



Rich/John:

your actions.

August 7, 2003

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Mr. Pao-Tsin Kuo, Program Director  
License Renewal and Environmental Impacts  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

RE: H.B. Robinson Steam Electric Plant, No. 2 (RNP), License Renewal Review and National  
Historic Preservation Act, Section 106 Review Process

Dear Mr Kuo:

We have reviewed the Generic Environmental Impact Statement for the above-referenced project and would like to offer the following comments.

Our major comments regarding archaeological sites are in response to section 4.4.5. This section notes that the SC SHPO in May of 2001 wrote that license renewal should not affect historic properties or archaeological sites (which of course can be historic properties). Our office now has new information, both from this draft EIS, and other sources, that raises concerns for us. While it appears that the operation of RNP is unlikely to undergo major changes during the new license period, we would like a clearer understanding of the types of activities that are on-going and where they occur. We would also recommend a greater effort to identify likely resources that could be affected by these activities. Finally, we believe that the best way to carefully manage resources, and potential resources, is to develop a Programmatic Agreement. This should be done prior to relicensing. The PA should direct the development of a Cultural/Historic Resources Management Plan (or Historic Properties Management Plan) and define activities that the SHPO would need to review.

Technical comments are attached separately. These comments are provided to assist you with your responsibilities pursuant to Section 106 of the National Historic Preservation Act, as amended. If you have any questions, please contact me at (803) 896-6169. Thank you.

Sincerely,

*Marta Matthews*

Marta Matthews  
Review and Compliance Coordinator  
State Historic Preservation Office

encl.

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## TECHNICAL COMMENTS

The following comments pertain to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants regarding H.B. Robinson Steam Electric Plant, Unit No. 2

1. Is this EIS just for the Plant and immediate property or the whole lake, etc. as shown in Fig. 2-3? I assume it is the whole thing. We would like to see the project (and APE) plotted on a topographic-based map.
2. Does the land that CP&L leases out fall under FERC regulation? If so, how are activities on those lands reviewed for effects to historic properties?
3. Under 2.2.9.1, include a discussion of the Segars Mill Farm property under Euro-American Historic Period. Our office has just learned about this property and determined it eligible for the National Register of Historic Places. The families that lived here played an important role in the Hartsville area history.
4. Under 2.2.9.2, there may not have been sites near the project that were considered to be eligible or potentially eligible for the National Register earlier, but I know, with our review of Segars Mill Farm, that there are now. Several Native American sites on the farm tract also appear to be eligible, but need more testing. This indicates, too, that with a comprehensive survey, more sites would likely be identified.
5. We believe that an effort needs to be made to locate the Wiley Warren family cemetery (2.2.9.2) – this should not wait for ground-disturbing activities. Also additional work needs to be done to locate and evaluate resources associated with the other farm properties known to have been in the project area.
6. Is the Old Camden Road likely to be affected by the project in any way?
7. The definition of areas of low, moderate and high probability is reasonable, but pretty general. We would like to see these more carefully defined, and procedures put in place for how to proceed with undertakings in the higher probability areas.
8. We concur with the recommendations on page 4-32 in the paragraph beginning on line 24. But, again, the language is too vague. What does "care should be taken mean"? Let's describe how care will be taken. What are "normal operational and maintenance activities"? A partial list is included, but these are pretty general categories that could include a wide variety of undertakings. How will property managers know what to do when? We absolutely agree that forested areas are particularly high probability and vulnerable. There should be a plan to identify and manage the resources in them.