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Wyoming State Parks & Cultural Resources

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June 4, 2015

Lydia Chang, Chief
Environmental Review Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

re: Power Resources, Inc., Cameco Resources Smith Ranch Project Proposed License Renewal (Smith Ranch Site and North Butte Property), Proposed Direct and Indirect Areas of Potential Effect (SHPO File # 0499RLC034)

Dear Ms. Chang:

Thank you for consulting with the Wyoming State Historic Preservation Office (SHPO) regarding the above referenced undertaking.

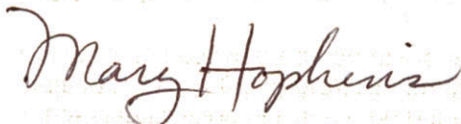
At this time we seek clarification/justification for the definition of the Direct and Indirect Areas of Potential Effect (APE) as proposed for this undertaking. These questions relate to both Smith Ranch Site and North Butte Property APE definitions.

Specifically, the Direct APE as defined appears to be limited to new constructions (with a buffer) that are outside of previously disturbed areas. How does this relate to the licensed activities? Generally, whether or not a portion of the APE is previously disturbed is not taken into account during the definition of the APE. Previous disturbance is generally accounted for when considering the level of effort required in the identification of historic properties [36 CFR § 800.4(b)(1)]. This is done after the APE has been defined [36 CFR § 800.4(a)(1)]. Additionally, why is the construction of Trunklines to support the wellfields not considered part of the APE?

Concerning the indirect APE, we recommend that the indirect APE consist of a radius of three (3) miles from the boundary of the Direct APE. This is consistent with the guidance of other federal agencies within the State of Wyoming which define a 3 mile buffer as the "foreground". The foreground is utilized for consideration of indirect effects for low profile disturbances similar In-situ leaching operations. Additionally, as noted above, the definition of the APE is completed prior to identification efforts. We are curious as to why the U.S. Nuclear Regulatory Commission (NRC) would then "finalize its initial delineation of the indirect APE based on the data search and the viewshed analysis" since the APE definition is not dependent on, nor guided by, the results of the identification effort?

Please refer to SHPO project #0499RLC034 on any future correspondence regarding this undertaking. If you have any questions, please contact Richard L. Currit at 307-777-5497 or myself at 307-777-6311.

Sincerely,



Mary Hopkins
State Historic Preservation Officer



Matthew H. Mead, Governor
Milward Simpson, Director