



New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

November 25, 2005

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

10/6/05
70FR58489
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RULES AND DIRECTIVES
BRANCH

To Whom It May Concern:

Re: NRC: NUREG-1437, Supplement 24, draft
Nine Mile Point Nuclear Station, Units 1 & 2
Town of Scriba, Oswego County, New York
03PR00532

Thank you for requesting the comments of the New York State Historic Preservation Office (NYSHPO). The NYSHPO has reviewed the Draft Generic Environmental Impact Statement for License Renewal Report, Supplement 24, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Based upon this review, the NYSHPO understands that there are no ground disturbing activities associated with the relicensing and has no further concerns with this undertaking.

However, we would like to note that the NYSHPO does not accept probability models as discussed on pages 4-33 to 4-35. It is our policy to require Phase I archaeological investigation for the entire area of potential effect (APE) and not just those areas ranked as having a moderate to high probability of containing archaeological resources.

The NYSHPO appreciates the opportunity to comment on this information. Please telephone me at ext. 3280 with any questions you may have. Please also refer to the PR# above in any future correspondences for this project.

Sincerely,

Nancy Herter
Historic Preservation Program Analyst,
Archaeology

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Att = J. Field (ICF)