

From: Schroer, Keely <KSchroer@scdah.sc.gov>
Sent: Tuesday, November 19, 2019 11:10 AM
To: Quintero, Jessie
Cc: Johnson, Elizabeth
Subject: [External_Sender] Westinghouse Columbia Fuel Fabrication Facility License Renewal, Richland County
Attachments: RICH_Westinghouse Columbia Fuel Fabrication Facility 40 Year License_15-EJ0022_DraftEA.pdf

From: South Carolina State Historic Preservation Office

Please find attached our comments letter on the subject referenced project. A hard copy can be provided upon request.

Please contact us if you have any questions regarding our comments.



Keely Lewis-Schroer
Archaeologist
State Historic Preservation Office
SC Department of Archives & History
8301 Parklane Road
Columbia, SC 29223
Ph: 803.896.6181 Fax: 803.896.6167 <https://scdah.sc.gov/historic-preservation>
kschroer@scdah.sc.gov

Federal Register Notice: 84FR57777
Comment Number: 28

Mail Envelope Properties (004cbe7b2d254a398c55f23a3d94d58b)

Subject: [External_Sender] Westinghouse Columbia Fuel Fabrication Facility License
Renewal, Richland County
Sent Date: 11/19/2019 11:09:30 AM
Received Date: 11/19/2019 11:09:39 AM
From: Schroer, Keely

Created By: KSchroer@scdah.sc.gov

Recipients:

Post Office: DAH-MAIL-01.scdah.local

Files	Size	Date & Time
MESSAGE	525	11/19/2019 11:09:39 AM
image001.png	12293	
RICH_Westinghouse Columbia Fuel Fabrication Facility 40 Year License_15-EJ0022_DraftEA.pdf		
297124		

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:





November 19, 2019

Jessie Muir Quintero
Environmental Project Manager, NMSS/REFS/ERMB
U.S. Nuclear Regulatory Commission

Re: Westinghouse Columbia Fuel Fabrication Facility License Renewal
Draft Environmental Assessment
Richland County, South Carolina
SHPO Project No. 15-EJ0022

Dear Jessie Quintero:

Thank you for your email of October 28, 2019 regarding the subject-referenced undertaking. We also received the draft *Environmental Assessment for the Renewal of SNM-1107 Columbia Fuel Fabrication Facility in Richland County, South Carolina* (EA) as supporting documentation for this undertaking. The State Historic Preservation Office (SHPO) is providing comments to the U.S. Nuclear Regulatory Commission (NRC) pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

The proposed undertaking is defined as a 40-year license renewal request. The Area of Potential Effect (APE) for the undertaking is defined as the Columbia Fuel Fabrication Facility in Richland County, South Carolina.

The undertaking will require the installation of new groundwater wells in previously undisturbed areas within the APE. In previous correspondence of December 14, 2006 and May 28, 2015 our office noted that, "The [Westinghouse] site as a whole has a very high probability of significant archaeological properties. Any future proposed expansion or ground disturbance in previously-undisturbed areas should be submitted to our office for review and comment." The NRC states that the installation of the wells will be performed by a contractor following procedures to avoid subsurface objects (e.g. human remains, underground utilities) and thus should be able to avoid digging in an area that might have remains or artifacts. NRC additionally notes that Westinghouse has a procedure in place to address inadvertent discoveries and Westinghouse must follow state law. NRC's preliminary determination is that the proposed undertaking would have no effect on historic properties, if present.

Based on the description of the Area of Potential Effect (APE) and the identification of historic properties within the APE, our office concurs with the assessment that no properties listed in or eligible for listing in the National Register of Historic Places will be affected by this project.

If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include, but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal and glass objects, and human skeletal materials. The federal agency or the applicant receiving federal assistance should contact our office immediately.

We continue to recommend that our office be consulted for review and comment if any future expansion or additional ground disturbance in previously undisturbed areas is proposed.

Our office has additional technical comments on the draft EA that we ask to see addressed (please see attached).

Please refer to SHPO Project Number 15-EJ0022 in any future correspondence regarding this project. If you have any questions, please contact me at (803) 896-6181 or KSchroer@scdah.sc.gov.

Sincerely,



Keely Lewis-Schroer
Archaeologist
State Historic Preservation Office

cc: Elizabeth Johnson, SHPO

Technical Comments

p. vii, Figures- TYPO: “Denley Cemeta[e]ry.”

Sections 3.9 and 4.9- Historic and Cultural Resources- Stated that there is no record of archaeological surveys being completed. Our records indicate that in 2004, an *Archaeological Survey of the Hopkins Transmission Line and Substation* (Reid 2004) was conducted within the property boundaries as depicted in Figure 2-2. Our office notes that the property is considered to have a high probability for archaeological resources because it is in direct proximity to known archaeological sites.

Figure 2-8a- We recommend indicating the location of Denley Cemetery on this figure or an additional figure to ensure that no ground-disturbing activities related to the construction of the wells occurs within the boundaries of the cemetery.

Section 3.9, NRHP database- We recommend consulting [SC ArchSite](#), the cultural resource information system for SC, for up-to-date information regarding cultural resources and historic properties in the state. Based on our records and SC ArchSite, the following are recorded within 5 miles of the property boundaries as depicted in Figure 2-2:

- 55 archaeological resources
- 61 historic architectural resources
- 4 historic properties listed in the National Register of Historic Places (Hopkins Graded School, Barber House, Hopkins Presbyterian Church, and the Northwest Boundary Dike)

Section 4.9 and 6.1, SHPO response- Our office was contacted by NRC regarding their preliminary conclusions on July 9, 2019. Our office responded on July 16, 2019 with a request for additional information and a meeting was held on July 25, 2019 regarding the additional site investigation activities. No additional response from our office was requested following the meeting. Please clarify.