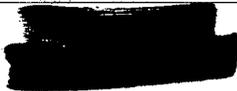


PA-LR



**From:** "BUCKLEY, RICKY N" <RBUCKLE@entergy.com>  
**To:** "Rich Emch " <RLE@nrc.gov>  
**Date:** 11/02/2006 1:43:31 PM  
**Subject:** Entergy Nuclear Cultural Resources Protection Plan

Rich,

Attached is Entergy Nuclear's fleet procedure EN-EV-121 (Cultural Resources Protection Plan) that will

be effective across the fleet on November 3, 2006, with the exception of Arkansas Nuclear One (ANO).

The procedure will be effective at ANO on January 1, 2007 to allow their site time to covert from an existing

site procedure to this fleet procedure.

If you have any questions, please don't hesitate to call me.

Thanks,

Rick Buckley, CHMM, REM  
Sr. Project Manager  
Entergy Nuclear  
601-368-5372 (Office)  
601-927-5132 (Cellular)  
601-368-5799 (Fax)  
rbuckle@entergy.com

**CC:** "YOUNG, GARRY G" <GYOUNG4@entergy.com>, "Metell, Mike" <hmetell@entergy.com>, "Brochu, Jill" <JBroc94@entergy.com>, "DeWald, Lynn" <ldewald@entergy.com>

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**Subject:** Entergy Nuclear Cultural Resources Protection Plan  
**Creation Date** 11/02/2006 1:42:21 PM  
**From:** "BUCKLEY, RICKY N" <[RBUCKLE@entergy.com](mailto:RBUCKLE@entergy.com)>

**Created By:** [RBUCKLE@entergy.com](mailto:RBUCKLE@entergy.com)

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TEXT.htm	4405	
EN-EV-121 _Cultural Resources_.pdf		43228
Mime.822	67578	

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Title: **Cultural Resources Protection Plan**

<b>Procedure Owner:</b>	Rick N. Buckley / Corporate Environmental Chairman		
	(Print Name / Title)		
<b>Approved:</b>		<i>Ricky N. Buckley</i>	11/01/06
	(Procedure Owner Signature)		(Date)

<b>Effective Date</b>	EN Common	<input checked="" type="checkbox"/>	11/03/06	<b>Effective Date Exception</b>	ANO	01/01/07	PNPS	
	ENN	<input type="checkbox"/>			ECH		RBS	
	ENS	<input type="checkbox"/>			GGNS		VY	
					IPEC		W3	
					JAF		WPO	

Procedure Contains NMM REFLIB Forms: YES  NO

Basis Statement

This procedure provides a mechanism for protecting historical and archaeological areas located on Entergy's nuclear site properties.

**Site and NMM Procedures Cancelled or Superseded By This Revision**

ANO Procedure 1000.167, ANO Historical and Archaeological Preservation Program will be cancelled.

Process Applicability Exclusion (ENN-LI-100) / Programmatic Exclusion (ENS-LI-101)

All Sites:  Specific Sites: ANO  GGNS  IPEC  JAF  PNPS  RBS  VY  W3

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## 1.0 PURPOSE

- [1] Provides a mechanism to protect either existing or potentially existing cultural resources located at the Entergy Nuclear sites.

## 2.0 REFERENCES

### [1] Regulatory References

- (a) National Historic Preservation Act (and amendments)

### [2] Company References

- (a) NMM Procedure EN-EV-115. Environmental Reviews and Evaluations  
(b) NMM Procedure EN-IS-112, Trenching, Excavation and Ground Penetrating Activities

### [3] ANO References

- (a) FTN Letter No. 6045-061, "Cultural Resources Issues, ANO  
(b) Commitment 1CAN090005, Reference P-17051, "Develop an administrative level environmental procedure to provide additional control over future land disturbances at ANO site"

### [4] JAF References

- (a) Letter from Nancy Herter, New York State Office of Parks, Recreation and Historic Preservation, to T. A. Sullivan, James A, Fitzpatrick, dated April 27, 2006 (refer to Attachment C of License Renewal Environmental Report)

### [5] PNPS References

- (a) Letter from Eric S. Johnson, Massachusetts Historical Commission, to Stephen Bethay, Pilgrim Nuclear Power Station, dated March 14, 2005 (refer to Attachment C of License Renewal Environmental Report)

### [6] VYNPS References

- (a) 30 V.S.A. § 248, New Gas and Electric Purchases, Investments and Facilities; Certificate of Public Good

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2.0 cont

- (b) Letter from Jane Lendway, Vermont Division for Historic Preservation, to Gary Tucker, FTN Associates, LTD., dated October 17, 2005 (refer to Attachment C of License Renewal Environmental Report)

[7] W3 References

- (a) W3 Cultural Resources Protection Plan

### 3.0 **DEFINITIONS**

- [1] Disturbed Land Areas – Surface and/or subsurface land areas that were significantly disturbed during the construction phase of the site (i.e., plant's protected area).
- [2] Cultural Resources – Resources that include but are not limited to:
  - (a) Cemeteries, burial sites, funeral monuments, or other sites with human remains
  - (b) Historic buildings, structures, or building remains
  - (c) Ancient sites containing cultural artifacts such as pottery, tools, weaponry, and other implements
  - (d) Ritual artifacts
  - (e) Discarded materials (i.e. Indian mounds with shells and animal bones)
  - (f) Sites of historical significance to the community, state, or nation, such as battlegrounds, encampments, villages, etc.
  - (g) Traditional cultural properties.
- [3] Land-Disturbing Activities – Activities that involve grading, construction of buildings, excavations, reforestation, landscaping, placement of any fill or spoil or other terrestrial impact.
- [4] Undisturbed Land Areas – Surface and/or subsurface land areas that have not been disturbed either during the construction phase of the site or during current operations, or if there is uncertainty at the site about the degree of disturbance.

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#### 4.0 **RESPONSIBILITIES**

- [1] Entergy Nuclear Environmental Focus Group - is responsible for maintaining, reviewing and interpreting this procedure.
- [2] Site Environmental Representatives - are responsible for:
  - (a) Conducting environmental reviews of land disturbance activities in accordance with this procedure to ensure either existing or potentially existing cultural resources are protected to the maximum extent practicable.
  - (b) Ensuring that the State Historic Preservation Office (SHPO) is notified for activities that may affect existing or potentially existing cultural resources, if required by specific state laws, SHPO, operating license conditions or site reporting procedures.
- [3] Site Departments – are responsible for complying with Sections 5.1 through 5.3 of this procedure.
- [4] Contract Managers and Contractors – are responsible for complying with Sections 5.1 through 5.3 of this procedure.

#### 5.0 **DETAILS**

##### 5.1 PRECAUTIONS AND LIMITATIONS

- [1] Land disturbing activities must be stopped immediately in the event that there is evidence of a historical or archaeological artifact and the SHPO notified for guidance prior to re-commencing land disturbing activities.

##### 5.2 LAND DISTURBANCE OF UNDISTURBED AREAS

<b>NOTE</b>
If the land disturbance activity is occurring within the Protected Area Fence that encloses the power block area, then no further actions are required regarding this procedure.

- [1] Site Departments, Contract Managers and Contractors, for activities involving land disturbance in undisturbed areas are to:

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5.2 cont

- (a) Complete Section A of Attachment 9.1 to this procedure (Land Disturbance Environmental Review Form) and forward to the Site Environmental Representative for review.
  - (b) Obtain approval from the Site Environmental Representative prior to the activity commencing.
  - (c) Adhere to the management requirements identified in Section C of Attachment 9.1 (Land Disturbance Environmental Review Form), as applicable to the land disturbance activity.
- [2] Site Environmental Representative, upon receipt of Attachment 9.1 (Land Disturbance Environmental Review Form), is to:
- (a) Contact SHPO for activities that may affect existing or potentially existing cultural resources.
  - (b) Complete Section B of the Form and if applicable Section C.
  - (c) If approved, return a copy of the completed Form to the requester.
  - (d) If not approved, notify the requestor of the reasons for denying the approval.
  - (e) Maintain copies of the required documents on file.
  - (f) Conduct periodic visual observations of the area to ensure that any management requirements identified in Section C of Attachment 9.1 (Land Disturbance Environmental Review Form) are followed.
  - (g) Ensure that mitigation measures are implemented as appropriate.

5.3 MODIFICATION/REMODELING OF CULTURAL RESOURCE STRUCTURES

- [1] Site Departments, Contract Managers and Contractors, for activities involving modifications/remodeling to cultural resource structures are to:
- (a) Complete Section A of Attachment 9.2 to this procedure (Cultural Resource Structure Modification/Remodeling Review Form) and forward to the Site Environmental Representative for review.

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5.3 cont

- (b) Obtain approval from the Site Environmental Representative prior to the activity commencing.
  - (c) If applicable, adhere to the management requirements identified in Section C of Attachment 9.2 (Cultural Resource Structure Modification/Remodeling Review Form).
- [2] Site Environmental Representative, upon receipt of Attachment 9.2 (Cultural Resource Structure Modification/Remodeling Review Form) is to:
- (a) Contact SHPO to inform them of the activity.
  - (b) Complete Section B of the Form and if applicable Section C.
  - (c) If approved, return a copy of the completed Form to the requester.
  - (d) If not approved, notify the requestor of the reasons for denying the approval.
  - (e) Maintain copies of the required documents on file.
  - (f) Conduct periodic visual observations of the area to ensure that any management requirements imposed by SHPO are followed.
  - (g) Ensure that mitigation measures are implemented as appropriate.

5.4 ROUTINE SURVEILLANCES

- [1] The Site Environmental Representative should:
- (a) Conduct periodic environmental rounds to ensure that no unauthorized activities occur that could damage existing or potentially existing culturally protected resources.
  - (b) Notify the SHPO and the NRC if ground disturbing activities are discovered within an existing or potentially existing culturally protected resource area, if required by operating license conditions, SHPO or site reporting requirements.
  - (c) Obtain a certified archaeologist to conduct a damage assessment of the affected area, if deemed necessary.

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## 5.5 SPECIAL PROTECTION PROCEDURES

- [1] Should the site find it necessary to conduct any activities within a culturally protected area and if required by operating license conditions, SHPO or site procedures, the Environmental Site Representative should notify the SHPO and NRC in writing of the proposed activity. The notification should include, but not limited to:
- A description of the proposed activity.
  - Description for the need for the activity.
  - A map showing the location of the planned activity in relation the culturally protected areas.
  - A demonstration for the need to perform the activity within the culturally protected area.
- [2] The NRC, after consultation with the SHPO, will advise the site whether or not a mitigation plan is required.

## 5.6 RECORDS

<b>NOTE</b>
If the cultural resources review is performed as a result of an EN-EV-115 review, then the forms generated via this procedure should be filed with the EN-EV-15 screening paperwork.

- [1] Site Environmental Representative should maintain the following documents on file:
- (a) Completed Land Disturbance Environmental Review Forms (Attachment 9.1 to this procedure).
  - (b) Completed Cultural Resource Structure Modification/Remodeling Review Forms (Attachment 9.2 to this procedure).
  - (c) Conversation and correspondence records involving the State Historic Preservation Office and/or NRC.
  - (d) Records of modification/remodeling activities associated with cultural resource structures.

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**6.0 INTERFACES**

- [1] NMM Procedure EN-IS-112, Trenching, Excavation and Ground Penetrating Activities
- [2] NMM Procedure EN-EV-115, Environmental Reviews and Evaluations

**7.0 RECORDS**

None

**8.0 OBLIGATION AND REGULATORY COMMITMENT CROSS-REFERENCES**

8.1 OBLIGATIONS AND COMMITMENTS IMPLEMENTED OVERALL

None

8.2 SECTION SPECIFIC OBLIGATIONS AND COMMITMENTS

None

8.3 SITE SPECIFIC COMMITMENTS

Step	Site	Document	Commitment Number or Reference
[1]	ANO	1CAN090005	P-17051

**9.0 ATTACHMENTS**

- 9.1 Land Disturbance Environmental Review Form (Typical)
- 9.2 Cultural Resource Structure Modification/Remodeling Review Form (Typical)

**A. Land Disturbance Activity**

1. Brief Description of Activity: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

2. Amount of Land Involved:

	<1 Acre
	1 – 5 Acres
	>5 Acres

3. Location of Affected Land Area (attach map also): \_\_\_\_\_  
 \_\_\_\_\_

4. Expected Duration of Activity: \_\_\_\_\_

**B. Environmental Review**

1. Consultation with the State Historic Preservation Office Required:  Yes  No

2. SHPO Protection Measures Imposed:  Yes  No  Not Applicable

3. Existing historical or archaeological sites:  Yes  No

4. Visual Walk-down of Land Area Required:  Yes  No

5. Date(s) of Visual Walk-down: \_\_\_\_\_

6. Potential historical or archaeological site(s) Identified during Walk-down:

Yes  No  Not Applicable

**ATTACHMENT 9.1 LAND DISTURBANCE ENVIRONMENTAL REVIEW FORM (TYPICAL)**  
**SHEET 2 of 2**

**C. Required Management Practices**

Management Practice(s)	Yes	No	NA
Stop the activity if a potential historical or archaeological site is discovered or if an existing site is damaged.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notify the Site Environmental Representative immediately in the event that a potential historical or archaeological site is discovered during the land disturbance activity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In the event that a potential historical or archaeological artifact is discovered, do not resume the land disturbance activity until the Site Environmental Representative has performed an evaluation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Place a protective barrier around existing historic or archaeological site(s).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notify the Site Environmental Representative immediately in the event that an existing historical or archaeological site is damaged during the land disturbance activity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Remarks:** Potential evidence that a historical or archaeological site may exist would be the presence of pottery, glass, arrowhead, bones, tools, weaponry, wooden or metal structures, flakes, brick, mortar or plaster.

**SHPO Protective Measures:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Approved By: \_\_\_\_\_ / \_\_\_\_\_  
Signature Date



**ATTACHMENT 9.2 CULTURAL RESOURCE STRUCTURE MODIFICATION/REMODELING REVIEW FORM (TYPICAL)**  
**SHEET 1 of 1**

**A. Modification/Remodeling Activity**

1. Description of Activity: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Expected Duration of Activity: \_\_\_\_\_

**B. Environmental Review**

1. SHPO Contacted:  Yes  No

2. Date SHPO Contacted: \_\_\_\_\_

3. SHPO Protective Measures Imposed:  Yes  No

**C. SHPO Protective Measures (if applicable)**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Approved By: \_\_\_\_\_ / \_\_\_\_\_

Signature

Date