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 AUTH. NAME: AUTHOR AFFILIATION
 BASKIN, K.P. Southern California Edison Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 MIRAGLIA, F. Licensing Branch 3

SUBJECT: Forwards LC McCoy comments on K Mellon 801218 ltr re "Natl Register Assessment Program of Cultural Resources of 230kv Transmission Line Rights-of-Way from San Onofre Nuclear Station to Black Star Canyon & Santiago Substation."

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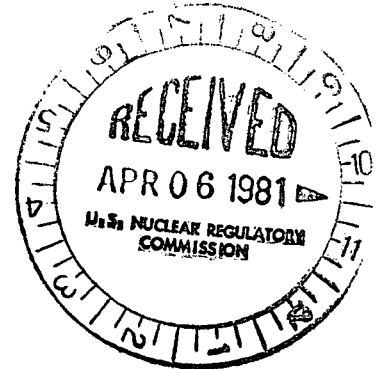
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ROSEMEAD, CALIFORNIA 91770

K. P. BASKIN
MANAGER OF NUCLEAR ENGINEERING,
SAFETY, AND LICENSING

March 30, 1981

TELEPHONE
(213) 572-1401

Director, Office of Nuclear Reactor Regulation
Attention: Mr. Frank Miraglia, Branch Chief
Licensing Branch No. 3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
San Onofre Nuclear Generating Station
Units 2 and 3

Reference is made to Dr. Knox Mellon's letter to Dino Scaletti of your staff dated December 18, 1981. Dr. Mellon's letter offered comments on the "National Register Assessment Program of Cultural Resources of the 230 kV Transmission Line Rights-of-Way from San Onofre Nuclear Generating Station to Black Star Canyon and Santiago Substation and to Encino and Mission Valley Substation," prepared by WESTEC Services, dated September, 1980.

Dr. Mellon's letter has been thoroughly reviewed by Company staff and by Ms. Lesley C. McCoy, Manager, CSRI Archaeological Resources Group and formerly Principal Investigator/Project Manager for WESTEC Services. Ms. McCoy's comments on Dr. Mellon's letter are enclosed and are concurred in by Southern California Edison and San Diego Gas & Electric Companies.

Please let me know if you have any questions or need additional information.

Very truly yours,

KP Baskin

Enclosure

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MEMORANDUM TO FILE

January 28, 1981

Mr. Dennis Cox
Southern California Edison
Nuclear Engineering - GO #1
2244 Walnut Grove Ave.
P.O. Box 800
Rosemead, CA 91770

Dear Mr. Cox:

ARCHAEOLOGICAL REQUIREMENTS AND
DETERMINATION OF MANAGEMENT PLAN
FOR SAN ONOFRE NUCLEAR GENERATING
STATION, UNITS #2 AND #3

In response to Dan Bell's (SHPO) letter of December 18, 1980, to the U.S. Nuclear Regulatory Commission we have the following comments to offer concerning archaeological requirements:

1. In accordance with your comments, 1,2,3,4,5,6,7, 8,9,10, and 11, all determinations of eligibility (or ineligibility) for the so-described archaeological sites have been recorded as such with the appropriate clearinghouses. Formal determinations of eligibility for sites and districts will be sought as instructed upon completion of the approved Management Plan.
2. In response to your comments 12 and 13, and in regard to operation and maintenance (O & M) effects of access roads at the eligible site CA-Ora-498, Ora-824, Ora-495, Ora-447, Ora-496, Ora-499, Ora-825, Ora-725, Ora-830, Ora-831, SDi-6130, and Ora-438, conditions 12a and 13a do not represent viable archaeological alternatives since all existing access roads, with the exception of CA-Ora-825, are owned privately and assurance of preservation by "capping" cannot be maintained.

Conditions 12b and 13b, therefore, will be incorporated in order to devise an appropriate Management Plan. A "Scope of Services" for this plan will be submitted to SHPO for approval and will include suggested measures with micro-mapping and collection for all surface artifacts remaining in the existing access roads. In addition, a

Data Recovery Plan will be implemented at CA-Ora-438 in accordance with the Advisory Council's Supplementary Guidance for Treatment of Archaeological Properties supporting a No Adverse Effect Determination.

3. Concerning comment 14 discussing the undertaking's effect on sites CA-SDi-6135, SDi-6138, SDi-6149, and SDi-6140 - we have compiled additional data as requested to clarify and finalize documentation of the current archaeological evaluation. As presented in the Cultural Resources Report (Vol. 1) under Section XII, construction impacts were expected to occur at the eligible sites as listed above. However, final tower locations at these sites were recently staked and an in-field check to determine tower/site relationships was conducted December 2, 1980. Results of the examination of potential construction effect are as follows:

CA-SDi-6135

One new steel lattice tower is proposed. The new tower location will be approximately 80 feet directly to the east of the existing structure (226549) within an existing access road and road cut area (see attached map). Proposed construction activities at this site will not cause adverse effects to any cultural resources. Therefore, no program is necessary to mitigate construction effects.

SDi-6138

Three new towers are proposed. All new steel lattice towers will be replacing existing structures (see attached map). One proposed tower location was tested during current assessment for subsurface cultural remains. Excavation results were negative (Unit 2). The other two new tower locations are beyond archaeological site boundaries. Therefore, the lack of any adverse effects to cultural remains by construction effects precludes the necessity of mitigation.

CA-SDi-6149

Previous assessment at this archaeological site mistakenly identified construction of a proposed new steel lattice tower as being a potential adverse impact to cultural resources. However, no new tower is proposed and although pulling operations are scheduled on an existing access road, this area is clear of site cultural remains (see attached map).

The lack of any potential construction impacts precludes the necessity of mitigation.

CA-SDi-6140

One new steel lattice tower is proposed. The new tower location will be approximately 80 feet to the northeast of an existing three-pole wooden structure. The area of the proposed new tower was tested for subsurface cultural remains during the current assessment. Excavation results were negative (Unit 2). Proposed construction activities at this site will not cause any adverse effects to cultural resources.

4. Similar to comment 2 above, a majority of existing access roads utilized by SDG&E are also owned privately. Therefore, any adverse effects to cultural materials as evidenced in existing access roads to the proposed new tower locations at CA-SDi-6135 and SDi-6140 will be mitigated according to condition 12b. Additionally, adverse effects to cultural resources evidenced in an existing access roads to the proposed new tower locations at CA-SDi-6149 which would be used to reach the pulling operations off-site will be mitigated as suggested in condition 12b. All proposed mitigation measures will be completely described and submitted to SHPO in a "Scope of Services."

Access to the new tower location at CA-SDi-6138 will be restricted to an existing road with no cultural remains in evidence and beyond site boundaries.

5. It should be noted that implementation of all proposed Management Programs is subject to legal authority for Contractor to enter upon privately owned properties.

If you have any further questions or comments, please contact the undersigned at (714) 235-7783.

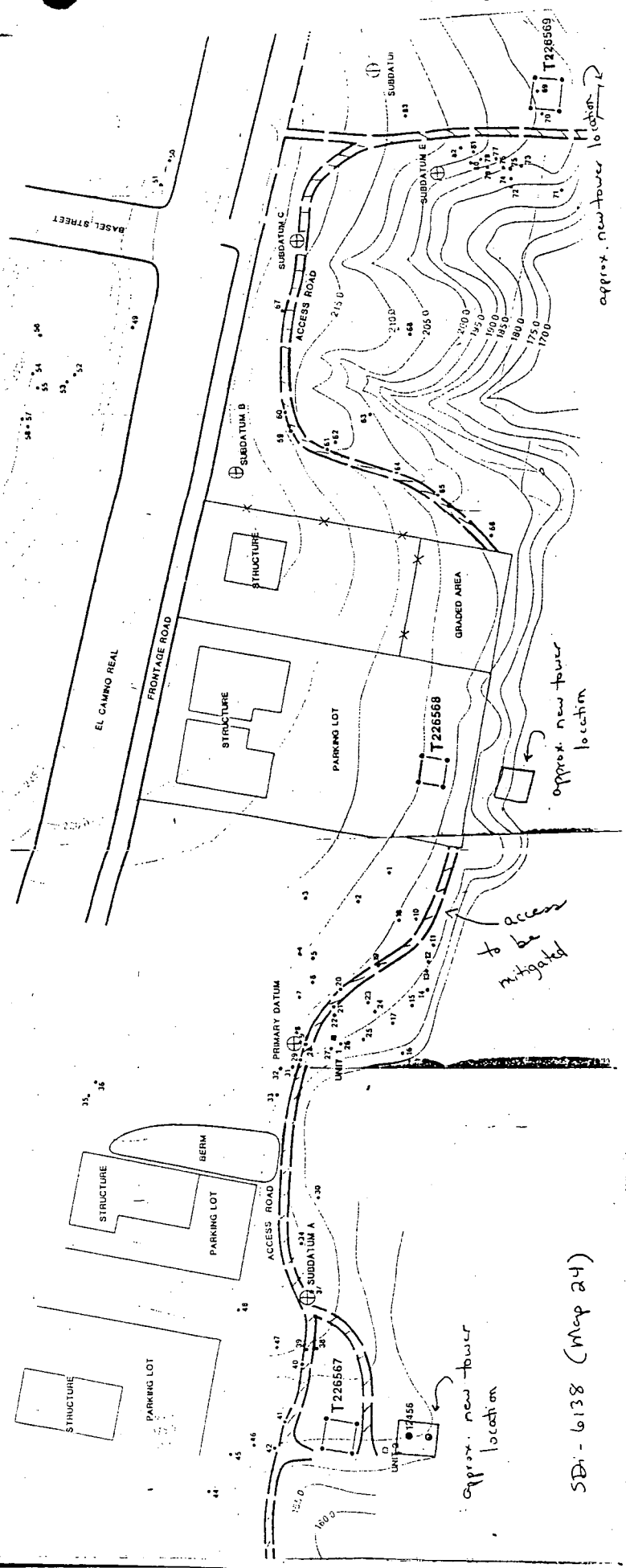
Sincerely,

Lesley C. McCoy

Lesley C. McCoy, Manager
CSRI Archaeological Resources
Group

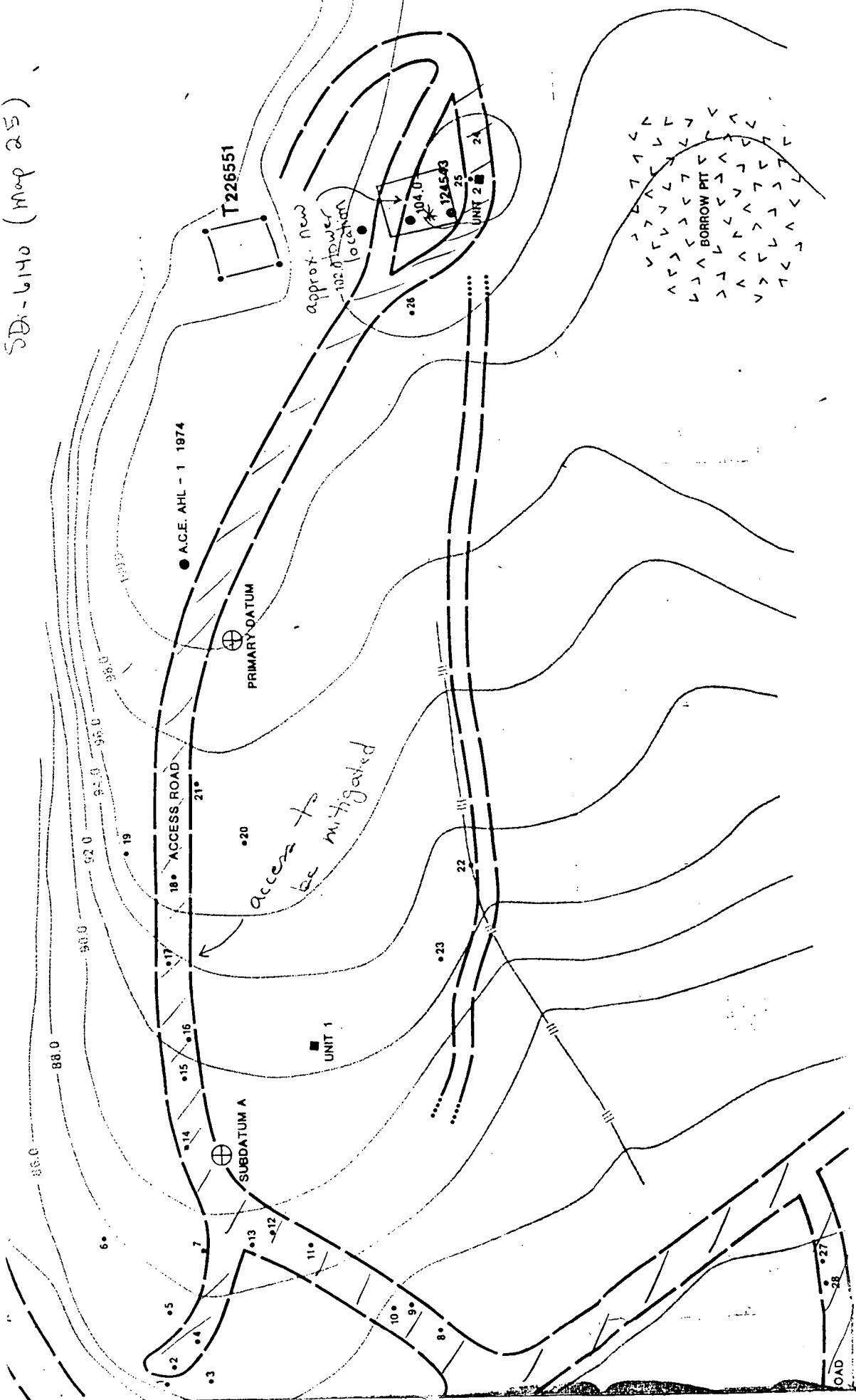
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cc: David White
L. J. Brunton

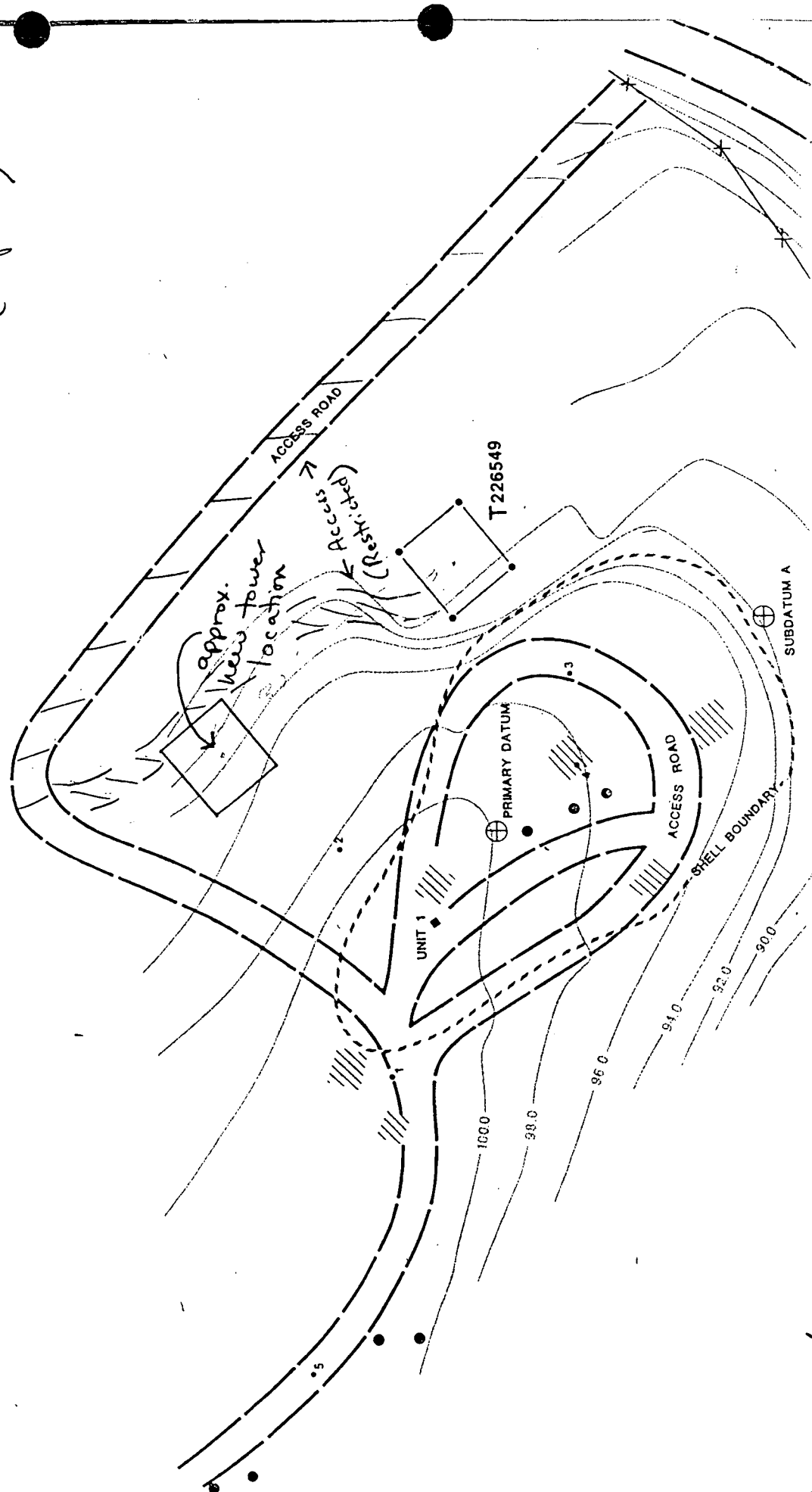


SDI-6138 (Map 24)

SD-6140 (Map 25)



SDI-6135 (Map 26)



SDI-6149 (Map 28)

