATR (Option 2). Power Management was tasked with deciding where to place the proposed transmission line. Because of high construction and maintenance costs, new power lines are designed to run the shortest distance possible between two points while also avoiding other infrastructure or obstacles. Power Management provided a concept for the proposed RWMC to ATR power line corridor (Option 2) and ATR to MFC power line corridor (Option 4) in October 2020. The INL CRMO conducted preliminary Class III inventories to identify cultural resources. No location selection for the RWMC to ATR power line corridor, or ATR to MFC power line corridor, has been made and no undertaking is proposed at this time.

Although there is no proposed undertaking at this time, all resources within the survey area have been documented and evaluated as of April 2023. However, new plans for this Option 2 corridor were initiated in May 2023 and project design has yet to be finalized as of end of FY2023. If and when an undertaking is proposed, Section 106 process will be initiated.

6.3 Section 106 Monitoring

INL LWP-8000 (INL 2018) requires a cultural resource review for any ground disturbance activities within the CITRC boundary, including areas that have already been disturbed. Likewise, the INL CRMP states that monitoring any soil disturbance in this area is "routine and required" (DOE-ID 2016:434). Due to active projects in the CITRC area, regular monitoring by INL CRMO staff occurred in FY2023. HeTO personnel were invited to participate in these monitoring activities and often accompanied INL CRMO staff. These monitoring events were prompted by two project activities.

6.3.1 BEA-23-10 Telephone Post Removal, CITRC

This project is within the CITRC facility boundaries and monitoring efforts took place on 5/24/2023 (BEA-23-10 in Table 6). No post-review or inadvertent discoveries were noted during these projects in FY2023. Based on the routine and repetitive monitoring in some locations within CITRC, INL CRMO staff and HeTO staff anticipate working collaboratively in FY2024 on a CITRC monitoring plan that reflects the results of the monitoring efforts in these areas.

6.3.2 BEA-23-20 Fire Alarm Panel Upgrades at PBF

The project includes installation of a single power pole southeast of PBF-TR-04 in order to run cable on additional existing poles between buildings PBF-622, PBF-623, and PBF-TR-04. The project is within the CITRC facility boundaries and requires monitoring during ground disturbing construction activities. These activities are being planned for early FY2024.

6.4 Emergency Response Assessment Plan

An emergency action is any undertaking resulting from a declared emergency, activation of the INL Emergency Operations Center or any other immediate threat to life or property that has the potential to affect historic properties, both known and unknown.

Within seven days of an emergency response, BEA INL CRMO will prepare an Emergency Response Assessments Plan (ERAP) to DOE-ID for review. DOE-ID will provide SHPO and the Shoshone-Bannock Tribes an ERAP outlining measures to assess effects to historic properties, both known and unknown, potentially affected by the emergency response. They will have 30 days to comment on proposed methods of cultural resource assessment and mitigation. In coordination with DOE-ID, the INL CRMO will arrange participation of tribal representatives in both assessments of effects to tribal cultural resources and monitoring of mitigation or stabilization activities through consultation with Tribes. Results of all ERAPs will be reported to SHPO and Tribes within one year of the emergency action in a report that meets SHPO guidelines and INL standards for NHPA Section 106 reports.

There were no declared emergency actions in FY2023 that required an ERAP and therefore, there are no activities to report in FY2023.

6.5 FY2023 MOAs Progress and Completion of Stipulations

6.5.1 Power Grid Test Bed (PGTB) Expansion BEA-18-14

In 2018, a proposal to expand the Power Grid Test Bed (PGTB) at the INL Site prompted a Section 106 review of the undertaking to assess potential effects to historic properties. The results of the cultural resource investigation (DOE-ID 2019) determined that five historic properties (10BM0109, 10BT1049, 10BT1052, 10BT1059, and 10BT1062) will be adversely affected by project activities, more specifically road upgrades. The SHPO concurred with the adverse effect determination. The DOE-ID entered into a MOA with SHPO on June 26, 2019.

6.5.1.1 MOA Stipulations

The MOA has five identified stipulations, and a monitoring and reporting requirement which includes the preparation of a summary annual report detailing work undertaken pursuant to its terms. DOE-ID submitted the FY2020 PGTB Annual Report to SHPO and the Shoshone-Bannock Tribes in August 2021. The FY2021 PGTB Annual Report was submitted to SHPO in October 2022 and to the Tribes in November 2022. **Stipulations I and II.A.** were completed in FY2019-2020. **Stipulation II.B** was fulfilled in July 2021. **Stipulation II.C** was fulfilled in FY2022.

Stipulation II.D. *DOE-ID shall ensure that the publicly accessible INL website be updated to include a section on preserving and protecting cultural resources at the DOE-ID site. DOE-ID will work with the SHPO and the Shoshone-Bannock Tribes to develop the content and design of the web page*.
INL CRMO continued to work on content development for the update to the publicly accessible webpage in FY2023 and presented content to INL Communications, DOE, and Shoshone-Bannock Tribes. The pre-contact content has been reviewed and approved by Shoshone-Bannock Tribes; however, an updated webpage with just a section on preserving and protecting cultural resources at the INL Site was launched

(https://inl.gov/cultural-resources/). DOE-ID anticipates continued coordination in FY2024 to finalize additional content with SHPO and Shoshone-Bannock Tribes by May 2024.

6.5.2 High Assay Low Enriched Uranium

The High Assay Low Enriched Uranium (HALEU) Project was initiated in early FY2019 through an EA for the undertaking (DOE/EA-2087) which would establish fuel fabrication processes in two facilities at the INL Site, either MFC or INTEC. However, the EA did not identify which buildings will house the operations. After discussions with the SHPO in October 2018, DOE-ID requested deferral of the Section 106 process until the buildings were selected. In reference to SHPO granting a deferment of Section 106 for this undertaking, the draft EA states that: *DOE will prepare a Memorandum of Agreement (MOA) outlining how the Section 106 process will be completed, once determinations are made regarding the specific buildings involved in the undertaking; and the MOA will be signed prior to the signing of the FONSI. The FONSI will include stipulations for completing the Section 106 process.*

6.5.2.1 MOA Stipulations

The HALEU MOA was signed on December 17, 2018, with two stipulations. Stipulation 1 was fulfilled, and stipulation 2 was partially fulfilled in 2019 with the signing of the HALEU FONSI.

Stipulation 2.a-d: *The FONSI will include the following stipulations for completion of the Section 106 process.*

a. The Section 106 process will begin once the project scope and description has been finalized.
b. The Project will be responsible for funding the Section 106 process.
c. INL Cultural Resource Management Office (INL CRMO) staff Architectural Historian meeting the Secretary of the Interior's Professional Qualification Standards for Architectural History will complete the Section 106 process.
d. Completion of the Section 106 process will include:
i. Survey of proposed project area and identification of Area of Potential Effect (APE);
ii. Identification of historic properties within the APE;
iii. Evaluation of potential effects - immediate and cumulative direct and indirect - to historic properties from project activities.
iv. Adverse Effects will be mitigated as identified in the INL Cultural Resource Management Plan, which may require consultation and concurrence between DOE-ID, the Shoshone-Bannock Tribes, and the SHPO.

In June 2021, MFC-798, Radioactive Liquid Waste Treatment Facility (known as RLWTF), was selected as the first building to be equipped with HALEU fuel production. Utilizing procedures in the INL CRMP, a Secretary of the Interior-qualified INL CRMO Architectural Historian performed the Section 106 review on the proposed undertaking within the first selected building for HALEU project. Based on the results of the records search, a reconnaissance inventory was not completed based on the activity occurring solely within the interior of a building that is exempt from NRHP evaluation as the building was constructed in 1983 and is less than 45 years of age. Furthermore, the building does not meet Criterion Consideration G. Therefore, the activity was exempt from further Section 106 review. Therefore, the selection of this first building resulted in No Historic Properties Affected.

In May 2023, CPP-653, INTEC Decontamination Testbed Facility High Bay, was chosen as the second building to be equipped for HALEU production. An SOI-qualified INL CRMO Architectural Historian performed the Section 106 review on the proposed undertaking within the second selected building for HALEU project. Based on the results of the Section 106 review, it was determined that the activity will occur solely within the interior of a building that is exempt from NRHP evaluation as the

building was constructed in 1975. Furthermore, the building does not meet Criterion Consideration G. The activity was exempt from further Section 106 review. Therefore, the selection of this second building resulted in No Historic Properties Affected.

In summary, the selection of MFC-798 and CPP-653 concludes building selection for the HALEU fuel production project. Each of the buildings is not a historic property and each is exempt from NRHP evaluation, thus the stipulations in the MOA have been fulfilled. The notification of completion with respect to Section 106 compliance was transmitted to DOE-ID on July 13, 2023.

7. Archives and Special Collections

The INL Archives and Special Collections was established as part of an October 2005 MOA between the DOE-ID and the SHPO. The Archives and Special Collections represents an additional component of the INL Historic Preservation Program, preserving elements of the history of the INL Site in a manner reflecting its importance at local, regional, and national levels.

The INL Archives and Special Collections contain the cultural record of the tangible and intangible development of the INL Site and surrounding area. This development includes the evolution of the landscape and built environment as well as that of the corporate culture of the INL Site under various prime and subcontractors, and as its federal governing body transformed from the Atomic Energy Commission to the Energy Research and Development Administration and, finally, to the DOE-ID. However, the cultural identity of the INL Site landscape is not comprised solely of the scientific and technical research that began in 1949 and continues to take place today. It also encompasses the cultural identity of the landscape in its use by native groups, the industrialized manipulation of trappers, miners, and homesteaders during the late nineteenth and early twentieth centuries, and military operations during the mid–twentieth century. As with any landscape, natural features such as geology and climate of the area have also influenced the use of the space, both historically and in planning future projects.

As the historic and cultural resource research component of the INL Site, operating in coordination and consultation with INL Records Management and the INL Site Research Library, the INL Site Archives and Special Collections is responsible for the identification, preservation, management, long-term storage and access to the permanently valuable records and historical archival artifacts, relating to the establishment, development and land use of the area, and historic programs and projects of the INL.

7.1 FY2023 Accomplishments

During FY2023, the INL Archives and Special Collections was staffed by INL Archivist, Austin Schulz, retained full-time intern, Alana Haack, and former intern Christa White until she accepted a full-time Archaeology Technician position with the INL CRMO in February 2023. The work of these individuals was paramount in the continual maintenance and establishment of the INL Archives and Special Collections.

Archives staff added 11 procedures, plans, and forms that have been approved and are in use. These procedures include a LI on historical Document Handling and a guide on archives scanner use and drawing identification. The plan includes the Archives and Special Collections Management Plan. Lastly, the forms include the INL Archives and Special Collections Accession Form, Purchase or Deed of Gift, Record Inventory Form, Oral History Interview Information, Oral History Interview Questions, Oral History Interview Release, Records Use Form, and Researcher Registration Form. Details about each from and its purpose and need are included below:

- **LI-1195 "Document Handling"** gives clear instructions on handling archival documents and institutional objects. LI-1195 informs the readers on the safe handling of not only historical documents but also how to keep employees safe from injury while handling archival documents or institutions objects. Ensuring that there is Laboratory Instruction available to all INL employees makes the gathering, handling, and accessioning to the INL Archives & Special Collections smoother and as damage free as possible.
- **GDE-55076 "Archives Scanner Use & Drawing Identification Guide"** instructs current and future Archives Staff on the operation of the archival equipment to create archival quality scans. Now future employees do not need the institutional knowledge in order to operate the scanning equipment. The Drawing Identification section instructs current and future Archives Staff on the different identifying marks and symbols on Architectural & Engineering Drawings for the purposes of inventory, identification for document handling, and digitization procedures. Future Archives Staff do not have to try and figure out how to identify the different sections on the drawings.
- **MCP-4373 "CRMO Archives and Special Collections Procedure"** This procedure provides directions for Archives and Special Collections. Archival records are documents officially produced or received by a government agency, a public or private organization, or an individual which record the operations or activities of that institution or individual. Records of archival value to the Idaho National Laboratory Archives are 1) bodies of non-current permanently valuable records that are evidence of the organization's functions, policies, decisions, procedures, operations, or other activities of INL personnel and subcontractors, or 2) records that should be preserved for their informational content. Special Collections, or institutional objects, associated with INL's nuclear research history can include displays, models, recordings, etc. The DOE-ID intends for the items to be used in interpretive displays to educate the public about INL history and research. These may comprise of either permanent, rotating, or traveling displays. The MCP ensures guidance on the collections of and care for archival records and institutional objects such as, the environmental conditions and disaster recovery procedures that are in compliance with NARA regulation. This document is one of the many new procedures and forms that will allow new incoming staff to learn how the INL Archives & Special Collections functions in order to continue Archives functions.
- **PLN-5920 "IDAHO NATIONAL LABORATORY ARCHIVES AND SPECIAL COLLECTIONS MANAGEMENT PLAN"** The PLN includes the Mission, Scope, Survey, Selections and Appraisal, Acquisition and Accession, Arrangement and Description, Preservation, Emergency Response, User Access, Security, and the list of relevant record groups that encompass the INL Archives & Special Collections activities and functions. Regardless of their physical form or the preservation challenges they present, archives are of vital importance as official documentation of government actions. PLN-5920 is the overview of how the INL Archives & Special Collections functions.
- **FRMs:** These forms are used to maintain property rights, chain of custody, provenance, and proper archives procedures for the INL Archives & Special Collections.
  - **412.49 "INL ARCHIVES AND SPECIAL COLLECTIONS ACCESSION FORM"** The Accessions Form is the document that is an agreement to place new items into the INL Archives collections from within the INL. It also provides proof of chain of custody, transfer of property rights, and initial information for processing.
  - **412.50 "INL ARCHIVES AND SPECIAL COLLECTIONS PURCHASE OR DEED OF GIFT"** The Purchase or Deed of Gift Form is a document that is used with the Accessions Form for records or items that are being gifted to the INL Archives & Special Collections from a private individual.
  - **412.51 "INL Archives & Special Collections Record Inventory Form"** The Records Inventory Form is used in surveys to list records that have value to the INL Archives & Special Collections so they can be retained for future transfer.

- **412.67 “INL ARCHIVES AND SPEICAL COLLECTIONS ORAL HISTORY INTERVIEW INFORMATION”** The Oral History Interview Information Form is the initial information from an Interviewee to the INL Archives for the purposes of an oral history interview. The information includes background information to help Archives Staff curate questions that would yield the fullest history possible for oral history interview.
- **412.68 “INL ARCHIVES AND SPECIAL COLLECTIONS ORAL HISTORY INTERVIEW QUESTIONS”** This form holds basic questions about an interviewees time at the INL.
- **412.69 “INL ARCHIVES AND SPECIAL COLLECTIONS ORAL HISTORY INTERVIEW RELEASE”** This interview release in the legal permission for the oral history interviews to be used for the purposes of researchers or the public for educational purposes including publications, exhibitions, World Wide Web, and presentations.
- **412.70 “INL ARCHIVES AND SPECIAL COLLECTIONS RECORDS USE FORM”** The Records Use Form is used in tandem with Form 412.71 to list records that researchers have reviewed and request copies of records and items for their research.
- **412.71 “INL ARCHIVES AND SPECIAL COLLECTIONS RESEARCHER REGISTRATION FORM”** This form lays out the policies governing the use of archival materials for researchers that are using the INL Archives & Special Collections. This form explains the Reproduction for Research, Permission to Publish, and the Use of Materials. This form also includes an entrance interview for researchers to help the Archives Staff find what they are researching.

Archives staff assisted the INL CRMO Architectural historians by scanning 384 items for the SMC built environment inventory update conducted in FY2023. These activities are critical to provide appropriate evaluations of significance and integrity for built environment resources at SMC and related historic objects.

The INL Archives and Special Collection purpose and mission have been highlighted in two articles with input from Archives staff; *Idaho National Laboratory and Two ISU Alumni Establish and Archive* (Curtis 2023) and *Archivist Brings the Past Into the Present* (Walker 2023). The Archives staff continual marketing of the importance of the INL Archives and Special Collections has resulted in five external requests and six internal requests for accessions, collections, reviews. The completed requests have resulted in 204 archival quality scans.

The INL Archives and Special Collection is involved in the INL Site Record Center (ISRC) destruction and permanent monthly transfer meetings. This also allows the INL Archives to scan the material of interest for the Archives purposes. Archives Staff has worked with the property organizations and have created our own tagging system to track and accession large objects that are administratively controlled.

During FY2023, INL Archives staff completed 17 accessions, including approximately 23,000 archival photographs, five INL specific booklets and articles, five maps, 310 slides, and 41 archival objects. Metadata for 111 architectural and engineering drawings was completed in the ISRC transfer/destruction process with 355 scans completed. Repairs were completed for 58 damaged architectural drawings. Of note, these accomplishments were completed while the Archives space was under renovations to become compliant with NARA standards for six months of FY2023.

8. Program Assessment and Management Recommendations

The following section discusses FY2023 self-assessments conducted within the INL CRMO, DOE assessments, and overall management recommendations related to the INL Historic Preservation Program

and INL Archives and Special Collections. Discussed below are progress and status updates to previously suggested management recommendations within FY2022 Annual Reports followed by a discussion of the FY2023 management recommendations.

8.1 FY2023 INL (BEA) Assessments

To identify areas to improve and ensure processes and procedures are clear and consistently applied within the INL CRMO program, BEA conducted five assessments of work performed at the INL Site. With several new procedures issued in FY2021, the focus of one of the assessments was on a recently issued procedure, MCP-8009 - *Section 106 Visual Effects Assessment*. Three of the assessments focused on work orders and the screening process at the INL Site for routine maintenance activities in each trimester of FY2023. Two of the assessments focused on the INL CRMO screening process within the ERP system to identify appropriate use of exclusions and Section 106 justification language.

8.1.1 MCP-8009 Section 106 Visual Effects Assessment

This assessment was conducted to evaluate MCP-8009- *Section 106 Visual Effects Assessment*, which was issued on August 3, 2021. Prior to the issuance of this procedure, there was no standardized procedure to ensure consistent and accurate assessments of potential visual effects, particularly since the NHPA and its implementing regulations do not specify a methodology for conducting such assessments. Since MCP-8009 was issued, visual effects considerations have been discussed at scenario-based training sessions held on May 16, and May 31, 2022. Since the procedure was newly issued in 2021 and serves as a primary procedure utilized by INL CRMO staff to complete certain aspects of the Section 106 review, this procedure was chosen for assessment in FY2023. Projects finalized since the issuance of the procedure were reviewed in this assessment and the outcomes offer ways to improve the MCP-8009 procedure and other techniques to ensure consistency and accuracy.

The findings of this assessment are satisfactory; however, the following conditions address the need to improve MCP-8009 to allow for greater clarity and consistency in its application, and alignment with other procedures that have been revised since its issuance.

The following long-term corrective actions are recommended:

- Revise MCP-8009 and FRM-3005 – *Visual Contrast Rating Form* to explicate the process more clearly through which visual effects analyses are conducted, including:
    - when a full visual effects analysis, including FRM-3005, is warranted;
    - determination of APEs that include the potential for visual effects as per MCP-8008 Revision 1 and 36 CFR 800.4;
    - how to assess effects to setting, feeling, and association as per *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation*;
    - describe undertakings at facilities that are unlikely to modify landscape elements beyond contrast, space, and scale;
    - establish process to identify and maintain list of Key Observations Points (KOPs) at historic properties;
    - establish process to create and maintain a photo library from historic properties that capture setting, feeling, and association in snow, brown, and green conditions; and,
    - documentation necessary to report visual effects.
- Update MCP-8009 and FRM-3005 to be compatible with MCP-8008, Revision 1.
- Provide tailgate training(s) on how to implement the updated MCP-8009, including at least one on-site visit to complete the FRM-3005 and compare findings among INL CRMO staff.

Revisions to MCP-8009 and FRM-3005 are currently scheduled for completion in January 2024.

8.1.2 FY2023 T1, T2, and T3 Routine Maintenance and Section 106 Compliance

A total of three assessments were conducted in conjunction with NEPA assessments that looked at a sample size of work orders conducted for routine maintenance work within each trimester of FY2023. At the INL, an average of 14,000 work orders can be completed within a given fiscal year. To streamline and maintain efficiencies, specific routine maintenance actions are permitted under a "tent" ECP. Although not all activities that are excluded under NEPA or equivalent under Section 106, attention was given to ensure all activities that are excluded under Section 106 were aligned with the activities in the ECP.

Routine maintenance activities at the INL are generally covered under Tent ECP INL-20-022. The ECP covers actions performing preventive, predictive, and corrective maintenance (e.g., repair) on a routine basis to verify that INL Site facilities, processes, systems, and equipment are maintained in a condition suitable for their intended use. This assessment will analyze work order data, to ensure that the activities comply with Section 106 hold points (building and structural maintenance within a historic property), and do not meet one of the activity limitations listed below that pertains to Section 106.

- Actions at EBR-I beyond normal custodial work
- Actions with extraordinary circumstances that affect any sensitive area or natural resources, cultural and historic resources, federally-listed threatened and/or endangered (T&E) species or their habitat, federally proposed or candidate species and their habitat, state-listed or state proposed T&E species, and other federally protected species such as Bald and Golden eagles and birds protected under the Migratory Bird Treaty Act (MBTA), floodplains and wetlands, areas having a special designation (e.g., national landmarks), special sources of water (such as sole source aquifers), and involve genetically engineered organisms, synthetic biology, noxious weeds and invasive species)
- Activities that disturb 1) sagebrush anywhere on the INL Site outside of fenced facility boundaries, 2) native vegetation within the Sage-Grouse Conservation Area (SGCA), Sagebrush Steppe Ecosystem Reserve, or the area between SMC and TAN, 3) soil in the INL Site storm water corridor, or 4) disturb vegetation or soils in the CITRC area (including previously disturbed areas at CITRC) require project specific ECs
- Building and Structural Maintenance within a Historic Property: Maintenance activities also include repairing/replacing equipment and facility components.
    - Repairing, and replacing exterior siding, rain-gutters, decks, fencing, and heat tracing
    - Minor modifications to or removing components to increase effective use of space (e.g., doors, ceilings, floor coverings, walls, windows, stairs, platforms, and ramp repositioning)
    - Painting and coating indoor and outdoor surfaces (e.g., equipment surfaces, walls, floors, ceilings, and decks) with paint, epoxy, and other coatings, including surface preparation, such as cleaning, grouting, scraping, sanding, sandblasting, or other methods
    - Removing and installing roofing materials and installing insulating materials, roofing materials, and sealants.

Within each trimester (T1-T3), for work orders in the sample, three questions will be answered:

1. Is the activity within a historic property or outside a fenced facility?
2. Is there a potential to affect historic properties?
3. Is this satisfactory?

The results of the T1 and T2 assessments were satisfactory. Although routine maintenance activities occurred within historic properties, they were not building or structural maintenance activities, and therefore did not require INL CRMO involvement to assess potential effects to historic properties. All the

activities in the sample did not have the potential to affect Historic Properties, meaning they have been agreed upon by DOE-ID and SHPO to have No Effect on Historic Properties. These exclusions are documented in the Cultural Resource Management Plan (CRMP) Revision6 (2016) and in Appendix A of MCP-8008 and/or Appendix A and B of MCP-8008 Revision 1. With respect to Appendix B, the activities that fell under the Routine Maintenance #1 activity exclusion, activities also fell under Security and Safety Systems #4, or Ground Disturbance Within a Fenced Facility #7, per MCP-8008 Revision 1. At present, the T3 assessment is pending review.

Although the results of these routine maintenance activities were satisfactory and within Section 106 compliance, INL CRMO will continue to perform self-assessments each trimester for a minimum of three years before determining if this assessment should continue or be retired. Furthermore, the sample size, categories of activities, and specific facilities may be considered for a more detailed analysis in future assessments.

8.1.3 FY2023 T1 and T2 Section 106 Screened Activities and Exclusions

Prior to the integration of Section 106 reporting into the NEPA ERP workflow program in April 2022, undertakings that did not trigger Section 106 were not tracked by the INL CRMO. Undertakings that qualified as exempt activities or involved exempt properties were documented on A CRR. The ERP system integrates the Section 106 process and the screening of these types of undertakings are now documented within the program. Section 106 recommendations are entered by an INL CRMO archaeologist or architectural historian, and the recommendations and their justifications are reviewed for approval by the INL CRMO Manager, or Technical Lead (as of February 2023). Undertakings that require full Section 106 review are documented on FRM-3004. If historic properties are documented within the undertaking's APE, FRM-3006 must also be completed. FRM-3004 and FRM-3006 requires the approval of the DOE CRC in addition to the INL CRMO Manager or Technical Lead.

In August 2022, a Timely Order was issued to outline procedures associated with the integration of Section 106 review recommendations into ERP. The procedures prompt the Section 106 reviewer to complete the ERP cultural resource review and provide standard language for consistency. The reviewer is required to insert the appropriate type of action or property type with reference to the MCP-8008 Revision 1 appendices and concise justification for their recommendation. The Timely Order also directs INL CRMO staff reviewers to complete the INL CRMO ERP Tracking Spreadsheet. To allow for simultaneous editing this Excel worksheet is available to INL CRMO staff via Microsoft TEAMS. The worksheet tracks individual reviews by the ERP number.

As the ERP system and the Timely Order were newly issued in 2022, a sample of the undertakings reviewed in FY2023 were chosen for assessment. These assessments evaluated the screening of Trimester 1 and 2 undertakings that do not trigger the Section 106 process and the application of exclusions/exemptions that do not require further cultural resource review. Two notable events occurred in T2: the INL CRMO hired a Technical Lead and the 2023 *Programmatic Agreement Among the Department of Energy, Idaho Operations Office, the Idaho State Historic Preservation Office, and the Advisory Council on Historic Preservation Concerning Management of the Manner in which the Department of Energy will meet its National Historic Preservation Act Responsibilities on the Idaho National Laboratory Site* (PA) was approved.

A total of two assessments were conducted reviewing the screening of undertakings that do not trigger Section 106 as part of the ERP. Appendix A of MCP-8008 and the ensuing MCP-8008 Rev 1. list actions that do not meet the threshold of Federal undertakings with the potential to affect historic properties (referred to in the PA as 'non-undertakings', see Appendix D). The T1 assessment evaluated 45 projects pursuant to MCP-8008. The T2 assessment evaluated 70 projects pursuant to MCP-8008 and

their overlaps with the issuance of MCP-8008 Revision 1. Seven lines of inquiry were considered when conducting each assessment:

1. Were proposed undertakings that do not trigger Section 106 accurately screened and justified in the ERP system?
2. Were undertakings that propose activities that qualify as exempt/excluded activities accurately identified and justified in the ERP system and on FRM-3004?
3. Were proposed undertakings that involve exempt/excluded property types accurately identified and justified in the ERP system and on FRM-3004?
4. Were proposed undertakings that require a full Section 106 review identified with FRM-3004 accurately completed?
5. Was the language provided in the Timely Order used appropriately?
6. Were data entered in the ERP system or on FRM-3004 accurately entered into the INL CRMO ERP Tracking Worksheet?
7. Were any other issues identified that could improve efficiencies in the review process or the tracking of projects?

The results of the assessments identified a 94.5% accuracy as to whether the proposed action(s) triggered the Section 106 process or qualified as an exempt activity or exempt property type. The following suggestion was proposed following the Assessment of T1 Exemptions. If the NEPA Determination in the ERP system is "new ECP," Cultural Resources staff will not screen the activity until the Project Environmental Lead (PEL) has completed a draft ECP and uploaded it to the Scope of Work tab to ensure a review of all proposed activities and to avoid any inaccurate Section 106 review justification.

This suggestion was determined to be relevant with respect to some ERPs that lacked appropriate project details. As a result, INL CRMO staff reached out to PELs, their designees, and Project Managers, to request the necessary additional information. In T1 and T2 it was identified that this outreach sometimes occurred via phone call of TEAMS message, resulting in no documentation to refer to, should the need arise. To address this concern and to better track this additional information for projects that do not warrant FRM-3004 and, therefore, are not assigned a project number, action was taken early in T3; the INL CRMO Technical Lead created a Miscellaneous Information folder in the Section 106 project folder for additional information received by the INL CRMO reviewer via email or phone call. The reviewer is required to upload this documentation into *INL CRMO Files* within the ERP system.

The INL CRMO staff are also responsible for maintaining data on their projects in real-time as the ERP activities are screened. This was happening on an inconsistent basis in T1. With the implementation of the MCP-8008 Revision, expectations regarding real-time INL CRMO ECP Tracking Worksheets were reinforced during weekly INL CRMO Section 106 Coordination meetings and clearly stated in the ERP Tracking Worksheet. As a result, improvements in this regard were noted between the T1 and T2 Assessments. Updates to the ERP Tracking Worksheet for improvements toward efficiency, elimination of redundancy, and prevention of errors and omissions are underway and are anticipated to be completed in FY2024.

Likewise, implementation of the MCP-8008 Revision 1 experienced some hiccups with respect to application of the various exemptions and exclusions afforded by the appendices A, B, and C. Although the results of the assessments are satisfactory, there is room for improvement:

- Documentation of supplemental information in the Miscellaneous Information folders
- A need for more detailed justifications of Section 106 screening, including activities that do not trigger Section 106, those activities that trigger Section 106 but are excluded, or activities that trigger full Section 106 review (FRM-3004).

These areas of improvement are highly organic, but worth noting that they continue to evolve in a positive direction, largely due to the close working relationships between the INL CRMO staff as they navigate varying opinions on application of exemptions and exclusions and come to consensus during the assessments. Overall, given the transition from project review leveraged against the INL CRMP and MCP-8008 and rapid transition to MCP-8008 Revision 1 following the 2023 PA, the results of the T1 and T2 Assessments reflect a high degree of accuracy. As a result, no corrective activities are required.

8.2 DOE-ID Assessment

No formal assessments were performed by DOE-ID in FY2023. DOE-ID performed operational awareness oversight of the INL CRMO's operations, including observing field work; performing facility walkdowns; and reviewing cultural resource review records, cultural resource investigation reports, site records, and research proposals and reports. The DOE-ID Cultural Resource Coordinator met weekly with the INL CRMO Manager and Technical Lead to discuss status and coordinate INL Site Cultural Resource Management Program activities. DOE-ID also performed federal contract oversight responsibilities through periodic assessments of the sufficiency and effectiveness of contractor assurance activities, compliance with contract requirements, and evaluation of contract performance. DOE-ID did not note findings or concerns with INL CRMO operations during these periodic oversight activities.

8.3 Previous Management Recommendations Updates

The status of previous management recommendations made in FY2021 and FY2022 Annual Reports are discussed in the following sections.

8.3.1 EBR-I National Historic Landmark

Recommendation 1: Update EBR-I Nomination Form in FY2023-FY2024.

INL CRMO completed a technical amendment to the National Register Nomination for EBR-I. Please see Section 2.9 for more details.

Recommendation 2: Update EBR-I Preservation Plan in FY2023-FY2024.

INL CRMO completed a draft EBR-I preservation plan in FY2023. Please see Section 2.9 for more details.

8.3.2 Stabilization Efforts at Birch Creek

Recommendation 1: Collaborate with BLM on shared and continued efforts to stabilize Birch Creek site in coordination with Shoshone-Bannock Tribes and SHPO.

The INL CRMO in conjunction with the DOE-ID, INL Natural Resources Group, INL Facility Sites and Services, HeTO, and BLM completed several steps to the hydroseeding of Birch Creek site. It is anticipated that completion will occur in early FY2024. Please see Section 2.7.1 for more details.

8.3.1 Built Environment Inventory Update at SMC and RWMC Facilities

Recommendation 1: Initiate Section 106 strategy with Idaho Environmental Coalition (IEC) for RWMC activities proposed between FY2023-FY2028.

INL CRMO supported IEC in FY2023 through the development of a Section 106 strategy to evaluate and assess buildings within the fenced facility and Surface Disposal Area (SDA) cap area. The strategy was presented to IEC environmental personnel in May 2023. INL CRMO anticipates reengaging with IEC and DOE-ID regarding the proposed strategy in early FY2024, and shortly thereafter with SHPO.

Recommendation 2: Initiate and pursue additional funding for SMC facility to receive built environment inventory update.

INL CRMO conducted the built environment inventory update in-house due to security logistics within Specific Manufacturing Capability (SMC). This report and associated data were completed in FY2023 and is currently under review by DOE-ID. Please see Section 2.10 for more details.

8.3.1 INL Archives and Special Collections

Recommendation 1: Update PLN-5920 to include revisions and detailed processing guidance.

In FY2022, archives staff completed a draft comprehensive rewrite of the Archives Management Plan (PLN-5920), which was issued in FY2023. As a result, additional procedures were created, MCP-4373 INL CRMO Archives and Special Collections Procedure, LI-1195 – Historical Document Handling, GDE-55079 Archives Scanner Use & Drawing Identification Guide as well as eight forms (FRMs) that were issued concurrently with procedure updates in January 2022. Please see Sections 1.3.3 and 7.1 for more details.

Recommendation 2: Large Object Inventory and Public Display Opportunities Plan.

INL CRMO staff (archivists and architectural historians) monitored historical objects at West One storage. Although INL CRMO staff were not able to complete a draft of the public display opportunity plan, one was initiated, and on-going contributions will be made in FY2024. In addition to understanding the historic object inventory and display opportunities, additional strategic planning for the archives will be completed in FY2024 and will likely include guidance on an oral history project, expansion of interpretive displays at EBR-I, and opportunities to pursue a building for interpretive center for the INL Site.

8.4 Management Recommendations for FY2024

8.4.1 CITRC Monitoring Plan

Recommendation 1: INL CRMO Staff to coordinate with HeTO staff to create monitoring plan for CITRC.

Based on the routine and repetitive monitoring in some locations within CITRC, INL CRMO staff and HeTO staff anticipate working collaboratively in FY2024 on a CITRC monitoring plan that reflects the results of the monitoring efforts in these areas.

8.4.2 Built Environment Inventory Update Strategic Plan

Recommendation 1: Develop a strategic plan to guide built environment inventory updates at INL Site as resources age to 45-years of age.

As buildings, structures, and objects age to 45-years old, INL CRMO will proactively evaluate these resources, rather than being reactive to evaluation as triggered by Section 106 projects. The document will identify those resources that are recommended for evaluation each year for a minimum of 10 years.

Recommendation 2: Develop a strategic plan for evaluating Research Campus (REC) building and structures given complexities of variety of ownership and leases.

As the Research and Education Campus (REC) facility ages and increases in the number of undertakings being proposed within Idaho Falls, the INL CRMO will anticipate how Section 106 reviews and evaluations will be conducted.

Recommendation 3: Develop a strategic plan for providing updates to the built environment inventory update to SHPO.

It is important for the updated built environment inventory completed in FY2023 and anticipated completion of SMC in FY2024 to seamlessly be updated as a living document, and periodically reviewed for applicable historic contexts justifications as programs later in INL Site history become the context in which to evaluate buildings and structures aging to 45-years.

8.4.3 Initiative to Pursue Interpretive Center

Recommendation 1: INL CRMO will pursue options to secure a building to be utilized as an interpretive center for tribal and historical INL Site history.

INL CRMO and DOE-ID foresee continued growth at the INL Site in the coming decade and will pursue options to secure a building that may be used for an interpretive center. As the INL Archives and Special Collections becomes publicly accessible and more interest in bringing industry and projects to DOE-ID, there will be a need to document more buildings, structures, objects, equipment, etc. through the Section 106 process. Developing a strategy to address the big picture development of the Site and how INL CRMO and DOE-ID can highlight the unique history and irreplaceable objects will be critical to keeping ahead of actions that may diminish the historic properties at the INL Site.

9. References

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10. Appendix A - Annual Monitoring Forms and Results (FRM-3001) - Official Use Only – FOIA Exempt 3

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11. Appendix B - ASI Site Forms, ASI Isolate Forms, and IHSI Forms - Official Use Only – FOIA Exempt 3

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12. Appendix C - INL Site Building Inventory -

Table 7. INL Site Building Inventory (2023)

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
B27-601	23-10387	Generator Building	1984	Exempt	N/A	N/A
B27-602	23-10388	Guardhouse on E. Portland Avenue	1984	Not Eligible	N/A	N/A
B27-603	23-10389	Badging Building on E. Portland	1986	Not Eligible	N/A	N/A
B27-604	23-10390	Unknown	1985	Not Eligible	N/A	N/A
B27-605	23-10391	Deep Well Pump House	1987	Exempt	N/A	N/A
B27-606	N/A	Multipurpose Laboratory Facility	ca. 2001	Not Assessed	N/A	N/A
B27-607	N/A	Unknown	2007	N/A	N/A	N/A
B27-608	N/A	Unknown	2007	N/A	N/A	N/A
B8-601	23-10375	Lincoln Generator Building	1984	N/A	N/A	N/A
B8-602	23-10376	Guardhouse on Lincoln Boulevard	1986	N/A	N/A	N/A
CF-1602	N/A	Hydrant and Standpipe Facility	1990	Not Eligible	N/A	N/A
CF-1603	23-10149	Firewater Pump House	1995	Not Eligible	N/A	N/A
CF-1606	23-10151	CFA Training Facility	1995	Not Eligible	N/A	N/A
CF-1607	23-10152	Antifreeze and Oil Dispensing Building	1995	Not Eligible	N/A	N/A
CF-1608	23-10153	CFA Modular Office	1995	Not Eligible	N/A	N/A
CF-1609	23-10154	CFA/DOE Modular Office	1995	Not Eligible	N/A	N/A
CF-1610	23-10155	CFA Waste Management Modular Office	1995	Not Eligible	N/A	N/A
CF-1611	23-10156	CFA Fire Station 1	1996	Not Eligible	N/A	N/A
CF-1612	23-10157	CFA Medical Facility	1996	Not Eligible	N/A	N/A
CF-1614	23-10158	Fire Training Facility	1997	Not Eligible	N/A	N/A
CF-1616	23-10159	Truck Scale House North of 629	1997	Not Eligible	N/A	N/A
CF-1618	N/A	Health Physics Instrument Laboratory	2002	Not Eligible	N/A	N/A
CF-1701	N/A	Fuel Tank #2 (CF-668) (U/G)	1951	N/A	N/A	N/A
CF-1704	N/A	Fuel Tank (CF-608) (U/G)	1994	N/A	N/A	N/A
CF-1705	N/A	Heating Oil Tank (CF-609) (U/G)	1995	N/A	N/A	N/A
CF-1710	N/A	LNG/CNG Vehicle Fueling Station	2001	N/A	N/A	N/A
CF-1711	N/A	Temporary Storage Pad	2003	N/A	N/A	N/A
CF-1714	N/A	Truck Scale	1996	N/A	N/A	N/A
CF-1715	N/A	CFA Sanitary Treatment System	1995	N/A	N/A	N/A
CF-1716	N/A	LNG Tank (CF-1611/1612) Heating	1995	N/A	N/A	N/A
CF-1717	N/A	Liquid Propane Tank for CF-1614	1997	N/A	N/A	N/A
CF-1718	N/A	CFA Final Sewage Lift Station	2003	N/A	N/A	N/A
CF-1719	23-10526	Evacuation Tower #1	1961	N/A	Not eligible	N/A
CF-1720	23-10527	Evacuation System & Tower #2	1961	N/A	Not eligible	N/A
CF-1723	N/A	E85 Fuel Station	1996	N/A	N/A	N/A
CF-1725	N/A	INL Communication Systems	1989	N/A	N/A	N/A
CF-1728	N/A	CFA Water Distribution Systems	1953	N/A	N/A	N/A
CF-1729	N/A	CFA Steam Distribution System	1952	N/A	N/A	N/A
CF-1730	N/A	Cell Site Tower #1 (CF-609)	2002	N/A	N/A	N/A
CF-1731	N/A	CFA-609 Bulk Diesel Fuel Tank	2017	N/A	N/A	N/A
CF-601	23-9952	Warehouse	1950	Eligible	Not eligible	N/A
CF-608	23-10130	Security Helicopter Storage/Maintenance Facility	1984	Not Eligible	N/A	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
CF-609	23-10131	Security Headquarters	1988	Not Eligible	N/A	N/A
CF-612	23-10132	CF Office Building No. 1	1983	Not Eligible	N/A	N/A
CF-614	23-10133	CF Office Building No. 2	1986	Not Eligible	N/A	N/A
CF-615	23-10134	CF Office Building No. 3	1991	Not Eligible	N/A	N/A
CF-619	23-10137	Utility Building	1989	Not Eligible	N/A	N/A
CF-621	23-10138	Multi-craft Shop No. 1	1983	Not Eligible	N/A	N/A
CF-622	23-10421	Multi-craft Shop No. 2	1984	Not Eligible	N/A	N/A
CF-623	23-10139	Multi-craft Shop No. 3	1986	Not Eligible	N/A	N/A
CF-624	23-10420	Multi-craft Shop No. 4	1986	Not Eligible	N/A	N/A
CF-625	23-10140	CF Laboratory Complex	1989	Not Eligible	N/A	N/A
CF-638	23-9938	High Explosives Magazine (Dosimetry Calibration Lab)	1943	Eligible	Eligible	N/A
CF-642	23-9961	Pump House (CFA Well No. 2)	ca. 1943	Eligible	Eligible	N/A
CF-651	23-9966	Pump House (CF Well No. 1)	1943	Eligible	Eligible	N/A
CF-661	23-9970	Material Storage Building	1963	Eligible	Not eligible	N/A
CF-663	23-10143	Core Storage Library	1990	Not Eligible	N/A	N/A
CF-664	23-9972	Storage Building	1951	Eligible	Not eligible	N/A
CF-668	23-9976	Communications Building	1951	Eligible	Not eligible	N/A
CF-674	23-9979	Warehouse (Roads & Grounds / Materials Storage)	1952	Eligible	Not eligible	N/A
CF-676	23-9981	Storage Building (DOE Equipment Storage)	1963	Eligible	Not eligible	N/A
CF-681	23-9951	Control House, Substation	1951	Exempt	Not eligible	N/A
CF-685	23-9986	Bus Depot	1952	Eligible	Not eligible	N/A
CF-686	23-10144	High Bay Lab Building	1979	Not Eligible	Not eligible	N/A
CF-695	23-9992	Fire Safety Equipment Storage	1966	Eligible	Not eligible	N/A
CF-696	23-10146	CFA Transportation Complex	1995	Not Eligible	N/A	N/A
CF-697	23-10147	Equipment Storage	1960	Eligible	Not eligible	N/A
CF-698	23-9993	Standards & Calibration Laboratory	1969	Eligible	Not eligible	N/A
CF-699	23-9994	Radio & Alarm Shop	1969	Eligible	Not eligible	N/A
CF-701	N/A	CFA Landfill	2003	N/A	N/A	N/A
CF-701A	N/A	Asbestos Disposal Landfill	2003	N/A	N/A	N/A
CF-701B	N/A	Closed Landfills (I, II, III)	2003	N/A	N/A	N/A
CF-702	N/A	Weather Station Farm	2003	N/A	N/A	N/A
CF-704	23-9958	Concussion Wall (CF-633)	1943	N/A	Eligible	N/A
CF-709	N/A	Helicopter Landing Pad	1985	N/A	N/A	N/A
CF-717	N/A	Sewage Lift Station	2003	N/A	N/A	N/A
CF-719	23-9966	CFA-Well #1	1949	N/A	Eligible	N/A
CF-720	23-9961	CFA Well #2	1949	N/A	Eligible	N/A
CF-756	N/A	Water Storage Tank	2003	N/A	N/A	N/A
CF-761	23-10524	Scoville Substation	1951	N/A	Not eligible	N/A
CF-768	23-10525	Equipment Loading Ramp	1953	N/A	Not eligible	N/A
CF-782	N/A	Water Storage Tank	1995	N/A	N/A	N/A
CF-783	N/A	Bus Refueling Station (CF-696)	1996	N/A	N/A	N/A
CF-784	N/A	Car Refueling Island (CF-696)	1996	N/A	N/A	N/A
CF-785	N/A	Liquid Propane Tank (CF-696)	1996	N/A	N/A	N/A
CF-791	N/A	Antifreeze Tank (CF-696)	1996	N/A	N/A	N/A
CF-792	N/A	Oil Tank (CF-696)	1996	N/A	N/A	N/A
CF-793	N/A	Oil Tank (CF-696)	1996	N/A	N/A	N/A
CF-794	N/A	Oil Tank (CF-696)	1996	N/A	N/A	N/A
CF-795	N/A	Waste Oil Tank (CF-696)	1996	N/A	N/A	N/A
CF-796	N/A	Diesel Tank (CF-696)	1996	N/A	N/A	N/A
CF-797	N/A	Diesel Tank (CF-696)	1996	N/A	N/A	N/A
CF-799	N/A	Gasoline Tank (CF-696)	1996	N/A	N/A	N/A
CPP-1604	23-10430	Office Building No. 4	1986	Not Eligible	N/A	N/A
CPP-1605	23-10431	Document Control Building	1986	Not Eligible	N/A	N/A
CPP-1606	N/A	Plant Support Warehouse (FPR)	1986	Not Eligible	N/A	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
CPP-1608	23-10085	Contaminated Equip. Storage/Manipulator Repair	1987	Not Eligible	N/A	N/A
CPP-1615	N/A	Service Building for Bin Set VII	1990	Not Eligible	N/A	N/A
CPP-1617	23-10086	Waste Staging Building	1986	Not Eligible	N/A	N/A
CPP-1618	23-10087	Liquid Effluent Treatment and Disposal Building	1990	Not Eligible	N/A	N/A
CPP-1631	23-10090	Production Computer Support Building	1989	Not Eligible	N/A	N/A
CPP-1634	23-10091	FDP Pilot Plant	1995	Not Eligible	N/A	N/A
CPP-1636	23-10093	Contractors' Warehouse FPR	1989	Not Eligible	N/A	N/A
CPP-1642	23-10096	Fire Pump House	1992	Not Eligible	N/A	N/A
CPP-1643	23-10097	Fire Pump House	1992	Not Eligible	N/A	N/A
CPP-1646	23-10099	Anti-C Safety Handling Equipment Facility	1992	Not Eligible	N/A	N/A
CPP-1647	23-10100	Demineralizer Waste Neutralizing Facility	1993	Not Eligible	N/A	N/A
CPP-1650	23-10102	Training Support Facility	1991	Not Eligible	N/A	N/A
CPP-1651	23-10103	Operations Training Facility	1994	Not Eligible	N/A	N/A
CPP-1659	23-10107	Contaminated Equipment Maintenance Building	1994	Not Eligible	N/A	N/A
CPP-1662	23-10108	Remote Inspection and Alarm System Facility	1993	Not Eligible	N/A	N/A
CPP-1663	23-10109	Security and Fire Protection Support Facility	1993	Not Eligible	N/A	N/A
CPP-1666	23-10110	Office Building	1993	Not Eligible	N/A	N/A
CPP-1671	23-10111	Protective Force Support Facility	1994	Not Eligible	N/A	N/A
CPP-1673	23-10113	Utility Control Center	1994	Not Eligible	N/A	N/A
CPP-1674	23-10114	SNM Vault Guardhouse	1993	Not Eligible	N/A	N/A
CPP-1676	N/A	Oil Hazardous Materials Building	1994	Not Eligible	N/A	N/A
CPP-1678	23-10116	Industrial Contractors Lunchroom/Shop	1993	Not Eligible	N/A	N/A
CPP-1681	23-10117	Box Staging Area	1994	Not Eligible	N/A	N/A
CPP-1683	23-10119	New Control Room for Waste Operations	ca. 1994	Not Eligible	N/A	N/A
CPP-1684	N/A	Standby Generator Facility	2000	Not Eligible	N/A	N/A
CPP-1686	N/A	Access Control Building	2000	Not Eligible	N/A	N/A
CPP-1689	N/A	SSSTF Administration Building	2003	Not Eligible	N/A	N/A
CPP-1751	23-10057	Camera Tower	2000	N/A	Not eligible	N/A
CPP-1777	23-10530	USGS Water Quality Monitoring	1960	N/A	Not eligible	N/A
CPP-1789	N/A	Staging and Storage Annex	2000	N/A	N/A	N/A
CPP-2710	N/A	IFSF Ventilation Equipment Building	2005	N/A	N/A	N/A
CPP-2719	N/A	IWTU Power Distribution Center	2012	N/A	N/A	N/A
CPP-2724	N/A	CPP-666 Stack Monitor Steel Enclosure	2010	N/A	N/A	N/A
CPP-2725	N/A	Waste Transfer Facility	2016	N/A	N/A	N/A
CPP-603	23-9933	Fuel Receiving and Storage Building	ca. 1950-1951	Eligible	Not eligible	N/A
CPP-604	23-10009	Waste Treatment Building	1952	Eligible	Not eligible	N/A
CPP-605	23-10010	Blower Building	1952	Exempt	Not eligible	N/A
CPP-606	23-10011	Service Building/Powerhouse	1951	Eligible	Not eligible	N/A
CPP-609	23-10013	Vehicle Monitoring Facility Office	1982	Not Eligible	N/A	N/A
CPP-611	23-10422	Pump House, Deep Well Pump No. 1	ca. 1952	Exempt	Not eligible	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
CPP-612	23-10423	Pump House, Deep Well Pump No. 2	ca. 1951	Exempt	Not eligible	N/A
CPP-613	23-10424	Electrical Substation No. 10 Building	ca. 1951	Exempt	Not eligible	N/A
CPP-614	23-10425	Pump house for Diesel-Driven Fire Pump	1984	Exempt	N/A	N/A
CPP-615	23-10426	Sewage Treatment Plant Compressor Building	1982	Not Eligible	N/A	N/A
CPP-616	23-10427	Emergency Air Compressor Building	1979	Not Eligible	Not eligible	N/A
CPP-618	23-10016	Tank Farm Measurement and Control Building	ca. 1980	Eligible	Not eligible	N/A
CPP-623	23-10018	Instrument House (Tank Farm)	1974	Not Eligible	Not eligible	N/A
CPP-626	23-10026	Storage Basin Change Room	ca. 1975	Not Eligible	Not eligible	N/A
CPP-628	23-10019	Tank Farm Control House	1953	Eligible	Not eligible	N/A
CPP-632	23-10020	Tank Farm Instrument House	ca. 1974-1980	Eligible	Not eligible	N/A
CPP-635	23-10022	Waste Storage Pipe Manifold Building	1957	Eligible	Not eligible	N/A
CPP-636	23-10023	Waste Storage Pipe Manifold Building (Waste Station WM-189-190)	1965	Eligible	Not eligible	N/A
CPP-639	23-10031	Blower Building	1958	Eligible	Not eligible	N/A
CPP-644	23-10032	Emergency Power Building Substation No. 20	1960	Not Eligible	Not eligible	N/A
CPP-646	23-10034	Instrument Building for Bin Set II	ca. 1965-1966	Eligible	Not eligible	N/A
CPP-647	23-10035	Instrument Building for Bin Set III	ca. 1970-1971	Eligible	Not eligible	N/A
CPP-649	23-10036	Atmospheric Protection Building	1976	Not Eligible	Not eligible	N/A
CPP-651	23-10038	Material Security and Consolidation Facility	1974	Reassess	Not eligible	N/A
CPP-652	23-10039	Multipurpose Building	ca. 1975-1976	Not Eligible	Not eligible	N/A
CPP-653	23-10040	Vehicle Monitoring Building	1975	Not Eligible	Not eligible	N/A
CPP-655	23-10042	Craft Shop & Warehouse Building	1974	Not Eligible	Not eligible	N/A
CPP-658	23-10045	Instrument Building for Bin Set IV	1975	Not Eligible	Not eligible	N/A
CPP-659	23-10046	New Waste Calcining Facility	1980	Reassess	Eligible	N/A
CPP-661	23-10048	Modular Guard Station No. 1	1986	Not Eligible	N/A	N/A
CPP-662	23-10049	Maintenance Fabrication Shop	1976	Not Eligible	Not eligible	N/A
CPP-663	23-10050	Maintenance Building	1980	Not Eligible	Not eligible	N/A
CPP-666	23-10053	FAST Facility	1983	Reassess	N/A	N/A
CPP-671	23-10057	Instrument Building for Bin Set V	1981	Not Eligible	Not eligible	N/A
CPP-673	23-10059	Service Building for Bin Set VI	1986	Not Eligible	N/A	N/A
CPP-674	23-10060	UREP Substation No. 40 Control House	1984	Not Eligible	N/A	N/A
CPP-677	23-10063	UREP Load Center No. 2 YDB Area	1984	Not Eligible	N/A	N/A
CPP-679	23-10065	Fast Model Building	1983	Not Eligible	N/A	N/A
CPP-684	23-10069	Remote Analytical Laboratory	1985	Not Eligible	N/A	N/A
CPP-692	23-10077	Instrument Building for Stack CPP-708	1983	Not Eligible	N/A	N/A
CPP-697	23-10082	East Guardhouse and VMF	1986	Not Eligible	N/A	N/A
CPP-698	23-10083	MK Warehouse and Office Building	1984	Not Eligible	N/A	N/A
CPP-701	23-10528	Fuel Oil Unload Shelter	1951	N/A	Not eligible	N/A
CPP-708	23-10529	Exhaust Stack	1953	N/A	Not eligible	N/A
CPP-729	23-10031	Vault for Bin Set 1	1960	N/A	Not eligible	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
CPP-732	23-10031	Cooling Stack / 1st Bin Set	1960	N/A	Not eligible	N/A
CPP-741	23-10031	WCF Solids Storage Vault	1962	N/A	Not eligible	N/A
CPP-742	23-10034	Vault for Bin Set II	1966	N/A	Not eligible	N/A
CPP-744	23-10034	Building Equipment Storage	1965	N/A	Not eligible	N/A
CPP-746	23-10035	Vault for Bin Set III	1971	N/A	Not eligible	N/A
CPP-747	23-10035	Building Equipment Storage	1971	N/A	Not eligible	N/A
CPP-760	23-10045	Vault for Bin Set IV	1977	N/A	Not eligible	N/A
CPP-761	23-10045	Vault for 4th Bin Set Equipment	1977	N/A	Not eligible	N/A
CPP-765	23-10057	Vault for Bin Set V	1981	N/A	Not eligible	N/A
CPP-TB-1	23-10121	MK Carpenter Shop	1980	Eligible	Not eligible	N/A
CPP-TB-3	23-10122	FPR East Guard Gate	1985	Not Eligible	N/A	N/A
CPP-TR-93	23-10531	Office Trailer	1974	N/A	Not eligible	N/A
EBR-601	23-790	Experimental Breeder Reactor I	1951	Listed	Eligible	Contributing (EBR-I)
EBR-602	23-10223	Security Control House	1950	Eligible	Not eligible	Contributing (EBR-I)
MFC-1722	N/A	Tool Quonset	2012	N/A	N/A	N/A
MFC-1723	N/A	Electrical Craft Quonset	2009	N/A	N/A	N/A
MFC-1726	N/A	Sodium Treatment Monitoring Building	2010	N/A	N/A	N/A
MFC-1727	N/A	Modular Office Building	2011	N/A	N/A	N/A
MFC-1728	N/A	MFC Dial Room	2012	N/A	N/A	N/A
MFC-1729	N/A	Irradiated Materials Lab	2012	N/A	N/A	N/A
MFC-1730	N/A	Quonset No. 1 Storage Building	2010	N/A	N/A	N/A
MFC-1731	N/A	Quonset No. 2 Storage Building	2010	N/A	N/A	N/A
MFC-1733	N/A	Storage Quonset	2011	N/A	N/A	N/A
MFC-701	11-17967	Security Building/Former Laundry	1981	Not Eligible	Not eligible	N/A
MFC-702	11-17968	Plant Services Equip. Storage	1983	Not Eligible	Not eligible	N/A
MFC-703	N/A	Sodium Storage Building	1986	Not Eligible	N/A	N/A
MFC-703A	N/A	Sodium Storage Fire Extinguisher Building	1997	Not Eligible	N/A	N/A
MFC-704	N/A	Fuel Manufacturing Facility	1986	Not Eligible	N/A	N/A
MFC-704A	N/A	FMF Compressor Building	1986	Not Eligible	N/A	N/A
MFC-706	N/A	Construction Shop/Storage	1986	Not Eligible	N/A	N/A
MFC-707	11-17969	Fire Pump House	1981	Exempt	Not eligible	N/A
MFC-709	N/A	Safety Equipment Building	1992	Not Eligible	N/A	N/A
MFC-710	N/A	Engineering Office Building	1991	Not Eligible	N/A	N/A
MFC-713	11-17970	Modular Office Building (T-13)	1978	Exempt	Not eligible	N/A
MFC-714	11-17971	Modular Office Building (T-12)	1977	Exempt	Not eligible	N/A
MFC-717	N/A	Modular Office Building (T-2)	1985	Exempt	N/A	N/A
MFC-719	N/A	Security Inspector Post (T-4)	1988	Exempt	N/A	N/A
MFC-720	11-17954	TREAT Reactor Building	1958	Eligible	Eligible	Contributing (TREAT HD)
MFC-721	11-17972	TREAT Office Building	1958	Eligible	Not eligible	Contributing (TREAT HD)
MFC-722	11-17973	TREAT Guardhouse	1980	Not Eligible	Not eligible	Contributing (TREAT HD)
MFC-723	11-17974	TREAT Warehouse	1979	Not Eligible	Not eligible	Contributing (TREAT HD)
MFC-724	11-17975	TREAT Control Building	1979	Not Eligible	Eligible	Contributing (TREAT HD)
MFC-725	N/A	Fire Station	1998	Not Eligible	N/A	N/A
MFC-728	N/A	MFC Dispensary	2006	Not Eligible	N/A	N/A
MFC-733	N/A	RPS/HS Air Compressor Building	2006	Not Eligible	N/A	N/A
MFC-734	N/A	MFC Checkpoint Facility	2009	Not Eligible	N/A	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
MFC-735	N/A	MFC Guardhouse Inspection Facility	2009	Not Eligible	N/A	N/A
MFC-736	N/A	VEDS Equipment Enclosure	2009	Not Eligible	N/A	N/A
MFC-742	11-17976	Gas/Diesel Dispensary	1979	Not Eligible	Not eligible	N/A
MFC-751	11-17977	Safety Storage Building	1961	Eligible	Not eligible	N/A
MFC-752	11-17907	Laboratory and Office Building	ca. 1959	Eligible	Not eligible	N/A
MFC-752A	11-17978	Diesel Generator Building	1962	Exempt	Not eligible	N/A
MFC-753	11-17979	Plant Services Building	1961	Eligible	Not eligible	N/A
MFC-754	11-17980	Well Pump House No. 1	1961	Exempt	Not eligible	N/A
MFC-756	11-17981	Well Pump House No. 2	1961	Exempt	Not eligible	N/A
MFC-758	11-17982	Electrical Substation	1960	Exempt	Not eligible	N/A
MFC-759	11-17983	Emergency Entrance/Old Fire House	1959	Eligible	Not eligible	N/A
MFC-760	11-17984	Sanitary and Industrial Waste Pump House	1961	Exempt	Not eligible	N/A
MFC-765	11-17955	Fuel Conditioning Facility	1962	Eligible	Eligible	N/A
MFC-765A	11-17985	FCF Office Annex	1963	Eligible	Not eligible	N/A
MFC-767	11-17786	EBR-II Reactor Plant Building	ca. 1961	Eligible	Eligible	N/A
MFC-768	11-17986	Power Plant	1961	Eligible	Eligible	N/A
MFC-768B	11-17987	Water Chemistry Laboratory	1969	Eligible	Not eligible	N/A
MFC-768E	11-17988	Flammable Material Storage	Before 1971	Eligible	Not eligible	N/A
MFC-769	11-17989	Dangerous Material Storage	1963	Eligible	Not eligible	N/A
MFC-770B	11-17990	Sodium Components Storage	1962	Eligible	Not eligible	N/A
MFC-772	11-17991	EBR II Engineering Laboratory	1966	Eligible	Not eligible	N/A
MFC-772C	N/A	EDL Systems Support Building	2004	Not Eligible	N/A	N/A
MFC-774	11-17908	ZPPR Support Wing	1967	Eligible	Not eligible	Contributing (ZPPR HD)
MFC-775	11-17992	ZPPR Vault Work/Equipment Room	ca. 1968	Eligible	Eligible	Contributing (ZPPR HD)
MFC-776	11-17993	Zero Power Plutonium Reactor	1968	Eligible	Eligible	Contributing (ZPPR HD)
MFC-777	11-17994	ZPPR Equipment Building	1968	Eligible	Not eligible	Contributing (ZPPR HD)
MFC-778A	11-17995	Industrial Waste Lift Station	1966	Exempt	Not eligible	N/A
MFC-780	11-17996	Laundry Sorting Building (Quality Level A&B Storage Building)	1966	Eligible	Not eligible	N/A
MFC-781 & MFC-782	11-17997	Material Handling Building & Machine Shop Building	1968	Eligible	Not eligible	N/A
MFC-783	11-17998	Rigging Test Facility	1968	Eligible	Not eligible	N/A
MFC-784	11-17999	ZPPR Material Control Building	1968	Eligible	Not eligible	Contributing (ZPPR HD)
MFC-785	11-17957	Hot Fuel Examination Facility	1972	Eligible	Eligible	N/A
MFC-786	11-18007	HFEF Substation	1973	Exempt	Not eligible	N/A
MFC-787	11-18008	Fuel Assembly and Storage Building (Fuels & Applied Science Building)	1970	Eligible	Not eligible	N/A
MFC-788	11-18009	EBR II Maintenance Shop	1955	Eligible	Not eligible	N/A
MFC-789	11-18010	EBR II Engineering Laboratory	1959	Eligible	Not eligible	N/A
MFC-789A	11-18011	Equipment Building	ca. 1977-1982	Eligible	Not eligible	N/A
MFC-790	11-18012	Interim Contaminated Equipment Building	1953	Eligible	Not eligible	N/A
MFC-791	11-18013	Instrument and Maintenance Facility	1972	Not Eligible	Not eligible	N/A
MFC-792	11-18014	ZPPR Mockup Building (SSPSF Control Room)	1972	Eligible	Not eligible	Contributing (ZPPR HD)
MFC-792A	N/A	Security and Space Power Source Facility	2004	Not Eligible	N/A	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
MFC-793	11-18015	Sodium Components Maintenance Shop	1960	Eligible	Not eligible	N/A
MFC-793C	N/A	Contaminated Storage Building	1984	Not Eligible	N/A	N/A
MFC-793G	11-18016	Sodium Contaminated Storage	1979	Not Eligible	Not eligible	N/A
MFC-794	11-18017	Contaminated Equipment Storage Building	1975	Not Eligible	Not eligible	N/A
MFC-796	11-18018	Metal Stock Control Building	1978	Not Eligible	Not eligible	N/A
MFC-798	11-18019	Radioactive Liquid Waste Treatment Facility Building	1983	Not Eligible	Not eligible	N/A
MFC-TR-17	11-18020	Electrical Equipment Storage Trailer	1978	Exempt	Not eligible	N/A
MFC-TR-51	N/A	SPF Operations Trailer	2000	Exempt	N/A	N/A
MFC-TR-52	N/A	D&D Shower Trailer	2009	Exempt	N/A	N/A
MFC-TR-56	N/A	D&D Engineering Trailer	2009	Exempt	N/A	N/A
MFC-TR-57	N/A	D&D Management Trailer	2009	Exempt	N/A	N/A
MFC-TR-58	N/A	D&D RadCon Trailer	2009	Exempt	N/A	N/A
MFC-TR-59	N/A	D&D Comfort Station Trailer	2009	Exempt	N/A	N/A
MFC-TR-60	N/A	D&D Comfort Station Trailer	2009	Exempt	N/A	N/A
MFC-TR-64	N/A	D&D Rad Scrap/ Waste Fac Support Trailer	2009	Exempt	N/A	N/A
PBF-602	23-10225	Pump House (Well No. 1)	1955	Exempt	Not eligible	N/A
PBF-608	23-10242	Electrical Substation Control House	1957	Exempt	Not eligible	N/A
PBF-612	23-10227	CITRC Control System Research Facility (former SPERT-II)	1959	Eligible	Not eligible	N/A
PBF-613	23-10228	CITRC Communications Research Facility (former SPERT-IV)	1961	Eligible	Not eligible	N/A
PBF-614	23-10243	Pump House (Well No. 2)	1960	Exempt	Not eligible	N/A
PBF-622	23-10234	CITRC Explosives Detection Research Center	1989	Not Eligible	N/A	N/A
PBF-623	23-10235	CITRC Wireless Communications Support Building	1991	Not Eligible	N/A	N/A
PBF-632	23-10236	WROC Office Building	1980	Not Eligible	Not eligible	N/A
PBF-638	23-10239	Potable Water and Fire Water Pump House	1995	Exempt	N/A	N/A
PBF-707	23-10532	CITRC Electrical Substation	1957	N/A	Not eligible	N/A
PBF-718	23-10533	NOAA Meteorological Tower	1964	N/A	Not eligible	N/A
PBF-724	N/A	Septic Tank (PBF-619)	1972	N/A	N/A	N/A
PBF-725	N/A	WEDF Septic Tank (PBF-612)	1992	N/A	N/A	N/A
PBF-727	N/A	MWSF Septic Tank (PBF-613)	1960	N/A	N/A	N/A
PBF-735	N/A	Seepage Pit (PBF-619)	1972	N/A	N/A	N/A
PBF-744	N/A	Septic Tank (PBF-632)	1980	N/A	N/A	N/A
PBF-745	N/A	Seepage Pit (PBF-632)	1980	N/A	N/A	N/A
PBF-746	N/A	Seepage Pit (PBF-632)	1980	N/A	N/A	N/A
PBF-747	N/A	Seepage Pit (PBF-632)	1980	N/A	N/A	N/A
PBF-748	N/A	Seepage Pit (PBF-632)	1980	N/A	N/A	N/A
PBF-753	N/A	Storm Water Collection (PBF-612)	1960	N/A	N/A	N/A
PBF-757	N/A	Storm Water Collection (PBF-613)	1962	N/A	N/A	N/A
PBF-758	N/A	Storm Water Collection	1962	N/A	N/A	N/A
PBF-760	N/A	Storm Water Collection (PBF-612)	1960	N/A	N/A	N/A
PBF-763	N/A	Septic Tank/Lift Station (PBF-TR-05)	1992	N/A	N/A	N/A
PBF-765	N/A	Exhaust Stack (PBF-622)	1982	N/A	N/A	N/A
PBF-768	N/A	PBF Fire & Water Tank/Dist. System	1995	N/A	N/A	N/A
PBF-770	N/A	Drain Field (PBF-TR-05)	1992	N/A	N/A	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
PBF-780	N/A	Drainage Basin #2	1992	N/A	N/A	N/A
PBF-782	N/A	Drainage Basin #3	1992	N/A	N/A	N/A
TRA-1608	N/A	ATR Tech Support	2009	NA	N/A	N/A
TRA-1626	N/A	ATR Test Train Assembly Facility	2009	NA	N/A	N/A
TRA-1627	N/A	Radioanalytical Chem Lab	2010	NA	N/A	N/A
TRA-1628	N/A	ATRC Nuc Ops Storage	2008	NA	N/A	N/A
TRA-1629	N/A	CWI Carpenter Shop	2010	NA	N/A	N/A
TRA-1630	N/A	RaCL Storage	2010	NA	N/A	N/A
TRA-1631	N/A	TTAF Storage	2010	NA	N/A	N/A
TRA-1632	N/A	R&G Storage No. 8	2010	NA	N/A	N/A
TRA-1633	N/A	R&G Storage No. 9	2010	NA	N/A	N/A
TRA-1634	N/A	Resin Transfer Enclosure	2000	NA	N/A	N/A
TRA-1635	23-10412	Maintenance Storage Building	2005	NA	N/A	N/A
TRA-1636	N/A	ATRC Water Shed	Unknown	NA	N/A	N/A
TRA-601	23-10392	Deep Well Pump House No. 1	1952	Exempt	Not eligible	N/A
TRA-602	23-10393	Inactive Deep Well Pump House No. 2	1952	Exempt	Not eligible	N/A
TRA-604	23-10395	Mechanical & Electrical Equipment Basement	1952	Eligible	Not eligible	N/A
TRA-605	23-10396	Process Water Building	1952	Eligible	Not eligible	N/A
TRA-607	23-10397	Carpenter Shop	1952	Eligible	Not eligible	N/A
TRA-608	23-10398	Demineralizer Building	1952	Eligible	Not eligible	N/A
TRA-609	23-10399	Steam Plant	1952	Eligible	Not eligible	N/A
TRA-614	23-10403	Maintenance Office Building/Bunkhouse	1952	Eligible	Not eligible	N/A
TRA-616	23-10405	Cafeteria	1952	Eligible	Not eligible	N/A
TRA-619	23-10407	Raw Water Pump House	1952	Exempt	Not eligible	N/A
TRA-620	23-10408	Guardhouse	1952	Eligible	Not eligible	N/A
TRA-621	23-10409	Nuclear Materials Inspection and Storage	1982	Not Eligible	N/A	N/A
TRA-622	23-10410	Warehouse	1952	Eligible	Not eligible	N/A
TRA-623	23-10411	Substation Control House	1952	Exempt	Not eligible	N/A
TRA-625	23-10534	ATR Maintenance Support Building	1981	Not Eligible	Not eligible	Contributing (ATR HD)
TRA-627	23-10413	Fuel Oil Pump House	1952	Exempt	N/A	N/A
TRA-628	N/A	Engineering Services Building	1986	Not Eligible	N/A	N/A
TRA-633	23-10535	Diesel Firewater Pump House	1980	Exempt	Not eligible	N/A
TRA-634	23-10536	ATR Storage Facility	1982	Not Eligible	Not eligible	Contributing (ATR HD)
TRA-636	23-10256	Warm Waste Effluent Monitor Station	1952	Eligible	Not eligible	N/A
TRA-638	23-10537	QA Office Trailer	1979	Not Eligible	Not eligible	N/A
TRA-640	N/A	Hazardous Chemical Storage Building	1984	Not Eligible	N/A	Contributing (ATR HD)
TRA-641	23-9940	Gamma Facilities Building	1955	Eligible	Not eligible	N/A
TRA-649	23-10262	MTR -Office Building, Wing C	1966	Eligible	Not eligible	N/A
TRA-650	23-10263	Deep Well Pump House (Well No. 3)	1960	Exempt	Not eligible	N/A
TRA-652	23-10265	MTR Office Building, Wing B	1966	Eligible	Not eligible	N/A
TRA-653	23-10415	Maintenance Shop	1957	Eligible	Not eligible	N/A
TRA-658	N/A	ATR Complex Access Control Facility	1987	Not Eligible	N/A	N/A
TRA-660	23-9941	Advanced Reactivity Measurement Facility	ca. 1957-1959	Eligible	Not eligible	N/A
TRA-662	23-10268	Storage & Receiving/Machine Shop	1961	Eligible	Not eligible	N/A
TRA-666	23-10272	Safety & Tritium Applied Research Facility	1963	Eligible	Not eligible	N/A
TRA-666A	23-10538	Tritium Lab	ca. 1966	Eligible	Not eligible	N/A
TRA-667	23-10273	Health and Safety Building (Dispensary/DOE Building)	1964	Eligible	Not eligible	N/A

INL Facility #	IHSI #	Property Name	Year Built	NRHP Individual Eligibility (CRMP 2016)	NRHP Individual Eligibility (CEMML 2023)	NRHP Contributing / Non-Contributing (CEMML 2023)
TRA-670	23-10276	ATR Reactor Building	1964	Eligible	Eligible	Contributing (ATR HD)
TRA-671	23-10277	ATR Cooling Tower Pump House	1971	Eligible	Not eligible	Contributing (ATR HD)
TRA-672	23-10419	Deep Well Pump House (Well No. 4)	1963	Exempt	Not eligible	N/A
TRA-674	N/A	Diesel Generator Building	1984	Exempt	N/A	N/A
TRA-676	N/A	Waste Heat Recovery Building	1989	Not Eligible	N/A	N/A
TRA-677	23-10280	Demineralization Water Facility	1992	Exempt	N/A	N/A
TRA-678	N/A	TRA Office Building No. 2; Health and Safety Building	1991	Not Eligible	N/A	N/A
TRA-679	23-10285	Nuclear Training Facility	1991	Not Eligible	N/A	N/A
TRA-680	23-10281	Emergency Command Center	1991	Not Eligible	N/A	N/A
TRA-681	23-10282	Temporary Accumulation Unit No. 1	1995	Not Eligible	N/A	N/A
TRA-682	23-10282	Temporary Accumulation Unit No. 2	1995	Not Eligible	N/A	N/A
TRA-683	23-10282	Temporary Accumulation Unit No. 3	1995	Not Eligible	N/A	N/A
TRA-684	23-10282	Temporary Accumulation Unit No. 4	1995	Not Eligible	N/A	N/A
TRA-685	23-10282	Temporary Accumulation Unit No. 5	1995	Not Eligible	N/A	N/A
TRA-686	23-10282	Temporary Accumulation Unit No. 6	1995	Not Eligible	N/A	N/A
TRA-687	23-10283	Gas Bottle Storage Facility	1995	Not Eligible	N/A	N/A
TRA-688	N/A	Firewater Pump House	2000	Exempt	N/A	N/A
TRA-696	N/A	Potable Water Pump House	2006	Exempt	N/A	N/A
TRA-710	23-10539	Exhaust Stack for TRA-666 and TRA-605	1952	N/A	Not eligible	N/A
TRA-718	23-10540	Raw Water Overhead Storage	1952	N/A	Not eligible	N/A
TRA-770	23-10541	ATR Vent Stack	1964	N/A	Not eligible	Contributing (ATR HD)
TRA-771	N/A	ATR Cooling Tower	1998	N/A	Not Eligible	Contributing (ATR HD)
TEMP-ATR-HD	23-10516	Advanced Test Reactor (ATR) Historic District	1964-2007	N/A	Eligible	N/A
TEMP-CFA-HD	23-10517	Central Facilities Area (CFA) Historic District	1949-1974	N/A	Not Eligible	N/A
TEMP-EBRII-HD	11-17963	Experimental Breeder Reactor II (EBR-II) HD	1962-1994	N/A	Not Eligible	N/A
TEMP-ETR-HD	23-10518	Engineering Test Reactor (ETR) Historic District	1957-1982	N/A	Not Eligible	N/A
TEMP-ICCP-HD	23-10519	Idaho Chemical Processing Plant (ICPP) HD	1953-1981	N/A	Not Eligible	N/A
TEMP-MFC-HD	11-17964	Materials and Fuels Complex (MFC) HD	1958-1994	N/A	Not Eligible	N/A
TEMP-MTR-HD	23-10520	Material Test Reactor (MTR) Historic District	1952-1974	N/A	Not Eligible	N/A
TEMP-NPG-HD	23-10521	Arco Naval Proving Ground (NPG) Historic District	1942-1949	N/A	Not Eligible	N/A
TEMP-PBF-HD	23-10522	SPERT and Power Burst Facility (PBF) HD	1955-1980	N/A	Not Eligible	N/A
TEMP-TRA-HD	23-10523	Test Reactor Area (TRA) Historic District	1950-2011	N/A	Not Eligible	N/A
TEMP-TREAT-HD	11-17965	Transient Reactor Test (TREAT) Historic District	1959-1994	N/A	Eligible	N/A
TEMP-ZPPR-HD	11-17966	Zero Power Plutonium Reactor (ZPPR) HD	1969-1992	N/A	Eligible	N/A

13. Appendix D - Exemptions Pursuant to the 2004 Programmatic Agreement as implemented in the INL CRMP or MCP-8008

INL Actions that Do Not Require Section 106 Review

The types of actions listed below do not meet the threshold of federal undertakings with the potential to affect historic properties. These actions will be screened through the NEPA process and do not require review by the CRMO:

Table 8. Activities that do not meet the threshold of an undertaking, as identified in MCP-8008.

Activity Number	Description
A1	Computer, 3D, or mathematical modelling.
A2	Theoretical computation and modelling.
A3	Materials analysis using existing infrastructure.
A4	Fuel/materials testing in existing test reactors.
A5	Materials analysis using existing laboratory equipment in their current state, orientation, and functional capacity.
A6	Research performed on firewalls, data security, etc. and only computers, servers, and networks are utilized.
A7	All standard operating activities and procedures take place inside buildings that utilize existing infrastructure.

INL Undertakings Exempted from Project-Specific Consultation

Included below are INL undertakings exempt from project-specific consultation with the Idaho SHPO. The following activities or undertakings are exempt from Section 106 review, provided that they do not affect or have the potential to affect those qualities or settings that make a historic property eligible for the National Register. CRMO staff will document these undertakings on FRM-3004.

Table 9. Activity Exemptions from Table 2 of the INL Cultural Resource Management Plan and MCP-8008 in effect through May 8, 2023.

Activity Type	Description
B1. Emergency response	Activities declared by the appropriate INL official, U.S. president, a tribal government, or the governor of a state as necessary to safeguard human health and the environment during declared disasters, emergencies, or national security threats (including EBR-I).
B2. Routine maintenance activities	Activities that include, but are not limited to, normal custodial services; electrical and plumbing installation or repair; repair of fire suppression systems, alarms, or communication systems; moving or assembly of interior furnishings; resurfacing of road, sidewalk, and parking areas; routine decontamination (through such activities as wiping down with rags, using strippable latex, and minor vacuuming, but excluding scabbing) of the surfaces of equipment, rooms, or other interior surfaces.
B3. Replacement in kind	Replacement of fixtures or components of a property, such as matching paint with existing or similar paint color, refinishing materials with existing or similar colors, or replacing or installing carpeting with water-soluble glue. This exemption includes refinishing with products that have improved safety, environmental, or health considerations over the existing or original, as long as the color of the refinishing product is similar to or matches the existing original color.
B4. Energy conservation measures	Activities that include, but are not limited to, modifications to heating, ventilation, and air conditioning systems; insulation to roofs, crawl spaces, walls, and floors; and caulking and weather stripping that are not visible or do not significantly alter or detract from those qualities that make the property eligible for nomination to the NRHP.
B5. Security systems	Installation, maintenance, or repair of security systems, including computer security, detection, monitoring, surveillance, and alarm systems.
B6. Safety systems	Installation, maintenance, and repair or modification of personnel safety systems and devices within the built environment, such as

	radiation monitoring devices; emergency exit lighting systems; protective additions to electrical equipment; improvements to walking and working surfaces; and installation of protective railings, guards, or shielding.
B7. Asbestos abatement	Removing or fixing asbestos for safety and health concerns, including lagging, insulating, painting, pipe and duct work, and panel removal. None of these activities may cause structural modifications or alter character-defining features. Asbestos abatement activities strictly associated with the DD&D of properties and that result in permanent, significant structural modification or alteration of the property are not included in this exemption.
B8. Internal reconfiguration of active laboratories	Changes to the internal configuration of active laboratories or other existing experimental or testing properties within the built environment to accommodate new experiments or tests.
B9. Ground disturbance within fenced facility perimeters	Modifications to the ground surface within existing facilities (TAN, EBR-I, WRRTF, NRF, RTC, INTEC, RWMC, MFC) or within 50 ft of existing buildings in unfenced facility areas (CFA, ARA, BORAX). All activities under this exemption are subject to the INL Timeout and Stop Work Authority (Appendix A) should cultural resources be unexpectedly encountered at any time. This exemption does not apply to the CITRC facilities.

Property types for which actions are exempt from review.

Table 10. Property Type Exemptions from Table 1 of the INL CRMP and MCP-8008 in effect through May 8, 2023.

Property Type	Description
C1. Post-1970 buildings, with exceptions	Activities or actions associated with buildings and structures constructed after 1970 are exempt from review, with the following exceptions: A property built after 1970 may be subject to review if it has been determined the exceptional historical importance of the property makes it eligible for inclusion on the NRHP.
C2. Subsurface structures	These structures have minimal or no visible surface manifestations and include earthen and concrete-lined trenches, French drains, underground tanks, vaults, underground pipelines, sewer lines, and other structures that are typically located below ground and were never intended to be routinely accessed by people.
C3. Storage tanks	These structures include surface and subsurface utility tanks used in routine facility operations. Associated concrete slab foundations, scaffolding, piping, or spill-management retaining walls are also included.
C4. Wells and boreholes	These structures include characterization wells, monitoring wells, drinking water wells, industrial water wells, injection wells, and various types of test wells and boreholes. Wells associated with homesteading and other early historic uses of the area are not included.
C5. Utility poles and towers	These structures include power lines, microwave towers, seismic data collection and transmission facilities, and other types of communication towers.
C6. Utility structures	These structures provide housing or control of utility equipment or access to underground utility equipment, such as pump houses, electrical substations, boiler tanks, or equipment monitoring shacks.
C7. Mobile trailers	These structures are used for temporary office space and/or storage.