REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS) ENV 1

ACCESSION NBR:8007160511 DOC.DATE: 80/07/03 NOTARIZED: NO DOCKET #
FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
AUTH.NAME AUTHOR AFFILIATION
GORDON,G.J. Interior,Dept.of
RECIP.NAME RECIPIENT AFFILIATION
SELLS,D.E. Assistant Director for Environmental Technology
KEBLUSEK,S. Assistant Director for Environmental Technology

SUBJECT: Forwards comments re adequacy of site archaeological investigations & Bonneville Power Adminsitration survey & testing along Asche-Slatt transmission route.

DISTRIBUTION CODE: C002S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 3
TITLE: Environ. Comments.

NOTES:PM: 2 copies of all material. 05000397

	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME		COPIES LTTR	COPIES ENCL
ACTION:	A/D LICENSNG		1	0	YOUNGBLOOD,B	17	1	1
	RUSHBROOK,M.	18	1	1	LYNCH,D.	05	1	1
INTERNAL:	ENV ENG BR	09	1	1	I&E	07	2	2
	~~NRC PDR~~	02	1	1	OELD		1	0
	REG FILE	01	1	1	SIT ANAL BR	10	1	1
EXTERNAL:	ACRS		1	0	LPDR	03	1	1
	NATL LAB	20	5	5	NSIC	04	1	1

JUL 17 1980

TOTAL NUMBER OF COPIES REQUIRED: LTTR ~~19~~ 21 ENCL ~~16~~ 18

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
PACIFIC SOUTHWEST REGION
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

W520

Interagency Archeological Services
450 Golden Gate Avenue, Box 36065

50-397

July 3, 1980

Donald E. Sells, Acting Chief
Environmental Projects Branch 2
Division of Site Safety and Environmental Analysis
Nuclear Regulatory Commission
Washington, D.C. 20555

Atten: Suzanne Keblusek

Dear Mr. Sells:

We appreciate your request for our advice regarding the adequacy of the archeological investigations for the WPSS-2 nuclear power plant, Hanford Reservation, Washington. We have reviewed pertinent sections of the Environmental Report on the WNP-2 operating license stage and related letter reports regarding the archeological survey of the WNP-2 acerage (1972) and the subsequent investigations at the WNP-2 pump house and water intake area (1975), all of which Ms. Keblusek forwarded to us.

We have also reviewed three documents prepared for the Bonneville Power Administration (Smith et al. 1977; Lindeman 1979; Stanfill and Eller 1979) on archeological survey and testing along the Asche-Slatt (previously AschePebble Springs) transmission route and BPA's files on their follow-up actions. Ms. Keblusek requested that we review compliance associated with the BPA line since NRC would ultimately be responsible for this project's effects. Dr. Michael Berg, BPA senoir environmentalist, was extremely helpful in providing us with all the pertinent material regarding BPA's archeological investigations along this transmission line.

Our comments and recommendations are enclosed. We hope these prove useful. Please call if we can be of further assistance (556-7741 FTS).

Sincerely,

Garland J. Gordon

Garland J. Gordon, Chief
Interagency Archeological Services
San Francisco

C002
S
1/1

cc: Jean Welch, Washington SHPO
Mike Berg, Senior Environmentalist, BPA
Dr. David Rice, Dept. of Anthropology, Univ. of Idaho
Britt Storey, ACHP Denver
HCRS-Seattle

8007160511

COMMENTS

We feel that your letter reports from Dr. David Rice (1972, 1975) do not provide full documentation of completed archeological field investigations in terms of todays standards. The September 1972 letter falls shy of indicating the exact area that was investigated, the fashion in which this area was surveyed, and the location of the Burns and Roe test trench. We also note that the WNP-2 ER (sec. 2.6) states that Dr. Rice was to determine the effects of transmission line relocation for WNP-2 but the 1972 letter report does not mention the survey of transmission lines.

The April 1975 letter fails to provide full description of archeological materials recovered in Dozer Cut C at the pump house site, or detailed rationale for why these materials are thought to be deflated. Whether or not this deposit was deflated, the key issue is if the site contains information that is significant to the region's prehistory. This point is not specifically addressed in the April 1975 letter.

We also feel that the 1977 ER may not fully address the scope of potential impacts to cultural resources. We feel your EIS could specifically assess impacts to cultural resources within 1) the full project area included within the site exclusion radius of 1950 meters, defined in sec. 2.1.1.2 of the 1977 ER and 2) areas within the exclusion radius of any related waste disposal site.

More generally we feel your EIS should specifically assess potential impacts of further radioactive contamination of archeological materials within the immediate region of the Hanford Reservation, including the six National Register properties listed in the 1977 ER (sec. 2.6). Dr. David Rice has alerted us to what he believes to be the effects of radioactive contamination on the carbon fourteen dating of archeological materials downstream from the Hanford Reservation. He reports obtaining modern radiocarbon dates from archeological sites he believes are in the neighborhood of 1000 to 2000 years old but have been contaminated by radioactive waters.

Exact radiocarbon dates are extremely important for determining the significance of archeological resources. Dates may be obtained by alternative methods, but radiocarbon dating is the most common one. We feel the extent of contamination and the feasibility of alternative dating methods should be demonstrated in this region before no adverse effects can be determined according to the Advisory Council on Historic Preservation regulations 36 CFR 800.

The three documents prepared for the BPA on the Asche-Slatt line (Smith et al. 1978; Lindeman 1979; Stanfill and Eller 1979) adequately address the major cultural resource problems encountered along the transmission route. Exceptions to this rule existed regarding the survey of Sec. 24 and 25, T 10N, 26E (Tract 2), a resurvey of portions of Glade Creek (Tract 4), and the possible testing or avoidance of 45-BN-235 and 236 (Tract 5). Subsequently, archeological survey and testing, and relocation of the transmission corridor have rectified these situations to the Washington State Historic Preservation Office's satisfaction, as documented in BPA's project file.

The major problem with the BPA project documentation appears to be a lack of adequate analysis and description of collected cultural materials. In several places BPA reports imply that artifacts were collected during the field surveys. If materials are collected that provide useful information on the specific nature of sites, then it is standard for the collected materials to be analyzed and described in a report. In this instance we are particularly interested in the potential indentification of the large mammal bone mentioned in a BPA archeologist's project report, and in the specific nature of the lithic manufacturing debris found on the archeological sites.

RECOMMENDATIONS:

Our conclusions regarding the necessity for future work are as follows:

1) The EIS should indicate the exact area and nature of Dr. Rice's 1972 survey. This survey should include the coverage of the entire project property boundary or else the survey should be supplemented with additional survey. We suggest you contact Dr. Rice and have him specify the exact areas he surveyed and in what fashion these areas were surveyed.

2) A survey should be completed of all accessible, unmodified areas within the WNP-2 exclusion radius, and within the area defined by the exclusion radius of any proposed project waste disposal site.

3) The effects of completed pump house construction, and future activity in this area, on the archeological site found in Dozer Cut C should be determined by specifically evaluating its potential to contribute information regarding the prehistory of the Columbia River. Dr. Rice reports to us that the materials in Dozer Cut C were extremely sparse and intermitent and will not provide important information regarding the prehistory of the region. This should be specified in the EIS.

4) A study should be initiated to assess the potential effects of radiocarbon contamination from WPPSS-2, or other nuclear facilities, on the archeological dating of cultural resources in the immediate region of the Hanford Reservation.

5) NRC should determine if cultural materials collected during the BPA transmission line investigations have been adequately analyzed and reported, and if necessary see that this work is eventually completed.