

The Detroit Edison Company
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10 CFR 51.45
10 CFR 52.77
10 CFR 52.79
10 CFR 2.390

May 13, 2011
NRC3-11-0017

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

- References:
- 1) Fermi 3
Docket No. 52-033
 - 2) Letter from Stephen Lemont (USNRC) to Peter W. Smith (Detroit Edison), "Requests for Additional Information Related to the Environmental Review for the Combined License Application for Fermi Nuclear Power Plant, Unit 3," dated May 12, 2009
 - 3) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison Company Response to NRC Requests for Additional Information Related to the Environmental Review," NRC3-09-0010, dated June 19, 2009
 - 4) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Updates to the Fermi 3 Combined License Application (COLA) Reflecting Changes to the Fermi Site Layout," NRC3-11-0002, dated January 10, 2011

Subject: Detroit Edison Company Response to NRC Requests for Additional Information Letter Related to the Environmental Review

In Reference 2, the NRC requested additional information to support the review of Part 3 (Environmental Report) of the Fermi 3 Combined License Application (COLA). Included in Reference 2 was Request for Additional Information (RAI) CR4.1.3-6. Detroit Edison provided

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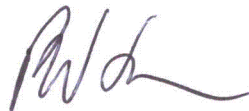
the initial response to RAI CR4.1.3-6 in Reference 3. This letter provides supplemental information to RAI CR4.1.3-6.

In a telephone call on May 3, 2011, the NRC Staff requested supporting information regarding additional cultural resource reviews conducted to support site layout changes submitted in Reference 4. A cultural resource report containing the requested information is provided as Enclosure 1. This report contains information identifying the location of a ~~sensitive historic~~ resource. That information has been ~~segregated from the report and~~ placed in Enclosure 2. ~~As such, Detroit Edison requests that the information in Enclosure 2 be withheld from public disclosure, in accordance with Section 304 of the National Historic Preservation Act (NHPA).~~

If you have any questions, or need additional information, please contact me at (313) 235-3341.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of May 2011.

Sincerely,



Peter W. Smith, Director
Nuclear Development – Licensing & Engineering
Detroit Edison Company

Attachment: 1) Supplemental Response to Fermi 3 ER RAI Question CR4.1.3-6

cc: Adrian Muñoz, NRC Fermi 3 Project Manager
Jerry Hale, NRC Fermi 3 Project Manager
Bruce Olson, NRC Fermi 3 Environmental Project Manager
Fermi 2 Resident Inspector (w/o attachments)
NRC Region III Regional Administrator (w/o attachments)
NRC Region II Regional Administrator (w/o attachments)
Supervisor, Electric Operators, Michigan Public Service Commission (w/o attachments)
Michigan Department Natural Resources and Environment
Radiological Protection Section (w/o attachments)

**Attachment 1
NRC3-11-0017**

Supplemental Response to RAI letter related to Fermi 3 ER

RAI Question CR4.1.3-6

NRC RAI CR4.1.3-6

Provide copies of current Phase I Cultural Resources reports prepared for the Fermi 3 project and copies of forthcoming Phase I reports that have been revised per SHPO comments. The reports should be in color and include all figures, photos, and appendices.

Supporting Information

Information included in this documentation is critical to ensuring a thorough and complete EIS review of project impacts. This information will be used to complete the NEPA analysis and to support compliance with the Section 106 process.

Supplemental Response

The original response to RAI CR4.1.3-6 was submitted to the NRC in Detroit Edison Letter NRC3-09-0010 (ML091940218), dated June 19, 2009. Per the NRC Staff's request in a telephone discussion on May 3, 2011, Detroit Edison is providing a letter report in Enclosure 1 from the Commonwealth Cultural Resource Group, Inc. to Doug Timpe (Black & Veatch) with the subject "Cultural Resources Review, Proposed Meteorological Tower and Access Road Location, Proposed Construction Laydown Area, and Proposed Onsite Transmission Line Corridor, Revised Site Layout 2010, Fermi 3 Project, Monroe County, Michigan," dated March 30, 2011. This report documents additional cultural resource reviews conducted to support site layout changes submitted to the NRC in Detroit Edison letter NRC3-11-0002 (ML110280350), dated January 10, 2011.

~~Figures 2 and 3 of the report contain information identifying the location of a sensitive historic resource. Detroit Edison has segregated this information in Enclosure 2. As such, Detroit Edison requests that Figures 2 and 3 in Enclosure 2 be withheld from public disclosure, in accordance with Section 304 of the National Historic Preservation Act (NHPA).~~

Proposed COLA Revision

None

**NRC3-11-0017
RAI Question CR4.1.3-6**

Enclosure 1

**Cultural Resources Review, Proposed Meteorological Tower and Access Road Location,
Proposed Construction Laydown Area, and Proposed Onsite Transmission Line Corridor,
Revised Site Layout 2010, Fermi 3 Project, Monroe County, Michigan
(following 14 pages)**



March 30, 2011
J-0584/R-0918.05

Mr. Douglas Timpe
Black & Veatch Corporation
11041 Lamar Avenue
Overland Park, KS 66211

RE: Cultural Resources Review, Proposed Meteorological Tower and Access Road Location, Proposed Construction Laydown Area, and Proposed Onsite Transmission Line Corridor, Revised Site Layout 2010, Fermi 3 Project, Monroe County, Michigan

Dear Mr. Timpe:

On October 20, 2009, Commonwealth Cultural Resources Group, Inc. (CCRG) conducted an archaeological survey of the then proposed locations of a Meteorological Tower (MET Tower) and Access Road and Construction Laydown area at the proposed Fermi 3 Project site (see Taylor 2009). In December 2010, the Fermi 3 proposed site layout was revised. As a result, a review of the proposed MET Tower and Access Road, proposed Construction Laydown area, and proposed Onsite Transmission Line was conducted.

Within the proposed MET Tower and Access Road location, the proposed MET Tower site occupies about 5.5 acres (ac) (2.2 hectares [ha]) in Section 28 (T6S/R10E), Monroe County, approximately 2.0 ac (0.8 ha) of which would be permanently impacted. The associated proposed Access Road corridor will involve approximately 0.6 ac (0.2 ha) of permanent impacts; its location is considered general. The proposed MET Tower design is a guy wire stabilized structure that stands approximately 197 feet (ft) (60 meters [m]) tall. The proposed Construction Laydown area comprises approximately 27.6 ac (11.2 ha) in Sections 20 and 29 (T6S/R10E), Monroe County, bounded on the south by Pointe Aux Peaux Road and on the west by Quarry Lakes Road. The proposed Onsite Transmission Line corridor commences at the proposed Enrico Fermi Unit 3 (EF3) switchyard, trends northeast for 0.21 mile (mi) (0.3 kilometer [km]), where it turns generally southeast and traverses a 0.35 mi (0.57 km)-long corridor between Toll Road and the Fermi property (approximately 5.7 ac [2.3 ha] of permanent impacts) in Section 17 (T6S/R10E), Monroe County (Figures 1 and 2).

In compliance with Section 106 of the National Historic Preservation Act and the regulations contained in NUREG 1555, the 2010 cultural resources assessment of the proposed MET Tower and Access Road location, the proposed Construction Laydown area, and the proposed Onsite

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Transmission Line corridor were conducted to ensure that proposed construction would not affect significant cultural resources. All key staff assigned to this survey project meet or exceed the Secretary of the Interior's professional qualifications.

The 2010 proposed MET Tower and Access Road location, proposed Construction Laydown area, and proposed Onsite Transmission Line corridor are situated within the established area of potential effect (APE) for above-ground resources. The resources within the APE were surveyed between December 2007 and April 2008 (see Demeter et al. 2008), and no National Register of Historic Places (NRHP)-listed or NRHP-eligible properties would be directly or indirectly affected by the proposed MET Tower and Access Road location, proposed Construction Laydown area, or proposed Onsite Transmission Line corridor; therefore, no additional survey of above-ground resources was conducted. The remainder of this report will focus on past and current survey of archaeological resources only.

Fieldwork conducted in 2009 in and near the site of the proposed MET Tower and Access Road location resulted in the identification of one previously unrecorded twentieth-century archaeological site (20MR825) (Taylor 2009). Site 20MR825 was not recommended eligible for listing in the NRHP. No additional field survey was conducted in 2010, as approximately two-thirds of the western portion of the 2010 proposed MET Tower site had been visually inspected and shovel tested during the 2009 survey. Examination of historic maps and aerial photographs revealed that the unsurveyed portion of the 2010 proposed MET Tower and Access Road location was unlikely to contain significant prehistoric or historic archaeological sites.

Visual reconnaissance of the proposed Construction Laydown area in 2009 revealed it to have been disturbed by past dumping and construction episodes. The location of the 2010 proposed Construction Laydown area remains within the area of past disturbance; therefore, no additional field survey was conducted in 2010 in the proposed Construction Laydown area.

Portions of the proposed Onsite Transmission Line corridor had been visually examined and shovel tested by CCRG in 2008 and found disturbed by road construction and possible structure demolition (Demeter et al. 2008). No additional field survey was conducted in 2010 within the previously unsurveyed portion of the proposed Onsite Transmission Line corridor, as it traverses areas of obvious disturbance and generally non-wooded wetland with no apparent high ground. These environmental conditions offer low potential for the existence of prehistoric or historic archaeological sites.



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Based on the results of the 2009 field survey and additional map and aerial photograph review, no additional archaeological fieldwork was deemed necessary for the 2010 Revised Site Layout.

Project Background

Detroit Edison Company (DECo) proposes to construct and operate a new nuclear power plant at the existing Fermi site in Monroe County, Michigan. The proposed unit is to be designated as Fermi 3. In support of the Fermi 3 project, Commonwealth Cultural Resources Group, Inc. (CCRG), contracted by Black & Veatch Corporation (BV) of Overland Park, Kansas, conducted surveys of cultural resources (above-ground and archaeological) to identify historic resources in and near the Fermi site and to assess possible impacts to these.

The cultural resources investigations for the Fermi 3 project began in November 2007 and continued into April 2008. An additional archaeological survey was conducted on one small parcel at the site on July 15, 2008. The results of these surveys of the Fermi site and vicinity are contained in Demeter et al. (2008). A preliminary NRHP evaluation of the Enrico Fermi Atomic Power Plant Unit 1 (Fermi 1) was conducted by Dean A. Doerrfeld and Ben Riggle of R. Christopher Goodwin and Associates, Inc., during the week of December 15, 2008 (see Doerrfeld et al. 2009). A maritime assessment was submitted to BV and DECo in October 2010 via a letter report addressed to Mr. Douglas Timpe, BV environmental manager (see Weir 2010). A cultural resources site file review was conducted for seven alternative sites in 2009 (Lillis-Warwick and Demeter 2009). In 2009, an archaeological field survey was conducted to investigate the proposed MET Tower and Access Road location and the proposed Construction Laydown area. Both of these impact areas were located outside of the original archaeological APE but were within the above-ground resources APE (see Demeter et al. 2008 for a description of the APEs). The results of the 2009 survey were documented in a letter report addressed to Mr. Douglas Timpe, Black & Veatch environmental manager (see Taylor 2009).

Current Land Use

Land use in the area of the proposed MET Tower and Access Road location is characterized primarily by low-density residential development, wooded undeveloped property, and cultivated farm fields that have obviously lain fallow for a number of years. The proposed Construction Laydown area, which is bisected by a gravel two-track road, has undergone long-term dumping of rubble and other construction waste material. The landscape in this area is extensively built up with spoil piles that contain this sort of debris and is, therefore, considered to be completely disturbed. Trees, grass, bushes, and other scrub vegetation cover much of this parcel. The area



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of the proposed Onsite Transmission Line corridor is marked by an existing gravel roadbed (Toll Road), a shallow drainage ditch paralleling the road, a berm (likely created with spoil from road construction), and scrub vegetation. The southeast trending portion of the proposed Onsite Transmission Line corridor traverses generally non-wooded wetland.

Pre-field Research

Prior to initiating the original 2007-2008 cultural resource survey for the Fermi 3 project, CCRG reviewed the archaeological site files maintained at the Michigan Office of the State Archaeologist (OSA) and the records of historic above-ground historic resources at the State Historic Preservation Office (SHPO) in Lansing (see Demeter et al. 2008). No additional site file research was conducted for the 2010 investigation.

CCRG's original review of the archaeological site files maintained at the OSA identified four previously recorded archaeological sites within 1.0 mi (1.6 kilometers) of the project area, one of which (20MR702) was recorded within the archaeological APE. Archaeological survey conducted for the Fermi 3 cultural resource investigations in 2007 and 2008 resulted in the identification of six additional archaeological sites within the archaeological APE. None of these newly recorded sites were recommended eligible for listing in the NRHP. Demeter et al. (2008) contains a detailed discussion of the previously recorded sites and the six archaeological sites discovered during the survey.

Historic atlases, aerial photographs, and U.S. Geological Survey (USGS) topographic maps covering the project area from 1839 to 1973 were also analyzed for potential historic archaeological sites. These sources included the 1839-1841 *Map of Part of Ash, Monroe County, Town 6S Range 10E* (Hubbard 1838-1841), the 1859 *Map of Monroe County, Michigan* (Geil, Harley and Siverd 1859), the 1876 *County Atlas Monroe County, Michigan* (Bartlett 1876), the 1896 *Standard Atlas of Monroe County, Michigan* (Ogle 1896), and the 1940, 1952, 1967, and 1973 USGS 7.5-minute Stony Point, Michigan, topographic maps. Aerial photographs depicting the project area, including those dated 1949, 1957, and 1961, were also examined.

In general, the highest potential for prehistoric site occurrence depends on the availability of well-drained soils in close proximity to water resources, such as drainage or expansive wetland. Sandy hummocks within low, poorly drained lands also indicate an increased chance for site occurrence, especially short-term prehistoric processing locales occupied by hunter-gatherer peoples. Water sources and well-drained locations also played an important role in the choice of



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habitation spaces during the opening phases of pioneer settlement beginning in the early 1800s. Such choices were, however, also dependent on roadway and railroad development.

Previous Archaeological Survey

Field survey of a portion of the proposed MET Tower and Access Road location and proposed Construction Laydown area took place on October 20, 2009. A thin surface scatter of twentieth-century debris, such as nondiagnostic plastic and glass, unidentified metal, and concrete rubble, was identified in the open fields and the two stands of trees associated with the proposed MET Tower site. The OSA assigned archaeological site number 20MR825 to this debris. In addition to the artifact scatter, three assumed pet burials were observed at 20MR825, which were marked by weathered wooden crosses with the name plaques of, "ROCKY," "...NIP," and "K D" (or "KID"). No specific source for the archaeological material at 20MR825 could be readily identified. It was CCRG's recommendation that 20MR825 did not meet the criteria for listing in the NRHP and, therefore, no additional archaeological testing of the site was recommended. The 2009 field survey of the Access Road corridor located on Fermi property revealed no historic or prehistoric archaeological material was evident (see Taylor 2009).

Visual field reconnaissance of a portion of the proposed Construction Laydown area conducted in 2009 revealed large spoil piles containing rubble and, presumably, other construction waste material. The entire proposed Construction Laydown area was considered to be completely disturbed and, therefore, no shovel testing was conducted in the area (see Taylor 2009).

Examination of a portion of the proposed Onsite Transmission Line corridor was conducted in 2008. Visual examination of the area noted contemporary demolition debris and construction debris (e.g., shingles, concrete, lumber waste). Shovel testing in the area revealed disturbed soils. Except for the contemporary surface debris, no archaeological sites were encountered either on the surface or in any of the shovel tests (see Demeter et al. 2008).

2010 Revised Site Layout Review

In December 2010, CCRG conducted additional map and aerial photograph review of the proposed MET Tower and Access Road location, the proposed Construction Laydown area, and the proposed Onsite Transmission Line corridor to determine whether additional field survey would be required beyond what had already been conducted within those impact areas. Based on analysis of historic maps and aerial photographs, combined with the results of previous surveys, CCRG recommends that additional field survey of the 2010 proposed MET Tower and



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Access Road location, proposed Construction Laydown area, and proposed Onsite Transmission Line corridor is not necessary.

The 2010 proposed MET Tower site is shifted east of the area surveyed by CCRG in 2009 but remains largely within the previously surveyed area (Figure 3). The 2010 proposed Access Road is shifted west of CCRG's 2009 survey area and forms a corridor that travels north and northeast from Pointe Aux Peaux Road, in an area west of the existing water tower. No portion of the currently proposed Access Road corridor was previously surveyed for archaeological resources. The 1838-1841 historic map (Hubbard 1838-1841) shows Section 28 as "partly overflowed" and "marsh" both north and south of Pointe Aux Peaux Road. Similarly, the 1859 map (Geil, Harley and Siverd 1859) clearly shows wetland both north and south of the road. By 1876, however, the land was being used as farmland (Bartlett 1876), indicating that it must have been drained at some point between 1859 and 1876 to provide cultivatable land. The original condition of the property (i.e., marsh) would preclude prehistoric settlement in the project area. In addition, water towers, such as the one that exists near the proposed access road, typically occupy high ground, the sort of landform that a historic or prehistoric archaeological site might occupy. The site of the water tower appears to be the only high ground in the area and, therefore, it is likely that construction of the water tower destroyed any archaeological site(s) that might have once existed. In correlating the historic maps with the position of the proposed access road route, it does not appear that any historic archaeological resource (e.g., dwelling) along Pointe Aux Peaux Road or in the interior area would be adversely impacted. Based on these factors, no significant intact archaeological sites are likely to be situated in the 2010 proposed MET Tower and Access Road location, and no additional field survey is recommended.

The proposed Construction Laydown area expands east of the area visually examined by CCRG in 2009 and remains in the area of previous disturbance (Figure 4). Consequently, no significant intact archaeological sites are likely to be situated within the proposed Construction Laydown area, and no additional field survey is recommended.

Environmental conditions in the previously unsurveyed portion of the proposed Onsite Transmission Line corridor (Figure 5) indicate a low potential for the presence of prehistoric or historic archaeological sites. Visual reconnaissance and shovel testing of a corridor along Toll Road undertaken in 2008 found the area to be disturbed, likely by road construction and historic demolition episodes. Other than modern debris, no historic or prehistoric archaeological remains were found on the surface. Environmental conditions in the southeast trending portion of the proposed Onsite Transmission Line corridor (generally non-wooded wetland with no apparent high ground), indicate a low potential for the presence of archaeological sites. Further, standing



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water and saturated soils preclude adequate archaeological field survey. It is CCRG's opinion that no significant intact archaeological sites are likely to be situated within the proposed Onsite Transmission Line corridor, and no additional field survey is recommended.

Summary and Conclusions

Field survey in 2009 of the proposed MET Tower and Access Road location produced a single historic archaeological site (20MR825) that consisted of non-diagnostic twentieth-century debris and three assumed pet burials. The lack of diagnostic artifacts, the absence of structural indicators (foundations, cellars, cisterns), and the lack of prehistoric archaeological material suggests that site 20MR285 is not eligible for listing in the NRHP. Visual examination of the proposed Construction Laydown area in 2009 revealed it to be completely disturbed. Visual examination of a portion of the proposed Onsite Transmission Line corridor revealed a surface scatter of contemporary demolition and construction debris. No evidence of archaeological sites was discovered as a result of shovel testing in the same area.

In December 2010, the location of the proposed MET Tower and Access Road location was revised from the area surveyed by CCRG in 2009. Based on the results of the 2009 field survey, combined with additional map and aerial photograph review, CCRG concludes that the unsurveyed portions of the 2010 impact areas are unlikely to contain significant archaeological sites. Early nineteenth-century maps of the area show it as marsh. Later maps and aerial photographs reveal that the area had been drained for agricultural use. Further, construction of a water tower may have impacted any archaeological site(s) within the only remaining high ground. CCRG, therefore, recommends no further testing for archaeological resources at the currently proposed MET Tower and Access Road location within the Fermi property.

Based on the results of prior visual examination combined with additional map and aerial photograph review, CCRG does not expect NRHP-eligible archaeological resources to be impacted by ground-disturbing activities at the previously unsurveyed portion of the proposed Construction Laydown area. The extensive disturbance that characterizes this area has more than likely destroyed, or at least permanently encased, any archaeological resources that may have existed at that site. No further archaeological fieldwork is recommended for the area.

Based on the results of visual reconnaissance and shovel testing conducted in 2008 along Toll Road in the northeast-trending portion of the proposed Onsite Transmission Line corridor, the area has been disturbed by road construction and possible historic demolition episodes. Environmental conditions in the southeast-trending portion of the proposed Onsite Transmission



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Line corridor (generally non-wooded wetland with no apparent high ground) signal a low potential for the presence of significant prehistoric or historic archaeological sites. It is CCRG's opinion that no NRHP-eligible sites would likely be impacted by ground-disturbing activities within the proposed Onsite Transmission Line corridor. No further archaeological survey is recommended for the area.

Sincerely,

A handwritten signature in cursive script that reads "Kent C. Taylor".

Kent C. Taylor Nancy
Project Archaeologist Com

A handwritten signature in cursive script that reads "Ford Demeter".

Ford Demeter
pliance Specialist

References

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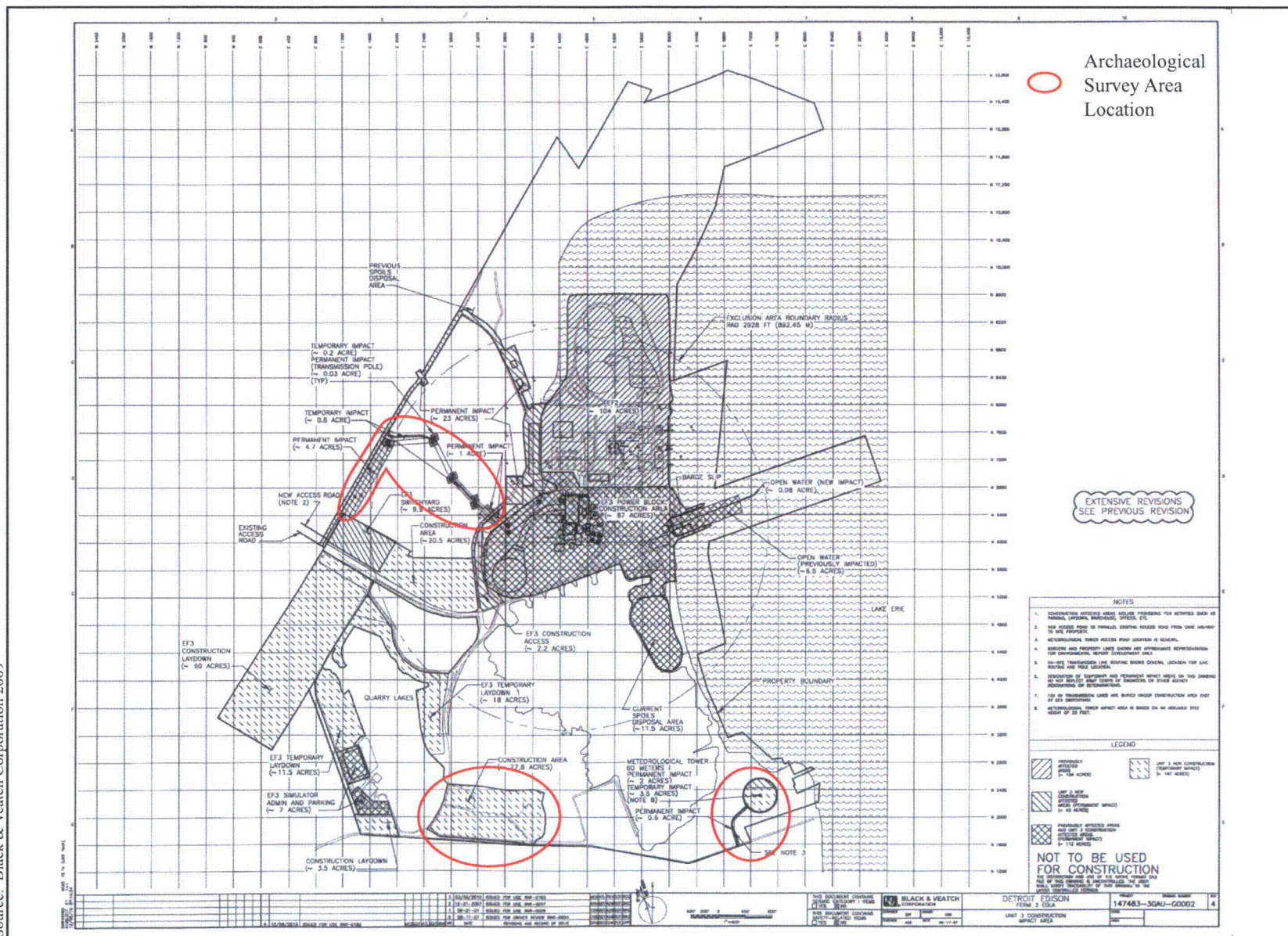


Figure 1. Fermi 3 Site Layout, December 2010

Figure 2: 2010 Study Area Locations and Previously Identified Site 20MR825 Location

~~Withheld in accordance with Section 304 of the National Historic Preservation Act~~

Figure 3: 2010 Proposed Meteorological Tower and Access Road Location and Archaeological Site 20ME825 Location overlaid with 2009 Proposed meteorological Tower and Access Road Location

~~Withheld in accordance with Section 304 of the National Historic Preservation Act~~

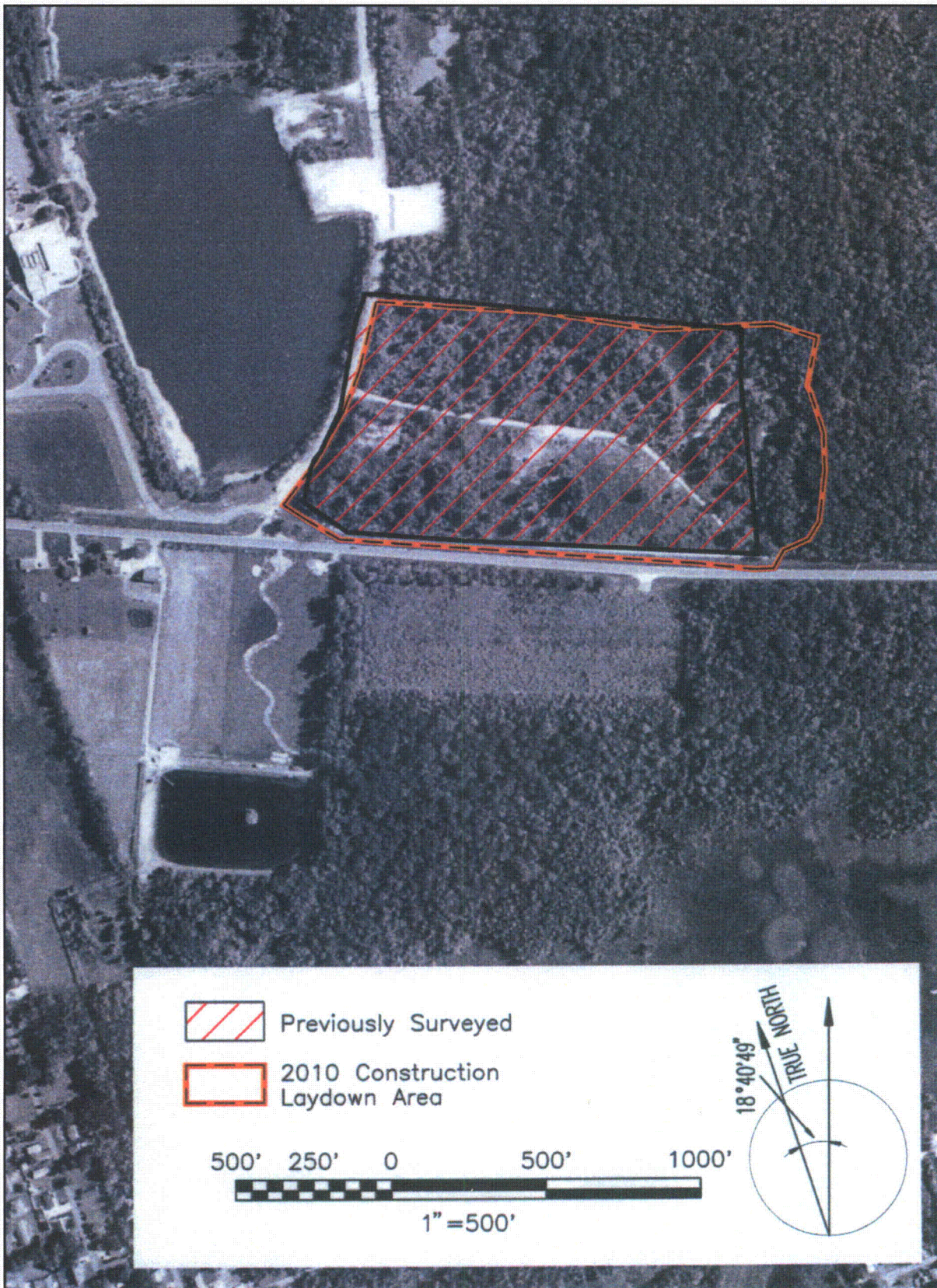


Figure 4. 2010 Proposed Construction Laydown Area Location overlaid with 2009 Proposed Construction Laydown Area Location (courtesy of Black & Veatch Corporation)

Source: Kucera International 2006

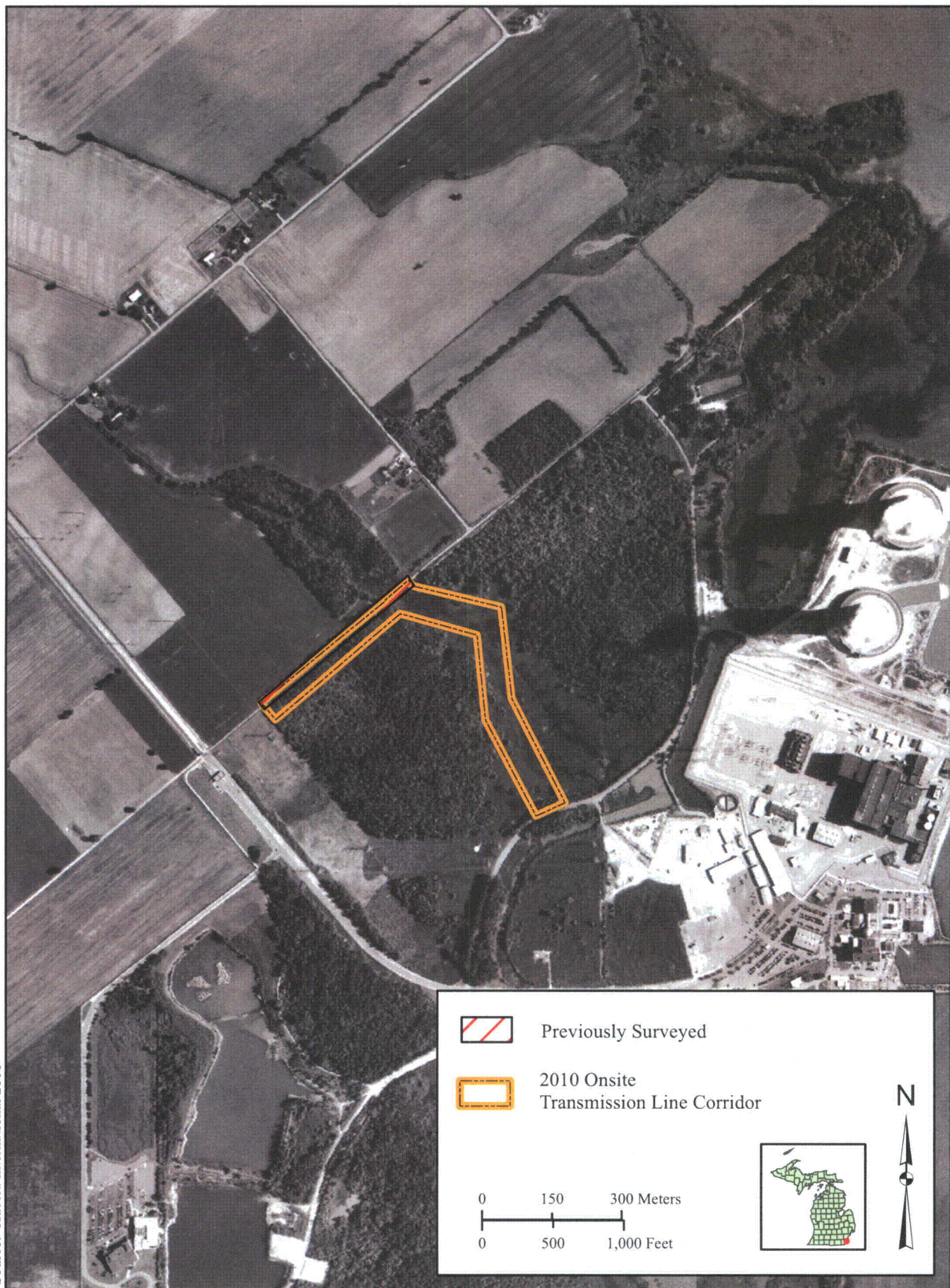


Figure 5. 2010 Proposed Rerouted Transmission Line Corridor Location overlaid with 2008 Survey Area