

Serial: RNP-RA/03-0147

**NOV 12 2003**

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

ARCHAEOLOGICAL, CULTURAL, AND HISTORIC RESOURCES

Ladies and Gentlemen:

By letter dated June 14, 2002, Carolina Power & Light (CP&L) Company, now doing business as Progress Energy Carolinas, (PEC) Inc., submitted an application for renewal of the Operating License for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, which is also referred to as the Robinson Nuclear Plant (RNP).

The South Carolina State Historic Preservation Office (SHPO) has expressed concern, in their letter to Mr. P. T. Kuo, NRC, dated August 7, 2003, about the protection of Archaeological, Cultural, and Historic (AC&H) Resources. This concern arose as a result of their review of the Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437), Supplement 13, Draft Report for Comment. This letter is to confirm that PEC is developing guidance regarding AC&H Resources to be incorporated into the Environmental Compliance Manual prior to the end of 2004. The guidance as currently envisioned will include the following elements:

1. A statement of the need to protect AC&H Resources during land disturbing activities,
2. A requirement for an assessment or evaluation before starting activities that could impact resources listed, or eligible for listing, on the National Register of Historic Places,
3. A requirement to stop work and consult with the PEC Environmental Services Section (ESS) if workers discover unexpected AC&H Resources at any time. ESS will consult with the SHPO, if deemed appropriate, before resuming work,
4. A discussion of examples of AC&H Resources that could be encountered, and
5. No assessment is required if land disturbing activities are restricted to areas of the site previously disturbed during construction.

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Attachment I provides an Affirmation in accordance with 10 CFR 50.30(b).

If you have any questions concerning this matter, please contact Mr. C. T. Baucom.

Sincerely,

A handwritten signature in black ink, appearing to read "J. F. Lucas". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. F. Lucas  
Manager - Support Services - Nuclear

JSK/jsk

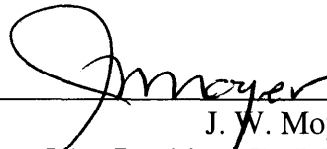
c: Mr. T. P. O'Kelley, Director, Bureau of Radiological Health (SC)  
Mr. L. A. Reyes, NRC, Region II  
Mr. C. P. Patel, NRC, NRR  
NRC Resident Inspectors, HBRSEP  
Attorney General (SC)  
Mr. S. K. Mitra, NRC, NRR  
Mr. R. L. Emch, NRC, NRR  
Mr. R. M. Gandy, Division of Radioactive Waste Management (SC)

**AFFIRMATION**

The information contained in letter RNP-RA/03-0147 is true and correct to the best of my information, knowledge and belief; and the sources of my information are officers, employees, contractors, and agents of Progress Energy Carolinas, Inc. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

November 12, 2003

A handwritten signature in black ink, appearing to read "J. W. Moyer", written over a horizontal line.

J. W. Moyer

Vice President, HBRSEP, Unit No. 2