

TEXAS HISTORICAL COMMISSION
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May 30, 2019

James Park
Environmental Project Manager
U.S. Nuclear Regulatory Agency
Washington, D.C. 20555-0001

Re: Project review under Section 106 of the National Historic Preservation Act: *Notification of and Request for Consultation Regarding Interim Storage Partners LLC's Proposed Consolidated Interim Storage Facility for Spent Nuclear Fuel, in Andrews County, Texas.* (Docket No. 72-1050; THC Tracking No. 201908232)

Dear Mr. Park:

Thank you for allowing us to review the project referenced above. This letter serves as comment from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The archeological review staff, led by Drew Sitters, has examined our records and determined that an intensive archeological survey in advance of Interim Storage Partners LLC's (then Waste Control Specialists) proposed consolidated interim storage facility for spent nuclear fuel in Andrews County, Texas was conducted in May of 2015 under Antiquities Code of Texas Permit No. 7277 (Dayton 2015). No cultural materials were found within the Area of Potential Effects (APE) as defined in the cultural resource survey report (Dayton 2015:15). Therefore, no further work was recommended prior to the construction of the proposed spent fuel storage facility. [REDACTED]

[REDACTED] After comparing maps from the cultural resource survey report (Dayton 2015) to those provided in the *Notification of and Request for Consultation Regarding Interim Storage Partners LLC's Proposed Consolidated Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas* (Docket Number 72-1050) it appears as though the APE has expanded [REDACTED]. Thus, an archeological survey is warranted for those portions of the current APE that do not overlap with previously surveyed areas.

The work should meet the minimum archeological survey standards posted on-line at www.thc.state.tx.us. A report of investigations should be produced in conformance with the Secretary of the Interior's Guidelines for Archaeology and Historic Preservation, and submitted to this office for review. In addition, any buildings 45 years old or older that are located within the proposed transmission line route should be documented with photographs and included in the report. You may obtain a list of archeologists in Texas on-line at: www.counciloftexasarcheologists.org or www.rpanet.org. Please note that other potentially qualified archeologists not included on these lists may be used.

If any of the work will be performed on public land or within a public easement your archeological principal investigator must obtain an Antiquities Permit from our office before any investigations are undertaken. An Antiquities Permit can be issued as soon as we have received a completed permit application.

Caitlin Brashear of the History Programs has determined that **no historic properties are present or affected** by the project as proposed. However, if historic properties are discovered or unanticipated effects on historic properties are found, work should cease in the immediate area; work can continue where no historic properties are present. Please contact the THC's History Programs Division at 512-463-5853 on further actions that may be necessary to protect historic properties.

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review or if we can be of further assistance, please contact **Drew Sitters** at (512) 463-6252 / Drew.Sitters@thc.texas.gov; or **Caitlin Brashear** at (512) 463-5851 / Caitlin.Brashear@THC.Texas.Gov.

Sincerely,



for
Mark Wolfe
State Historic Preservation Officer
MW/ds

cc: Michael F. King, Office of Nuclear Material Safety and Safeguards

GREG ABBOTT, GOVERNOR • JOHN L. NAU, III, CHAIR • MARK WOLFE, EXECUTIVE DIRECTOR

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