

From: Doershuk, John F [mailto:john-doershuk@uiowa.edu]
Sent: Monday, February 15, 2010 11:55 AM
To: Eccleston, Charles
Cc: Thompson, Jerome [DCA]
Subject: DAEC license renewal Supplement 42 DSEIS (NUREG-1437) comment

Dear Mr. Eccleston:

Thank you for providing my office with the Generic Environmental Impact Statement for License Renewal of Nuclear Plants Supplement 42 Regarding the Duane Arnold Energy Center Draft Report for Comment. I understand the public comment period expires April 19, 2010. Please accept the following as my comments as State Archaeologist of Iowa.

- 1) Systematic professional archaeological survey of the vast majority of the DAEC facility lands and associated 101 miles of ITC transmission line ROWs has not been undertaken, therefore I concur that the potential impact of license renewal on historical and archaeological resources should be considered "moderate" simply because there is currently insufficient data to judge otherwise.
- 2) The DSEIS correctly identifies the general DAEC area as one known to be rich in archaeological resources based on the results of intensive surveys of the limited areas in the region thus far subjected to such investigations; the reasonable conclusion is that similar investigation of the DAEC facility and associated ITC transmission ROWs will also lead to discovery of many heretofore unknown archaeological sites of potential significance and subject to the provisions of the National Historic Preservation Act and associated legislation.
- 3) The currently known archaeological resources with the DAEC facility (four sites) and identified as located within the ROWs of the associated ITC transmission lines (12 sites) should be considered as unevaluated for the National Register of Historic Places and the State Historic Preservation Office should be consulted prior to any ground-disturbing activities being conducted at or within 100 feet of these 16 sites. My office is also available to consult on these resources.
- 4) I concur that it is highly desirable that DAEC revise their procedures for consultation with SHPO and develop a comprehensive and effective cultural resource management plan. I recommend DAEC consider a long-term (e.g., 20-year), carefully staged program of systematic archaeological field investigations to establish as fully as possible the population of archaeological resources (sites) and their significance so that when the next license period ends it will be possible to accurately and efficiently make decisions regarding these resources vis-à-vis whatever the future disposition of DAEC may be.

Respectfully, submitted,
John F. Doershuk, Ph.D.
State Archaeologist
John-doershuk@uiowa.edu
319-384-0751
700 CLSB
Iowa City, Iowa 52242-1030