



United States Department of the Interior

NATIONAL PARK SERVICE ROCKY MOUNTAIN REGIONAL OFFICE

655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:
H2415

July 1, 1981

Mr. Louis Bykoski
USNRC
Washington, D. C. 20555
Mail Stop AR3-5109

Dear Mr. Bykoski:

We reviewed with interest the research proposal for "Cultural Resources Survey and Assessment of the Union Electric Nuclear Plant Site, Callaway County, Missouri" by American Resources Group, Ltd. The major points are summarized below.

We are uncertain how it was decided that 5,300 of the 7,600 acres should be intensively inventoried and where these 5,300 acres are located vis-a-vis the entire holding. While it is laudable that Union Electric is willing to inventory this large area, it is possible that this exceeds the company's obligation. Union Electric Company is obligated to inventory that area of direct impact, a suitable bufferzone, and identifiable secondary or indirect impact areas. In this particular case it is hard to perceive that there will be any indirect impact area. The buffer should be determined on an individual case basis, depending upon the activity in that part. However, 50 meters should generally be ample. It is not necessary for Union Electric to inventory areas that it will not be impacting, for example, agricultural fields that will remain in cultivation.

The research proposal was prepared by a firm from Illinois and certain deficiencies in their proposal can be tied directly to their lack of familiarity with the literature and archaeology of central Missouri State Historic Preservation and the Missouri Association of Professional Archaeologists (MAPA). Generally, the proposal is under-referenced and demonstrates a lack of familiarity a) with pertinent research questions and b) with the literature dealing with Missouri archaeology. Reference to Illinois archaeology is not acceptable here due to the significant differences.

An adequate literature search will be necessary before the contractor attempts to write the final report as it is doubtful that the final report would be of an acceptable quality without it. This work should concentrate on the archeology of central Missouri and generally it is done prior to fieldwork. This familiarity is necessary in order to properly evaluate the cultural resources that will be found



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Mr. Louis Bykoski

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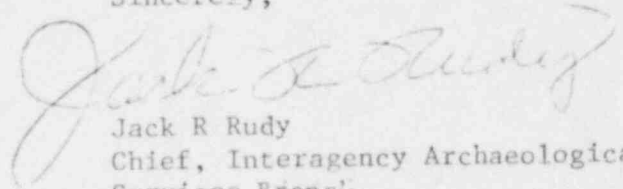
and to evaluate them as per the National Register of Historic Places. Also with a greater familiarity with the literature, the contractor will be able to pose realistic research questions.

Each state has developed a state Historic Preservation Plan that contains suggested research questions for each time period and/or culture. The consultant might find this document contains material that is of interest to him.

The Missouri Archaeological Survey could also be consulted for sites and projects in the vicinity of the United Electric Nuclear Plant project.

I hope this brief review will be of use to you. If I may be of further assistance to you, please do not hesitate to call upon me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jack R. Rudy".

Jack R Rudy
Chief, Interagency Archaeological
Services Branch