

YANKEE ATOMIC ELECTRIC COMPANY

Telephone (413) 424-5261



49 Yankee Road, Rowe, Massachusetts 01367

May 4, 2004
BYR 2004-050

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Attention: Ms. Anne Canaday, MEPA Environmental Analyst

Subject: **Expanded Environmental Notification Form (EOEA #13247)**
Yankee Nuclear Power Station
Site Closure Project
Rowe, Massachusetts

Dear Ms. Canaday:

Yankee Atomic Electric Company (YAEC) has prepared this letter in response to the comment letter, dated 21 April 2004, from the Massachusetts Historical Commission (the Commission on the Expanded Environmental Notification Form (ENF) for the Site Closure Project at the Yankee Nuclear Power Station (YNPS) in Rowe, Massachusetts.

With respect to the MHC's comments, YAEC will work closely with MHC when planning decommissioning activities at the site.

Specifically, YAEC will:

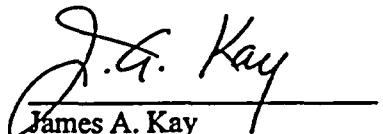
- ♦ Submit information in a timely manner to MHC if specific ground-impacting activities are proposed within archaeologically sensitive areas;
- ♦ Seek MHC's review and comment on new Conservation Restrictions to ensure that stipulations are consistent with cultural resource management practices; and,
- ♦ Take into account the locations of archaeologically sensitive areas for avoidance and protection during the project, particularly in the development of potential plans for disposal of soils.

With respect to the report "Archaeological Reconnaissance Survey, Archaeological Resources Management Plan, Yankee Nuclear Power Station, Rowe and Monroe, Massachusetts" prepared by PAL, we recently received the final approval letter from the MHC on this document. A copy of their approval letter is enclosed herewith.

YAEC appreciates the Commission taking the time to review and comment on the Expanded ENF and the supporting documentation. Should you have questions or require additional information, please contact Mr. Kenneth W. Dow, Environmental Supervisor, at (413) 424-2245.

Sincerely,

YANKEE ATOMIC ELECTRIC COMPANY


James A. Kay
Principal Licensing Engineer

cc: Bruna Simon – Massachusetts Historical Commission
Deborah C. Cox – PAL
Osiris Srurano, Nuclear Regulatory Commission
Deborah M. Osborne, Federal Energy Regulatory Commission
Crystal Gardner, USACOE-NED-Regulatory
Kate Atwood, USACOE-NED
Patrice Kish, Massachusetts DCR
DEP-Western Region Office
Rowe Historical Commission
Monroe Historical Commission



cc - gail
dig file

The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

April 28, 2004

Deborah C. Cox
PAL
210 Lonsdale Avenue
Pawtucket, RI 02860

RE: Yankee Rowe Nuclear Power Station Site Closure Project, Rowe & Monroe, MA. MHC#RC.34735.
PAL #1547.

Dear Deborah:

Staff of the Massachusetts Historical Commission have reviewed the final report, *Archaeological Reconnaissance Survey, Archaeological Resources Management Plan, Yankee Nuclear Power Station, Rowe and Monroe, Massachusetts*, prepared by the PAL and received by the MHC on April 21, 2004.

Please submit the items checked off below in compliance with 950 CMR 70:



Original MHC inventory forms (please note that the Furlon House site form should be a MHC B Form).



Second copy of the final report.



Two copies of the final report.



A copy of the bibliographic entry and abstract on a 3½" diskette.

Please submit these items as soon as possible so that we may update our files and incorporate the results of your investigation into MHC's inventory. Thank you in advance for your consideration.

If you have any questions, please feel free to contact me.

Sincerely,

Edward L. Bell
Senior Archaeologist
Massachusetts Historical Commission

220 Morrissey Boulevard, Boston, Massachusetts 02125
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www.state.ma.us/sec/mhc



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

April 21, 2004

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston MA 02114

Attn.: Anne Canaday, MEPA Unit

RE: Yankee Rowe Nuclear Power Station Site Closure Project, Rowe & Monroe, MA. MHC#RC. 33426
EOEA # 13247.

Dear Secretary Herzfelder:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Environmental Notification Form (ENF) filed for the proposed project referenced above.

MHC staff have also reviewed the report prepared by the PAL, *Archaeological Reconnaissance Survey, Archaeological Resources Management Plan, Yankee Nuclear Power Station, Rowe and Monroe, Massachusetts*. The Archaeological Resources Management Plan for the property contains useful and appropriate procedures to follow by the property owner. The federal agencies that will review and approve the project should take into account the results of the identification effort and the management recommendations.

The project area is adjacent to the Sherman Development Hydroelectric Power Facility which was determined by the Federal Energy Regulatory Commission and the MHC to meet the criteria of eligibility (36 CFR Part 60) for listing in the National Register of Historic Places.

The results of the archaeological reconnaissance survey evaluated an approximately 2,200-acre survey area. Preliminary information on the results of the survey was summarized in the ENF attachment, Section 2 ("Supplemental Information"), pp. 19-20. Review of the archaeological report indicates that fourteen (14) historical period archaeological sites were field verified, including eight farm complexes and residences, one sawmill, one cemetery, one barn, two sugarhouses, and the abandoned Hoot, Toot & Whistle Railroad alignment. In addition to the verified historical archaeological sites, specific areas of the property were identified as archaeologically sensitive, based on historical development patterns, and on environmental attributes. In New England, archaeological sites are typically buried and thus require systematic archaeological testing to be specifically located and identified. The archaeological report includes two figures (Figures 6-46 and 6-47) that define the archaeologically sensitive areas. If specific ground-impacting activities were proposed within the archaeologically sensitive areas, information should be submitted to the MHC as early as possible in the planning stage of the proposed project.

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The ENF does not indicate what may be proposed for the extensive land holdings, but further consultation with the MHC would be required for any activities, including disposition of the property, that could affect significant historic and archaeological resources. For example, if a Conservation Restriction were proposed to be placed on the property, MHC would request the opportunity to review and comment on a draft CR to ensure that the stipulations were consistent with appropriate cultural resource management practices.

Appendix E of the ENF attachment includes a copy of MHC's comments of August 18, 2003, concerning the proposed demolition and contaminated soils and solid waste remediation project. The current industrially developed portion of the property containing the structures proposed for demolition, and the areas proposed for excavation, are not considered to be archaeologically sensitive. However, immediately contiguous to the previously impacted areas are lands that are considered to be archaeologically sensitive. Project plans should take into account the locations of the archaeologically sensitive areas for avoidance and protection during the project, particularly in the development of plans for disposal of soils.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800), Massachusetts General Laws, Chapter 9, Sections 26-27C as amended by Chapter 254 of the Acts of 1988 (950 CMR 71), and MEPA (301 CMR 11). If you have any questions or would like to set up a meeting to discuss site preservation, please feel free to contact Edward L. Bell of my staff.

Sincerely,



Brona Simon
State Archaeologist
Deputy State Historic Preservation Officer
Massachusetts Historical Commission

xc:

~~James A. Kay, Yankee Atomic Energy Company~~
Brian Wood, Yankee Atomic Energy Company
Ken Dow, Yankee Atomic Energy Company
John W. McTigue, ERM
James A. Hamilton, CLF Ventures, Inc.
Deborah C. Cox, PAL
Osiris Srurano, Nuclear Regulatory Commission
Deborah M. Osborne, Federal Energy Regulatory Commission
Crystal Gardner, USACOE-NED-Regulatory
Kate Atwood, USACOE-NED
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