Metell, Mike

From:	Bob Miller [rmiller@drm.com]	
Sent:	Wednesday, May 24, 2006 3:19 PM	
То:	Metell, Mike	
Cc:	Peter Van Oot	
Subject:	Docket No. 6480; Exhibit PB-10	
Attachments: Assessment_001.pdf		

Mike,

Attached is the letter from Thomas R. Jamison, PhD. that was attached as Exhibit PB-10 to the testimony of Peter Boemig in Vermont Yankee's Bulk Fuel Storage Facility Section 248 docket.

<<Assessment_001.pdf>>

Note that Findings Numbered 125 and 126 in the Board's final order in Docket No. 6480 accepted the Boemig testimony and Jamison recommendation that no further archeological review was required because the proposed site had been previously disturbed during plant construction. The Board made similar findings, I believe, in the other two orders I sent yesterday on the parking lot and the security barrier system.

Please let me know if you need any additional documents or information.

Robert A. Miller, Jr. Downs Rachlin Martin PLLC 90 Prospect Street P.O. Box 99 St. Johnsbury, VT 05819 (802)748-8324 rmiller@drm.com

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EXHIBIT PB-10

JAN 1 8 2001 Archeological Associates, Inc.

Cultural Resource Specialists PO BOX 81 • PUTNEY, VERMONT 05346

Peter Van Oot Downs, Rachlin & Martin 14 Linden Street Brattleboro, Vermont 05301 RE: Archeological Sensitivity of Assessment Proposed Gas Storage Area and Access Road Vermont Yankee Nuclear Power Plant Town of Vernon, Windham County HAA #V151

Dear Peter,

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January 17, 2001

This letter describes the results of an archeological assessment of the proposed Gas Storage Area and Access Road at the Vermont Yankee Nuclear Power Plant in the Town of Vernon, Windham County (Figure 1). Vermont Yankee plans to construct a storage facility for hydrogen and oxygen gas with associated utility line, and an access road. The facility is to be located immediately south of the cooling towers at the plant in a partly wooded area approximately 5 acres in size (Figures 2 and 3). The topography of the project area is dominated by a long narrow berm running southeast to northwest constructed soon after the plant was built.

The proposed access road will connect with the existing entrance road immediately east of the gate house. It will then proceed to the south / southeast toward the river, turn to the east / northeast paralleling the river bank and running along the plant fence, and then turn to the north to connect with the cooling tower pad. The proposed hydrogen and oxygen storage areas will be on the access road where it will run along the plant fence. Most of the road and facility will be constructed on fill, with three areas of cutting in the vicinity of the gas storage facilities.

Snow cover at the site prevented on site inspection of the conditions. However, review of boring logs, plans, and photographs provides enough information to assess the archeological potential of the project area.

Prior to construction of the plant the area was relatively undisturbed. The vicinity is highly sensitive for precontact archeological sites due to the proximity to the river and the presence of several reported sites in the area. The project area had probably been cultivated during the late 18th to early 20th centuries, leaving little tree cover, and a few seasonal camps were located on the property immediately prior to the plant construction (HAA 1998; VYNPC 1967).

CERTIFIED DBE/WBE IN VERMONT, NEW HAMPSHIRE, NEW YORK, NEW JERSEY, MAINE,				
MASSACHUSETTS, CONNECTICUT, PENNSYLVANIA, DELAWARE, MARYLAND				
AND NEW YORK CITY ACENCIES				

TELEPHONE (802) 387-6020	Email: tom@hartgen.com	FAX (802) 387-8524

During construction of the plant earthmoving activity effected most of the plant vicinity. Photographs provided by Vermont Yankee show the project area during the construction of the plant (Figures 4 and 5). In the first photograph dating to June 21, 1971, the project area is clearly visible south of the cooling towers. At that time the area was being used for storage of materials including large piles of soil or other material. In addition, the northwest corner of the project area appears to have been graded to allow for these uses. The second photograph dated to September 22, 1971 shows the project area in slightly greater detail with preparations being made for construction of the existing berm. The plant fence is visible along the bottom of the photograph, there are clear signs of grading throughout the area and the southern portion is being used for parking of cars and heavy equipment.

On September 28^{th} , 2000, GPI Construction excavated six soil tests along the centerline of the proposed access road to determine the suitability of the soils for the proposed project (Figure 2). These tests were placed at stations 3+00 to 8+00. The log of these tests is attached to the letter. The results indicate that most of the project alignment has been disturbed at least to 3 feet (0.9 meter). In several instances there is evidence of concrete, asphalt, and tar disposal on the surface and up to 3.5 feet (1 meter) below the surface. Other tests encountered clayey material mixed with small stones and one encountered a hard surface of unknown material at 5 feet (1.5 meters), probably part of the fill. Clean alluvial silts were encountered at the base of most of the tests. Aside from the alluvial silts, none of the soils appear to be intact. A photograph of the profile of the test at Station 5+00 illustrates that the upper soils are not stratified, suggesting they are fill dating to the plant construction (Figure 6).

Thus, although much of the vicinity is sensitive for precontact and historic deposits due to the proximity to the river, presence of reported sites, and early settlement of the area, the project Area of Potential Effect (APE) was extensively disturbed during construction of the power plant. <u>No</u> <u>further archeological review is recommended</u>. If the construction plans change to effect areas not investigated in this study, further review may be necessary.

Sincerely,

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ahmar U. Jer

Thomas R. Jamison, Ph.D. Project Director

Attachments: References Figures GPI Soil Tests

January 2001

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Reference Cited

Hartgen Archeological Associates, Inc. (HAA)

1998 Phase I Archeological Investigations for the Proposed Office Building, Vermont Yankee Nuclear Power Plant, Town of Vernon, Windham County, Vermont, prepared for GPI Construction, Brattleboro, Vermont.

Vermont Yankee Nuclear Power Corporation (VYNPC)

1967 *Plant Area Excavation Plan*, Sheets G-191434 and G-191437, provided by Vermont Yankee.

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STA 5+00

Figure 6. Profile of test at Station 5+00. Note unconsolidated material at top of profile and fine silt at the base.

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Hartgen Archeological Associates, Inc.

January 2001

GPI CONSTRUCTION, INC.

35 WILLIAMS STREET BRATTLEBORO, VT 05301 802-257-7839

Site Exploration for road and hydrogen tank pads Vermont Yankee

Test holes dug 9/28/00 with Larock

Station 8+00

Depth of dig 5'0"

Found sand/silty river soil, 500 MCC ground cable exposed

Station 7+00

Depth of Dig 6'9"

Found clayish material mixed with some stones $1^{"}-4"$ size. At 4'0" below grade we found sand, silty river soil.

Station 6+00

Depth of Dig 9'6" Junk concrete stockpiled on knoll

Found at 6'0" below knoll hit hard dense gravel which was comingled with good material. Punched through this material at 7'0" and found sand and silty material. Dug 9'6" below knoll all good clean silts.

Station 5+00

Depth of Dig 8'

There was surface evidence of concrete and black top dumpings. At 0'-3' we found some mixed size stones gravel clay then from 3' to 8' all river silt.

Station 4+00

Depth of Dig 5'

This area has surface evidence of concrete and tar. At 0' to 3' we found comingled roots and chunks of tar we hit a hard surface @ 5'. The dig was moved Westerly 3' more to continue the dig and continued to hit a hard surface. There was debris of tar at 3'6".

Station 3+0

Depth of Dig 5'

Soils were sand and silt from 0'-3' and silt and clag at 3' to 5'. No foreign debris.