

CCNPP3COLA PEmails

From: Lutchenkov, Dimitri [Dimitri.Lutchenkov@constellation.com]
Sent: Monday, April 20, 2009 4:43 PM
To: 'RLittle@MDP.STATE.MD.US'; 'DHenry@MDP.STATE.MD.US'
Cc: 'Anderson, Kathy NAB02'; 'Gray, Susan T'; 'Barbara A Munford'; Quinn, Laura
Subject: Draft Mitigation Plan - Calvert Cliffs Unit 3
Attachments: UN#09-202 - Draft Mitigation Plan Ltr (2).pdf

Follow Up Flag: Follow Up
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Regards,

Dimitri Lutchenkov
Director, Environmental Affairs
UniStar Nuclear Energy
410-470-5524 (w)
410-370-9090 (m)

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Subject: Draft Mitigation Plan - Calvert Cliffs Unit 3
Sent Date: 4/20/2009 4:43:23 PM
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From: Lutchenkov, Dimitri

Created By: Dimitri.Lutchenkov@constellation.com

Recipients:

"Anderson, Kathy NAB02" <Kathy.Anderson@usace.army.mil>
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Tracking Status: None
"Barbara A Munford" <b.munford@gaiconsultants.com>
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Options

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Recipients Received: Follow Up

Dimitri Lutchenkov
Director, Environmental Affairs

750 East Pratt Street, Suite 1600
Baltimore, Maryland 21202



April 20, 2009

UN#09-202

Mr. J. Rodney Little, Director
State Historic Preservation Officer
Maryland Historic Trust
100 Community Place
Crownsville, MD 21032

Attn: Ms. Dixie Henry

Subject: Draft Mitigation Plan, Adverse Effect for NRHP-Eligible Historic Properties, Calvert Cliffs Nuclear Power Plant, Calvert County, Maryland

Reference: 1) J. Rodney Little (MHT) to William Seib (USACE), MHT Review of Phase II National Register Evaluations and Assessment of Effects for Cultural Resources, Calvert Cliffs Nuclear Power Plant Expansion, Calvert County, Maryland, dated February 13, 2009.

Enclosed please find the document, "Draft Mitigation Plan, Adverse Effect for NRHP-Eligible Historic Properties, Calvert Cliffs Nuclear Power Plant, Calvert County, Maryland." This draft plan has been prepared in response to the Maryland Historic Trust's comments as they were provided to UniStar Nuclear Energy via the Mr. J. Rodney Little February 13 letter (Reference 1) to Mr. William Seib, Chief of the Maryland Section Southern Regulatory Branch of the Baltimore District of the U.S. Army Corps of Engineers.

If you have any questions concerning the attached document, please call Mr. Dimitri Lutchenkov at (410) 470-5524.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Lutchenkov", with a long horizontal line extending to the right.

Dimitri Lutchenkov

Enclosure – Draft Mitigation Plan, Adverse Effect for NRHP-Eligible Historic Properties, Calvert Cliffs Nuclear Power Plant, Calvert County, Maryland

UN#09-202
April 20, 2009
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cc: Kathy Anderson – US Army Corps of Engineers
Susan Gray – Power Plant Research Program
Barb Munford – GAI Consultants
Laura Quinn – NRC Project Manager, Environmental Projects Branch 2

**Enclosure
Draft Mitigation Plan,
Adverse Effect for NRHP-Eligible Historic Properties,
Calvert Cliffs Nuclear Power Plant,
Calvert County, Maryland**

**Draft Mitigation Plan
Adverse Effect for NRHP-Eligible Historic Properties
Calvert Cliffs Nuclear Power Plant
Calvert County, Maryland
April 15, 2009**

GAI Consultants, Inc. (GAI) has conducted Phase I and Phase II cultural resources investigations of the Calvert Cliffs Nuclear Power Plant (CCNPP) expansion project on behalf of UniStar Nuclear Development, LLC (UniStar). This work has resulted in the identification of historic properties within the Area of Potential Effect (APE) of the proposed project. Consultation with the Maryland Historical Trust (MHT) (letter dated February 13, 2009) has determined that the undertaking will have an adverse effect on two of the identified historic properties: the Baltimore & Drum Point Railroad (CT-1259) and Camp Conoy (CT-1312). Construction will directly impact both historic properties. Consultation has been initiated in order to produce a Memorandum of Agreement (MOA), which will include agreed-upon measures designed to mitigate the adverse effect on each resource. As one of the terms of the MOA, this mitigation plan will allow the undertaking to proceed within the Section 106 process.

Historic Properties Adversely Affected

Baltimore & Drum Point Railroad (CT-1259)

The Baltimore & Drum Point Railroad has been determined NRHP-eligible under Criteria A and C. Within the project APE, this historic property consists of several non-contiguous segments of a nineteenth-century railroad construction project that was never completed. Based on current project design, construction of a roadway and additional nuclear power block at CCNPP will demolish segments of the rail bed that maintain integrity and contribute to the significance of the resource, thereby diminishing the qualifying characteristics of the Baltimore & Drum Point Railroad. By removing rail bed segments from the landscape, the historic property will be adversely affected.

Camp Conoy (CT-1312)

Camp Conoy, a recreational facility dating from the first half of the twentieth century, has been determined NRHP-eligible under Criteria A. The project will cause a change in the qualifying characteristics of the historic property. Proposed construction of power block facilities will result in the destruction of contributing buildings that constitute this historic property and convey its historic significance. By removing the contributing buildings from the landscape, the historic property will be adversely affected.

Mitigation Documentation Overview

To resolve adverse effects, GAI recommends that UniStar adopt a mitigation plan based on the documentation and recordation of the adversely affected historic properties prior to their demolition, for the benefit of future public education and outreach. The mitigation plan shall include historical and architectural investigations relevant to the significant characteristics of each historic property. The mitigation is described in the four tasks below.

Task 1—Project Management, Section 106 Consultation, and Meetings

Project management will ensure that assignments are clearly delineated and efficiency is maintained throughout the project. This task also includes logistical coordination of fieldwork and archival research and, if necessary, attendance at one project meeting in Crownsville, Maryland, with the MHT. GAI will update project status monthly via email.

As a first step, GAI can identify consulting parties with a stake in the historic properties at CCNPP. It is expected that consulting parties may include the United States Army Corps of Engineers, the Calvert County Historical Society, the Calvert County Department of Planning and Zoning, and the MHT. GAI will draft invitation letters to and, if necessary, coordinate a telephone conference with consulting parties. Throughout the mitigation project, GAI will consult with UniStar on proceeding within the Section 106 compliance process. It is assumed that preparation of 36CFR§800.11(e) documentation and the MOA will be completed by MHT.

Task 2—Archival Research

GAI will conduct archival research to develop an historic context and to prepare historic overviews for each of the two adversely affected historic properties. Archival research will consist of a review of such information as survey reports, historic overviews, historic mapping, and local records relative to the Baltimore & Drum Point Railroad and Camp Conoy, available at local and state repositories, including the MHT. The results of archival research will be used to establish the chain-of-title for ownership and verifiable dates of construction of both historic properties.

Task 3—Field Recordation

Field recordation of the two adversely-affected historic properties will include mapping, photography, detailed written descriptions, and as appropriate, architectural investigations or topographic survey.

For mitigating adverse effects to the Baltimore & Drum Point Railroad, GAI surveyors will conduct a topographic survey of rail bed segments throughout the project PE. Based on the results of this survey, GAI will prepare measured drawings of the rail bed. This historic property will also be documented with digital photographs and detailed written descriptions.

For Camp Conoy, GAI will prepare measured drawings of elevations and floor plans of each of Camp Conoy's contributing buildings, as agreed upon in consultation with the consulting parties. GAI will also complete a site plan illustrating the spatial relationship of contributing resources, driveways, roadways, and important natural features. Fieldwork will include photographic documentation (in digital format), specifically several interior and exterior photographs of the camp buildings and existing conditions. Photography will support a detailed written description of the exterior and interior features of each historic property and its setting.

Task 4—Technical Report

Upon completion of fieldwork, GAI will prepare a separate reader-friendly technical report for each of the two historic properties describing the methods and results of each investigation. The reports will incorporate maps, measured drawings, documentary materials, photographs, an historic narrative, and, where appropriate, a chain-of-title table. The report on each historic property will recount the general county history as it pertains to local development and settlement patterns. The narrative will document how each property reflects historic trends and

events that contributed to the community's history. The reports will place the historic properties in their appropriate historic contexts and establish their associative and historic value within those contexts.

Following submittal and review of the technical reports, the consulting parties may have a meeting at MHT offices in Crownsville (or alternatively, a conference call) to solicit and discuss comments on the draft reports prior to finalization. If necessary, once a coordinated set of comments is received from the parties, GAI will revise and submit final reports for distribution to consulting parties. GAI will produce eight copies of the final report on each historic property.