

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

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ASSISTANT COUNSEL

April 4, 1983

Mr. A. Schwencer, Chief  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Docket No. 50-352  
50-353

SUBJECT: Limerick Generating Station Units 1 and 2  
Request for Additional Information

REFERENCE: 1. Letter, A. Schwencer to E. G. Bauer, Jr.  
Dated: November 8, 1982  
2. Letter, E. G. Bradley to A. Schwencer,  
Dated: February 25, 1983

Dear Mr. Schwencer:

Question 310.10 (revised) submitted with your November 8, 1982 letter (Reference 1) requested copies of correspondence with the State Historic Preservation Officer. Copies of the following correspondence were provided to you in a February 25, 1983 letter from E. J. Bradley.

1. Brenda Barrett to George N. DeCowsky, dated January 26, 1982
2. Greg Ramsey to Philadelphia Electric Company, dated September 3, 1982
3. George N. DeCowsky to Greg Ramsey, dated September 17, 1982
4. Greg Ramsey to Harry Bechtel, dated September 27, 1982
5. Greg Ramsey to George N. DeCowsky, dated November 16, 1982
6. Donald S. Frieman to Greg Ramsey, dated December 1, 1982
7. Greg Ramsey to Donald S. Frieman, dated December 8, 1982

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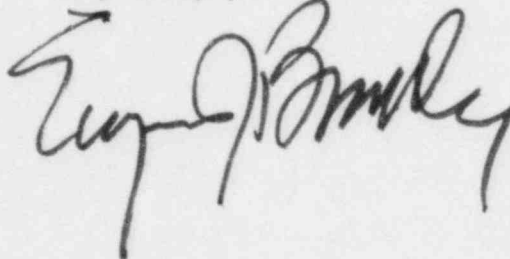
Since then, we have received the following correspondence (5 copies attached):

1. Greg Ramsey to John Milner Associates, dated February 7, 1983
2. Donald S. Frieman to Greg Ramsey, dated February 16, 1983
3. Donald S. Frieman to Greg Ramsey, dated February 22, 1983
4. Donna Williams to Donald S. Frieman, dated March 21, 1983
5. John Milner Associates to Donna Williams, dated March 30, 1983, transmitting the following report which addresses the concerns cited in the above correspondence.

"Norristown Design Changes and Chester County Potential Visual Effect Evaluation, A Report Supplementary to: An Investigation of Potential Visual Effects Upon Previously Recorded Historic Sites in the Vicinity of Proposed Limerick Transmission Lines, Montgomery and Chester Counties, Pennsylvania" by John Milner Associates, Inc. dated March, 1983. (The original Milner Historic Site Report, dated 1982, is also attached.)

The answer to Question 310.10 will be revised to convey the above information in the April, 1983 revision of the EROL.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Eugene J. Bradley". The signature is fluid and cursive, with a large initial "E" and "B".

Enclosures

cc: See attached Service List

cc: Judge Lawrence Brenner (w/o enclosure)  
Judge Richard F. Cole (w/o enclosure)  
Judge Peter A. Morris (w/o enclosure)  
Troy B. Conner, Jr., Esq. (w/o enclosure)  
Ann P. Hodgdon (w/o enclosure)  
Mr. Frank R. Romano (w/o enclosure)  
Mr. Robert L. Anthony (w/o enclosure)  
Mr. Marvin I. Lewis (w/o enclosure)  
Judith A. Dorsey, Esq. (w/o enclosure)  
Charles W. Elliott, Esq. (w/o enclosure)  
Mr. Alan J. Nogee (w/o enclosure)  
Robert W. Adler, Esq. (w/o enclosure)  
Mr. Thomas Gerusky (w/o enclosure)  
Director, Pennsylvania Emergency Management Agency (w/o enclosure)  
Mr. Steven P. Hershey (w/o enclosure)  
James M. Neill, Esq. (w/o enclosure)  
Donald S. Bronstein, Esq. (w/o enclosure)  
Mr. Joseph H. White, III (w/o enclosure)  
Walter W. Cohen, Esq. (w/o enclosure)  
Robert J. Sugarman, Esq. (w/o enclosure)  
Rodney D. Johnson (w/o enclosure)  
Atomic Safety and Licensing Appeal Board (w/o enclosure)  
Atomic Safety and Licensing Board Panel (w/o enclosure)  
Docket and Service Section (w/o enclosure)



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Philadelphia Electric Co.  
Transmission Lines associated with  
Limerick Generating Station  
February 7, 1983  
ER82 042M 0047 (cont.)

In our opinion it is imperative that these significant omissions be corrected and that the analysis of the effects of this project be extended as well to evaluate effects on these sites.

We look forward to meeting you in the near future to discuss your further analysis of effects on sites in Montgomery and Chester County.

Sincerely,

A handwritten signature in dark ink, appearing to read "Greg Ramsey". The signature is fluid and cursive, with the first name "Greg" and last name "Ramsey" clearly distinguishable.

Greg Ramsey, Chief  
Division of Planning and Protection  
Bureau for Historic Preservation  
(717) 783-8947

GR:sk  
cc: D.C. Frieman✓  
PUC



PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

REAL ESTATE DIVISION

(215) 841-4000

February 16, 1983

Mr. Greg Ramsey, Chief  
Division of Planning & Protection  
Bureau for Historic Preservation  
William Penn Memorial Museum and  
Archives Building  
Box 1026  
Harrisburg, Pennsylvania 17120

File No. PE 9150

Dear Mr. Ramsey:

I have your letter of February 7, 1983 addressed to Mr. Milner of John Milner Associates with respect to our proposed transmission lines associated with Limerick generation.

We are aware that Mr. and Mrs. Richard M. Heess of East Vincent Township, Chester County have submitted their property for placement on the State or National Register. Steps have already been taken to minimize any visual effect our new line may have on the property. In discussion with Mr. and Mrs. Heess, we have agreed to change the location of a pole. It will be moved to the property line and to the other side of the railroad tracks away from the dwelling. Also, to mitigate the possible visual effect on the property other facilities owned by this Company that will be crossed by the proposed transmission line will be lowered so the new line will present a lower profile. And lastly, on this property we have agreed in a letter to Mr. and Mrs. Heess to add plantings to the existing screening around the dwelling.

May I also point out that the dwelling will not be physically affected by our proposed line. This has been discussed in meetings with Mr. and Mrs. Heess and this Company's engineers.

Historic sites on plans attached to our Petition submitted to the Public Utility Commission in December of 1981 were gathered from various sources. One of the sources was Mrs. Estelle Gremers, who I believe was involved in the Chester County survey. We met with Mrs. Gremers in the Spring of 1981 and to the best of our knowledge the Parkerford and Heess sites were not mentioned.

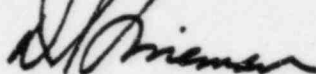
Mr. Greg Ramsey

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February 16, 1983

We are prepared together with John Milner Associates to discuss any aspects of the proposed transmission lines at your convenience.

Very truly yours,



D. S. Frieman  
Manager

HMS:jfg

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

REAL ESTATE DIVISION

February 22, 1983

Mr. Greg Ramsey, Chief  
Division of Planning and Protection  
Bureau for Historic Preservation  
William Penn Memorial Museum and Archives Building  
Box 1026  
Harrisburg, Pennsylvania 17120

SUBJECT: Archaeological Survey, Transmission Lines Associated  
with Limerick Generating Station

Dear Mr. Ramsey:

In a letter to you dated December 1, 1982, we outlined to you a program designed to adequately consider those prehistoric cultural resources within the area of concern. This letter is to make you aware of the results of the archaeological survey to date, and to inform you of the results of discussions with Mr. Kurt Carr, P.H.M.C., on February 2 and 3, 1983, at which time mutually agreeable mitigative measures were determined regarding three sites deemed to be potentially significant. An outline of these meetings and the mitigative measures agreed upon follows:

- A. First meeting was held on Wednesday, February 2, 1983. Those present were Mr. Carr and P. Jehle of the P.H.M.C., D. Roberts and K. Zatz of John Milner Associates, West Chester, Pennsylvania. Representing Philadelphia Electric Company were P. Cava, T. Milone and W. Payne.

Mr. Roberts first reviewed the results of the survey to date, stating that 23 new sites have been uncovered, virtually all of which are ephemeral, upland sites, and do not appear to have significance. The phase two survey was performed on all sites for which sufficient data was not available following the phase one survey. Mr. Carr was satisfied that proper procedures had been followed throughout the survey. An offer was made, and accepted, to have Mr. Carr review the artifacts and data associated with these sites the following day at the offices of John Milner Associates in West Chester, Pennsylvania.

Three sites which are of concern were then discussed. The first of these sites, 36 CH 103, is directly across the Schuylkill River from Limerick Nuclear Generating Station and will be impacted by one of the transmission lines to be constructed. This site stretches for



thousands of feet along the river bank and cannot be avoided during this project. As this site has yielded thousands of artifacts dating from approximately 7000 B.C. to the period just before the coming of the Europeans, and as several features have been uncovered in the process of limited excavations conducted in the past, mitigative measures have been discussed at length in order to determine what measures PE CO may take to minimize impact upon the site. Mitigative measures decided upon, and accepted by Mr. Carr, are as follows:

1. Approximately 1100 feet of new construction is involved with a single structure falling within the site. An existing stone access road leads to within approximately 200 feet of this proposed structure. From this point to the structure a new access road must be constructed. Top soil along the proposed access road will be carefully stripped with a gradeall and a thorough search made for subsurface features. Should any features be found during this process they will be excavated, unless they should be excessive in number, in which case a representative sample will be excavated. The same procedure will be carried out in the area immediately surrounding the proposed structure site.
2. As mentioned above, approximately 1100 feet of new right of way affect the site. Impact will be avoided on all but the new structure location by utilizing a helicopter to fly in the lead lines for pulling cable. This will avoid the necessity of using heavy equipment along the 1100 feet of right of way. Only the structure location, and the 200 feet of new access road, will have an impact on the site.

The second area of concern lies on the east bank of the Schuylkill River Directly across from our Cromby Generating Station. It has been impossible to do any but minimal archaeological work in this area due to the presence of raw sewage spread upon the surface of the ground covering approximately 2800 feet of right of way. Although it has been possible to do only minimal survey work in this area, existing collections indicate that a broad range of projectile points, as well as pottery, have been found at one or more sites within this 2800 foot strip. It was proposed to Mr. Carr, and accepted, that a strip approximately 20 feet wide would be plowed, following the route of the proposed access road. A controlled surface search would then be conducted along the plowed strip. Should any areas of artifact concentration be uncovered, mitigative measures would be followed within those areas. These mitigative measures would be the same as those proposed for 36 CH 103.

The third area of concern lies on the east bank of Skippack Creek along our proposed Cromby-North Wales Line. Sites of high potential lie on both sides of the proposed transmission line at this location. Findings within the right of way, however, have been minimal with the exception of a small area just east of Skippack Creek. This is a flood plane area lying only 3 to 4 feet above the elevation of the existing creek. No surface finds were found in this area, however, a test pit uncovered a large number of water worn pottery sherds lying within a lens of darker soil approximately 6 inches in thickness and approximately 18 inches below the surface of the ground. No other artifacts were found. No artifacts were found in nearby test pits either, nor was the dark band of soil. Mr. Carr reserved judgment on this location until he could personally view the site in the field the following day.

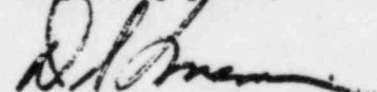
Discussion was held regarding the two lines to be built along the existing railroad rights of way between Limerick and Cromby. Mr. Carr stated that with the exception of 36 CH 103 and the site across from Cromby Generating Station on which raw sewage has been spread, these lines were clear for construction so long as structure locations and heavy equipment were limited to the ballast area, railroad access roads and other heavily disturbed areas. Philadelphia Electric Company has agreed to restrict contractors to these areas.

- B. On February 3, 1983, following a field inspection of the Skippack Creek site, Mr. Carr met with D. Roberts, K. Zatz in the offices of John Milner Associates, West Chester, Pennsylvania. W. Payne of this office was not present due to illness. The subject site was discussed in detail. Mr. Carr felt that the dark lens of soil was probably the only vestige remaining of a prehistoric living surface, the remainder of which had probably washed away during a flood in the past. It was agreed that the test pit, in which the pottery sherds and dark lens of soil had been discovered, would be expanded in an attempt to define the limits of the dark band of soil, and hopefully to locate diagnostic artifacts which might be associated with the pottery. Philadelphia Electric Company has agreed to the above.

Mr. Carr reviewed the artifacts and data relative to the 23 new sites uncovered, and agreed that to date mitigative measures were necessary only on the three sites discussed above.

We greatly appreciate the quick responses and close cooperation afforded by you and Mr. Carr, and look forward to working closely with you in the future.

Very truly yours,



D. S. Frieman  
Manager

WCP:lb

cc: B. Kent	D. Zolatz
K. Carr	G. Paradis
H. Schenk	G. Gornish
P. Cava	W. C. Payne
✓ T. Milone	G. De Cowsky



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION  
WILLIAM PENN MEMORIAL MUSEUM, 13 ARCH VES BUILDING  
BOX 1026  
HARRISBURG, PENNSYLVANIA 17120

March 21, 1983

Mr. D. S. Frieman, Manager  
Philadelphia Electric Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, Pennsylvania 19101

Re: File No. ER 82-042M-0047

Dear Mr. Frieman:

Thank you for your letter of February 16 regarding mitigation of possible adverse effects by the transmission lines on Mr. Heess' property in East Vincent Township. We appreciate your efforts on behalf of this property, however, we want to reiterate our concern about negative visual impacts of the line on 49 other sites discussed in John Milner's report (see November 16 letter to G. N. DeCowsky, copy enclosed).

We are still waiting to hear from you concerning ways to avoid or mitigate those visual effects. Because of the Nuclear Regulatory's responsibility for licensing the Limerick Station, some resolution will have to be reached under the Advisory Council on Historic Preservation regulations before the licensing can proceed.

We would be happy to review material you could submit or meet to discuss the issues involved. Please call if you have questions.

Sincerely,

*Donna Williams*

Donna Williams, Chief  
Division of Planning & Protection  
Bureau for Historic Preservation  
(717) 783-8947

cc: Brian Richter, NRC

Enclosure

DW:jk

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MAR 25 1983		
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DATE	TITLE	NAME
C.M.F.		FILE

JOHN MILNER ASSOCIATES

309 north matlack street, west chester, pennsylvania 19380 • telephone 215-436-9000

March 30, 1983

Ms. Donna Williams, Chief  
Division of Planning and Protection  
Bureau for Historic Preservation  
Box 1026  
Harrisburg, PA 17120

Re: Philadelphia Electric Company, Limerick Transmission Lines,  
Potential Visual Effects

Dear Ms. Williams:

Enclosed for your review is a supplementary report concerning the above-referenced project. It addresses questions raised by Greg Ramsey's letter of February 7, 1983, which indicated the principal remaining concern was potential visual effects to Parker's Ford, the Heess property, and other sites included in the Chester County survey. In addition to these concerns, the enclosed report discusses design changes made on the Cromby-Plymouth Meeting line in Norristown which will eliminate adverse visual changes to sixteen historic sites.

I would like to reiterate some background information about the project. First, I feel it is important to note that PE is making a concerted effort to protect historic and archeological sites from adverse effects resulting from the proposed power lines. Regarding the historic sites, PE did not hesitate to undertake the additional work encompassed in the enclosed report. In addition, PE, in consultation with Mr. and Mrs. Heess, arrived at mitigative measures for that property prior to Mr. Ramsey's comments. Regarding archeological sites, PE is undertaking a major program of survey, testing, and mitigation and is cooperating fully with Mr. Kurt Carr. Two PE employees are devoting much of their time in the furtherance of these projects. Mr. Harvey M. Schenk is assisting with the historic sites and, in addition to providing technical information, Mr. Schenk has worked with PE's engineers to develop the mitigation measures presented in the enclosed report. Mr. Walter Payne, a knowledgeable and conscientious avocational archeologist, has taken an active role in data collection and in coordinating the archeological program with PE engineers and with landowners. The contributions made by these individuals evidences PE's good faith effort to protect the archeological and historic sites.

ARCHITECTS • ARCHEOLOGISTS • PLANNERS

restoration • adaptive reuse • prehistoric & historic archeology • historical & architectural research • planning



Donna Williams, Chief  
Div. of Planning and Protection  
Bureau for Historic Preservation  
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I would like also to provide additional information about the methods and results of John Milner Associates, Inc. 1982 report (Struthers and Zatz 1982). In order to identify areas of potential adverse effects, that investigation identified anticipated view shed changes and evaluated them as either positive or negative. In contrast, the enclosed report emphasizes net visual effects by considering current viewing current viewing conditions as well as changes expected to result from the proposed transmission lines. In addition to positive or negative, this approach includes an evaluation category of "negligible" to account for instances in which the expected change is insignificant. I feel this approach allows a more comprehensive and realistic evaluation of potential adverse effects, and would like to apply it to the sites previously evaluated in term of only postive or negative changes. The following discussion is organized by proposed transmission lines:

1. Limerick-Cromby

Sites potentially affected by the proposed Limerick-Cromby lines include those discussed in the enclosed report, and the Coch Home in Limerick Township, Montgomery County. The current view shed of this property is dominated by the Limerick cooling towers and existing transmission lines. When evaluated as strictly positive or negative, the change anticipated from the proposed line was considered negative due to the presence of additional visual intrusions (Struthers and Zatz 1982:11). However, when the anticipated change is evaluated with regard to current elements of the view shed, the net visual effects of the proposed facilities are expected to be negligible due to the low visibility of the proposed transmission facilities and the overriding visual dominance of the existing cooling towers and transmission lines.

2. Cromby-Plymouth Meeting

As discussed in the enclosed report, design changes are expected to eliminate adverse visual effects to the sixteen historic sites in Norristown which would have been affected by extensions to existing railroad catenary structures. The remainder of the



Donna Williams, Chief  
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route currently contains lattice structures which are to be replaced by lower, less obtrusive, pole structures. They may be visible from sites 91, 104, 151, and 154 (Struthers and Zatz 1982:Table 2.2). Site 91 is approximately 2,700 feet from the proposed line and is separated from it by a railroad switch yard, an artificial impounding basin, and other negative viewing elements. Similarly, site 151 is further removed from the proposed line and has a view shed towards it which includes multiple railroad tracks, the Barbadoes Island generating and substation facilities, and additional industrial development. Site 154 lies almost two miles from the proposed line and overlooks the entire valley including the aforementioned negative viewing elements. Due to their distance from the proposed line, the currently negative view shed qualities, and the minimal visual change expected from the replacement of lattice structures with pole structures, these three sites are not expected to be adversely affected by the proposed transmission line. Site 104 shares the negative viewing elements, and as a cemetery, it is probably not eligible for the National Register. Accordingly, it is not subject to effects as defined in 36CFR800.

### 3. Cromby-North Wales

The proposed Cromby-North Wales line will be supported by tubular structures within a right-of-way which currently contains lattice structures. Under the approach which allowed only a positive or negative evaluation, the determination was negative due to the increased density of lines within the right-of-way (Struthers and Zatz 1982:12). Under the current approach, however, the evaluation is negligible because of the minimal change which will actually occur to the view sheds of the historic sites.

### 4. Limerick-Whitpain

The Limerick-Whitpain proposal calls for new lattice structures to be placed adjacent to extant structures of the same type within the right-of-way. As with the Cromby-North Wales line, the original evaluation was negative due to the increased density of lines (Struthers and Zatz 1982:12). When the existing viewing conditions and the symmetrical placement of proposed structures

Donna Williams, Chief  
Div. of Planning and Protection  
Bureau of Historic Preservation  
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are considered, the changes in the view sheds are more appropriately evaluated as negligible.

To summarize, minor changes in the view sheds of historic sites may result from the proposed Cromby-Plymouth Meeting, Cromby-North Wales, and Limerick-Whitpain lines. However, when these changes are considered in relation to current viewing conditions, including existing transmission lines, industrial development, and other negative elements, the changes are insignificant. Accordingly, the sites are not expected to be visually affected by the proposed lines. The Limerick-Cromby line will produce visual intrusions to the historic sites listed in Table 3 of the enclosed report. However, these intrusions can be successfully mitigated as discussed in pages 13 through 16 of the enclosed report. Accordingly, the Limerick-Cromby line is expected to have no adverse effect on the historic sites. mitigated as discussed in pages 13 through 16 of the enclosed report. Accordingly, the Limerick-Cromby line is expected to have no adverse effect on the historic sites.

I trust the above discussion and the enclosed report provide sufficient information to resolve all remaining areas of concern. Please call or write if you have questions regarding any aspect of the project. We would be happy to meet with you in Harrisburg or on-site to further discuss the project. As I mentioned on the phone, PE is anxious to satisfy NRC Operating License and PUC siting requirements as soon as possible. It would be most unfortunate if PE faced serious project delays despite their efforts to protect the area's cultural resources. Thank you for your assistance in seeing the project to a conclusion satisfactory to all parties concerned.

Sincerely,

JOHN MILNER ASSOCIATES, INC.

*Thomas L. Struthers*  
Thomas L. Struthers  
Project Manager  
TLS/pjm  
Enclosures

Donna Williams, Chief  
Div. of Planning and Protection  
Bureau of Historic Preservation  
March 30, 1983  
Page 5

References Cited:

Struthers, Thomas L. and Karyn L. Zatz

- 1982      An Investigation of Potential Visual Effects Upon  
Previously Recorded Historic Sites in the Vicinity  
of Proposed Limerick Transmission Lines, Montgomery  
and Chester Counties, Pennsylvania. Report sub-  
mitted to Philadelphia Electric Company by John  
Milner Associates, Inc.