

**LaSalle Environmental Audit  
Response to Request for Additional Information**

**Index #:** 054      **RAI #:** HC-05      **Category:** Historic & Cultural Resources

**Statement of Question:**

Related to Exelon's environmental review procedures for land-disturbing activities, please provide:

- a. A description of how inadvertent historical or cultural discoveries on the LSCS site are considered by Exelon staff.
- b. A list of Exelon's environmental procedures and a short description of their purpose.
- c. A description of the LSCS Cultural Resources Management Plan and its state of implementation

**Response:**

- a. If cultural or historic resources are discovered during an ongoing excavation at LSCS, the work would be stopped, appropriate notifications would be made, a cover would be positioned to protect the exposed resources from the elements, access to the area would be controlled with barriers and/or signs, and work would not resume until authorized by Environmental personnel. Also, Environmental personnel would coordinate the salvage or disposition of any recovered resources.
- b. A short description of each Exelon Generation procedure pertinent to land-disturbing activities is provided below.
  1. EN-AA-103, Environmental Review  
This procedure provides a process for screening proposed activities to determine if an activity requires further evaluation for environmental impacts and risk. Activities to be screened include, but are not limited to:
    - Engineering Configuration Changes
    - Initiatives
    - Maintenance Activities
    - Operational Changes
    - Procedure / T&RM Changes
    - Other Site / Non-Generating Facility Activities.Activities are reviewed against a list of activities known to require further evaluation for environmental impacts and risk. If an activity is on the list, further evaluation under procedure EN-AA-103-0001 may be initiated.
  2. EN-AA-103-0001, Environmental Evaluations  
This procedure provides guidance on performing further environmental evaluations to identify the environmental and regulatory impacts (including impacts on known or potential cultural and historical resources), if any, of proposed activities. If an environmental evaluation concludes that implementation of a proposed activity would result in an unacceptable environmental condition or risk, then the proposed activity will not be implemented until the environmental impact(s) is / are addressed.

3. SA-AA-117, Excavation, Trenching, and Shoring

This procedure provides instructions on safe work practices for excavating, trenching, and shoring, including instructions on actions to be taken if cultural, historic, or paleontological resources are uncovered during an activity involving excavation or trenching.

- c. A draft Cultural Resource Management Plan (CRMP) has been developed for LSCS use and comment. Its purpose is to serve as a human performance tool to assist LSCS in completing the cultural and historic resources component of an Environmental Evaluation, as defined in EN-AA-103-0001. Presently, use of this tool by Station environmental personnel is optional. A future revision of EN-AA-103-0001 is expected to acknowledge CRMPs as appropriate guidance for use in performing Environmental Evaluations at Exelon Generation nuclear stations that have developed such plans.

The content of the LSCS CRMP includes site-specific guidance on preparing a cultural and historic resources component, when warranted, for an Environmental Evaluation being conducted in accordance with EN-AA-103-0001. Steps are provided for:

- Evaluating a proposed land disturbing activity in the Owner-Controlled Area (OCA); and
- Evaluating a proposed activity in the OCA that introduces a new noise, air, or visual element which potentially could affect a culturally sensitive area outside the OCA.

A Cultural Resource Environmental Review Form is provided to prompt an environmental evaluator of a proposed land-disturbing activity to consider whether the activity has characteristics that could impact cultural or historic resources. For example:

- Would the activity be located in an area delineated as a recorded archaeological site or as having a moderate or high potential for the existence of archaeological sites?
- Would the activity be within view or hearing distance of a historic structure?

Attachments to the CRMP include maps of the OCA showing the approximate locations of known archaeological sites and indicating the potential (low, moderate, high) for existence of archeological sites throughout the OCA. Also marked are areas within the OCA that do not require evaluation because previous extensive land-disturbing activities have occurred there. A table of historic properties listed on the National Register of Historic Places and located within 10 miles of LSCS is provided. It identifies the address of each property and its distance from the Station.

**List of Attachments:**

None.