

MD #07-001

March 23, 2007

Ms. Elizabeth Cole, Administrator
Project Review and Compliance
Office of Preservation Services
Maryland Historical Trust
Maryland Department of Planning
100 Community Place
Crownsville, MD 21032

Subject: Phase Ib Cultural Resources Investigation – Draft Interim Report
Calvert Cliffs Nuclear Power Plant Site, Lusby, Maryland

Dear Ms. Cole:

UniStar Nuclear, LLC is considering the possibility of constructing a new nuclear power generating unit. A potential site that we are looking at is Constellation Energy's existing Calvert Cliffs Nuclear Power Plant (CCNPP) Site in Lusby, Maryland. UniStar Nuclear is currently planning to submit a Combined License application to the U.S. Nuclear Regulatory Commission (NRC), requesting approval to construct and operate the new unit. NRC's decision to issue a license meets the definition of an 'undertaking' in the National Historic Preservation Act and 36 CFR 800, "Protection of Historic Properties," Section 16(y), and thus is subject to consultation under Section 106 of the Act and 36 CFR 800. NRC, as the lead agency, has authorized applicants, at 36 CFR 800.2(4), to initiate consultation with the State Historic Preservation Officer (SHPO). UniStar Nuclear is submitting this letter to request consultation by the Maryland SHPO on the possible project and is requesting concurrence by the SHPO with the determination of the area of potential effect (APE), the identification of historic properties in the APE, the assessment of effect to historic properties, and recommendations for further work on potentially eligible resources.

If the generating unit and construction and operation-phase support facilities were to be located on the CCNPP site, they would be located entirely on the current CCNPP site except for water-dependent facilities (e.g., cooling water intake and discharge structures), which could be located on the Chesapeake Bay shoreline or a short distance offshore. All construction activities would occur within a 600-acre project area adjacent to the existing CCNPP Units 1 and 2. The location of the CCNPP site is shown in Attachment 1: "Calvert Cliffs Nuclear Power Plant Site, Lusby, Maryland (Cove Point, MD, Quadrangle)."

UniStar Nuclear, with the assistance of cultural resource specialists from GAI Consultants, Inc. (GAI) and Tetra Tech NUS, Inc. (TtNUS) determined the APE for potential physical impacts to cultural resources as the 600-acre potential project area, and determined the APE for potential

visual effects as an additional 1000 feet beyond the 600-acre boundary which encompasses the potential project view shed.

UniStar Nuclear conducted a Phase Ib cultural resources investigation of the project APE to, as defined, identify resources that are eligible or potentially eligible for listing on the National Register of Historic Places (NRHP). GAI conducted the background research, fieldwork, and reporting for the study. The attached UniStar Nuclear approved Draft Interim Report presents the findings and recommendations of the investigation, a Determination of Effects assessment and completed Maryland Historic Trust Determination of Eligibility forms. The investigation revealed three architectural resources within the APE that are eligible for listing on the NRHP; Preston's Cliff (CT 59), Camp Conoy, and portions of the Baltimore and Drum Point Railroad (CT 1295). In addition, there are five archaeological resources within the APE that are potentially eligible for listing on the NRHP; Field Site Numbers 1, 7, 8, 9, and 10.

UniStar Nuclear has determined that Preston's Cliff would not be adversely affected by the potential project; however, Camp Conoy and the Baltimore and Drum Point Railroad would be adversely affected by the potential undertaking. UniStar Nuclear has also determined that under the potential development plan, the five potentially eligible archaeological resources could be adversely affected by the possible undertaking. UniStar Nuclear has proposed further work in the attached Draft Interim Report (i.e., Chapter VI: Phase II Workplan) to be conducted on these five archaeological sites to determine their eligibility to the NRHP. A full report on the Phase I cultural resources investigation will be included in a subsequent, combined Phase I/Phase II report that we plan to submit to your office once it is final.

Additionally, we are providing information as was requested in your office's correspondence dated November 20, 2006, on the current status of Maryland Inventory of Historic Properties locations that were identified by your office as being on or in the vicinity of the potential project area. Attachment 2, "Status of Cultural Resources in Vicinity of Proposed Project," contains information gathered by GAI on each resource including a brief description and GAI's determination as to whether the resource was within the project's APE. Those resources determined to be outside the APE were not included in the Phase Ib study.

Thank you for your attention to this matter. If you have any questions or need additional information, please contact me at (410) 864-6441.

Respectfully,

R. M. Krich

Attachments:

- 1) Calvert Cliffs Nuclear Power Plant Site, Lusby, Maryland (Cove Point, MD, Quadrangle)
- 2) Status of Cultural Resources in Vicinity of Proposed Project
- 3) GAI Consultants Draft Interim Report, Phase Ib Cultural Resources Investigation, dated March 14, 2007

cc: Rich McLean – MD Department of Natural Resources (2 copies)

Ms. Elizabeth Cole

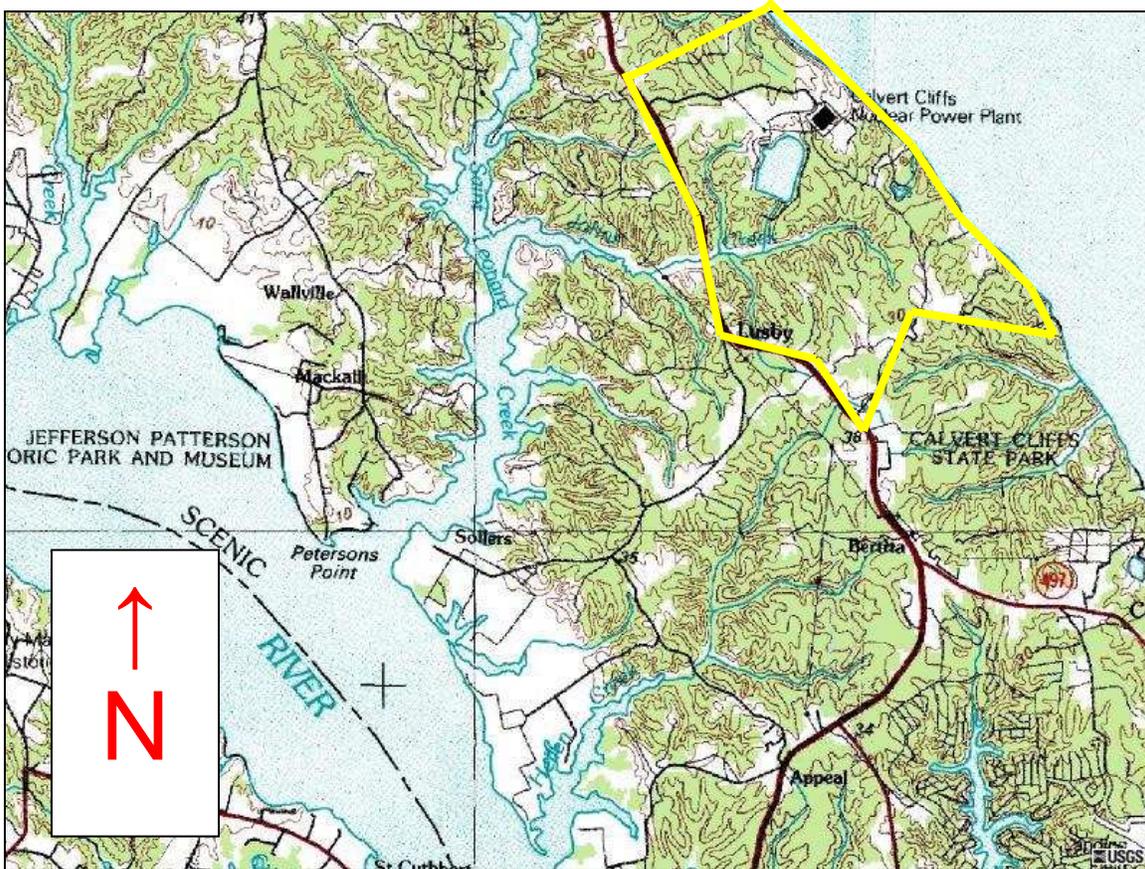
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bcc: Yvonne Abernethy (w/o Attachment 3) – Constellation
Carla Logan – Constellation
John Price – UniStar Nuclear
Kathy Roxlau – TtNUS
Tom Roberts (w/o Attachment 3) – UniStar Nuclear
George Vanderheyden (w/o Attachment 3) – UniStar Nuclear
George Wrobel – UniStar Nuclear

ATTACHMENT 1

Calvert Cliffs Nuclear Power Plant Site
Lusby, Maryland (Cove Point, MD, Quadrangle)



Approximate Boundary of Calvert Cliffs Nuclear Power Plant Site

ATTACHMENT 2

Status of Cultural Resources in Vicinity of Proposed Project

Archaeology

Site 18Cv7—Charles's Gift (alternate name: Preston's Cliffs CT 59)

- Located at Calvert Cliffs Nuclear Power Plant Visitor's Center
- Eighteenth century domestic site includes frame residence with brick chimneys and brick foundation (CT 59), log tobacco barn (CT 59A) and frame tobacco barn (CT 59B)
- Residence was demolished and ruins were stabilized in the 1970s; frame barn (CT 59B) used for visitor's center
- Resource addressed in Phase Ib Draft Interim Report.

Site 18Cv217—Johns Creek Cabin

- Located on knoll north of Johns Creek and just west of Old Route 2/4, approximately 2000 feet west of the project area boundary
- Nineteenth to early twentieth century domestic site/country store; includes fieldstone foundation, brick chimneys and rubble
- Site was destroyed by construction of Maryland Route 2/4
- Resource determined to be outside the area of project effect (APE).

Site 18Cv312—Day Cemetery

- Located in subdivision west of Maryland Route 2/4 (south of Planter's Wharf Creek) over 2000 feet west of the project area boundary
- Small cemetery (31x31 meters) with gravestones dating to mid nineteenth century; one gravestone has been removed, two gravestones have been moved and the remainder are in situ
- Resource determined to be outside the APE.

Historic Built Environment

CT-58—Parrans Park

- Located in western portion of Old Bay Farm section of project area
- Eighteenth century domestic site included a frame residence (CT 58) and tobacco barn (CT 58A)
- Residence was demolished by BG&E in 1972; the tobacco barn is still standing and has been used for storage and offices by BG&E
- Resource addressed in Phase Ib Draft Interim Report.

CT 59—Preston's Cliffs

- See Site 18Cv7 above
- Resource addressed in Phase Ib study.

CT 154—Calvert Cliffs Nuclear Power Plant

- Existing power plant constructed in mid-1970s
- Resource addressed in Phase Ib Draft Interim Report.

CT 673—James B. Laveille Farmhouse

- Located on Pardoe Road (Maryland Route 765) west of Maryland Route 2/4 and just north of town of Lusby; situated over 2000 feet southwest of project area boundary
- Two story frame farmhouse built circa 1900
- Resource determined to be outside the APE.

ATTACHMENT 2

Status of Cultural Resources in Vicinity of Proposed Project

CT 691—Robert G. Pardoe Cross-Gable Farmhouse

- Located on Pardoe Road west of Maryland Route 2/4 and just north of town of Lusby; situated over 2000 feet southwest of project area boundary
- One and a half story, cross-gable farmhouse built in late nineteenth century
- Resource determined to be outside the APE.

CT 693—House with Log Outbuildings

- Located on Camp Conoy Road, 0.25 miles west of the Chesapeake Bay; located approximately 2000 feet south of project area boundary
- Abandoned two story frame farmhouse with stone and brick chimneys (built circa 1870), property includes two log outbuildings (one corn crib and one structure of undetermined use)
- Resource determined to be outside the APE.

ATTACHMENT 3

**GAI Consultants Draft Interim Report,
"Phase Ib Cultural Resources Investigation," dated March 14, 2007**



*Maryland Department of Planning
Maryland Historical Trust*

*Martin O'Malley
Governor*

*Anthony G. Brown
Lt. Governor*

*Richard Eberhart Hall
Secretary*

*Matthew J. Power
Deputy Secretary*

June 7, 2007

Mr. R. M. Krich
Senior Vice President, Regulatory Affairs
UniStar Nuclear
111 Market Place, Suite 200
Baltimore, MD 21202

Re: MHT Review of Phase I Cultural Resources Investigations
Calvert Cliffs Nuclear Power Plant
Calvert County, Maryland

Dear Mr. Krich:

Thank you for providing the Maryland Historical Trust (MHT) with a copy of the draft interim report on the Phase I cultural resources investigations that have been conducted for the above-referenced location. We have reviewed the documents in accordance with Section 106 of the National Historic Preservation Act and Sections 5A-325 and 5A-326 of the State Finance and Procurement Article and are writing to provide our comments regarding potential effects on historic properties.

Archeology: The draft report, *Phase IB Cultural Resources Investigation: Calvert Cliffs Nuclear Power Plant, Calvert County, Maryland* (Munford and Hyland 2007), is largely consistent with the reporting requirements of the *Standards and Guidelines for Archeological Investigations in Maryland* (Shaffer and Cole 1994) and presents the necessary documentation on the goals, methods, results, and recommendations of the Phase I survey work that has been conducted within the project area. The document is well-organized and well-written and provides readers with particularly useful site summaries and recommendations. While certain elements have not been included in the interim report (see below), it is our understanding that a full and comprehensive Phase I/Phase II report will be produced once all subsequent Phase II investigations have been completed. Please note that the following items should be addressed in the preparation of the full report:

- The report should include an Abstract that summarizes the purpose of the historic preservation work, the nature and location of the undertaking, and the findings and recommendations that have resulted from the investigations.
- The report must also include a prehistoric and historic context with an appropriate level of detail.
- Both an artifact inventory and the qualifications of the principal investigator must be included in the report as appendices.



- The title for Figure 1 (project area) must include the name of the USGS quadrangle (Cove Point).
- Each of the fourteen archeological sites identified during the survey must be referred to throughout the final report (including on the map labeled as Figure 2) by the appropriate Maryland inventory numbers. Compliance reports should not be submitted to MHT until site numbers have been assigned and can be incorporated into the document.
- The final report should be double-sided, as this practice will conserve space in the MHT Library.

The Phase I survey was carried out between November of 2006 and January of 2007 and resulted in the identification of fourteen archeological sites. Attachment 1 lists each of these sites along with brief site descriptions, our recommendations regarding each site's eligibility for the National Register of Historic Places, and the need for additional archeological investigations. It is our opinion that Phase II evaluative investigations are warranted for four of the identified sites (18CV474, 18CV480, 18CV481, and 18CV482). The Phase II efforts must be sufficient to: a) identify the sites' vertical and horizontal boundaries; b) interpret the sites' cultural affiliations, functions, and significance; c) evaluate the integrity of the sites; d) conclusively determine each site's eligibility for the National Register of Historic Places; and e) define the need for further archeological work. The investigations must be undertaken by a qualified archeologist and performed in accordance with the *Standards and Guidelines for Archeological Investigations in Maryland* (Shaffer and Cole 1994).

Based on the investigation's results, we will be able to determine whether or not the project will have an effect on National Register eligible archeological resources and make appropriate recommendations regarding measures to avoid, minimize, or mitigate any such effects. Implementation and review of the Phase II research should be coordinated with our office, and we will be happy to provide guidance on the recommended work.

Historic Built Environment: The project site contains five properties that are included in the Maryland Inventory of Historic Properties (MIHP). MHT was provided with determination of eligibility forms to assess the significance and integrity of each property and determine if it is eligible for listing in the National Register of Historic Places. The forms meet the Standards and Guidelines for Architectural and Historical Investigations in Maryland and have been added to the MIHP for the benefit of future researchers.

Researchers preparing the forms recommended that Parran's Park (CT-58) be found ineligible for listing in the National Register of Historic Places. After careful consideration, we have found the property to be eligible under Criterion A, for association with agricultural history. MHT agrees with the recommendations that the Baltimore and Drum Point Railroad right of way (CT-1295), Camp Conoy (CT-1312), and Preston's Cliffs (CT-59) are eligible for listing in the National Register of Historic Places. Our November 20, 2006 letter noted that the power plant (CT-154), which was constructed in the 1970s, was unlikely to be eligible and did not warrant detailed study. Once plans for the proposed undertaking are available, we will work with all interested parties to determine what effects, if any, upcoming work may have on the four eligible properties.

If you have any questions or need further information, please do not hesitate to contact either Dixie Henry (for archeology) at 410-514-7638 \ dhenry@mdp.state.md.us or Jonathan Sager (for historic built environment) at 410-514-7636 \ jsager@mdp.state.md.us. We look forward to receiving a copy of the full Phase I/Phase II

Mr. R. M. Krich
Calvert Cliffs Nuclear Power Plant
June 7, 2007
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report, when it becomes available, and we also look forward to continued consultation as project planning and Phase II investigations proceed. Thank you for providing us with this opportunity to comment.

Sincerely,



J. Rodney Little
Director \ State Historic Preservation Officer
Maryland Historical Trust

JRL \ JES \ DLH
Attachment

cc: Paul Kallan (NRC)
R. McLean (DNR)
Barbara Munford (GAI Consultants)
Kirsti Uunila (Calvert County)
George Wrobel (Constellation Energy)

Attachment 1
MHT Recommendations for Archeological Sites
Identified During Phase I Survey – Calvert Cliffs Nuclear Power Plant, Calvert County, Maryland

Site Number	Site Description	National Register Status	Recommended Action
18CV474	High density scatter of 19 th century artifacts and a fieldstone foundation	Insufficient data	Phase II
18CV475	Low density scatter of 19 th century artifacts and a disturbed fieldstone foundation	Ineligible	No further work warranted
18CV476	Small, low density 20 th century refuse area	Ineligible	No further work warranted
18CV477	Mid to late 20 th century refuse area and outbuilding	Ineligible	No further work warranted
18CV478	Low density scatter of 20 th century artifacts, heavily disturbed	Ineligible	No further work warranted
18CV479	Prehistoric lithic scatter, low density, no diagnostics	Ineligible	No further work warranted
18CV480	Remains of Parran's Park farmstead (CT-58), mid 19 th to 20 th century artifact concentration and two tobacco barns	Insufficient data	Phase II
18CV481	19 th to early 20 th century domestic site	Insufficient data	Phase II
18CV482	19 th to early 20 th century domestic site	Insufficient data	Phase II
18CV483	Scatter of mid 19 th to 20 th century artifacts, significant disturbance, no evidence of features	Ineligible	No further work warranted
18CV484	Low density scatter of 20 th century artifacts, loss of integrity	Ineligible	No further work warranted
18CV485	Low density scatter of mid 19 th to early 20 th century artifacts, no evidence of features	Ineligible	No further work warranted
18CV486	Low density scatter of 19 th to 20 th century artifacts, no evidence of features	Ineligible	No further work warranted
18CV487	Low density scatter of 19 th century artifacts, no evidence of features	Ineligible	No further work warranted

*Please note that GAI has recommended that Phase II investigations be conducted at site 18CV483. However, given the lack of associated features and the significant disturbance that has taken place due to construction and landscaping activities, we believe that the site is ineligible for the National Register of Historic Places and that Phase II studies are *not* warranted for Section 106 purposes.