



MEMO

DATE: February 13, 2020
TO: Jill Caverly, Project Manager, US NRC
FROM: Andrew Wilkins, Archaeologist, WSP USA
SUBJECT: **Summary of Site Visit for Holtec CISF Project Cultural Resources Tribal Consultation (2043259.02), Lea County, New Mexico**

The U.S. Nuclear Regulatory Commission (US NRC) held an in-person consultation meeting and site visit on Tuesday, February 4, 2020, for the Holtec International (Holtec) Consolidated Interim Storage Facility (CISF) Project. The meeting was conducted as part of US NRC's ongoing consultation with Indian tribes pursuant to Section 106 of the National Historic Preservation Act (NHPA). This letter summarizes the visit and discussion between US NRC and tribal representatives. The meeting was held at the offices of Holtec's consultant, Center of Excellence for Hazardous Materials Management (CEHMM) in Carlsbad, New Mexico. The meeting included the following attendees from US NRC and their consultant WSP USA, Holtec and their consultant CEHMM and their archaeological consultant APAC, and the Navajo Nation Tribal Historic Preservation Office (NN THPO).

- Richard Begay, NN THPO
- Jill Caverly, US NRC
- Stacey Imboden, US NRC
- Andrew Wilkins, WSP USA
- Jeffery Pangburn, APAC
- David Hill, APAC
- Emily Wirth, CEHMM
- Matt Mathis, CEHMM
- Ed Mayer, Holtec

The group met in the main conference room of CEHMM, beginning at 9 a.m. with introductions of the attendees and a review of the agenda by Jill Caverly. Ed Mayer from Holtec provided an overview of the proposed CISF project and its design elements. Andrew Wilkins provided a summary of the tribal consultation efforts conducted by WSP USA on behalf of US NRC. This consultation summary included a review of the tribes initially contacted, and those that expressed interest in participating in the consultation process, including the Hopi Tribe, the Kiowa Tribe of Oklahoma, the Pueblo of Tesuque, and the Navajo Nation. Representatives from the Hopi, Kiowa, and Pueblo of Tesuque either were not able or declined to attend the meeting but expressed interest in continuing to receive information about the project. The Navajo Nation was the only consulting tribe in attendance at the meeting and site visit.

Mr. Wilkins then gave a summary of the three cultural resource investigations (Murrell et al. 2016; Pangburn and Therriault 2019a,b) prepared on behalf of Holtec for the proposed CISF project. Multiple investigations occurred because the project design was altered after the initial study, resulting in the need to survey new areas. [REDACTED]

[REDACTED]

Site LA 187010 was recorded as including one feature— [REDACTED]

[REDACTED]

Jeffery Pangburn of APAC, Holtec’s archaeological consultant, then contributed his findings from the two more recent surveys he directed and the current state of Site LA 187010 as he has observed it in the field. [REDACTED]

[REDACTED]

The group then drove to the project site, approximately 32 miles east of Carlsbad, to inspect the condition and location of Site LA 187010. Upon arriving at the parking area, a safety briefing was held and included input from Mr. Wilkins and Mr. Pangburn, largely covering potentially hazardous plants, animals, and walking terrain. [REDACTED]

[REDACTED]

[REDACTED]

The group returned to the CEHMM offices in Carlsbad for lunch, followed by a discussion of the site and future tasks. Mr. Wilkins summarized that he would recommend that the US NRC determine Site LA 187010 to be not eligible for the NRHP, and Mr. Begay noted that NN THPO had no objection with that determination. Mr. Wilkins noted that currently the US NRC was only in receipt of cultural resource investigations that recommended the site as potentially eligible, and that US NRC would request Holtec to provide a small cultural resource investigation limited only to Site LA 187010, documenting its current condition and conducting no more than a single shovel test pit within the feature to directly assess subsurface potential and the presence or absence of datable material. Should the results be negative with no additional artifacts or datable materials identified, Holtec will provide US NRC with documentation of the investigations including a negative report form that will permit US NRC to support a determination of not eligible. All parties agreed to this approach, and the meeting was concluded.

cc: Richard Begay
Project File (2043259.02)

REFERENCES

- Murrell, Monica L., Timothy M. Mills, Carrie J. Gregory, and David T. Unruh
2016 *A Cultural Resource Inventory of the Holtec International Proposed Consolidated Interim Storage Facility (CISF) Project Area, Lea County, New Mexico*. Prepared for Tetra Tech, Inc. by Statistical Research, Inc., Albuquerque, New Mexico.
- Pangburn, Jeffrey, and Stacey Therriault
2019a *The Proposed Holtec Railroad Spur, Fence Line, and Access Road Right-of-Ways Located in Sections 13, 19, 20, 21, 22, 23, 24 in T 20 S R 32 E; and Section 19 in T 20 S R 33 E, Lea County, New Mexico*. Prepared for The Center of Excellence for Hazardous Materials Management representing Holtec International by APAC, Carlsbad, New Mexico.
- 2019b *The Proposed Extension to the Holtec Site named HI-STORE a Consolidated Interim Storage Facility (CISF) for Spent Nuclear Fuel in Lea County, New Mexico*. Prepared for The Center of Excellence for Hazardous Materials Management representing Holtec International by APAC, Carlsbad, New Mexico.