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

SUBJECT: Forwards Cultural Sys Research, Inc 810615 ltr re scope of
 svcs for data recovery program of cultural resources
 determined to be Natl Register eligible within proposed
 facility 230 kV transmission line rights-of-way.

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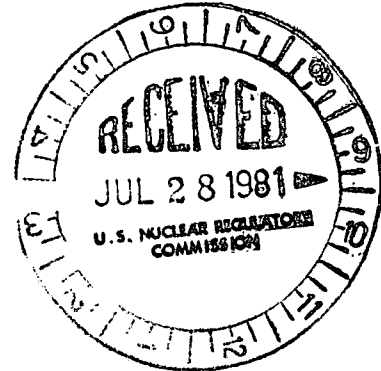
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K. P. BASKIN
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TELEPHONE
(213) 572-1401

July 22, 1981

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&3

Enclosed is a "Scope of Services for Data Recovery Program of Cultural Resources Determined to be National Register Eligible Within the Proposed San Onofre 230 kV Transmission Line Rights-of-Way," dated June 15, 1981, and signed by Ms. Lesley C. McCoy. Ms. McCoy is Manager, CSRI Archaeological Resources Group and formerly Principal Investigator/Project Manager for WESTEC Services.

The Scope of Services is for a proposed Data Recovery Program at 15 archaeological sites determined to be eligible for inclusion to the National Register. The 15 archaeological sites were identified as being potentially eligible after completion of a National Register Assessment Program which was forwarded to you by letter dated October 31, 1980. The sites were determined to be eligible for inclusion in the National Register by the State Office of Historic Preservation.

The Data Recovery Program is in compliance with the Advisory Council on Historic Preservations's Procedures set forth in 36 CFR 800, Section 106 of the National Historic Preservation Act of 1966, and the Memorandum of Agreement (MOA) of October 29, 1979. The program as fully described in Ms. McCoy's memorandum is designed to eliminate any adverse impacts to these cultural resources and will be implemented in accordance with the Advisory Council's Supplementary Guidance for Treatment of Archaeological Properties supporting a No Adverse Effect Determination. The proposed program will follow procedures as suggested in the Cultural Resource Management Plan (WESTEC 1980) and will conform to 36 CFR 63 and to the suggestions outlined in the MOA (1979).

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Mr. Frank Miraglia, Branch Chief

-2-

July 22, 1981

By copy of this letter, the Scope of Services is also being sent to Mr. Dan Bell at the State Office Historic Preservation and to Mr. Charles Niquette at the Advisory Council on Historic Preservation. A projected schedule for the Data Recovery Program is also enclosed.

Please contact me if you have any questions concerning this matter or require additional information.

Very truly yours,

V. P. Basham

Enclosure

cc: Mr. Dan Bell (w/encl.)
Office of Historic Preservation

Mr. Charles Niquette (w/encl.)
Advisory Council on Historic Preservation

Cultural Systems Research, Inc.

8148 Ronson Rd. Suite H
San Diego, California 92111
(714) 565-6332

June 15, 1981

**Subject: Scope of Services for Data Recovery Program of Cultural Resources
Determined to be National Register Eligible within the Proposed
San Onofre 230 KV Transmission Line Rights-of-Way**

The following Scope of Services (Scope of Work) has been prepared in response to Southern California Edison Company's (SCE) and San Diego Gas and Electric's (SDG&E) request for a proposed Data Recovery Program at 15 archaeological sites determined to be eligible for inclusion to the National Register. These cultural resources are located within the proposed 230 KV transmission line rights-of-way from San Onofre Nuclear Generating Station to Black Star Canyon and Santiago Substation and to Encina and Mission Valley Substation. The 15 archaeological sites were identified as being potentially eligible after completion of a National Register Assessment Program (WESTEC 1980) and were determined to be eligible for inclusion in the National Register by the Office of Historic Preservation (SHPO 1980).

In compliance with the Advisory Council on Historic Preservation's Procedures set forth in 36 CFR 800, Section 106 of the National Historic Preservation Act of 1966 and the Memorandum of Agreement (MOA) of October 29, 1979, SCE and SDG&E have requested Cultural Systems Research, Inc. to conduct a Data Recovery Program at the following sites as located within "areas of potentially adverse environmental impact":

CA-Ora-498	Ora-499	Ora-438
Ora-824	Ora-825	SDi-6138
Ora-495	Ora-725	SDi-6140
Ora-447	Ora-830	SDi-6149
Ora-496	Ora-831	SDi-6130

The Data Recovery Program is designed to eliminate any adverse impacts to these cultural resources and will be implemented in accordance with the Advisory Council's Supplementary Guidance for Treatment of Archaeological Properties supporting a No Adverse Effect Determination. The proposed program will follow procedures as suggested in the Cultural Resource Management Plan (WESTEC 1980) and will conform to 36 CFR Part 63 and to the suggestions outlined in the MOA (1979).

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-2-

The Data Recovery Program will include an in-depth investigation of the 15 archaeological sites and will be preservation oriented, i.e., methods destructive of data or injurious to the natural features of the property will not be employed. The Data Recovery Program will focus on elimination of potential adverse impacts to cultural resources as created by operation and maintenance activities in existing access roads. Field investigations will be implemented at those properties where permission to perform such work has been legally obtained. The Data Recovery Program will involve those portions of the sites to be directly adversely affected (access roads); all other portions of the resources within the rights-of-way will not be affected and will be preserved as determined National Register eligible sites.

At each of the 15 archaeological sites, operation and maintenance activities will be restricted to existing access roads, and the remaining research potential of surface artifacts within the provenience of these existing access roads will be used to define the important factors which should be considered in determining the effects of continued disturbances as proposed in the Cultural Resource Management Plan (WESTEC 1980).

Prior to implementation of the field investigation, a general research design has been established in an effort to produce a data recovery strategy and method of analysis that will allow the research and interpretation to go beyond simple description. Specifically, CSRI will be seeking data to fulfill the following research questions:

1. Defining the value of research potential and the effects that various activities may have on disturbed surface sites in similar environmental contexts: What types of disturbing activities occur and how do these activities affect cultural material within existing access roads? Program techniques will include controlled surface mapping and collection of all cultural materials within the access roads, comparison of current data to previous assessment results, a review of data relating to other sites in similar and dissimilar environments, and a review of historic documentation of the study area.

The Data Recovery Program will also be implemented to seek data to enhance and fulfill research questions as established during the previous National Register assessment phase.

2. Type of site and what activities are reflected? Program techniques will include controlled surface mapping and collection of all cultural material within the access roads, comparison of current data to previously encountered surface and subsurface site materials, and a review of data relating to other sites in similar and dissimilar environments.

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-3-

3. Cultural affiliation: What temporal period is reflected by the cultural activities? Program techniques will include a review of historic documentation of the study area, the use of ethnographic/ethnohistoric analogy via commonly acknowledged and used references, and analysis of the artifact assemblage with previously encountered surface and subsurface cultural materials.

The Data Recovery Program and research design have been developed in coordination with Native American involvement as continued from the previous National Register Assessment Program (WESTEC 1980). Local Native Americans, culturally associated with the study area and as suggested by the Native American Heritage Commission, have been contacted in an effort to enhance the program's ethnographic foundation and to better understand Native American land use for site documentation. The Native American representatives have been requested to share their knowledge about the presence and significance of the cultural resources to be investigated. All cultural materials will be curated in a manner based on discussions with these Native Americans as representatives of their groups. Any human remains or objects determined to be sacred to these Native Americans, if discovered, will also be treated in accordance with the desires of the Native American representatives in so far as legally possible. Native American involvement in this program will also include the process of analysis and report preparation. In brief, Native American consultants are being requested to provide information and personally participate during all field investigations, to provide information during all site documentation and analysis, and to review and comment on the rough draft prior to official submission, if desired. Their comments and involvement will be documented in the final report.

The Data Recovery Program at each of the 15 archaeological sites will include controlled surface mapping and collection of all cultural material remaining within the existing access roads. All data will be plotted on USGS 7.5' quadrangle topographic maps and SCE and SDG&E project maps. Care will be taken to ensure correct elevations, contours and locations through the use of transit and metric stadia rod. All surface artifacts within existing access roads to be adversely impacted will be collected after being mapped and photographed.

At archaeological site CA-Ora-438, the current program will include subsurface excavation of previously recognized midden deposition within the existing access road to be adversely impacted (WESTEC 1980). Placement of manually excavated test units (10 to 20 test units, each one meter square) will be based on surface conditions, such as midden or artifact concentrations. Each unit will be excavated in arbitrary 10 centimeter levels through the cultural horizon and into sterile subsoils. All soils will be passed through 1/8" hardware cloth and analyzed for cultural debris.

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-4-

Emphasis will be placed on recovery of artifacts in situ, and every attempt will be made to delineate any subsurface features (i.e., hearths) as they appear in the ground. Shellfish and other faunal remains will be retained regardless of condition or size. All test units will be backfilled upon completion of excavation. All subsurface testing will be designed in keeping with Native American sensitivities.

Care will be taken to obtain as many data infield as possible on each site. This will ensure that a critical evaluation of the archaeological resources is possible. Field notes will be taken by the project archaeologist and will be requested from the Native American participant. Individual crew members will prepare level sheets for every excavated unit as appropriate and unit sheets upon completion of each unit. Horizontal and vertical diagrams of each unit will be made and a complete photographic record will be compiled. Soil profiles will also be completed for each unit. Any features will be photographed, measured, and sketched. Extensive photographs will be taken at each site. Photographs will also be taken to document site topography.

When appropriate, soil samples will be taken to assess the composition of both culturally and naturally deposited soils. Soil samples will also be taken to conduct pollen analyses where conditions indicate the preservation of appropriate deposits.

Any organic material that could be suitable for radiometric ^{14}C dating will be collected and forwarded to a recognized institution for analysis. Cultural material such as ceramics, shellfish, fish remains, and other faunal remains may also be recovered and analyzed.

Compilation and documentation of final site-specific data will be completed at the CSRI laboratory facility. All cultural material recovered during surface collection and excavation will be washed, weighed, measured, and catalogued for additional examination. Artifacts will be analyzed within typological models and will include artifact typing, preliminary edge-wear analysis, definition of material types, and definition of cultural affinity.

As applicable, shellfish and faunal remains will either be washed or dry-brushed, then speciated, weighed, measured, and analyzed in light of their function and role in prehistoric diet.

During laboratory analysis, any pottery (ceramics) will be cleaned and identified using traits such as temper, carbon streak, hardness, and core.

All pollen samples will be processed and analyzed by Mr. David Vork of the Standard Oil Chemical Laboratory, Ventura, California, and any ^{14}C samples will be forwarded to the University of Georgia.

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-5-

Data recovered during the current program will be synthesized and placed in the format of a Cultural Resource Report to be submitted to SCE and SDG&E and the appropriate governing agencies. The final report shall deal with the specifics of the cultural resources and the results of the Data Recovery Program and will include a summary and comparison of previous site assessment results, information on the effective environment, research goals and strategy for the program, methods of data collection and analysis, a description of the analytical techniques used, a description of Native American involvement and input, a synthesis of the resources, and an evaluation of the research and cultural resources. Technical appendices, including all mapping, will accompany the Cultural Resource Report separately.

Attached to this Scope of Services is the CSRI projected scheduling for the proposed Data Recovery Program. If you should have any questions or comments, please contact the undersigned at (714) 565-6332 or (714) 235-7783.

Sincerely,

Lesley C. McCoy

Lesley C. McCoy

LCC:np

cc: David White (SCE)
Jack Brunton (SDG&E)
Dennis Cox (SCE)
Dan Bell (SHPO)
Advisory Council
NRC

CSRI PROPOSED TIME SCHEDULE

July 15, 1981 to July 24, 1981: Completion of information solicitation.

July 27, 1981 to August 24, 1981: Completion of field investigation; 19 days total for fieldwork.

August 31, 1981 to October 15, 1981: Completion of analysis and report preparation.

October 15, 1981: Draft report submitted.

November 1, 1981: Final report submitted.