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Vogle Project

October 22, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. Elinor G. Adensam, Chief
Licensing Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

File: X7T02.6
Log: GN-721

NRC DOCKET NUMBERS 50-424 AND 50-425
CONSTRUCTION PERMIT NUMBERS CPPR-108 AND CPPR-109
VOGTLÉ ELECTRIC GENERATING PLANT - UNITS 1 AND 2
INFORMATION CONCERNING ARCHAEOLOGICAL AND HISTORICAL
RESOURCES EXEMPT FROM PUBLIC DISCLOSURE

Dear Mr. Denton:

By D. O. Foster's letter of August 3, 1984 (File X7T02.6, Log: GN-400), Georgia Power Company provided consultant's reports and Cultural Resource Management Plans (CRM) delineating historical and archaeological properties along certain transmission line rights-of-way associated with the Vogle project. As noted in that letter, additional reports and CRM plans were being developed and would be submitted as they became available.

Enclosed are 10 copies of the Consultant's reports and submittal letters to the Historic Preservation Section (HPS) for the Vogle-Scherer Transmission Line. These reports include the: Resource Inventory and Assessment Studies (Resource Inventory I and II), Tentative Resource Treatment Plan, Resource Evaluation and Data Recovery Planning final report on properties GP-BL-01 and GP-JO-05. Also included is the HPS's review of this last report.

This information is being provided with the understanding that it will not be subject to public disclosure. Withholding this information from public disclosure is necessary to protect these resources and ensure their preservation. The basis for withholding from public disclosure were stated in D. O. Foster's letter of August 3, 1984.

Additional reports and CRM plans are being developed for submittal to the HPS for the transmission lines associated with the Vogle Electric Generating Plant. Such reports will be submitted to you under the same conditions noted herein as they become available.

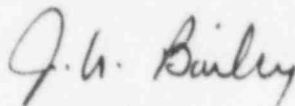
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Director of Nuclear Reactor Regulation
October 22, 1985
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If you have any questions concerning the enclosed information please contact us.

Yours very truly,



J. A. Bailey

JAB/DHW/sro
Enclosures

cc w/o enclosures:

- D. O. Foster
- M. A. Miller
- B. A. Jones
- G. Bockhold, Jr.
- B. W. Churchill, Esquire
- L. T. Gucwa
- J. E. Joiner, Esquire
- R. A. Thomas
- W. C. Ramsey
- L. Fowler
- T. Johnson
- D. C. Teper
- Vogtle Project File

Georgia Power Company
280 Peachtree Street
Atlanta, Georgia 30303
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Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

Ronald C. Kester
Vice President-Land



Georgia Power

the southern electric system

August 21, 1985

FILE NO. 10-38

SUBJECT: PLANT VOGTLE PROJECT

RE: CRM/VOGTLE-SCHERER TRANSMISSION LINE
WALLACE DAM-PLANT SCHERER SECTION
GP-BL-01 AND GP-JO-05

Dr. Elizabeth A. Lyon, Chief
Historic Preservation Section
Department of Natural Resources
Historic Preservation Section
270 Washington Street, S. W., Room 704
Atlanta, Georgia 30334

Attention: Mr. Joe McCannon
Environmental Review Coordinator

Dear Dr. Lyon:

In accordance with the Tentative Resource Treatment Plan (tentative plan) for cultural resources on the captioned project, Effects Negation-Stage 1 studies have been undertaken for the two properties captioned above, by the firm of Garrow & Associates, Incorporated. A copy of their final report is enclosed for your review and comment. Our views regarding these studies and our intentions with regard to resource management strategies for each of the above-captioned properties are discussed below.

GP-BL-01

In accordance with the tentative plan, a Designated Work Area (DWA) has been established at this property for the construction of line tower # 522 (see attached map). All line construction activities will be confined within this DWA. This DWA has been established primarily in light of our discovery of an historic cemetery within the line corridor at GP-BL-01. That portion of this property lying outside of the DWA will be subject to the construction restrictions detailed in Part IV.A (avoidance alternative) of the tentative plan. Therefore, the remainder of this

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discussion relates most specifically to the DWA portion of GP-BL-01.

As discussed in the enclosed report, Garrow & Associates have recommended that additional archaeological testing studies should be undertaken in order to more fully determine if sufficient research potential exists to warrant data recovery prior to line tower construction. They propose to combine this additional testing with any warranted data recovery, in order to meet our critical scheduling requirements. All such work would be confined by Georgia Power Company to within the DWA for construction of line tower # 522.

Georgia Power Company does not concur with the recommendation by Garrow & Associates that additional archaeological testing and/or data recovery is required within the DWA. Based upon our review of the data presented in Chapter II of the enclosed report, we believe it highly improbable that intact cultural remains (in the form of occupation-related features) are present within the DWA. We base this upon the considerations that:

- (1) soil stratigraphy exhibits no "clear-cut cultural stratigraphy" and that vertical distributions of cultural materials "suggests there is poor vertical separation" of those materials (enclosed report: p. 24);
- (2) there are no "particularly striking" patterns in the horizontal distributions of cultural materials (enclosed report: p. 34);
- (3) the highest counts of artifacts recovered in testing were recovered most often in the general Level 2 soil zone, described by Garrow & Associates as a "...probable... plow zone..." (enclosed report: see Tables 1-8 and p. 19); and
- (4) no cultural features were found in the excavation of 10, two x two meter (40 square meters) units within the DWA (enclosed report: Figure 2 and pp. 17-18; see also the attached map).

It is also important to note that in all of the 11, two x two meter tests (44 square meters) excavated outside of the DWA, only five soil anomalies were encountered; that upon excavation, only two of these anomalies were identifiable as cultural features; and that no features of "definite prehistoric" origins were encountered at all (enclosed report: pp. 17-18 and p. 36). While the research questions posited by Garrow & Associates (enclosed report: p. 36) are pertinent to the study of Late Woodland prehistoric occupations of the Georgia Piedmont, addressing these

Dr. Elizabeth A. Lyon
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questions would be largely dependent upon the occurrence of intact features related to such a Late Woodland occupation at GP-BL-01. We believe that the evidence does not suggest that such features are extant inside the DWA (or probably outside), and that additional work would not reverse this finding. Therefore, at this time we are not authorizing Garrow & Associates to proceed with any work.

We are requesting a thorough review by your office of the data presented in the enclosed report. However, the scheduling of line tower construction of this critical project is such that we need to release this property (with adequate and appropriate restrictions upon construction) on or before September 16, 1985. Given this short time frame, we have determined that if it is finally determined that sufficient research potential is present within the DWA to warrant data recovery (based upon the present evidence), or if additional testing work is deemed appropriate, then we will proceed with construction of line tower # 522 under the following strategy. A wooden working platform would be constructed by hand within the DWA at this property. From this platform, would be conducted all construction activities essential to the construction of line tower # 522. The construction of foundations for this tower would not adversely affect any significant resource values. Test units C, D, E and F (see attached map) were excavated at the locations of these foundations, by Garrow & Associates, in order to confirm that no historic interments were present. No such interments were determined to be present. As noted above, no prehistoric cultural features were located in either of these four test units. The soils removed in the borings for foundation construction would be spoiled off of the working platform, outside of cultural property GP-BL-01. After completion of all line construction activities, the wooden working platform would be removed by hand and, as necessary, a cover crop of grasses planted without surface scarification, in order to maintain adequate ground cover.

GP-JO-05.

In accordance with the tentative plan, Georgia Power Company has established a Designated Work Area (DWA) for the construction of line tower # 528 at this historic archaeological property (see attached map). All line construction activities will be confined within this DWA and/or within "Area I" of this property (Garrow & Associates has recommended no data recovery in this area - see enclosed report, Figure 13 and p. 77). We are proceeding with archaeological data recovery (under the research design proposed in the enclosed report) within the DWA for the construction of line tower # 528. Included in these studies is the recommended historical

Dr. Elizabeth A. Lyon
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documentary research for property GP-JO-05 as a whole. In accordance with the tentative plan, only the DWA would be released for construction after completion of on-site, archaeological data recovery field work therein.

Georgia Power Company has considered the resources identified in the studies reported by the enclosed report, the apparent significance of those resources, and the long-term management needs of this property as a whole. It is our opinion that in-place conservation of that portion of this property lying outside of the DWA is not in the best interests of the resources represented at GP-JO-05. We believe this is so in consideration of the apparent significance of the resources, and that recovery of resources within the DWA would be essentially meaningless without at least a usable sample of the resources outside of the DWA.

Therefore, after completion of necessary line construction we would cause to be conducted, archaeological data recovery studies on that portion of GP-JO-05 lying outside of the DWA for construction of line tower # 528. Such studies would be conducted within the parameters of a research design applicable to GP-JO-05 as a whole. Further, the scope of such studies would be directed at recovering a usable sample of resources sufficient to allow the deletion of GP-JO-05 from future (post-construction) management considerations, as detailed in Part V of the tentative plan. Prior to commencing any such data recovery outside of the DWA, we will consult with your office regarding the appropriateness of the final specifics of scope for such studies. One scope of work we are considering is included in the enclosed report.

Overall, the designation of a two-phase data recovery strategy is consistent with our objectives regarding the negation of potential adverse effects, prior to both critical project construction and post-construction activities. It is therefore consistent with Part IV.B of the tentative plan.

In summary, then, we are seeking the following specific consultations at this time. In general, we seek your overall comments upon the enclosed report. Also, we seek your overall comments regarding the resource treatment alternatives we have included in this submittal. As regards GP-BL-01, we do not concur with the Garrow & Associates recommendation, and we seek your comments regarding any demonstrable research potential and/or the need for additional studies within the DWA for construction of line tower # 522. As noted above, if necessitated by scheduling constraints, we will adopt a protective strategy (wooden working platform) for work inside the DWA for construction of line tower # 522. As regards GP-JO-05, we are proceeding with data recovery

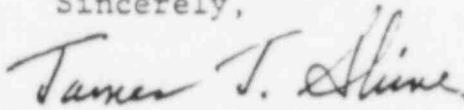
Dr. Elizabeth A. Lyon
August 21, 1985
Page Five

inside the DWA for construction of line tower # 528. We propose to conduct additional data recovery outside of this DWA, after completion of essential construction. We seek your comments regarding appropriate data recovery and this overall management strategy.

In order to meet critical construction schedules, we will need to release property GP-BL-01 (with restrictions as may be necessary) on or before September 16, 1985. As noted above, tower construction (tower # 528) will proceed within the DWA at GP-JO-05 as soon as data recovery field work within the DWA is completed. Therefore, we need to receive your written comments on these matters on or before September 6, 1985. That portion of GP-JO-05 lying outside of the DWA will not be released until we have completed the necessary consultations with your office regarding the scope of data recovery, and until necessary data recovery field work is completed. Your written comments should be addressed and sent to: James J. Shive, Senior Archaeologist, Land Department 260-2nd Floor, P. O. Box 4545, Atlanta, Georgia, 30302. We will be available at your discretion for any discussion of these matters with you or your staff.

We appreciate this opportunity to work with you in the responsible management of Georgia's nonrenewable cultural resources.

Sincerely,



James J. Shive
Senior Archaeologist

JJS:mcs

Enclosures

xc: Mr. R. C. Kester
Mr. A. L. Lightsey
Mr. R. E. Gentry
Mr. J. E. McGuffey
Mr. H. H. Ezzard
Mr. H. D. Brooks
Mr. A. L. Smith, Jr.
Mr. M. H. Thompson, Jr.
Mr. D. H. Jones
Mr. S. G. Powner
Mr. W. L. Bowers

Georgia Department of Natural Resources

270 Washington Street, S.W., Room 704, Atlanta, Georgia 30334

J. Leonard Ledbetter, Commissioner

C. B. Cothran, III, Director

Historic Preservation Section

Elizabeth A. Lyon, Chief

404/656 2840

September 13, 1985

RECEIVED
SEP 19 1985

LAND DEPT

Mr. James J. Shive
Senior Archaeologist
Land Department 260-2nd Floor
Post Office Box 4545
Atlanta, Georgia 30302

RE: Resource Evaluation and Data Recovery Planning
Plant Vogtle
Burke County, Georgia
HP 850822-003

Dear Mr. Shive:

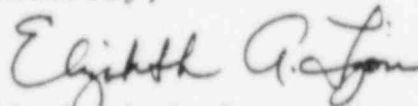
The Historic Preservation Section has reviewed the documentation in your letter of August 21, 1985 concerning the Phase II survey of GP-BL-01. Based on the information contained in this report, it is our opinion that this site is not eligible for listing in the National Register of Historic Places for the following reasons:

1. The site lacks demonstrated vertical integrity.
2. Horizontal integrity is undemonstrated for the site.
3. No potential was demonstrated for the occurrence of intact features which pertain to the Late Woodland Period, and identified as the "candidate for data recovery".

Without an eligible site, the management of this resource is the option of Georgia Power. Section 106 compliance responsibilities are considered complete as far as these sites are concerned.

If we may be of further assistance, please contact Joe McCannon, Environmental Review Coordinator, at (404) 656-2840.

Sincerely,



Elizabeth A. Lyon, Chief
Historic Preservation Section
Deputy State Historic Preservation Officer

Georgia Power Company
260 Peachtree Street
Atlanta, Georgia 30303
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

Ronald C. Kester
Vice President-Land



July 1, 1985

FILE NO. 10-38

SUBJECT: PLANT VOGTLE PROJECT

RE: CRM/VOGTLE-SCHERER TRANSMISSION LINE

Dr. Elizabeth A. Lyon, Chief
Historic Preservation Section
Department of Natural Resources
270 Washington Street, S. W. - Room 704
Atlanta, Georgia 30334

Attention: Mr. Joe McCannon
Environmental Review Coordinator

Dear Dr. Lyon:

Georgia Power Company is conducting cultural resource management planning actions for a transmission line presently under construction between the Vogtle Electric Generating Plant (Burke County, Georgia) and the Robert W. Scherer Electric Generating Plant (Monroe County, Georgia). Garrow & Associates, Inc., has completed a cultural resource inventory and assessment study for a 53.6-mile section of this line, known as the Wallace Dam to Plant Scherer Section. A copy of their final report is enclosed.

Garrow & Associates has identified thirty-three (33) cultural properties on the referenced line section which they recommend as eligible for inclusion in the National Register of Historic Places. All 33 of these properties were recommended as eligible for the National Register in consideration of their potential to contribute archaeological data important in the study of prehistory or history.

Georgia Power Company has assessed resource treatment alternatives for the 33 properties recommended by Garrow & Associates as eligible for National Register listing. A copy of a tentative resource treatment plan for these properties is also

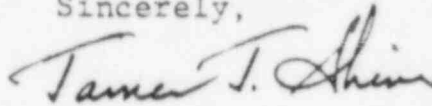
Dr. Elizabeth A. Lyon
July 1, 1985
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enclosed. This plan discusses cultural resource management planning actions taken to date, and sets out Georgia Power Company's intentions with regard to the management of the 33 properties referenced above.

Georgia Power Company solicits your review and comments upon these planning actions. Specifically, we are seeking your comments regarding the National Register eligibility of the properties recommended as eligible by Garrow & Associates, as well as the treatment measures proposed in the enclosed tentative treatment plan. Your comments should be addressed and forwarded to: James J. Shive, Senior Archaeologist, Georgia Power Company, Land Department 260/2nd, P. O. Box 4545, Atlanta, Georgia 30302. Due to the critical scheduling of construction and resource management activities on this project, we need to receive your comments on or before July 31, 1985.

We appreciate this opportunity to work with you in the management of Georgia's nonrenewable cultural resources. Please feel free to contact me if any further information is required.

Sincerely,



James J. Shive
Senior Archaeologist

JJS:mcs

Enclosures

xc: Mr. A. L. Lightsey
Mr. R. E. Gentry
Mr. J. E. McGuffey
Mr. H. D. Brooks
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Mr. A. L. Smith, Jr.
Mr. D. H. Jones
Mr. R. O. Holton
Mr. W. L. Bowers