

July 7, 2003

Dr. Rodger E. Stroup, Director
South Carolina Department of Archives
and History
Archives and History Center
8301 Parklane Road
Columbia, SC 29223

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT, NO. 2, LICENSE RENEWAL
REVIEW AND NATIONAL HISTORIC PRESERVATION ACT, SECTION 106
REVIEW PROCESS

Dear Dr. Stroup:

The U.S. Nuclear Regulatory Commission (NRC) is evaluating an application submitted by Carolina Power and Light Company (CP&L) for the renewal of the operating license for the H.B. Robinson Steam Electric Plant, Unit 2 (RNP), located approximately 5 miles west-northwest of Hartsville, South Carolina, on the southwest shore of Lake Robinson in Darlington County. The application for renewal was submitted by CP&L on June 17, 2002, pursuant to NRC requirements of Title 10 of the *Code of Federal Regulations*, Part 54 (10 CFR Part 54). The current operating license will expire July 31, 2010. As part of its review of the proposed action, the NRC staff has prepared a site-specific draft Supplemental Environmental Impact Statement (SEIS) to its "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (GEIS), NUREG-1437. The SEIS will include analyses of relevant environmental issues, including potential impacts on historic and cultural resources from refurbishment activities, and for the extended period of operation.

The Agency official (the Director, Office of Nuclear Reactor Regulation) has determined that the area of potential effect (APE) for a license renewal action is the area at the power plant site and its immediate environs which may be impacted by post-license renewal land disturbing operation or projected refurbishment activities associated with the proposed action. The staff views the APE for the Robinson license renewal application as including the Robinson site and the immediate environs.

On May 31, 2001, CP&L sought feedback from the South Carolina State Historic Preservation Office (SHPO) regarding license renewal at RNP. In its letter, CP&L stated that there are no plans to substantially alter current operations over the license renewal period, and that no substantive disturbance of land is anticipated. On August 8, 2001, the South Carolina SHPO responded to the CP&L letter and stated, "It does not appear, based on the information provided, that any properties listed on or determined eligible for inclusion in the National Register of Historic Places will be affected. Since the license renewal does not involve new construction, archaeological sites should not be affected."

During our independent review, the NRC staff met with Mr. Chad Long of your office on September 26, 2002, to discuss the potential impacts of the proposed RNP license renewal. The staff conducted a review of several existing literature and electronic database sources, along with direct contacts with your office, the South Carolina Institute of Archaeology and Anthropology, and the Darlington County Historian. The results indicate that this undertaking will have no effect on historic properties. For your reference, we have enclosed our cultural resources narrative (Enclosure 1). We have also issued the draft SEIS for the proposed RNP license renewal action for public comment on May 5, 2003 (Enclosure 2). A copy of the draft SEIS was forwarded to Dr. Marta Matthews of your office.

Pursuant to 36 CFR 800.4, please state whether there are any changes to your August 8, 2001, determination letter to CP&L. We also request your comments regarding our preliminary determination provided above. On June 25, 2003, the NRC held two public meetings in Hartsville, South Carolina to discuss the preliminary conclusions in the draft Robinson-specific supplement to the GEIS and to accept public comments on the document. Comments must be received no later than July 30, 2003. If you have any questions or require additional information, please contact Richard Emch, the NRC Environmental Project Manager for the RNP license renewal project, at 301-415-1590 or RLE@nrc.gov.

Sincerely,

/RA/

Pao-Tsin Kuo, Program Director
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No.: 50-261

Enclosures: As stated

cc w/o encl.: See next page

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Pao-Tsin Kuo, Program Director
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Accession nos.:

1. Letter to R. Stroup w/Att. 1: **ML031950463**
2. Att. 2. CP&L Ltr. to So. Carolina SHPO: **ML021700129** (pge. 110)
3. Att. 3: So. Carolina SHPO Ltr to CP&L: **ML021700129** (pge. 113)
4. Att. 4: Ltr. from So. Carolina SHPO to CP&L; Att. 5: Ltr from US Dept. of Interior to US Atomic Energy Comm, Cvr for Att. 6: **ML031920232**; Pkg: **ML031920242**
5. Att. 6: USGS Topographic Map: **ML031920239**; Pkg: **ML031920242**
6. NUREG-1437 Draft Report for Comment: Pkg. **ML031250201**

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML031950463.wpd

*See previous concurrence

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**U.S. NUCLEAR REGULATORY COMMISSION (NRC)
OFFICE OF NUCLEAR REACTOR REGULATION
DIVISION OF REGULATORY IMPROVEMENT PROGRAMS**

**HISTORIC AND ARCHAEOLOGICAL RESOURCES REPORT NARRATIVE
H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 LICENSE RENEWAL**

June 2003

HISTORIC AND ARCHAEOLOGICAL RESOURCES REPORT NARRATIVE

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 LICENSE RENEWAL

Project Description

The U.S. Nuclear Regulatory Commission (NRC) licenses the operation of domestic nuclear power plants in accordance with the Atomic Energy Act of 1954, as amended, and NRC implementing regulations. The proposed Federal action is the renewal of the Operating License (OL) for the H.B. Robinson Steam Electric Plant, Unit No. 2 (RNP) for an additional 20 years. The current OL will expire July 31, 2010. RNP, owned by Carolina Power and Light (CP&L), is located in northeastern South Carolina, approximately 8 km (5 mi) west-northwest of Hartsville, South Carolina (Attachment 1, see maps [Figures 2-1 through 2-3] in enclosed DSEIS). It is located on the shore of Lake Robinson in Darlington County.

This report presents the findings of the Section 106 review conducted to establish whether any historic properties will be affected by the proposed license renewal of RNP.

Area of Potential Effect

RNP is located in Darlington County, South Carolina. It is situated on the southwest shore of Lake Robinson, which was created by CP&L in 1959 to serve as a source of cooling water for power production. The site is in a sparsely populated, largely rural area, with a few houses situated across Lake Robinson from the plant site.

Two generating units are located on the RNP site: Unit 1 is a coal plant that has been operating since 1960, and Unit 2, referred to as Robinson Nuclear Plant (RNP), is a single-unit nuclear plant. The nuclear steam supply system for RNP is a pressurized water reactor (PWR) with three steam generators. RNP obtains cooling water from Lake Robinson, an impoundment of Black Creek. The U.S. Nuclear Regulatory Commission (NRC) has categorized Lake Robinson as a cooling pond.

RNP is located on approximately 2435 ha (6020 ac) of CP&L property in northwestern Darlington and southwestern Chesterfield Counties, including the 911-ha (2250-ac) Lake Robinson. Due to the construction of RNP, an area with a 0.5-km (0.3 mi) radius has been heavily disturbed and consists of numerous buildings, parking areas, landscaped areas, and roads. The Darlington County Internal Combustion Turbine Electric Plant is also located on the CP&L property, slightly more than 1.6 km (1 mi) north of RNP.

The upper 448 km² (173 mi²) of the Black Creek drainage were impounded in 1958 to create Lake Robinson. The 11-km (7-mi) long lake was originally built to provide cooling water for the coal plant, but was sized to accommodate future plant additions. In addition to functioning as a cooling pond, the lake supports recreational use and modest fishing.

CP&L owns property around the impoundment but leases it to adjacent property owners for access to the impoundment. As a result, the eastern side of Lake Robinson is sparsely developed with homes, recreational areas, a marina, and public access points. CP&L leases the northern portion of its property to the State of South Carolina, which manages it in conjunction with its adjacent Sandhills State Forest. CP&L manages the balance of the undeveloped property for timber production.

Continued operation of RNP would have a beneficial effect on any potential unknown or

undiscovered historic or archaeological resources for the duration of the license renewal period by restricting access to the site.

In conjunction with this license renewal action, CP&L does not plan to undertake a major refurbishment activity in the site vicinity or along the transmission lines expressly constructed to connect the plant to the electrical grid when the plant was initially licensed. Therefore, the area of potential effect (APE) for this license renewal action is the area at the power plant site and its immediate environs that may be impacted. Specifically, this area consists of the 0.4-km (0.25-mi) radius exclusion area boundary. The exclusion area is owner-controlled land surrounding the reactor building that is posted and access is controlled at all times.

Notifications and Public Involvement

On May 31, 2001, CP&L wrote to the South Carolina State Historic Preservation Office (SHPO) requesting comment on the RNP license-renewal process and on the determination by CP&L that the continued operation of RNP will not have an adverse effect on historic or cultural resources (Attachment 2). In a response dated August 8, 2001, the South Carolina SHPO stated that based on the information provided, license renewal should not affect historic properties nor archaeological sites (Attachment 3). It should be noted, however, that there is no record of any archaeological surveys having been conducted on the RNP site to assist the SHPO in the determination.

Eight Native American tribes or groups were contacted by letter on August 30, 2002, notifying them of the proposed action and the public meetings, providing an opportunity to comment on cultural resource issues pertaining to RNP, and inviting them to participate in the National Environmental Policy Act (NEPA) process. The following Tribes were contacted: (1) the Lumbee Tribe, (2) the Beaver Creek Band of Pee Dee Indians, (3) the Catawba Indian Nation, (4) the Chaklokowas Indian People of the Chickasaw Nation, (5) the Natchez Pee Dee Indian Tribe of Orangeburg, (6) the Pee Dee Indian Nation of Beaver Creek, (7) the Pee Dee Indian Nation, and (8) the Santee Indian Nation of South Carolina.

The NRC public involvement process is conducted in accordance with NEPA. Section 102 (42 USC 4321) directs that an environmental impact statement (EIS) is required for major Federal actions that significantly affect the quality of the human environment. The NRC has implemented Section 102 of NEPA in 10 CFR 51. In 10 CFR 51.20(b)(2), the Commission requires preparation of an EIS or a supplement to an EIS for renewal of a reactor operating license (OL); 10 CFR 51.95(c) states that the EIS prepared at the OL renewal stage will be a supplement to the *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (GEIS), NUREG-1437, Volumes 1 and 2.

The staff published a notice of intent to prepare an Environmental Impact Statement and conduct scoping in the *Federal Register* on August 22, 2002. An environmental site audit was conducted from September 24 - 26. On September 26, 2002, NRC staff met with Chad Long at the South Carolina SHPO's office and performed a review of the archaeological site files. Two public scoping meetings were held on September 25, 2002, in Hartsville, South Carolina. The NRC invited Federal, State, Tribal and local government agencies to participate in the scoping process by providing oral comments at the public meetings and/or submitting written comments by October 25, 2002. Comments received during the scoping period were summarized in the *Environmental Impact Statement Scoping Process: Summary Report – H.B. Robinson Steam Electric Plant, Unit No. 2, Darlington County, South Carolina*.

The Draft Supplemental Environmental Impact Statement (SEIS) regarding license renewal at RNP was issued in May 5, 2003. A *Federal Register* notice of availability of the draft Supplement 13 to the GEIS was published on May 14, 2003. A copy of the draft SEIS is enclosed with this package (Attachment 1). Two public meetings regarding the draft SEIS will be held on June 25, 2003 in Hartsville, South Carolina. The public comment period will end on July 30, 2003. The Final SEIS will be issued in January 2004. Information regarding license renewal and documents associated with license renewal at RNP can be viewed at the NRC website www.nrc.gov.

Identification of Historic Properties

To assess known and potential historic and archaeological resources at the APE, several existing literature and database sources were consulted, along with direct contacts with the South Carolina Department of Archives and History, the South Carolina Institute of Archaeology and Anthropology, and the Darlington County Historian. In addition, electronic database searches were conducted at the National Park Service's National Register of Historic Places Information System and the Historic American Buildings Survey/Historic American Engineering Record listings.

The Final Environmental Statement (FES) (NRC 1975) related to the operation of RNP stated that there are no known historical sites or archaeological remains on the RNP plant site. A further review of the 1972 National Register of Historic Places listings and subsequent monthly supplements discloses no historic sites present on site (NRC 1975). Two historic places were identified within approximately 20 miles of RNP. The Coker Experimental Farms, which is located west of Hartsville, South Carolina on Highway 151, and the Jacob Kelley house, which is three miles west of Hartsville, South Carolina (NRC 1975).

In conjunction with the FES, the South Carolina Department of Archives and History commented on June 1, 1973 that there will be no interference with historic properties in the area, and since there are no further plans for construction, the presumption is that there will be no effect to historic properties (Attachment 4). Also in conjunction with the FES, the U.S. Department of the Interior commented on July 6, 1973 that the proposed action will not directly affect any existing or proposed unit of the National Park System or any registered National Historic, Natural, or Environmental Education Landmark or any site now in process or registration as a landmark" (Attachment 5). Also, attached is the U.S. Geological Survey (USGS) topographic map of the site (Attachment 6).

Examination of the National Register listings in 2002 did not disclose any listed or potentially eligible properties on or adjacent to the APE. Twenty-five sites were located within a 10-km (6-mi) radius of the APE; 24 of these sites were clustered in or near the town of Hartsville, and one in the Town of McBee in Chesterfield County.

Review of archaeological and historic site files at the South Carolina Department of Archives and History and the South Carolina Institute of Archaeology and Anthropology indicated that no prehistoric or historic properties have been recorded at the APE itself. No formal archaeological surveys have been conducted at the plant nor the lake. However, two surveys (*An Intensive Archeological Survey of the South Carolina 151 Highway Widening Project*, Cable and Cantley 1979; *Woodland Occupation in the Upper Coastal Plain of South Carolina: An Archeological Reconnaissance of the Carolina Power and Light Company's Lake Robinson to Sumter 230 kV Transmission Line Corridor*, Canouts et al.) were conducted in the general

vicinity of the APE. The closest site in the Cable and Cantley survey occurred 1.6 km (1 mi) south of the APE and the Canouts et al. survey began adjacent to the APE and proceeded southeast. Information about the archaeological sites located near the APE is summarized in Table 1.

For the Cable and Cantley survey, one 10.7 km x 38.1 m (6.7 mi x 125 ft) transect was surveyed within 1.6 km (1 mi) of the APE and only one site (38-CT-6) was identified within that transect. Site 38-CT-6 is a prehistoric site located west of the APE along S.C. Highway 151, which runs northwest-southeast of the APE (Cable and Cantley 1979)

The second survey, performed in 1980 by Canouts et al., was conducted along the Lake Robinson-to-Sumter transmission line right-of-way, running southeast from the APE (Canouts et al 1984). This survey recorded two prehistoric sites (38-DA-35; 38-DA-47), one multi-component site (38-DA-48), and one prehistoric isolated find (IF-3) within a 10-km (6-mi) radius of the APE. Site 38-DA-48 is situated in the transmission line right-of-way within 1.6 km (1 mi) of the APE.

Table 1 Archaeological Sites Located Near the APE

Site Number	Description	National Register Status	Location	Survey Project
38-DA-48	A light scatter of historic materials occurs at the crest of a ridge above Black Creek. Plain and decorated whiteware, green glass, and a kaolin pipestem fragment and one chert flake were among the several artifacts recovered from the site.	Not Evaluated	Southeast of and within 1.6-km (1 mi) radius of APE	Canouts, et al.
38-DA-35	Several quartz, rhyolite and chert flakes and three biface fragments were located in the sandy bottomland along Beaverdam Creek	Not Evaluated	Southeast of and outside 1.6-km (1 mi) radius of APE	Canouts, et al.
38-DA-47	A sherd and lithic scatter occurs on a ridge slope above Beaverdam Creek. Included in the artifact collection are several cord marked, fabric impressed and plain sherds; basalt, chert, rhyolite and quartz flakes; and a biface.	Not Evaluated	Southeast of and outside 1.6-km (1 mi) radius of APE	Canouts, et al.
IF-3	Two lithic flakes and a biface fragment were located on an unnamed tributary of Beaverdam Creek.	Not Evaluated	Southeast of and outside 1.6-km (1 mi) radius of APE	Canouts, et al.

38-CT-6	Plain chert, quartz, slate, flow banded rhyolite denticulate, preforms, end scrapers, side scrapers, quartz crystal projectile point, unifacial tools.	Not Evaluated	West of and within 1.6-km (1 mi) radius of APE	Cable and Cantley
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Two archaeological sites are located within a 1.6-km (1 mi) radius of the APE. 38-DA-48 is southeast of the APE along the Lake Robinson-to-Sumter transmission line corridor and 38-CT-6 is west of the APE. Neither site has been evaluated for inclusion on the National Register of Historic Places. Site 38-DA-48 is a multi-component site with historic artifacts dating to the 19th century. This site consists of 53 historic ceramic artifacts split between plain and decorated whiteware, as well as, some pearlware and one prehistoric chert flake. Site 38-CT-6 is a prehistoric site that consists mainly of prehistoric lithics; four unifacial tools, one other flake tool, two projectile points, two preforms/flake blanks, one bipolar core, and a large amount of debitage. The other three sites listed in Table 1 are located over 1.6-km (1 mi) from the APE.

Examination of the 1840 Wiley Warren Plat for 223 Acres on Black Creek, Darlington District, shows the location of the Wiley Warren family farm located on what is now the RNP site. A copy of this plat is located at the South Carolina Department of Archives and History. Any structures that were part of the farm have been destroyed. There reportedly was a family cemetery located on the same knoll as the RNP visitor center.¹ No surface evidence of the cemetery was visible due to the site being grassed over; however the possibility for intact archaeological evidence of historic use in the APE remains. Secondary State Route 23, the Old Camden Road, passes east-west to the south of the APE; this road was called the Road to Camden on historical maps and is also of historical value. The Segars Farm complex is located on private land 2 miles south and east of the APE. This complex was a resort area in the early 20th century. In 2003, this complex was deemed eligible for the National Register of Historic Places.

Findings

Based on the following operational expectations and correspondence received including the following:

- 1) the expectation that operations at the H. B. Robinson Steam Electric Plant, Unit 2 during the proposed license renewal period will continue within the bounds of previously analyzed conditions, as evaluated in the FES (NRC 1975) and commented on by the South Carolina Department of Archives and History (Attachment 4) and the U.S. Department of the Interior (Attachment 5) as well as the historic and archaeological properties analysis,
- 2) recent correspondence with the South Carolina SHPO (Attachments 2 and 3), and
- 3) the representation by CP&L that there are no plans for new construction or to substantially alter current operations over the license renewal period,

¹ Personal communication with Horace Fraser Rudisill, Darlington County Historian, September 25, 2002.

the NRC staff concludes that there will be no adverse effect on historic properties within the APE, and no additional mitigation is warranted.

Attachments

1. Draft Supplemental Environmental Impact Statement for the renewal of the Operating License for the H.B. Robinson Steam Electric Plant, Unit No. 2.
2. May 31, 2001, CP&L letter to the South Carolina SHPO requesting its comment on the RNP license-renewal process and on the determination by CP&L that the continued operation of RNP will not have an adverse effect on historic or cultural resources.
3. August 8, 2001 South Carolina SHPO letter to CP&L stated that based on the information provided, license renewal should not affect historic properties nor archaeological sites.
4. June 1, 1973, letter from South Carolina SHPO to CP&L stated that there will be no interference with historic properties in the area since there were no further plans for construction at the RNP site.
5. July 6, 1973, letter from U.S. Department of the Interior to U.S. Atomic Energy Commission regarding comments on environmental considerations for H. B. Robinson Steam Electric Plant, Unit 2.
6. USGS Topographic Map.

References

Cable, J. S. and C. E. Cantley. 1979. *An Intensive Archeological Survey of the South Carolina 151 Highway Widening Project*. University of South Carolina Institute of Archaeology and Anthropology. Columbia, South Carolina.

Canouts, V., M. A. Harmon, and W. H. Monteith. 1984. *Woodland Occupation in the Upper Coastal Plain of South Carolina: An Archeological Reconnaissance of the Carolina Power and Light Company's Lake Robinson to Sumter 230-kV Transmission Line Corridor*. University of South Carolina Institute of Archaeology and Anthropology. Columbia, South Carolina.

Carolina Power & Light (CP&L). 2002. *Applicant's Environmental Report - Operating License Renewal Stage, H.B. Robinson Steam Electric Plant, Unit No. 2*. Docket No. 50-261, License No. DPR-23, Hartsville, South Carolina.

U.S. Nuclear Regulatory Commission (NRC), 1975. *Final Environmental Statement Related to the Operation of H.B. Robinson Steam-Electric Plant, Unit 2; Carolina Power and Light Company*. Docket No. 50-261, Washington D.C.