



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, TN 37902

*Reference
Used*

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COMMISSION

June 22, 2015

Mr. E. Patrick McIntyre, Jr.
Executive Director
Tennessee Historical Commission
2941 Lebanon Road
Nashville, Tennessee 37243-0442

Dear Mr. McIntyre:

TENNESSEE VALLEY AUTHORITY (TVA), DRAFT PROGRAMMATIC AGREEMENT, CLINCH RIVER SMALL MODULAR REACTORS PROJECT, ROANE COUNTY, TENNESSEE

TVA initiated consultation with your office on August 26, 2011 regarding the above-named project, a proposal to develop two or more small modular nuclear generating reactors (SMRs) at the former Clinch River Breeder Reactor Site in Roane County, Tennessee (and seek a Combined License from the United States Nuclear Regulatory Commission for the project). This year, we have continued that consultation in letters regarding an additional archaeological survey (letter dated April 2, 2015) and our evaluation of the project's potential effects on historic architectural resources (letter dated May 20, 2015). In our letter of August 26, 2011, we proposed developing a Programmatic Agreement (PA) with your office and other consulting parties to document the terms and conditions to resolve potential adverse effects of the undertaking.

TVA has determined, in consultation with your office, that the area of potential effects (APE) for archaeological resources consists of an approximately 1300-acre area bounded on the west, south, and east by Watts Bar Reservoir (between Clinch River miles 14.05 and 19.0), and on the northeast by land owned by the U.S. Department of Energy (DOE). Recently, however, TVA proposed utilization of the State Highway 58 off ramp onto Bear Creek Road during the construction phase of the undertaking. Consequently, TVA has modified the APE to include this ca. 5-acre area, resulting in an APE that encompasses approximately 1,305 acres. Within this APE, TVA proposes to clear a ca. 456-acre area of vegetation as part of the site preparation work. The APE for historic architectural resources consists of the area within a one-half mile radius of the proposed land clearing, and that would have a visual line of sight to the project.

TVA has conducted four archaeological surveys including all parts of the APE with two exceptions: (1) some DOE land in the north part of the APE that was included in a recent DOE archaeological survey, during which eligible site 40RE233 was identified; and (2) the ca. 5-acre off-ramp from State Highway 58, which was included in a 1995 archaeological survey carried out by Duvall and Associates for the Tennessee Department of Transportation, and which has been disturbed by road construction. A total of 59 archaeological sites have been identified

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within the APE. Our offices have agreed that 16 of these sites are potentially eligible for the NRHP, and that one site determined by the Department of Energy (DOE) to be eligible for the NRHP is located in the undertaking's APE.

TVA considers this undertaking to be a type that accords with the meaning of the term "complex project" cited in 36 CFR § 800.14(b)(3) because it will involve multiple phases carried out by multiple groups within TVA as well as more than one outside entity, and so planning and project development will be complex. Because planning may not be finalized for some months or years, TVA is unable to fully apply the criteria of adverse effect to the identified historic properties at this time, and will not be able to do so prior to seeking the Early Site Permit from the U.S. Nuclear Regulatory Commission. However, we anticipate that the construction and operation phases of the undertaking may result in adverse effects to one or more of these historic properties. Therefore, TVA proposes to develop a PA with your office under 36 CFR § 800.14(b)(3) to govern the management of historic properties within the undertaking's APE.

TVA has prepared the enclosed draft PA between our offices regarding the management of historic properties that may be affected by the undertaking. By this letter, we ask that you provide comments on this draft PA within thirty days of receipt of this letter. Upon mutual agreement by our offices on the draft PA, we plan to notify the Advisory Council on Historic Preservation and invite it to participate in this consultation pursuant to § 800.14(b)(3) and § 800.6(a)(1).

If you have any questions or comments, please contact Richard Yarnell at 865/632-3463 or wryarnell@tva.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Clinton E. Jones", with a long horizontal flourish extending to the right.

Clinton E. Jones
Manager, Biological and Cultural Compliance
Safety, River Management and Environment
WT11B-K

SCC:CSD
Enclosures