



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

September 10, 2008

Mr. Gregory F. Suber
Document Control Desk, MS T-8F05
Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: AREVA NP, INC. License Renewal
License # SNM-1227 / Docket # 70-1257
Log No: 121007-20-NRC

Dear Mr. Suber;

Thank you for contacting our department. We have reviewed the Draft Environmental Assessment (EA) you provided for the proposed AREVA NP, INC. License Renewal for its facility in Richland, Benton County, Washington.

We do not concur with your Determination of No Historic Properties Affected.

We offer the following comments:

- The Area of Potential Effect (APE) has not been surveyed for cultural resources as documented on page 30 Section 3.9, paragraph 2 of the EA.
- The Area of Potential Effect based upon studies in the area has the high potential for significant cultural properties as documented and acknowledged on page 30 and page 31 of the EA.
- The NRC consultation with the concerned tribes indicated concern and the requests for additional consultation along with the identification of traditional cultural properties' in the area as documented on page 47, Section 5.9 and page 48 Section 5.18.
- Therefore, we believe for this proposed NRC undertaking a determination of Adverse Effect with the development of a Programmatic Agreement (PA) for the life of the proposed 40 year license is appropriate.



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- We believe a substantive stipulation of the PA is the development of an Historic Property Management Plan (HPMP) that would address National Historic Preservation Act (NAHP) Section 106 compliance for the life of the 40 year license is appropriate.

We have multiple models for such a PA and the associated HPMP. Please feel free to contact me for references or examples. We look forward to further discussions with the NRC and the other consulting parties in developing both a PA and an HPMP that meets the requirements of 36 CFR800.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.

Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents. We look forward to further consultation.

Sincerely,



Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
email: rob.whitlam@dahp.wa.gov



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P.O. Box 48343 • Olympia WA 98504-8343



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