

November 26, 2004

Richard Sidebottom
Review and Compliance Coordinator
State Preservation Officer
8301 Parklane Road
Columbia, SC 29223-4905

SUBJECT: INITIATION OF SECTION 106 PROCESS FOR H.B. ROBINSON STEAM
ELECTRIC PLANT (HBRSEP) , UNIT NO. 2, INDEPENDENT SPENT FUEL
STORAGE INSTALLATION IN HARTSVILLE, SC

Dear Mr. Richard Sidebottom:

Carolina Power and Light Company (CP&L), now doing business as Progress Energy Carolinas, Inc. (PEC) has submitted an application to the U.S. Nuclear Regulatory Commission (NRC) requesting renewal of NRC License to operate the H.B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Independent Fuel Storage Installation (ISFSI) in Hartsville, SC.

The HBRSEP is located in northeastern South Carolina, approximately five miles west-northwest of Hartsville. The nearest large city is Columbia, South Carolina, approximately 55 miles west-southwest. The plant site is located approximately 30 miles south of the North Carolina border and 90 miles from the Atlantic Ocean. The HBRSEP site encompasses more than 5,000 acres of property in northwestern Darlington and southwestern Chesterfield Counties, including the 2, 250 - acre cooling water impoundment, Lake Robinson. The Independent Spent Fuel Storage Installation is approximately 600 feet to the west of the Unit No. 2 containment structure. The HBRSEP exclusion distance and low population distances are 1,400 feet and 4.5 miles, respectively from the containment building. The eastern side of the lake is developed with homes, recreational areas, a marina, and public access points. The area surrounding the site is predominantly rural, consisting of farmlands and woodlands with intermittent industrial sites. The region within six miles of the site includes Darlington, Chesterfield, and a portion of Lee Counties, and the City of Hartsville.

The Final Environmental Statement (FES) for operation of HBRSEP reported that there were no known historic or archeological sites on the site or in the transmission line corridors that were cleared for Unit 2. This was confirmed in a letter dated June 5, 1973, written by Charles E. Lee, the South Carolina State Historic Preservation Officer. At that time no known historical sites or archeological remains were disturbed in the construction of this plant. Lake Robinson, however was constructed in 1958, well before the requirements of the National Historic Preservation Act of 1966 were established (NRC 1975).

The nearest recorded archaeological sites are located along South Carolina Highway 151, running north-south to the west of the plant site. Twenty-six above-ground (historic) sites within 6 miles of HBRSEP are on the National Register of Historical Places. The attached Table E2-5

shows Sites on the National Register of Historic Places that are Within 6 Miles of RNP (Environmental Report Supplement).

As required by 36 CFR 800.4(a), the NRC is requesting the views of the State Historical Preservation Officer on further actions to identify historic properties that may be affected by the NRC's proposed action of License Renewal for H.B. Robinson. Any maps, surveys, or listings of National Register of Historic Places you provide will be used to document affects in accordance with 36 CFR 800.4(d).

Since our Agencywide Document Access and Management Systems (ADAMS) public document reading room on the NRC website is currently being reviewed the attached documents have been provided for your review. The Historic and Archaeological Resources description on page E-38 and figures E2-1 and E2-2 show a 50-Mile Vicinity Map and 6-Mile Vicinity Map respectively.

Please provide NRC with a response within **30 days** of receiving this letter for inclusion in the Environmental Assessment. After assessing the information provided by you, we will determine what additional actions are necessary to comply with the Section 106 consultation process.

Per our last conversation and email on October 28, 2004 you are now in possession of the final Progress Energy's cultural resource guidance document. It's my understanding, an archaeologist from your office is currently reviewing the guidance document to determine if it meets SHPO regulations. Please include in your response to NRC the findings of the guidance document compliance.

If you have any questions or comments, or need any additional information, please contact Alicia Mullins of my staff at 301-415-1224.

Sincerely,

/RA/

B. Jennifer Davis, Chief
Environmental and Performance
Assessment Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Docket Nos.: 50-261 and 72-03
License No. DPR-23

R. Sidebottom

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*See previous concurrence

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| <u>OFC</u> | DWMEP | | DWMEP | | | |
| <u>NAME</u> | AMullins | JDavis | | | | |
| <u>DATE</u> | 11/12/04 | 11/26/04 | | | | |