Section II. Ground Disturbing Activity

a.: A portion of the Stony Point, Mich 4083-H3-TF-024 (1978) quadrangle map is as attachment 1. See T6S/R10E, Section 21, labeled as "Fermi 1."

b. Attachment 2 contains a markup of site plan showing areas of planned piping excavation.

Section III. Project Work Description and Area of Potential Effects (APE)

a. Attachment 3: A markup of plate 15 from the March 2009 Preliminary National Register of Historic Places Evaluation for the Enrico Fermi Atomic Power Plant.

b. The project APE is shown on DTE Energy's March 2010 License Termination Plan Figure 2-2, *EF1 Survey Unit Designations,* which is provided as Attachment 4.

Section V. Photographs

Photographs of Fermi 1 taken from *Preliminary National Register of Historic Places Evaluation for The Enrico Fermi Atomic Power Plant Monroe County, Lagoona Beach, Michigan* are provided in Attachment 5. Note the approximate camera positions and angles are shown on Attachment 3.

Section VI. Determination of Effect

<u>No Adverse Effect.</u>

Although the Fermi 1 license termination project has the potential to create indirect impacts from decommissioning operation activities (e.g., temporary visual obstruction by industrial equipment and waste packaging), these impacts would be minimal.

The Fermi 1 nuclear power plant could be eligible for listing in the NRHP under Criterion A, for its role in the development of the U.S. nuclear power industry and under Criterion C, for the engineering design of the reactor and its associated components. Although components of the plant were removed during initial decommissioning in 1975 and subsequent remediation activities, the facility retains sufficient physical integrity, supported by extensive evidence, to adequately convey the significance of the plant. Approval of the LTP by the NRC, implementation of the LTP by DECo, and ultimately, termination of the Fermi 1 license will not diminish any interpretive understanding of the facility, as access to the public will continue to be prohibited. The possible demolition of the facility would occur after termination of the Fermi 1 license and as such, is beyond the NRC's jurisdiction.

DECo, however, at the NRC's request, has prepared an evaluation and recordation of the facility. This evaluation (Preliminary National Register of Historic Places Evaluation for the Enrico Fermi Atomic Power Plant, prepared by Commonwealth Cultural Resources Group) was completed in March 2009, and was provided to the State Historic Preservation Office by DECo shortly thereafter. This report indicates that preservation of the plant and objects from the plant

are “not feasible,” and keeping the plant “achieves no preservation purpose as access to the site is severely restricted, and the public would gain no interpretive understanding of the plant.” The evaluation also states that “the plant retains sufficient physical evidence, and comprehensive documentary evidence to reconstruct fully all aspects of the plant’s construction and operation.”

In addition, the American Nuclear Society (ANS) published a book on the Fermi 1 plant in 1979 titled “Fermi-1 New Age for Nuclear Power.” This book provides a 454 page detailed account of the history of the Fermi 1 site, including initial considerations, organizational structures, conceptual design, financing, legal matters, construction permitting, design and construction, testing and preparing for operations, operations, the fuel melting accident, renewed operation, safety, nuclear research and development and other related information.

As part of it preparation for license termination, DECo provided a copy of the ANS publication to the State of Michigan Historic Preservation Office in 2009. This work, combined with the March 2009 assessment, generally appears to meet historic engineering record guidelines. In light of the volume of historic recordation already completed for this site, the NRC believes no further action is necessary.

Attachment 5:

Selected Photographs from
The March 2009 Preliminary
National Register of Historic Places Evaluation for
the Enrico Fermi Atomic Power Plant