

Draft Interim Report
Phase Ib Cultural Resources
Investigation
Calvert Cliffs Nuclear Power Plant
Calvert County, Maryland

Prepared for:
UniStar Nuclear Development, LLC

Prepared by:
Barbara A. Munford, M.A.
and Matthew G. Hyland, Ph. D.
GAI Consultants Inc.
385 East Waterfront Drive
Homestead, Pennsylvania



GAI Project No. C060570.10

March 14, 2007

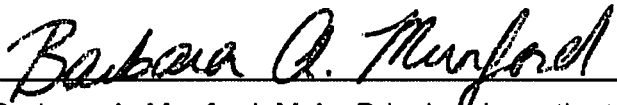



Draft Interim Report
Phase Ib Cultural Resources Investigation

Calvert Cliffs Nuclear Power Plant
Calvert County, Maryland

Prepared for:
UniStar Nuclear Development, LLC

Prepared by:


Barbara A. Munford, M.A., Principal Investigator


Matthew G. Hyland, Ph. D., Architectural Historian
Megan L. Otten, Cultural Resource Specialist

GAI Consultants Inc.
385 East Waterfront Drive
Homestead, Pennsylvania

GAI Project No. C060570.10

March 14, 2007

Contents of the Report are withheld per Section 34 of the National Historic Preservation Act
And
Title 36 of the Code of Federal Regulations Part 800.11(c)

Technical Report
Cultural Resource Records Search within
10-Mile Radius of Calvert Cliffs Nuclear Power Plant
Calvert County, Maryland

Prepared for: Tetra Tech NUS, Inc.
and Constellation Energy

Prepared by: Matthew G. Hyland, Ph.D.
and
Megan L. Otten, B.A.
GAI Consultants

GAI Project No. C060570.10 Task 002

March 5, 2007



Contents of the Report are withheld per Section 34 of the National Historic Preservation Act
And
Title 36 of the Code of Federal Regulations Part 800.11(c)

Management Summary Phase Ia Cultural Resources Investigation's Contents of the Report are
withheld per Section 34 of the National Historic Preservation Act
And
Title 36 of the Code of Federal Regulations Part 800.11(c)

Thomas Fredrichs - Piscataway Conoy Confederacy contact information

From: Barbara A Munford <b.munford@gaiconsultants.com>
To: "TLF@NRC.gov" <TLF@NRC.gov>
Date: 02/20/2008 1:28 PM
Subject: Piscataway Conoy Confederacy contact information
CC: "Wrobel, George" <George.Wrobel@unistarnuclear.com>, "Price, John" <John.Price2@unistarnuclear.com>, "Yvonne.Abernethy@constellation.com" <Yvonne.Abernethy@constellation.com>, "Benjamin Resnick" <b.resnick@gaiconsultants.com>, "MELukey@mactec.com" <MELukey@mactec.com>

Tom-

As requested, the following is the contact information we have for Mervin Savoy, Piscataway Conoy Confederacy:

Ms. Mervin Savoy
 Tribal Chairman
 Piscataway Conoy Confederacy and Subtribes, Inc.
 P.O. Box 1484
 LaPlata, MD 20646
 (301) 932-2899
msavoy9836@aol.com

Barb

Barbara A. Munford, M.A.
 Lead Archaeologist

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Mail Envelope Properties (47BC7148.BE1 : 6 : 19425)

Subject: Piscataway Conoy Confederacy contact information
Creation Date 02/20/2008 1:27:20 PM
From: Barbara A Munford <b.munford@gaiconsultants.com>

Created By: b.munford@gaiconsultants.com

Recipients

nrc.gov

OWGWPO02.HQGWDO01

TLF (Thomas Fredrichs)

mactec.com

MELukey CC ('MELukey@mactec.com')

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b.resnick CC (Benjamin Resnick)

constellation.com

Yvonne.Abernethy CC ('Yvonne.Abernethy@constellation.com')

unistarnuclear.com

John.Price2 CC (John 'Price')

George.Wrobel CC (George 'Wrobel')

Post Office

OWGWPO02.HQGWDO01

Route

nrc.gov

mactec.com

gaiconsultants.com

constellation.com

unistarnuclear.com

Files

MESSAGE

TEXT.htm

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Size

1252

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7942

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Date & Time

02/20/2008 1:27:20 PM

Options

Expiration Date:

None

Priority:

Standard

ReplyRequested:

No

Return Notification:

None

R. M. Krich
Senior Vice President, Regulatory Affairs

111 Market Place
Suite 200
Baltimore, Maryland 21202



October 3, 2006

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

Subject: Request for Cultural Resource Information
Calvert Cliffs Nuclear Power Plant Site, Lusby, Maryland

Dear Ms. Cole:

UniStar Nuclear, LLC, requests information from your office on historic and/or archaeological resources on and in the vicinity of our site. This information will assist us with characterization studies being undertaken in support of potential development of up to two additional nuclear power generation units at Constellation Energy's Calvert Cliffs Nuclear Power Plant (CCNPP) site near Lusby, Calvert County, Maryland. As currently envisioned, the generating facilities and construction and operation-phase support facilities would be located entirely on the 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. The location of the CCNPP site is shown in Attachment 1: "Calvert Cliffs Nuclear Power Plant Site, Lusby, Maryland (Cove Point, MD, Quadrangle)."

In view of the long lead times involved, we are planning initiation of field characterization studies to expedite the design, licensing, and permitting of the facility in the event a decision is made to construct the units. In this context, we intend to initiate a Phase I cultural resource investigation to determine the presence and status of historic and archaeological resources on the site. We would appreciate information concerning the site's known resources and the potential for resources that have not yet been identified. Your prompt response will allow us to plan and perform any required field surveys prior to finalizing the proposed construction footprint. As a first step in this process, Mr. George Wrobel contacted your office and spoke with Mr. Jonathan Sagar on Thursday, September 21, 2006. He communicated our project plans and intentions to begin the data collection process immediately. GAI, Consultants Inc., will be conducting both the Phase IA and IB cultural resource investigation work for UniStar Nuclear. As suggested by Mr. Sagar, photographs of structures located within the project area are included in Attachment 2. These four older buildings are remnants of the original Camp Conoy, a Boy Scouts of America facility, which may have begun operations as early as the 1930s.

Maryland Historic Trust
October 3, 2006
Page 2

Thank you for your attention to this matter. If you have any questions or need additional information, please contact me at (410) 230-4892.

Respectfully,

A handwritten signature in black ink, appearing to read "R. M. Krich", written over a horizontal line.

R. M. Krich

Attachments:

- 1 - Calvert Cliffs Nuclear Power Plant Site, Lusby, Maryland (Cove Point, MD, Quadrangle)
- 2 - Calvert Cliffs Nuclear Power Plant Site – Photographs

cc: R. McLean - DNR

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 Contents of the Report are withheld per Section 34 of the National Historic
Preservation Act
And
Title 36 of the Code of Federal Regulations Part 800.11(c)



Maryland Department of Planning
Maryland Historical Trust

Robert L. Ehrlich, Jr.
Governor

Michael S. Steele
Lt. Governor

Audrey E. Scott
Secretary

Florence B. Burian
Deputy Secretary

November 20, 2006

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

Re: Request for Information about Historic Properties
Calvert Cliffs Nuclear Power Plant Site, Lusby, Calvert County, Maryland

Dear Mr. Krich:

Thank you for your recent letter requesting information from the Maryland Historical Trust (MHT) regarding historic properties in the vicinity of the Calvert Cliffs Nuclear Power Plant Site. The planned expansion of the facility will require the approval of federal agencies and is an undertaking subject to review under Section 106 of the National Historic Preservation Act. In response to your inquiry, we have reviewed our files and are writing to offer preliminary comments and request additional information necessary to identify historic properties in accordance with 36 CFR 800.

Archeology: MHT files indicate that several archeological sites are located both within and in the vicinity of the proposed project area. Site 18CV7, for example, is located adjacent to the existing power plant complex and has been identified as an eighteenth century domestic site. Located just south of the project area, site 18CV312 has been identified as an early nineteenth century cemetery, while site 18CV217 (also located just south of the project area) contains the remains of an early twentieth century domestic site and country store. Due to the presence of these sites, MHT staff believe that the Calvert Cliffs nuclear power plant site has a moderate to high potential of containing significant archeological deposits. We are therefore recommending that a Phase I archeological survey take place in all planned disturbance areas prior to construction. The survey must be carried out by a qualified professional archeologist and performed in accordance with the *Standards and Guidelines for Archeological Investigations in Maryland* (Shaffer and Cole 1994). Upon our review of the results, further Phase II evaluative investigations of identified sites may be necessary.

Historic Built Environment: The project area marked in Attachment 1 of your letter includes a number of locations previously included in the Maryland Inventory of Historic Properties (MIHP). These include some properties that were incorporated into the power plant visitors center (portions of CT-59), some that were demolished in the 1970s (CT-58 and portions of CT-59), and the plant itself (CT-154). It is our opinion that the plant, which was constructed beginning in the mid-1970s, is not likely to be eligible for listing in the National Register of Historic Places at this time.

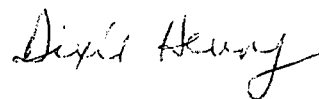
Three additional MIHP locations appear to be near the periphery of the project area. The James B. Laveille Cross-gable House (CT-673), Reba G. Pardoc Cross-gable House (CT-691), and "House with log outbuildings" (CT-693) may have been in poor condition when surveyed in 1980 and since demolished. Please update MHT on the status of these properties. If any of these houses remain extant, provide Determination of Eligibility (DOE) forms for the buildings or explain why they are located outside of the proposed project's area of potential effect.

Attachment 2 of your letter shows 5 buildings within the project area that are not currently in the MIHP. Based on the provided information, it appears that the buildings may date from the mid-twentieth century and have significance under National Register Criteria A, B, or C. We ask that the history of these buildings be investigated. If the "Eagle's Den," "Cabin on a Hill," or prominent and large-scale landscape features were constructed more than 50 years ago, a DOE form should be prepared to determine if the former Camp Conoy complex is eligible for listing in the National Register.

DOE forms must contain sufficient description of buildings, structures, areas of land use, and the overall landscape of a property to evaluate significance and integrity under National Register Criterion C. This should include information regarding feature age, form, stylistic elements, methods of construction, materials, and condition. Forms must also contain sufficient historical context to evaluate a property under National Register Criteria A and B. This should include information derived from historic maps and land records; examination of the existing buildings, structures, and landscape as historical sources; and relevant information from existing reports and other secondary sources. All DOE forms must be completed by a qualified architectural historian, preservationist, or historian and be accompanied by supporting materials as described in *General Guidelines for Compliance-Generated Determinations of Eligibility* and *Standards and Guidelines for Architectural and Historical Investigations in Maryland*. These documents and other information about completing a DOE form can be found on the Trust's website, <http://www.marylandhistoricaltrust.net>.

Thank you for providing us this opportunity to comment. If you have any questions or we may be of assistance, please contact me (regarding archeology) at dhenry@mdp.state.md.us \ 410-514-7638 or Jonathan Sager (regarding historic buildings, structures, or landscapes) at jsager@mdp.state.md.us \ 410-514-7636. Otherwise, we look forward to receiving the requested information and working with you to successfully complete the Section 106 requirements for this undertaking.

Sincerely,



Dixie L. Henry
Preservation Officer
Maryland Historical Trust

DLH / JES / 200603271

cc: R. McLean (DNR)
Kirsti Uunila (Calvert County)



*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.

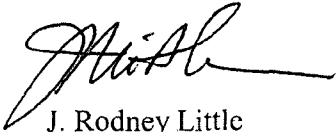
Researchers preparing the forms recommended that Parran's Park (CT-58) be found ineligible for listing in the National Register of Historic Places. After careful consideration, we have found the property to be eligible under Criterion A, for association with agricultural history. MHT agrees with the 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
Page 3 of 3

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,

A handwritten signature in black ink, appearing to read "J. Rodney Little", with a long horizontal flourish extending to the right.

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.

R. M. Krich
Senior Vice President, Regulatory Affairs

750 E. Pratt Street
14th Floor
Baltimore, Maryland 21202-3106
410.864.6441



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.

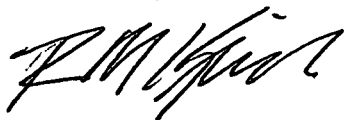
UniStar Nuclear conducted a Phase Ib cultural resources investigation of the project APE to, as defined, identify resources that are eligible or potentially eligible for listing on the National Register of Historic Places (NRHP). GAI conducted the background research, fieldwork, and reporting for the 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

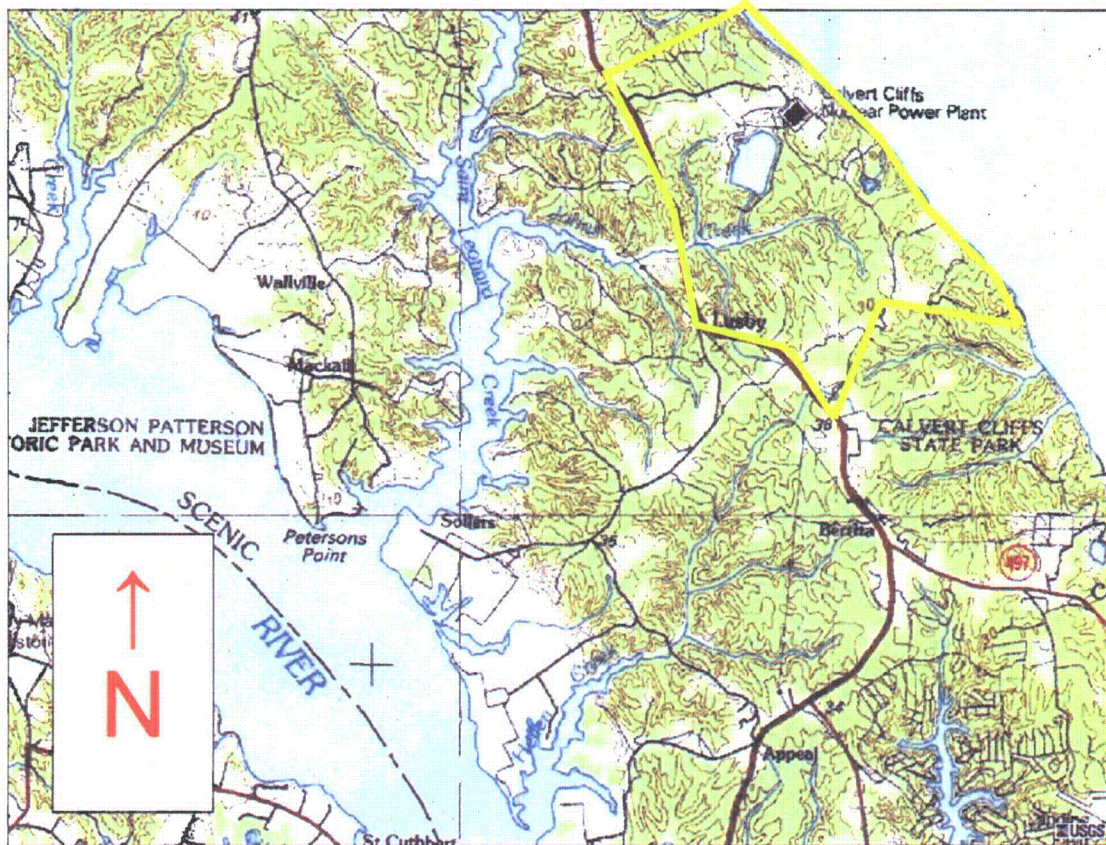
Attachments:

- 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)

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 Contents of the Report are withheld per Section 34 of the National Historic
Preservation Act
And
Title 36 of the Code of Federal Regulations Part 800.11(c)

ATTACHMENT 3

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

Attachment 3 Contents of the Report are withheld per Section 34 of the National Historic
Preservation Act
And
Title 36 of the Code of Federal Regulations Part 800.11(c)