

Allen, William

From: Sokolsky, David [DDS2@pge.com]
Sent: Thursday, March 07, 2013 12:41 PM
To: Allen, William
Cc: Banovac, Kristina; Sharp, Loren; Pulley, Lawrence; Post, Jennifer (Law); Baldwin, Thomas (DCPP); Cimino, Stephanie
Subject: RE: Historic Question

Chris,

This responds to your email question below:

PG&E determined that Humboldt Bay Power Plant, Unit 3 was eligible for listing on the National Register of Historic Places (NRHP) in 2003, and the State Historic Preservation Office (SHPO) concurred. However, PG&E did not pursue listing Unit 3 on the NRHP because Unit 3 is going to be demolished as part of the decommissioning and license termination process for Unit 3. Additionally, note that Section 106 of the National Historic Preservation Act of 1966 stipulates that historic properties eligible for inclusion in the NRHP are provided the same consideration as those that are listed (80 Stat. 915, 16 U.S.C. 470f, as amended). Therefore, Unit 3 structures and supporting facilities have been treated as if they were listed for purposes of decommissioning and to meet mitigation requirements outlined by the California Energy Commission (CEC) for the licensing of the Humboldt Bay Generating Station (HBGS).

A Mitigation Plan was prepared as part of CEC's approval for HBGS that aimed to diminish the adverse effects caused by demolition of Unit 3 structures. The mitigation plan included provisions for documenting the Unit 3 power plant to Historic American Building Survey (HABS)/Historic American Engineering Record (HAER) standards and the preparation of an illustrated history, interpretive display, artifact and document donation, and public art piece. All but two of the items specified in the mitigation plan have been completed to date:

- HABS/HAER Documentation (2009-2012)
- Interpretive display at the Clarke Historical Museum in Eureka (2012)
- Mural on administrative building (2011)
- Illustrated history book (In progress – est. completion Spring 2013)
- Archival material donation (In progress – est. completion Spring 2013)

Because the mitigation was completed under the auspices of the CEC, neither the SHPO nor the National Park Service (Department of the Interior-designated lead for cultural resources) have participated in development or approval of the mitigation as is typical in the Section 106 process followed by Federal lead agencies. That said, all of the measures described above go above and beyond the minimum typically required for mitigation of a historic property. The HAER documentation, for instance, was donated to the Library of Congress in 2012.

As for future listing of other structures at the site associated with Unit 3, it would be irrelevant since these structures have either been removed or are being removed. Demolished properties are typically de-listed from the National Register. Any structure associated with Unit 3 that will remain onsite will not be used to support Unit 3 in the future. Lacking historic context and integrity, they would not be eligible for historic listing consideration.

Please do not hesitate to contact me for clarification of the above response or if you need additional information.

David Sokolsky
707-601-6703

From: Allen, William [<mailto:William.Allen@nrc.gov>]
Sent: Friday, March 01, 2013 6:14 AM
To: Sokolsky, David
Cc: Banovac, Kristina
Subject: Historic Question

The NRC defined the APE as the entire Humboldt Bay site (~143 acres). At the time of the original license was issued, the Environmental Assessment (EA) mentioned that the licensee was considering a future listing of the Humboldt Bay, Unit 3 facility with the National Register of Historic Properties (NRHP) for its importance in the history of the commercial nuclear power industry. Has PG&E pursued or will pursue listing the Unit 3 facility with NRHP? Is PG&E considering listing other properties on the site with NRHP?

Please provide this information to assist with staff's development of its EA at your earliest convenience.

Thanks, Chris Allen

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