

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896  
SACRAMENTO, CA 94296-0001  
(916) 653-6624 Fax: (916) 653-9824  
calshpo@ohp.parks.ca.gov  
www.ohp.parks.ca.gov



15 February 2007

Reply To: NRC061102A

Jennifer Davis, Branch Chief  
Environmental Review Branch  
Division of Waste Management and  
Environmental Protection – Office of Federal and State Material Safety  
United States Nuclear Regulatory Commission  
Washington D.C., 20555-0001

Re: Section 106 Consultation for Rancho Seco Nuclear Generating Station License Termination Plan, Sacramento County, CA

Dear Ms. Davis:

Thank you for your continued consultation regarding the above referenced undertaking pursuant to 36 CFR 800, the regulations that implement Section 106 of the National Historic Preservation Act of 1966, as amended. This letter is in response to your request for comments regarding the above referenced undertaking.

I presently understand the undertaking consists of termination of the license for the Rancho Seco Nuclear Generating Station but I am unclear as to what future improvements will be made as mentioned in your 30 October letter and if these activities will be considered in future consultations or are part of this undertaking. In addition, you mention on the second page of your letter, the License Termination Plan (LTP) documents the actions that the licensee plans to undertake to decontaminate and decommission the site. Does this involve excavation and remediation of the soils? If so, is this considered part of this undertaking?

In your letter, you establish the boundaries of the Area of Potential Effect (APE) for the undertaking as the "Industrial Area" of the site, which is the 1,004 hectare owner-controlled area facility. I am unable to concur with the determination of the APE until NRC provides a map of the APE so that I can better assess whether this APE is sufficient.

It appears that the Commission has considered the presence of potential archaeological and historic properties within the APE; however, I feel the Commission effort has not fully documented potential historic properties. First, considering the controversial history of the construction of Rancho Seco, I would recommend the NRC evaluate the Station as a historic property taking Criterion Consideration G in to account. Secondly, in terms of potential archeological properties I would appreciate a copy of the California State University Sacramento report mentioned in your letter and a search at the appropriate California Historical Resources Information Center search.

Because I am deferring comment on the identification and evaluation of the properties within the APE, until additional documentation is provided, I would like to suspend consideration of the undertakings effect until we have reached a consensus on the identification effort.

Thank you again for considering historic properties in your planning process. I look forward to further consultation regarding future decommission activities. If you have any questions or

concerns, please contact Amanda Blosser of my staff at (916) 653-9010 or at [ablosser@parks.ca.gov](mailto:ablosser@parks.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Susan K Statten for". The signature is written in black ink and is positioned above the typed name.

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer

MWD:ab