



NPD-MISC-2008-017
August 18, 2008

Mr. Peter Sandbeck
Administrator, State Historic Preservation Office
Deputy State Historic Preservation Officer
4617 Mail Service Center
Raleigh NC 27699-4617

RE: Proposed Expansion, Harris Nuclear Plant, ER 06-2238

Dear Mr. Sandbeck:

Progress Energy is considering the expansion of Harris Nuclear Plant, in Wake and Chatham Counties, North Carolina. During a recent audit by the Nuclear Regulatory Commission (NRC), it was requested that we reiterate our intent to follow the requirements of Section 106 of the National Historic Preservation Act, as outlined in our archaeological survey plan submitted to your office earlier this year. Our purpose in writing you today is to strengthen the record and to clarify our intent.

You may recall that the Areas of Potential Effect (APEs) for cultural resources for this project, as defined last year included the following:

- 180 acres slated for the construction of Units 2 and 3 and associated infrastructure. This was surveyed and reported in Patch (2006). Two sites and three isolated finds were discovered; all were recommended not eligible. Your office concurred.
- An intake structure and water make-up line to transfer water from the Cape Fear River to Lake Harris. This was surveyed and reported in Espenshade (2007). Three sites and two isolated finds were discovered. All were recommended not eligible. Your office concurred.
- Approximately 4,000 acres to be inundated by the proposed expansion of Lake Harris. In consultation with your office, a survey plan was devised and presented in Espenshade et al. (2007). Your office reviewed and approved the survey plan.

Subsequent to the 2007 submittals, it has become clear that the proposed undertaking may also include ground-disturbing activities associated with new access road(s), new transmission lines, lay-down yards, railroad relocation, relocation of existing roads and bridges threatened by the lake expansion, and other, as yet unspecified actions. Progress Energy wishes to be explicit in stating our intent to assure Section 106 compliance for any and all additions to the undertaking, should this undertaking go forward.

Progress Energy will notify your office as additions to the APE are defined, will seek your concurrence with the revised definition(s) of the APE, and will complete the necessary Phase I archaeological and historic resource surveys, the Phase II evaluations (where indicated), and the Phase III mitigation of adverse effects studies (where indicated). All work will be conducted in compliance with the guidelines of the North Carolina Office of State Archaeology, and in keeping with the Department of Interior standards.

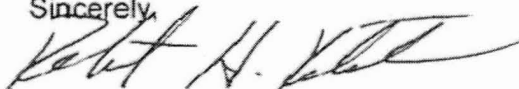
Progress Energy also wishes to reaffirm its commitment to complete the necessary Phase I, Phase II, and Phase III studies on the three originally defined APEs as listed above. We have already completed the Phase I surveys for the first two APEs to your approval. The Phase I survey of the 4,000 acres to be inundated will be scheduled to assure sufficient time to complete Phase II or III studies for those areas that require further investigation. In those areas that require Phase II or Phase III studies, the work will be completed prior to any ground-disturbing activities. Progress Energy will coordinate directly with your office to determine appropriate mitigation or other measures, as needed, in accordance with federal and state regulations and Progress Energy policy.

Progress Energy has established procedures for inadvertent discoveries during construction activities and post-licensing. Our guidelines for employees and contractors are designed to protect historic sites, historic landmarks, cemeteries/human graves, and artifacts or archaeological sites during land-disturbing activities. If a project or work activity inadvertently uncovers an archaeological resource, activities in the site area would be halted, and the appropriate Progress Energy Environmental Support Organization (ESO) would be contacted. For the Harris project, the Environmental Health and Safety Services (EHSS) would be the ESO, and thus would be the point of contact. In the event of an inadvertent find, a cultural resource assessment will be performed, and Progress Energy, through EHSS, will consult with your office, as necessary, to determine the appropriate steps to be taken prior to resuming site activities. We would appreciate your review and concurrence that our procedures, as noted above, are sufficient in the event that previously unknown cultural resources are found during and/or after construction.

As indicated by our earlier correspondences and meetings, Progress Energy has made a strong commitment to assure Section 106 compliance in all aspects of the proposed undertaking. Absent a formal agreement document, this letter and your concurrence will represent documentation of our intent.

As always, thank you for your continued assistance on this project. Progress Energy looks forward to working closely with your office throughout the Section 106 process.

Sincerely,



Robert H. Kitchen
Manager, Nuclear Plant Licensing

cc: Elizabeth Calvit, CH2M HILL
Chris Espenshade, New South Associates
Paul Sneed



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North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

September 10, 2008

Robert H. Kitchen, Manager
Nuclear Plant Licensing
Progress Energy Carolinas, Inc.
PO Box 1551
Raleigh, NC 27602

Re: Proposed Expansion, Harris Nuclear Plant, Chatham and Wake Counties, ER 06-2238

Dear Mr. Kitchen:

Thank you for your letter of August 18, 2008, concerning the above project.

We have reviewed the procedures established by Progress Energy for inadvertent discoveries of cultural resources during construction activities and post-licensing as outlined in your letter. It is our opinion that these procedures are sufficient to evaluate such discoveries and provide for mitigation of effects, if necessary.

Your letter also outlines the steps previously taken and those yet to be taken by Progress Energy for the Harris Plant expansion project to comply with Section 106 of the National Historic Preservation Act. The outline is an accurate description of completed activities and includes a commitment to implement the agreed upon plan for future cultural resource investigations. We look forward to working with your staff and your consultants on the successful completion of the Section 106 process for this project.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/807-6579. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

Peter Sandbeck

cc: Chris Espenshade, New South Associates