



May 3, 2010

Stephen Lemont
Nuclear Regulatory Commission
Environmental Review Branch
U.S. Nuclear Regulatory Commission
Washington D.C., 20555-0001

Preserving the past, Enriching the future

Our mission: to preserve and promote Idaho's cultural heritage.

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RE: AREVA Eagle Rock Enrichment Facility, Bonneville County, Idaho

Dear Mr. Lemont:

Our office has received information on the expanded footprint, proposed 161 kV transmission line, and archaeological treatment plan for AREVA's proposed Eagle Rock Enrichment Facility in Bonneville County, Idaho. Our comments on each project component and associated document(s) are outlined below. We have also provided guidance on the next steps in the Section 106 review process.

1. **Expanded Footprint:** AREVA wishes to expand the originally proposed footprint for the enrichment facility by 64 acres. The expansion was surveyed by Western Cultural Resource Management and documented in a report dated August 28, 2009. Two sites and seven isolates were identified within the expansion area. We agree that sites AR-2 and AR-3 are not eligible for the National Register of Historic Places for the reasons stated in the report. Although not addressed in the report, we also recommend that the isolates (IF-19 through IF-25) are not eligible.

Before we can accept this report, however, we will need the following: 1) two copies of the report and site forms; and 2) maps showing the site locations attached to *each* site form. These requirements apply to this submission and any future archaeological reports and forms submitted to the Idaho SHPO. For backup and local reference, we send the second copy of the report and forms to the regional repository. In this case, we will send the second copy to the Museum of Natural History in Pocatello.

2. **Transmission Line:** We received a report and site forms completed by North Wind documenting archaeological survey of two proposed alternate routes for a transmission line to the planned Eagle Rock facility.



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We found this report and the project proposal difficult to follow. To remedy this, we first recommend that the report be reformatted to discuss each alternate route separately with archaeological findings and potential effects described by route. The alternatives should be clearly marked on maps in the report.

As the preferred alternative is now known, it too can be shown on a map, and its specific findings and effects discussed in the report. It should be clearly pointed out that no federal land is involved in the preferred alternative, if that is still the case.

The environmental document presents good maps that should be included in the revised archaeological report. Also, the aerials recently sent showing the final surveyed areas (Figure 1, Sheet 1; Figure 1, Sheet 2, etc.) should be included in the revised report.

We will need to receive two copies of the revised report and two copies of each site form. A map should be attached to each site form. It appears that we do not have maps for isolate R1 and for archaeological sites R3 and R7. Archaeological site forms are filed separately from the IHSI forms, so we need a map attached to each.

What is NNR1? It appears on figure 13, but we cannot find any other reference to it.

3. Treatment of Site MW004 and Analysis of Obsidian Artifacts:

We support the proposed treatment of site MW004. We should receive two copies of the report that documents the investigations along with two copies of photographs and other appendices or attachments.

We appreciate receiving the letter report on the XRF analysis.

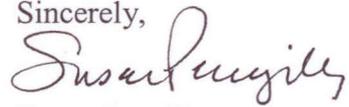
4. **Next steps:** When the project design is finalized and all of the archaeological survey and site evaluations have been completed, the NRC should draft a Memorandum of Agreement (MOA) that outlines mitigation measures. The agreed upon Treatment Plan should be referenced as planned mitigation, and the XRF can be listed as completed mitigation. If monitoring is required, that too should be described in the MOA.

We will be happy to review a draft of the MOA. NRC also needs to notify the Advisory Council on Historic Preservation of the adverse effect and determine the Council's participation. If the Council chooses to not participate, NRC and our office will conclude the agreement with Argonne (and/or AREVA) as concurring parties. Mitigation documentation will then be sent to our office for review and acceptance.

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We appreciate your cooperation. If you have any questions, please do not hesitate to call me at 208-334-3847, ext. 107.

Sincerely,



Susan Pengilly
Deputy SHPO and
Compliance Coordinator

cc: Bruce M. Biber, Ph.D., Environmental Science Division, Argonne National Laboratory