

From: Jones, Doug [DCA]

Sent: Thursday, May 27, 2010 2:30 PM

To: Eccleston, Charles

Cc: Jones, Doug [DCA]; 'Davis (FSME), Jennifer'; O'Rourke, Daniel J.; John F Doershuk

Subject: RE: Comments for Duane Arnold Draft SEIS

Dear Mr. Eccleston:

Thank you for providing our 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. We sincerely apologize for the lengthy delay in our response. Our office only has one comment in regard to the submitted document.

In Section 2.2.9.2. there appears to be some confusing language regarding the National Register consultant recommendations from previous surveys. We do agree that Table 2-16 does appear to be correct. We recommend taking another look at the written section to clarify any inconsistencies such as the one below.

2.2.9.2 Line 5. All but 13LN362 were recommended eligible for listing on the National Register. (this really should be unevaluated for their potential eligibility for listing on the National Register of Historic Places.)

Also, we are aware the Iowa State Archaeologist, John Doershuk, submitted some additional comments. Some of his comments were addressed in our teleconference on March 2. We understood that the remaining comments will be addressed within the document. We do concur with John Doershuk's comment that since a systematic archaeological survey of the majority of the DAEC facility lands and associated 101 miles of ITC transmission line ROWs has not been undertaken 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.

Thank you for the opportunity to provide comments on this document. If you have any questions for me about my comments, please feel free to contact me.

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