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Joseph E. Venable Vice President, Operations Waterford 3

W3F1-2003-0043 A4.05 PR

June 6, 2003

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Subject:

Waterford 3 SES

Docket No. 50-382 License No. NPF-38

Notification of Disturbances to Waterford Plantation Workers'

Quarters Site, Area 4

## Gentlemen

The purpose of this letter is to provide notification of "significant" ground disturbing activities that have taken place on a portion of the Waterford 3 property that contains cultural resource remains from the Waterford Plantation pursuant to the Waterford 3 Cultural Resources Protection Plan. The disturbed property contains remains associated with the Waterford Plantation Workers' Quarters Site (Area 4) and has been determined to be eligible for the National Register of Historic Places.

The first disturbance occurred sometime between August 1985 and December 1985 during construction of a circular 25 foot diameter helicopter landing pad. The second disturbance occurred between August 1987 and January 1988 when improvements were made to the helicopter landing pad. These improvements included enlargement of the pad's diameter from 25 feet to 50 feet and installation of perimeter landing lights. The modifications were implemented because of potential safety concerns for helicopter landings during adverse weather conditions and night landings.

As required by the Cultural Resources Plan, an assessment of the damage/impact to the cultural resource will be conducted by a certified archaeologist. A copy of the damage assessment will be forwarded as soon as it is available.

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The Waterford 3 Cultural Resources Plan requires that the protected areas will be routinely checked as part of the station's routine environmental surveillance procedures to ensure no unauthorized activities occur which could damage the resources. Environmental surveillance methods were not adequate to monitor the cultural resource protected areas.

When it was determined that Waterford 3 was not in compliance with the Cultural Resources Protection Plan, Environmental personnel began a weekly surveillance to inspect the cultural resource protected areas on May 15, 2003. Surveillance results are documented on a log-sheet maintained by Chemistry and Environmental personnel. This interim action will continue until permanent environmental surveillance procedures and processes are established. A training seminar module was developed and presented to applicable Chemistry and Environmental personnel to indoctrinate on inspection procedures and requirements.

An additional corrective action to ensure continued protection of the resources has been entered and is being tracked in the Waterford 3 Corrective Action Program. The corrective action involves re-establishing permanent markers to identify the locations of the cultural resource areas.

Should you have questions, you may contact G. Hood at (504) 464-3267.

This letter contains one commitment as denoted on the previous page in bold, italicized text.

Very truly yours,

J.E. Venable

**Vice President Operations** 

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CC:

E.W. Merschoff, NRC Region IV N. Kalyanam, NRC-NRR

J. Smith

N.S. Reynolds

NRC Resident Inspectors Office