



August 18, 2003

Mr. Pao-Tsin Kuo, Program Director
License Renewal and Environmental Impacts
Division of Regulatory Improvement Programs
Office Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: HB Robinson Steam Electric Plant, No. 2
License Renewal and National Historic Preservation Act
Darlington, Chesterfield Counties

Dear Mr. Kuo:

We have reviewed the report entitled *Historic and Archaeological Resources Report Narrative* for the above-referenced project, which we received July 17. Based on the information provided, we have several concerns as to whether historic properties have been adequately documented. Therefore, we cannot concur with your determination that no historic properties will be affected by the relicensing process.

Section 106 of the National Historic Preservation Act requires the federal agency to determine the area of potential effects (APE) within which historic properties may be affected. We do not agree with your delineation of the APE to include only "the power plant site and its immediate environs." We believe that an APE should be drawn to include the impoundment, which is used as a cooling pond for the nuclear power plant. The fluctuation in impoundment levels can have an effect on archaeological sites on the shoreline. There is precedent for establishing an APE to include the shoreline of the cooling pond as shown in the Cultural Resources Report for the Virgil Summer NRP Relicensing.

Once the APE has been established, usually in consultation with the State Historic Preservation Office, identification of historic properties within the APE should take place. It appears as though the NRC has undertaken adequate background research at both our office and the South Carolina Institute of Archaeology and Anthropology. That background research showed archaeological sites near the APE, as well as previously identified historic sites: the Wiley Warren Farm, the Old Camden Road, the Segars Farm Complex. It is also stated that "the possibility for intact archaeological evidence of historic use in the APE remains." That statement alone should take you to the next phase of survey work in order to determine if any historic property actually exists within the APE. Yet there is no evidence that any current surveys were undertaken as part of this research.

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We also question the purpose of supplying comments from both our office and the Department of the Interior that are almost thirty years old. A statement made in response to an "after-the-fact" environmental review from thirty years ago does not address issues that are known to be of concern now. Specifically, the review by the Department of the Interior, stated that although the project will not affect any sites currently listed as a National Historic Landmark, or part of the NPS, it clearly points out that no "interdisciplinary investigations of the development area by professionals was done," and therefore previously unknown cultural resources may have been lost since the plant was already constructed.

Our recommendations are as follows:

1. Expand the boundaries of the APE to include the shoreline of Lake Robinson.
2. Perform an advanced level of archaeological survey to locate sites that may be associated with the Wiley Warren Farm.
3. Evaluate potential effect to unidentified archaeological sites that may be affected by drawing water from the cooling pond for the nuclear reactor.

Once these recommendations have been completed, we suggest you submit a revised report to our office for review and comment.

We are providing these comments to assist you with your responsibilities pursuant to Section 106 of the National Historic Preservation Act, as amended. If you have any questions, please contact me at (803) 896-6169. Thank you.

Sincerely,



Marta Matthews
Review and Compliance Coordinator
State Historic Preservation Office