

November 17, 2003

Dr. Rodger E. Stroup, Director
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and History
Archives and History Center
8301 Parklane Road
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SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, NO. 2, LICENSE RENEWAL
REVIEW AND NATIONAL HISTORIC PRESERVATION ACT, SECTION 106
REVIEW PROCESS

Dear Dr. Stroup:

This letter responds to your recommendations provided by letter dated August 18, 2003, regarding the license renewal for H. B. Robinson Steam Electric Plant, Unit 2 (H. B. Robinson). On July 7, 2003, in accordance with Title 36 of the *Code of Federal Regulations*, Part 800 (36 CFR 800), the NRC sought concurrence from the South Carolina State Historic Preservation Office (SHPO) regarding the license renewal at H. B. Robinson that the proposed undertaking will have no effect on historic properties. Enclosed with our letter was our Cultural Resources Narrative. Your office responded on August 18, 2003, and recommended the following actions be provided in a revised report in order to make an assessment of effect. The SHPO's recommendations were 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 Family Farm
3. Evaluate potential effects to unidentified archaeological sites that may be affected by drawing water from the cooling pond for the nuclear reactor

NRC staff and the staff from Pacific Northwest National Laboratory participated in a conference call with Ms. Marta Matthews, Review and Compliance Coordinator, and Ms. Valerie Marcil, Staff Archaeologist of the State Historic Preservation Office, on September 10, 2003, to discuss the SHPO recommendations. Enclosure 1 is a summary of that conference call. Regarding the first recommendation, the area of potential effect (APE) for the H. B. Robinson license renewal is confined to the area at the power plant site and its immediate environs that may be impacted by land disturbing operations incidental to this license renewal activity. The APE includes the cooling water intake structures, the cooling canal, and the shoreline of Lake Robinson between the intake structures and the discharge outfall. Regarding the second recommendation, no remnants of the Wiley Warren Family Farm are currently visible within the vicinity of the plant and the visitor's center, and no land disturbing operations are planned as part of license renewal that would impact buried remnants. Regarding the third recommendation, the level of

Lake Robinson is normally controlled by Carolina Power and Light Company (CP&L) within a narrow band; therefore, there are no potential effects to unidentified archaeological sites along the shore of Lake Robinson. This information and technical information responsive to your earlier comments on the draft Supplemental Environmental Impact Statement were incorporated into the revised Historic and Archaeological Resources Report Narrative H. B. Robinson Steam Electric Plant, Unit No. 2 License Renewal (Enclosure 2). In addition, CP&L has committed to institute requirements and guidance for the preservation of historic, cultural, and archaeological resources in the Environmental Compliance Manual used by CP&L's nuclear plants. These results indicate that license renewal will have no effect on historic properties. Pursuant to 36 CFR 800.4(d)(1), we are providing documentation to support these findings, and we request your concurrence with our determination.

The Final SEIS for the H. B. Robinson license renewal action will be published in December 2003; it will reflect our interactions to date. If you have any questions or require additional information, please contact Richard L. Emch, Jr., the NRC Environmental Project Manager for the H. B. Robinson license renewal project, at 301-415-1590 or RLE@nrc.gov .

Sincerely,

SWest for */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

R. Stroup

2

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Pao-Tsin Kuo, Program Director
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cc w/o encl.: See next page

DISTRIBUTION: See next page

Accession nos.: Package: **ML033230321**

1. Letter to R. Stroup w/Encl. 2: Historic and Archaeological Resources Report Narrative: **ML033230282**
2. Encl. 1 to letter to R. Stroup: Conference call summary: **ML032820198**
2. Att. 1. to Report: CP&L Ltr. to So. Carolina SHPO: **ML021700129** (pge. 110)
3. Att. 2. to Report: So. Carolina SHPO Ltr to CP&L: **ML021700129** (pge. 113)
4. Att. 3. to Report: CD: Robinson Pictures: **ML033180579**
5. Att. 4. to Report: Archaeological, Cultural, and Historic Resources: **ML033180546**

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML033230282.wpd

*See previous concurrence

OFFICE	LA:RLEP	GS:RLEP	PM:RLEP	SC:RLEP	OGC (NLO -subject to comments)	PD:RLEP
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DATE	11/17/03	11/17/03	11/17/03	11/17/03	11/14/03	11/17 /03

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**U.S. NUCLEAR REGULATORY COMMISSION
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DIVISION OF REGULATORY IMPROVEMENT PROGRAMS**

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

Amended Report

October 2003

Enclosure 2

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) now known as Progress Energy, is located in northeastern South Carolina, approximately 8 km (5 mi) west-northwest of Hartsville, South Carolina (see Figures 2-1 through 2-3 in the DSEIS). The RNP site encompasses approximately 2435 ha (6020 ac) of CP&L property in northwestern Darlington and southwestern Chesterfield Counties, including the 911-ha (2250-ac) Lake Robinson.

Two generating units are located on the RNP site: Unit 1 is a coal-fired plant that has been operating since 1960, and Unit 2, referred to as Robinson Nuclear Plant, is a single-unit nuclear plant. The nuclear steam supply system for RNP is a pressurized water reactor (PWR) with three steam generators. Cooling water for both units comes from Lake Robinson, an impoundment of Black Creek that the NRC has categorized as a cooling pond. The intake structures for Units 1 and 2 are both located on the shore of Lake Robinson, near the generator facilities. Heated effluent from both facilities is discharged to the impoundment through a cooling canal at a discharge point located approximately 6.4 km (4 mi) upstream from the dam and cooling water intake structures. The combined circulating water flow for the two units averages 2.476×10^6 m³/day (654 million gallons per day).

The 11-km (7-mi) long Lake Robinson was created in 1958 when the upper 448 km² (173 mi²) of the Black Creek drainage was impounded to provide cooling water for the coal-fired plant. However, the lake was sized to accommodate heat loads from future plant additions. In addition to functioning as a cooling pond, the lake is used for recreation and supports a modest fishery. The lake level is controlled by CP&L, and operating procedures call for the elevation to be maintained between 67.3 and 67.5 m (220.7 and 221.5 ft), a range of 0.24 m (0.8 ft). Under extreme conditions such as severe drought, the lake level may vary outside this range. The shoreline starting at the dam and extending to near the end of the discharge canal is covered with riprap made up of large boulders to maintain shoreline stability near the plant. Maintaining the lake surface elevation within a tight range minimizes shoreline erosion that might damage unidentified historic and archaeological resources.

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. 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.

In conjunction with this proposed license renewal action for RNP, CP&L does not plan to undertake a major refurbishment activity in the site vicinity.

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

Area of Potential Effect

The area of potential effect (APE) is confined to the area at the power plant site and its immediate environs that may be impacted by land disturbing operations incidental to this license renewal activity. The APE includes the cooling water intake structures, the cooling canal, and the shoreline of Lake Robinson between the intake structures and the discharge outfall (see the U.S. Geological Survey [USGS] topographic map of the site provided with the July 7, 2003, letter).

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 1). 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 2). It should be noted, however, that there is no record of any archaeological surveys having been conducted on the RNP site.

The NRC public involvement process is conducted in accordance with the National Environmental Policy Act (NEPA), which 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 Part 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 nuclear reactor. 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. Eight Native American tribes or groups were contacted by letter dated 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 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.

An environmental site audit was conducted from September 24-26, 2002, and on September 26, NRC staff met with Chad Long of the South Carolina SHPO's office to review 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 on May 5, 2003. A Notice of Availability of the draft SEIS (Supplement 13 to the GEIS) was published in the *Federal Register* on May 14, 2003. A copy of the draft SEIS was enclosed with the July 7, 2003, package to the SHPO. Two public meetings regarding the draft SEIS were held on June 25, 2003, in Hartsville, South Carolina, and the public comment period ended on July 30, 2003. The final SEIS will be issued in December 2003. 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

In an effort to identify historic properties that may be located in 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.

Examination of a historic map at the South Carolina Department of Archives and History, entitled "1840 Wiley Warren Plat for 223 Acres on Black Creek, Darlington District," shows the location of the Wiley Warren Family Farm on the current RNP site. There reportedly was a family cemetery located on the same knoll as the RNP visitor center.¹ A site visit to RNP indicates that much of the APE was heavily disturbed by construction of RNP and associated facilities, and the site now consists of numerous buildings, parking areas, landscaped areas, and roads. A CD containing pictures taken of the area around the visitor's center during construction is enclosed with this report (Attachment 3). Structures that may have been part of the farm are no longer visible. No surface evidence of the cemetery was visible because the site has been grassed over. The map also shows Secondary State Route 23, the Old Camden Road, passing in an east-west direction to the south of the APE; this road was called the Road to Camden on historical maps and is also of historical value.

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 the APE has not been surveyed for cultural resources. 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. 1984) were conducted in the general vicinity of the APE. The closest site identified in the Cable and Cantley survey is located 1.6 km (1 mi) south of the plant, and the Canouts et al. survey began adjacent to the APE and proceeded

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

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 plant, 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, west of the APE (Cable and Cantley 1979)

The second survey, performed in 1980 by Canouts et al. (1984), was conducted along the Lake Robinson-to-Sumter transmission line right-of-way, running southeast from the APE. 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 plant. Site 38-DA-48 is situated in the transmission line right-of-way within 1.6 km (1 mi) of the plant.

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, 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 the plant	Canouts et al. 1984
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 the plant	Canouts et al. 1984
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 the plant	Canouts et al. 1984
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 the plant	Canouts et al. 1984

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 the plant	Cable and Cantley 1979
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Two archaeological sites are located within a 1.6-km (1-mi) radius of the plant. Site 38-DA-48 is located 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 plant.

Examination of the National Park Service’s National Register of Historic Places Information System did not disclose any listed or eligible properties on or adjacent to the APE. Twenty-six sites were located within a 10-km (6-mi) radius of the plant; 24 of these sites were clustered in or near the town of Hartsville, and one site was in the Town of McBee in Chesterfield County. Of particular note is the Segars Farm complex located on private land about 3 km (2 mi) south and east of the Plant. 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.

Amendments to CP&L’s Environmental Compliance Manual

In a letter dated November 12, 2003, CP&L made a commitment to the NRC to amend the Environmental Compliance Manual used at RNP to provide guidance regarding the preservation of historic, cultural, and archaeological resources (Attachment 4). The amendment will include the following elements: (1) a statement of the need to protect historic, cultural, and archaeological resources during land disturbing activities; (2) an assessment or evaluation before starting activities that could impact resources listed, or eligible for listing, on the National Register of Historic Places; (3) guidance to stop work any time an unexpected discovery is made and consult with the Environmental Services Section, which will in turn consult with the SHPO, if deemed appropriate before resuming work; (4) no assessment is required if land disturbing activities are restricted to areas previously disturbed during construction; and (5) examples of historic, cultural, and archaeological resources which may be encountered.

Findings

During the NRC review, the staff examined existing literature and database sources, consulted with the South Carolina Department of Archives and History, the South Carolina Institute of Archaeology and Anthropology, and the Darlington County Historian. The staff identified no sites within the APE. In addition, the staff invited the public and potentially affected Native American tribes to participate and comment.

CP&L does not plan to undertake a major refurbishment activity either in the site vicinity. CP&L has committed to implementing an amendment to the Environmental Compliance Manual used

at RNP to ensure that potential historic, archaeological, and cultural resources that have not yet been identified or discovered are protected. |

Due to the extensive disturbance present in the APE, and given the lack of substantial land altering aspects of this licence renewal, the NRC staff concludes this project will have no effect on historic properties. It is unlikely that subsurface archaeological remains associated with the Wiley Warren Family Farm are intact or eligible for listing on the National Register of Historic Places. |

Attachments

1. 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. (Page E-2 of the Environmental Report; Page 110 of Accession No. ML021700129) |
2. 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. (Page E-5 of the Environmental Report; Page 113 of Accession No. ML021700129) |
3. CD containing pictures taken of the area around the visitor's center during construction of RNP. (Accession No. ML033180579) |
4. November 12, 2003, CP&L letter to NRC regarding commitment to amend Environmental Compliance Manual for the protection of archaeological, cultural, and historic resources. (Accession No. ML033180546) |

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.

Carolina Power & Light (CP&L). 1999. *Robinson Impoundment Operation*. Hartsville, South Carolina. |

Carolina Power and Light (CP&L). 2003. Letter to NRC regarding commitment to amend Environmental Compliance Manual. 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.

Matthews, Marta. 2003. Letter regarding H.B. Robinson Steam Electric Plant, No. 2 (RNP). License Renewal Review and National Historic Preservation Act, Section 106 Review Process. State Historic Preservation Office. Columbia, South Carolina. |

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