

ULNRC-2566

ATTACHMENT 4

FACILITY OPERATING LICENSE NPF 30

APPENDIX B PAGE MARK-UPS

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CALLAWAY PLANT  
UNIT 1

ENVIRONMENTAL PROTECTION PLAN  
(NON-RADIOLOGICAL)

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## 2.0 Environmental Protection Issues

In the FES-OL dated January, 1982, the staff considered the environmental impacts associated with the operation of Callaway Plant. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

### 2.1 Aquatic Issues

No specific aquatic issues were raised by the staff in the FES-OL.

### 2.2 Terrestrial Issues

The specific terrestrial issue raised by the staff in the FES-OL is the need to undertake a limited-term terrestrial monitoring program by means of infrared aerial photography with accompanying ground truth aimed at monitoring the impact of cooling tower drift on the local flora. (FES-OL: Section 5.5.1.6)

### 2.3 ~~Cultural Resources~~

~~There is a need to protect the cultural resources sites which are located in the area of potential environmental impact related to the operation and maintenance of the plant and associated facilities, and which have also been identified in the survey as potentially eligible for the National Register of Historic Places. NRC requirements with regard to the cultural resources are specified in Subsection 4.3 of this environmental protection plan.~~

#### 4.3 Cultural Resources

- A. On June 3, 1983, the NRC received two reports related to the cultural resources survey of the Callaway site. The reports are entitled, "A Phase 1 Cultural Resources Survey and Assessment on Residual Lands at Union Electric Company's Callaway Nuclear Power Plant, Callaway County, Missouri, April, 1983," and "A Cultural Resources Management Plan for Residual Lands at Union Electric Company, Callaway Nuclear Power Plant, Callaway County, Missouri." The reports were prepared by American Resources Group, Ltd. and identified three cultural resource sites which are potentially eligible for the National Register and are located in the area of potential environmental impact related to the operation and maintenance of the plant and associated facilities.

The NRC requires the licensee to provide the NRC with information necessary to initiate a determination of eligibility request for sites 23CY20, 23CY352 and 23CY359. The licensee will prepare such information in consultation with the State Historic Preservation Officer (SHPO) and will obtain from the SHPO an opinion regarding the potential eligibility of the three sites for inclusion in the National Register of Historic Places.

Upon receipt and review of the information, the NRC will forward the materials to the Keeper of the National Register for action. If the Keeper rules the sites are not eligible, the finding will be filed and this section of the EPP is fully satisfied with no further action required.

If the Keeper rules that any of the sites are eligible for the National Register, the NRC requires the licensee to provide the NRC with information necessary to complete a determination of effect which the operation and maintenance activities may have on the eligible sites. The licensee will follow the steps outlined in 36 CFR 800.4 and 36 CFR 800.3 in developing the information. Upon receipt of the information, the NRC, in consultation with the SHPO, will complete the determination of effect process. If the determination results in a no effect finding as provided in 36 CFR 800.4b, 1, the documentation will be filed and this section of the EPP is fully satisfied with no further action required.

If the determination results in an effect finding, this conclusion will be supported by an analysis and adequate documentation. An appropriate action program, which the licensee has developed in consultation with the SHPO and concurred in by the SHPO, should be included in the materials provided to the NRC. Upon review of the program, the NRC will forward the documentation to the Advisory Council on Historic Preservation (ACHP) for comment.

After ACHP comment is received by the NRC, the program will be revised, if necessary, to incorporate comments received. The licensee shall then proceed, in consultation with the SHPO, to implement the program. Upon completion of the program, a report shall be submitted to the NRC which will include a description of the results of the program and the disposition of data recovered (if applicable). Upon submittal of this report and acceptance by NRC, this section of the EPP is fully satisfied with no further action required.

- B. The NRC will provide the Interagency Archeological Service (IAS) of the U. S. Department of Interior the two reports (survey and management plan) identified in Item A of this EPP and the review comments of the Missouri State Historic Preservation Office and the licensee's responses to the comments.

The IAS will be requested to review the information and present the NRC with an opinion as to the findings and the proposed course of action. If the NRC is advised by IAS that there are additional sites within the area of potential environmental impact related to the operation and maintenance of the plant and associated facilities which are potentially eligible for the National Register of Historic Places, the licensee will be required to furnish information for such sites as outlined in Item A of this section of the EPP.