

RFO Updated Guidance  
On Timing of NEPA Requirements  
for Projects

1. General timing is depicted in the attached "Key Decision Phases" chart.
2. Line Item Projects
  - a. An Environmental Checklist (EC) is to be submitted to EG&G's Ecology and NEPA Division (END) at RFP. END then makes a recommendation to RFO Environmental Restoration Division (ERD) as to the appropriate level of NEPA documentation for the project.
  - b. Categorical Exclusion (CX) Level Projects
    - (1) A draft CX is to be submitted to ERD at the time the final 100 percent Conceptual Design Report (CDR) is submitted to RFO Construction and Engineering Division (CED.) If completion of the CX is dependent on information to be developed as part of Title I design, clearly state this in the transmittal of the draft CX and identify the specific information required. A copy of the memo transmitting the draft CX to ERD should be sent to CED.
    - (2) Approval of the CX is normally required before Title I design will be authorized. In most cases, due to the enhanced CDR process, the need for Title I information should be the exception rather than the rule. Information, data and analysis to support the CX should be budgeted as part of the CD effort.
    - (3) Based on the "Key Decision Phases" chart, Title I design can be undertaken prior to completion of the NEPA process (approval of the CX). Authorization of Title I design prior to approval of the CX will be considered on a project specific basis in consultation with ERD and CED. In no case will Title II be authorized until the CX is approved.
  - c. Environmental Assessment (EA) Level Projects
    - (1) A draft EA is to be submitted to ERD at the time the final 100 percent Conceptual Design Report (CDR) is submitted to CED; November BY-2. If completion of the EA is dependent on information to be developed as part of Title I design, clearly state this in the transmittal of the draft EA and identify

the specific information required. A copy of the memo transmitting the draft EA to ERD is to be sent to CED.

In most cases, due to the enhanced CDR process, the need for Title I information to complete an EA is expected to be limited and should be the exception rather than the rule. Information data and analysis to support an EA should be planned and budgeted as part of the CD effort.

- (2) Publication of the EA and issuance of a Finding of No Significant Impact (FONSI) will normally be required before Title I design will be authorized. A minimum of 23 months is available between submittal of the draft EA and Title I authorization in which to complete the EA/FONSI process.
- (3) Based on the "Key Decision Phases" chart, Title I design can be undertaken prior to completion of the NEPA Process (issuance of a FONSI in the case of an EA level activity). Authorization of Title I design prior to publication of the EA and issuance of a FONSI will be considered on a project specific basis in consultation. In no case will Title II be authorized until a FONSI is issued.

d. Environmental Impact Statement (EIS) Level Projects

- (1) A detailed EIS schedule, coordinated through CED and ERD, must be approved within six months of the determination that an EIS is required.
  - If the determination is made at KD-O, the schedule is due by February BY-3.
  - If the determination is made following review of an EA, the schedule is due within six months of the EH-1 determination.
- (2) As in the case of an EA, authorization of Title I design prior to publication of the EIS and issuance of the Record of Decision (ROD) will be considered on a project specific basis in consultation with ERD. Due to the nature and significance of an EIS, authorization of Title I design prior to issuance of the ROD is expected only under very special circumstances

3. General Plant Projects (GPPs)

- a. An EC is to be submitted to EG&G's Ecology and NEPA Division (END) at RFP. END then makes a recommendation to RFO ERD as to the appropriate level of NEPA documentation for the project.

**b. CX Level Projects**

If the determination is made that a CX is required can be made without the need for Title I design, the authorization of Title I, prior to the approval of the CX, will be considered in consultation with ERD and CED. As with Line Item projects, the CX must be approved before Title II design will be authorized.

**c. EA Level Projects**

If the determination that an EA is required can be made without the need for Title I design, the authorization of Title I, prior to publication of the EA and issuance of the FONSI, will be considered in consultation. As with Line Item projects a FONSI must be issued before Title II design will be authorized.

**d. EIS Level Projects**

In the unlikely case that a GPP requires an EIS the guidance for Line Item projects is applicable.