

# Cultural Resources Management Plan for the Vogtle Electric Generating Plant 2020 Update



# Purpose and Meeting Agenda



- The purpose of the pre-submittal public meeting is to hear SNC's plan regarding a proposed licensing action to change the Vogtle, Units 1 and 2, Final Cultural Resource Management Plan (FCRM) Plan.
- The proposed licensing action is to update the resource inventory and assessment studies and the periodic management inspections of cultural properties along the transmission line corridors.

This meeting will cover the following topics:

- Background
- TS Requirements
- Proposed Changes
- Next Steps

# Vogtle Electric Generating Plant



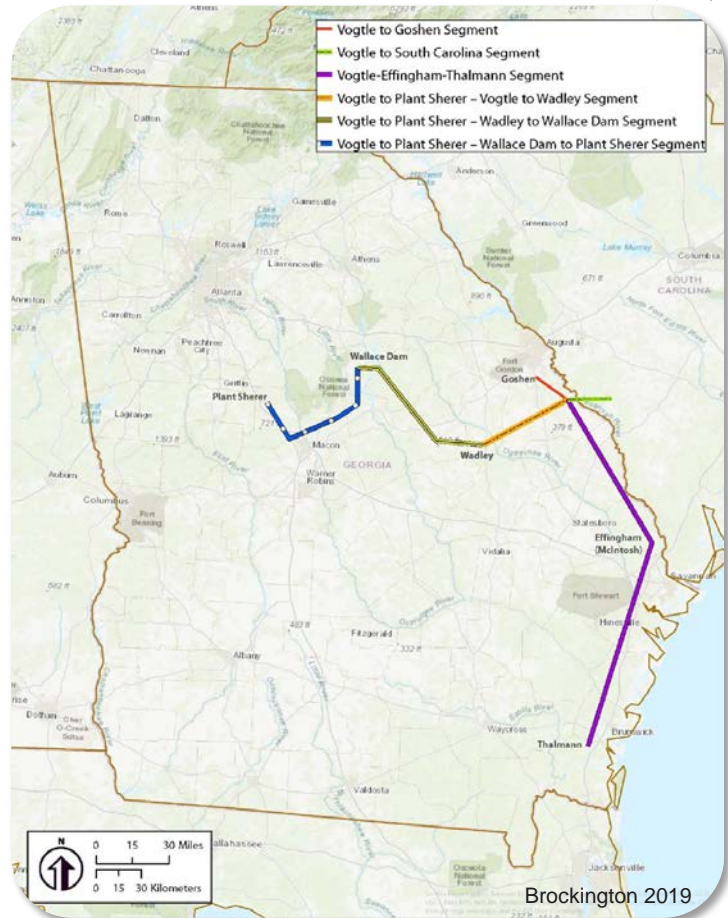
- Units 1 & 2 were commissioned in 1987 and 1989, respectively
- Operated by Southern Nuclear under a licenses issued by the Nuclear Regulatory Commission
- Cultural Resource investigations conducted on plant site and transmission lines began in 1973
- Final Environmental Impact Statement for Operation requires Cultural Resource Plans be developed



# Cultural Resources Management Plan (CRMP) for the Vogtle Electric Generating Plan (VEGP)



- Finalized in 1987
- Provides for long term protection and management of cultural resources along the:
  - Vogtle-Effingham-Thalman 500 kV
  - Vogtle-Scherer 500 kV
  - Vogtle-Goshen 230 kV
  - Vogtle-South Carolina 230 kV
- Special Requirements for the Francis Plantation



# Francis Plantation



- Constructed c. 1858
- Listed on National Register of Historic Places in 1975
- Criterion A (...associated with events that have made a significant contribution to broad patterns of our history)
- Criterion C (...embodies the distinctive characteristics of a type, period, or method of construction)
- Memorandum of Agreement in place



# Memorandum of Agreement – Francis Plantation



MEMORANDUM OF AGREEMENT

WHEREAS, the Nuclear Regulatory Commission (NRC) has issued a Construction Permit for the Alvin W. Vogtle Electric Generating Plant (VEGP) and its associated transmission lines to Georgia Power Company as agent for itself, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton Georgia; and,

WHEREAS, the NRC in consultations with the State Historic Preservation Officer (SHPO) for Georgia and Georgia Power Company has determined that the construction of one of these associated transmission lines would adversely effect the Francis Plantation, a property listed in the National Register of Historic Places by visually intruding upon the historical setting of this property and by relocating a structure located on this property; and,

WHEREAS, pursuant to the procedures of the Advisory Council for Historic Preservation (ACHP) (36 C.F.R. Part 800) the ACHP, the NRC, the SHPO for Georgia, and Georgia Power Company have consulted and reviewed the feasible and reasonable alternatives for avoiding or mitigating these adverse effects.

NOW THEREFORE:

It is mutually agreed that implementation of the planning and operational strategy identified as "Alternative IV" in a letter dated February 18, 1985, from Georgia Power Company to the SHPO for Georgia, under the stipulations detailed hereinafter, constitutes the most feasible and reasonable alternative for the mitigation of adverse effects to the Francis Plantation associated with the construction, operation and normal maintenance of the subject transmission line.

STIPULATIONS:

(1) Georgia Power Company will take the following actions to mitigate the adverse effects to the Francis Plantation due to the construction of the transmission line:

(A) Georgia Power Company will construct the transmission tower in the location described as Alternative IV to avoid the requirement of moving the domestic structure now located in the proposed transmission line right-of-way.

(B) Georgia Power Company will inform the land owner that relocation of the domestic structure now located in the transmission line corridor will not be required.

(C) Georgia Power Company will construct the transmission line tower (height 152') at the site as located in the description of Alternative IV.

(D) Georgia Power Company will top and trim by hand trees located in the proposed right-of-way in the area of the domestic structure to maintain a 25-foot conductor clearance, remove debris, and conduct in the same manner necessary side trimming of trees along the northern boundary of the transmission line corridor.

(2) Georgia Power Company will continue to utilize hand trimming and removal operations for the purposes of the normal maintenance of the subject transmission line corridor.

(3) Georgia Power Company will report annually to the SHPO for Georgia, regarding the implementation and continuation of these stipulations.

*Robert Dawson* Sept 13, 1985  
 Advisory Council on Historic Preservation Date  
 Executive Director

*L. E. King* 8/19/85  
 Nuclear Regulatory Commission Date  
 by: Elfinor G. Adensath, Chief: Licensing Branch No. 4, Division of Licensing

*Elizabeth A. Lyon* May 13, 1985  
 State Historic Preservation Officer for Georgia Date  
 by: Elizabeth A. Lyon, Deputy SHPO

*D. O. Foster* May 7, 1985  
 Georgia Power Company Date  
 by: D. O. Foster  
 Vice President and Project General Manager  
 Vogtle Project

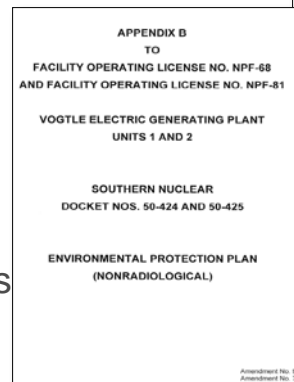
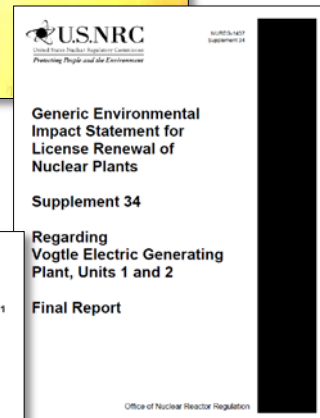
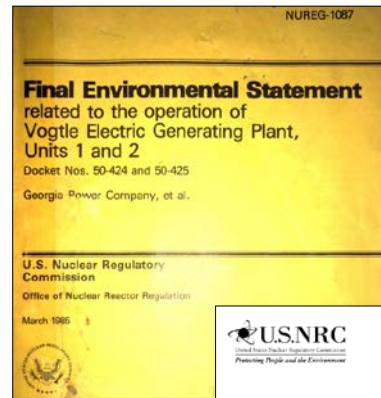
*John E. Bohn* 18 Sept. 85  
 Advisory Council on Historic Preservation Date  
 by: Chairman

- Signed in 1985 (Advisory Council On Historic Prestation (ACHP, U.S. Nuclear Regulatory Commission (NRC) State Historic Preservation Officer (SHPO) for Georgia Power Company)
- Designated alternative structure location (Alternative IV)
- Maintains vegetative buffer

# Vogtle Appendix B TSs – EPP



- **Objectives of the Environmental Protection Plan**
  - *“The Environmental Protection Plan (EPP) is to provide for protection of non-radiological environmental values during operation of the nuclear facility.”*
- **Outlines Environmental Protection Issues**
  - Identified issues that required additional study or license conditions to resolve concerns and assure adequate protection.
    - Issues related to maintenance of transmission line corridors
    - Noise levels along transmission line corridors



# Vogle Appendix B TSs – EPP



- **4.2.3.2 Francis Plantation**

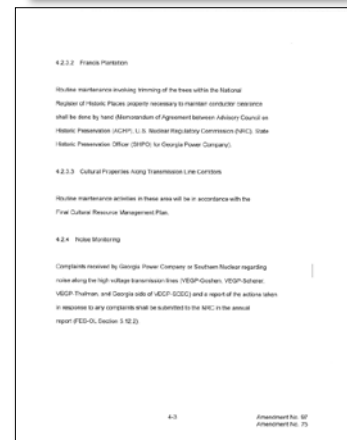
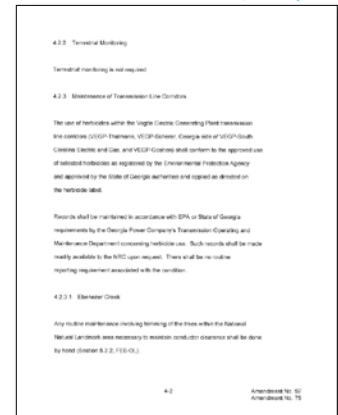
*“Routine Maintenance involving the trimming of the trees within the National Register of Historic Places property necessary to maintain conductor clearance shall be done by hand...”*

- **4.2.3.3 Cultural Properties Along Transmission Line Corridors**

*“Routine maintenance activities in these area will be in accordance with the Final Cultural Resource Management Plan.”*

- **5.3 Changes in Environmental Protection Plan**

*“Requests for changes in the [Environmental Protection Plan] EPP shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the EPP.”*





# Cultural Resources Management Plan



CULTURAL RESOURCE MANAGEMENT PLAN  
for  
OPERATION AND MAINTENANCE  
on the  
ASSOCIATED TRANSMISSION ROUTES  
VOGTLE ELECTRIC GENERATING PLANT

GEORGIA POWER COMPANY  
1987

## Resource Management: Project Planning and Construction

- Resource Inventory I
  - context, background
- Resource Inventory II
  - identification/evaluation

## Resource Management: Project Operation & Maintenance

- Replacing equipment
- Vegetation management
- Vehicle access
- Management of encroachment and permits by others
- Management of GPC development and redevelopment

# Cultural Resources Management Plan

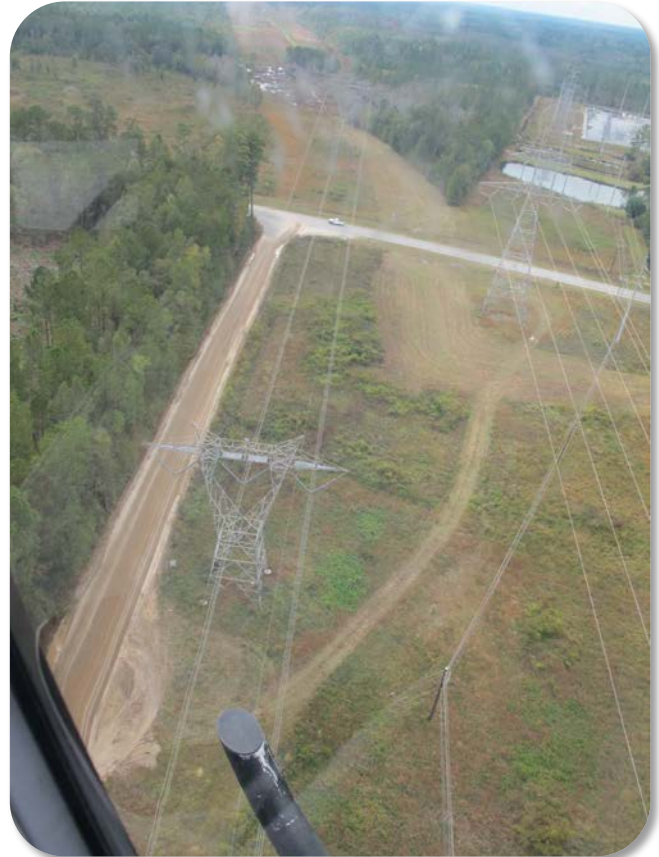


## Special Provisions: Francis Plantation Property

- Hand trimming and removal of vegetation
- Maintain 25 ft conductor clearance

## Programmatic

- Periodic management inspections
  - Currently 113 sites
  - Helicopter flyover every 3 years
  - Follow inspections as needed
- Annual Reporting
  - Submitted to the GA State Historic Preservation Office
  - Included in the Annual Environmental Operating Report



# Cultural Resources Management Plan



## Annual Reporting to SHPO

- MOA (Francis Plantation)
- CRMP (Programmatic)
- Triennial aerial inspection
- Reporting from Forestry & ROW

### VOGTLE ELECTRIC GENERATING PLANT ANNUAL CULTURAL RESOURCE SITE MONITORING

2018

Annual monitoring of the cultural resource properties in the Vogtle Transmission Line corridors is required under ENV-135, *Vogtle Electrical Generating Plant Environmental Protection Plan (EPP) Audit Procedure*. This procedure was developed in compliance with Section 5.1.1 of the Vogtle Electric Generating Project (VEGP) EPP (Appendix B of the Operating License No. NPF-6).

The Vogtle Transmission Line corridors included in this procedure are the VEGP to Scherer (VEGP to Wayley and Wayley to Scherer section), VEGP to South Carolina Electric and Gas (Georgia section), VEGP to Goshen (a Georgia Transmission Corporation corridor), and VEGP to Thalmann.

During 2018, aerial monitoring of cultural resource sites on the Vogtle Transmission Line corridors was conducted via helicopter flyover. Aerial monitoring of these sites is conducted every third year and was last completed in December 2015. The objectives of monitoring were to: 1) identify and report ground disturbing activities along transmission line corridors, 2) observe any effects to significant cultural resources within the corridors resulting from ground disturbing activities, and 3) document potential disturbances to significant cultural resources within the corridors.

As a result of the aerial monitoring, four archaeological sites and two unmarked cemeteries along

#### VOGTLE ELECTRIC GENERATING PROJECT (VEGP)

2018 CULTURAL PROPERTY DATA LIST FOR SCHERER TO VOGTLE LINE 500 KV  
[JTL-V]

PAGE 1 OF 7

#### SCHERER - WALLACE DAM SECTION

CULTURAL PROPERTY #	STRUCTURE REFERENCE	STATION NUMBER BEGIN/END	LD MAP # SHEET #	COMMENTS OR SPECIFIC RESTRICTIONS
5M0479	633634	262+86 265+36	N-303 4 OF 52	unaffected; adj. Str. 634 & 1/4 way to Map J5
5M0480	630631	349+35 350+63	N-303 6 OF 52	unaffected; from Str 626 find road; then site; very small; Map J5. Reclaim by hand only
5J054	614615	500+86 503+00	N-303 9 OF 52	unaffected; creek running through; E of Str 615 & 1/4 way; Map J5. Reclaim by hand only
5J056	612613	537+84 539+92	N-303 9 OF 52	deep creek adjacent to site; unaffected
5J059				N of Str 612; Map J5
5J064	607608	592+49 593+99	N-303 11 OF 52	adj. Str 608; some plowing and clearing around structure; Map J5. Reclaim cemetery by hand only; no mention of cemetery on site form; not identified in field; house foundations appear to be in adjacent wood off of ROW.
5J068	593A/593	785+86 793+99	N-303 14 OF 52	Minor erosion at tower; adj. Str 593A & 2/3 way to Str 593 Map J5
5J069	588/589	855+89 858+19	N-303 15 OF 52	Some erosion on road on north side of site near; unaffected ontr of ROW & twin Strs 588 & 589; Map J6
5J031	582583	935+81 943+07	N-303 17 OF 52	Some erosion; light ground cover; ontr of ROW & twin strs; Map J6

\*\*\*No vehicles or equipment allowed inside this cultural boundary

# Cultural Resources Management Plan



## Required Coordination with SHPO

- SHPO provides concurrence/comments

### ⇒ SHPO Recommendations ⇐

- ✓ Programmatic Agreement to replace MOA
- ✓ Updating CRMP
- ✓ Revising management of Francis Plantation

Georgia Department of Natural Resources  
206 Butler Street, S.E., Suite 1352, Atlanta, Georgia 30334  
G.R. Cantrell, III, Director, Parks, Recreation and Historic Sites Division  
404/656-5770

June 22, 1987

RECEIVED  
JUN 28 1987  
LAND DEPT./G.D.

James J. Shive  
Senior Archaeologist  
Georgia Power Company  
Land Department 270 / Second Floor  
P.O. Box 4546  
Atlanta, Georgia 30302

RE: Cultural Resources Management Plan--Plant Vogtle  
Burke County  
PR70604-001 (Plant Vogtle File)

Dear Mr. Charles:

Respectfully,  
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first review  
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MARK WILLIAMS  
COMMISSIONER  
March 22, 2017

Joseph Charles  
Hydro License Coordinator, Land Management  
Georgia Power  
241 Ralph McGill Boulevard, NE  
Atlanta, Georgia 30308-3374

RE: Compliance with Programmatic Agreement, Cultural Resources Management Plan  
Vogtle: Annual Cultural Resources Site Monitoring  
Statewide County, Georgia  
HP-150217-001

Dr. David Crass  
DIVISION DIRECTOR

The Historic Preservation Division (HPD) has reviewed the annual report regarding archaeological site monitoring at Vogtle Electric Generating Plant and related transmission lines. Our review of this document is in accordance with various programmatic agreements (PA), cultural resources management plans (CRMP), and other requirements for the above referenced undertaking.

HPD finds that the annual report of cultural resources site monitoring is adequate fulfillment of the PA, CRMP, and other requirement stipulations. Regarding the recommendations proposed, HPD concurs that archaeological site 9J035 is no longer eligible for listing in the National Register of Historic Places (NRHP), due to deflated soils and a lack of artifact density and diversity. Additionally, HPD concurs with Phase II testing, and the methods proposed, to determine if sites 9J029, 9J033, 9PM675, and 9R129 retain NRHP eligibility. HPD also concurs with the recommendations to refine boundaries for sites 9BK175, 9BK132, and 9PM6679, due to the discovery of artifacts outside of the original site boundaries. Furthermore, HPD concurs with the recommendation to utilize "vegetative enhancement" at sites 9J031, 9PM666, 9HL64, and 9R127/188, to prevent further erosion.

However, HPD is unable to provide comment on the conditions of sites 9SW59 and 9BK100 without additional information. Specifically, HPD requests:

1. Locations, intervals, and quantity of shovel tests
2. Soil conditions for all shovel tests throughout the right-of-way/corridor
3. Comparison to previously recorded soil conditions in the area

Due to the age of the referenced agreement documents and management plans, HPD recommends the following:

- Drafting a new PA regarding the Vogtle Electric Generating Plant and transmission lines, which should include stipulations regarding the ongoing treatment and monitoring of historic properties.
- Updating the Cultural Resources Management Plan.
- Revising agreement documents and plans for 9W629-Francis Plantation to consider evaluation of archaeological deposits.

JOHN W. CENTER FOR HISTORIC PRESERVATION  
2640 G.A. HWY 155, SW / STOCKBRIDGE, GA 30081  
770.389.7844 / FAX 770.389.7878 / WWW.GEORGIAHPO.ORG

# Cultural Resources Management Plan



## Proposed Changes

- Transition from aerial monitoring to a phased annual pedestrian inspection (e.g., 23 sites per year over a 5 year period)
- Review site significance against modern eligibility standards and historical context (SHPO recommendation)



# Cultural Resources Management Plan



## Proposed Changes

- Transition from an MOA to a PA
- Francis Plantation
  - House no longer exists
  - Outbuildings continue to deteriorate
  - Archaeological resource management



Google Images 2020

# Cultural Resources Management Plan



## What stays the same

- Maintain existing procedures for equipment and right-of-way maintenance
- Maintain encroachment and permit management processes for land use by others
- Maintain new GPC development or redevelopment requirements
- Maintain periodic management inspections
- Maintain reporting to SHPO



# Summary of Proposed Changes



## Update EPP and CRP

- Pedestrian Inspection
- Updated Review Standards for Cultural Resources
- Programmatic Agreement
- Francis Plantation Management





# Questions

## Next Steps

- Submit proposed change for the CRMP to the NRC
- Anticipated submittal 3Q2020
- Request approval in 12 months