



10 CFR 70.5

March 16, 2011

AES-O-NRC-11-00920

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

AREVA Enrichment Services LLC
Eagle Rock Enrichment Facility
NRC Docket No: 70-7015

Subject: Cultural Resources Report Addendum for the Eagle Rock Enrichment Facility and Cultural Monitoring Observations during Road Upgrades and Drilling at the Twin Buttes Substation

AREVA Enrichment Services LLC (AES) had several areas surveyed last fall for cultural resources to supplement prior surveys completed for the planned Eagle Rock Enrichment Facility (EREF). The recent surveys encompassed several isolated areas that had not been included in the previous surveys inventoried by North Wind, Inc. (NWI) in 2009 and by Western Cultural Resources Management (WCRM) in 2008. Enclosure 1 contains the cultural resources report addendum outlining the additional areas surveyed and the survey results.

Pursuant to the U.S. Nuclear Regulatory Commission (NRC)'s letter regarding commencement of construction (Ref. 1) and in accordance with the Archaeological Monitoring and Discovery Plan for the EREF (Ref. 2), AES arranged for a cultural resource monitor to observe ground disturbing activities associated with the re-conditioning of an existing, on-site dirt road. Road upgrades were performed in November 2010, and included the addition of a gravel base course to the existing roadway surface and the placement of several drainage culverts along the road. Enclosure 2 contains a summary of cultural monitoring observations during road improvements. Similarly, and as acknowledged by the State Historic Preservation Office (Ref. 3), geotechnical drilling conducted by Rocky Mountain Power at the future Twin Buttes Substation and at proposed transmission line laydown and tensioning locations from December 14 through December 17, 2010, was observed by a cultural resource monitor. A summary of cultural monitoring observations during substation drilling is provided in Enclosure 3. No cultural sites or features were encountered during either monitoring event.

AREVA ENRICHMENT SERVICES LLC

Solomon Pond Park - 400 Donald Lynch Boulevard, Marlborough, MA 01752
Tel. : 508 229 2100 - Fax : 508 573 6610 - www.aveva.com

NH5501

If you have any questions regarding this submittal, please contact me at (508) 573-6554.

Respectfully,


James A. Kay
Licensing Manager

References:

1. U.S. Nuclear Regulatory Commission letter, "Approval of AREVA Enrichment Services, LLC Exemption Request Related to Requirements Governing Commencement of Construction (TAC L32730)," March 17, 2010
2. Western Cultural Resource Management, "Archaeological Monitoring and Discovery Plan for the Eagle Rock Enrichment Facility," September 17, 2009
3. State Historic Preservation Office letter, "Geotechnical Borings at the Proposed Twin Buttes Substation within Cultural Resource Site 10BV246 (MW004), Eagle Rock Enrichment Facility," November 26, 2010

Enclosures:

1. Archaeological and Historic Survey Report Addendum
2. Cultural Monitoring Observations during Road Upgrades
3. Cultural Monitoring Observations during Drilling at the Twin Buttes Substation

CC:

Breeda Reilly, U.S. NRC Senior Project Manager
Steve Lemont, U.S. NRC Senior Project Manager
Bruce Biwer, Argonne National Laboratory
Ken Reid, Idaho State Historic Preservation Officer (2 copies)

AREVA Enrichment Services LLC
Eagle Rock Enrichment Facility
AES-O-NRC-10-00920

Enclosure 1
Archaeological and Historic Survey
Report Addendum

Archaeological and Historic Survey Report Addendum

Archaeological and Historic Survey Report Addendum

- 1. Project Name:** Eagle Rock Enrichment Facility Visitor Center and Other Inventories
Date: March 15, 2011
Report Author: William M. Harding
Location: Township, Range, and Section: T3N, R34E, Sections 13, 14, 23-26, 36
County: Bonneville
USGS Topographic Map: Kettle Butte, Idaho, 1991

2. Project Description:

AREVA requested several small cultural resource inventories to be completed to supplement surveys that had been completed in prior years for the planned Eagle Rock Enrichment Facility (EREF) west of Idaho Falls, Idaho. These surveys encompassed several isolated areas that had not been included in the previous surveys. Adjacent areas of the project area were inventoried by North Wind, Inc. (NWI) in 2009 and by Western Cultural Resources Management (WCRM) in 2008. The current surveys included the following locations which are shown on Figure 1:

- Proposed visitor center area – transected at 30 m (100 ft) parallel transects; 14.39 acres.
- A proposed interchange area on both sides of U.S. Highway 20 – transected at 30 m (100 ft) parallel transects for a total of 90 m (300 ft) additional corridor width; 21.22 acres
- A transmission line impact area that fell outside the previously surveyed proposed 161 kV transmission line corridor – transected at 30 m (100 ft) parallel transects for a total of 90 m (300 ft) additional corridor width; 51.06 acres.
- A triangular-shaped transmission line impact area adjacent to the transect described above – transected at 30 m (100 ft) parallel transects; approximately 90 m (300 ft) wide at the top; 11.95 acres.
- Another transmission line impact area near the proposed Twin Buttes substation – transected at 30 m (100 ft) parallel transects; approximately 150 m (500 ft) by 180 m (600 ft); 7.87 acres.
- Several laydown and transmission line tensioning locations associated with the planned electrical power lines – transected at 30 m (100 ft) parallel transects. No additional laydown or tensioning sites were surveyed east of the Kettle Substation along the proposed 161 kV transmission line corridor between the Bonneville Substation to the EREF site since these fell within the previously surveyed corridor.
- A triangular segment bisected by the 2009 survey within existing farmland – transected at 30 m (100 ft) parallel transects; 40.11 acres and 17.58 acres.
- An existing farm access road and three short transmission line access roads that fell outside the previously surveyed transmission corridor – The existing road and spurs were walked and a 15 m (50 ft) right-of-way (ROW) was walked on both shoulders of the road. The total length of the road and spurs is approximately 1 mi.
- A proposed access road (Ridge Road) – A 30 m (100 ft) ROW was walked on either side of the proposed centerline. The total length of the proposed road is approximately 1.5 mi.
- A proposed fence – An 8 m (25 ft) transect was walked on either side of the proposed fence line. The fence is proposed around federal property administered by the Bureau of

Land Management. The federal parcel is 40 acres and the fence will be approximately 1 mi long.

- Three additional areas near Highway 20 where various construction activities for fences, roads, staging may occur – transected at 30 m (100 ft) parallel transects; 16.17 acres, 16.41 acres, and 37.93 acres (total of 70.51 acres).
- A new alignment for a portion of a proposed 161 kV transmission line between the Kettle Substation and the EREF – transected at 30 m (100 ft) parallel transects for a total corridor width of 90 m (300 ft).

The inventories occurred on October 20 and 21, 2010 and were conducted by William Harding, RPA (crew chief) and John Michalak. Additional inventories were conducted on November 6, 2010 by Laurie Mauser, RPA. Additional inventories were conducted on November 15, 2010 by William Harding, RPA. Ground visibility was good and ranged from 100% on existing roads to 35% on vegetated areas (Figure 2).

3. Results:

No previously recorded sites are located within the current areas of potential effect (APE). Four resources were noted (see Figure 1), but not recorded (NNR). The first resource (NNR1) is a harvester. It is mostly composed of galvanized steel; however, traces of green paint are visible in some areas of the machine similar to John Deere. A manufacture plaque indicates that it was made by Caterpillar (Figures 3 and 4).

The second resource (NNR2) consists of two potato cellars and four metal silos (Figures 5 through 7). Imprints in the concrete foundations of these buildings indicate that they were erected in 1980 and are too recent to require recordation. They are mass produced metal buildings and do not presently warrant consideration for the National Register of Historic Places (NRHP) for their architecture.

The third resource (NNR 3) is a spoil pile on the south side of U.S. Highway 20. The spoil pile is comprised of basalt from outcrops that were cut from U.S. Highway 20 at the time of its construction (Figure 8).

The fourth resource (NNR 4) is a spoil pile and road cut on either side of U.S. Highway 20 (Figure 9).

4. Conclusions:

AREVA has identified additional areas that will be impacted by EREF construction. These areas include the visitor's center, new alignments of a transmission line, access roads, a fence, laydown and tensioning locations, and an interchange.

Overall, the project actions proposed for the use of the above developments will have **No Effect** upon any cultural resources.

It is recommended that this project be allowed to proceed as proposed. If any cultural resources are encountered during ground clearing and construction activities, all ground disturbing activities will cease until the State Historic Preservation Office (SHPO) is consulted.


Signature of Principal Investigator

March 15, 2011

Date

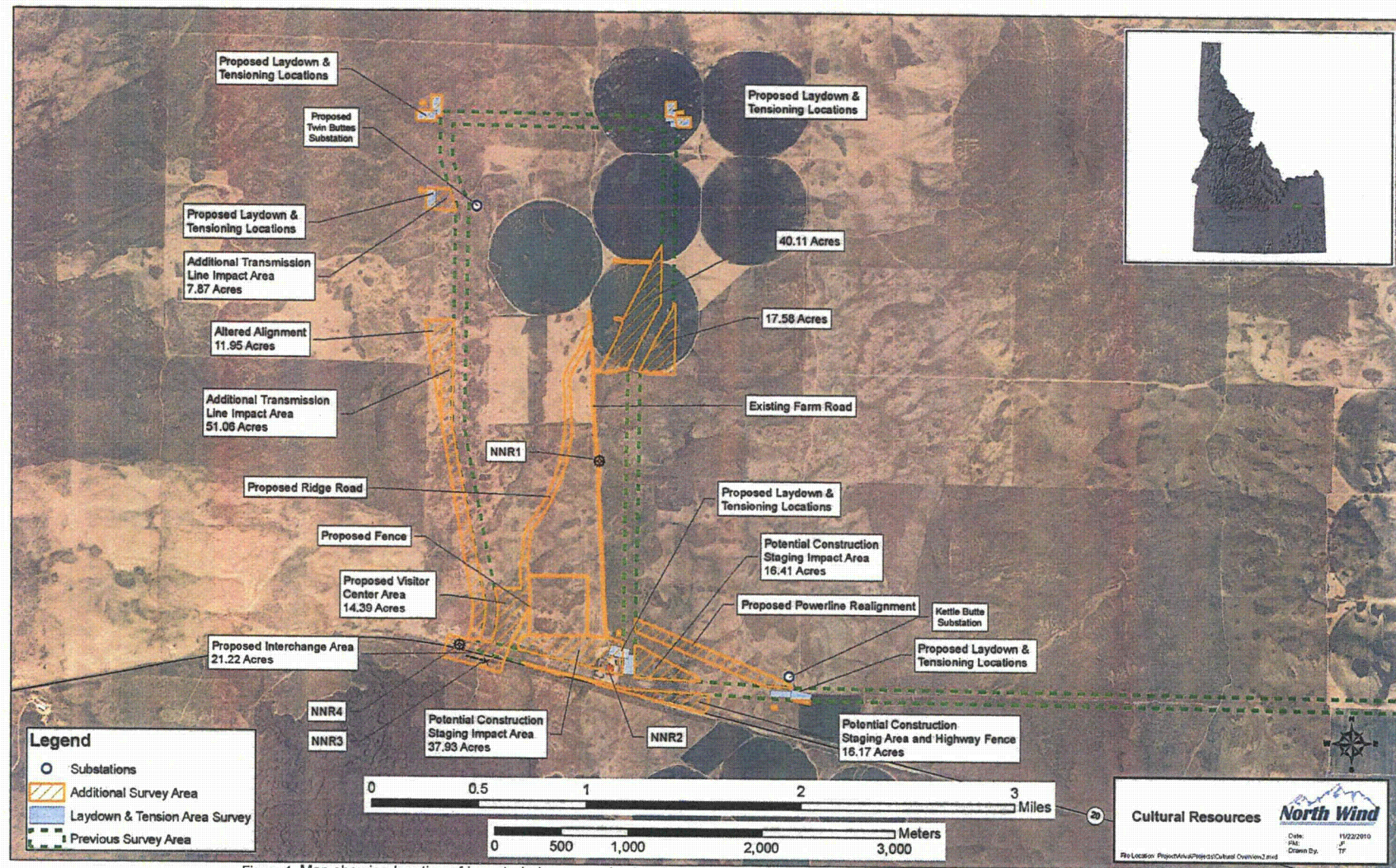




Figure 2. View north of project area.



Figure 3. NNR1, Caterpillar harvester, looking southeast.



Figure 4. NNR1, manufacture plate.



Figure 5.NNR2, Silos, looking northeast.



Figure 6.NNR2, potato cellars, looking north.



Figure 7. Overview of NNR2, silos and potato cellars, looking southeast.



Figure 8. NNR3, basalt spoil pile, looking southwest.



Figure 9. NNR4, basalt spoil pile and road cut, looking northwest.

AREVA Enrichment Services LLC
Eagle Rock Enrichment Facility
AES-O-NRC-10-00920

Enclosure 2
Cultural Monitoring Observations
During Road Upgrades

Cultural Monitoring Observations During Road Upgrades



Corporate Headquarters
1425 Higham Street
Idaho Falls, ID 83402

December 13, 2010

Stacy T. Thomson, P.E.
Advisory Engineer
AREVA NP Inc.
1230 E. Diehl Road - Suite 200
Naperville, IL 60563

Phone: (630)778-4452

SUBJECT: Road boring monitoring

Dear Stacy:

Monitoring occurred November 3 to 6 and November 8 to 10, 2010 by Laurie Mauser, November 15, 2010 by William Harding, and November 16, 2010 by Jeff Shelton. The monitoring was conducted at the request of URS at the AREVA site during ground disturbing activities. Monitoring activities were conducted in accordance with the monitoring plan dated September 17, 2009 and prepared for the Nuclear Regulatory Commission. The plan states that monitoring is to occur during ground disturbing activities by a qualified archaeologist and that historic properties are to be avoided. North Wind was not notified to monitor areas to be cleared of vegetation; however, because no ground disturbance occurs during clearing, it is not required by the monitoring plan. No cultural sites or features were encountered during monitoring.

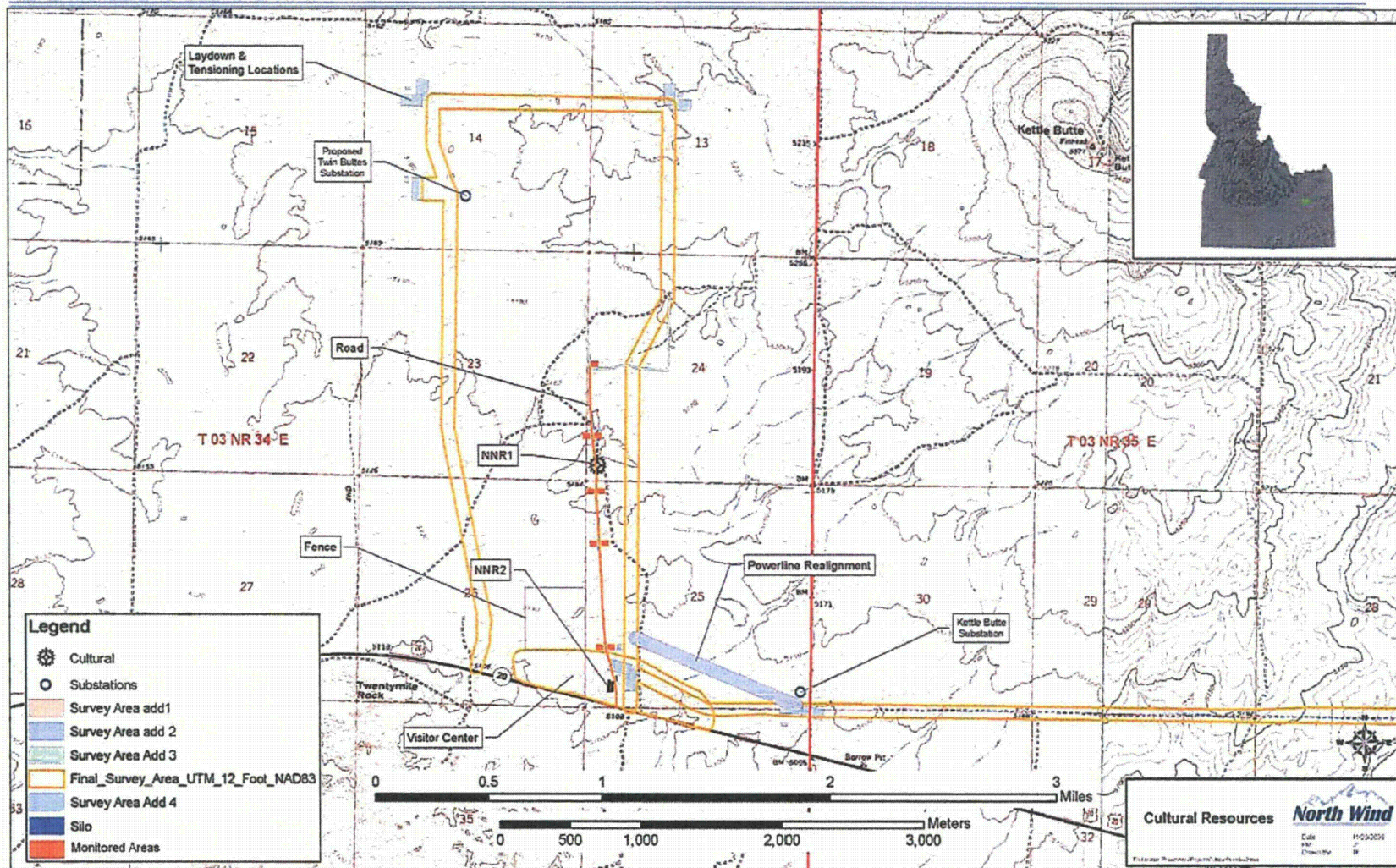
Please contact me if you have any questions or concerns.

Sincerely,

William M. Harding, RPA
Director of Cultural Resources

North Wind

Corporate Headquarters
1425 Higham Street
Idaho Falls, ID 83402



Map Showing location of the monitored road and drainage pits in the project area. Taken from the Kettle Butte (1991), Idaho, quadrangle, USGS 7.5' Series (1:24,000 Scale).

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Enclosure 3
Cultural Monitoring Observations During
Drilling at Twin Buttes Substation

Cultural Monitoring Observations During Drilling at Twin Buttes Substation



Corporate Headquarters
1425 Higham Street
Idaho Falls, ID 83402

January 27, 2011

Stacy T. Thomson, P.E.
Advisory Engineer
AREVA NP Inc.
1230 E. Diehl Road - Suite 200
Naperville, IL 60563

Phone: (630)778-4452

SUBJECT: Substation Borehole Test Monitoring
Eagle Rock Enrichment Facility (EREF) Site

Dear Stacy:

Cultural Resource monitoring of borehole tests occurred at the future Twin Buttes Substation and at proposed transmission line laydown and tensioning locations from December 14 to by December 17, 2010. Jeff Shelton, an archaeological crew chief for North Wind, Inc. conducted the monitor. The monitoring was conducted at the request of AREVA to observe geotechnical boring activities conducted by Rocky Mountain Power. Monitoring activities were conducted in accordance with the Archaeological Monitoring and Discovery Plan for the EREF dated September 17, 2009 and prepared for the Nuclear Regulatory Commission.

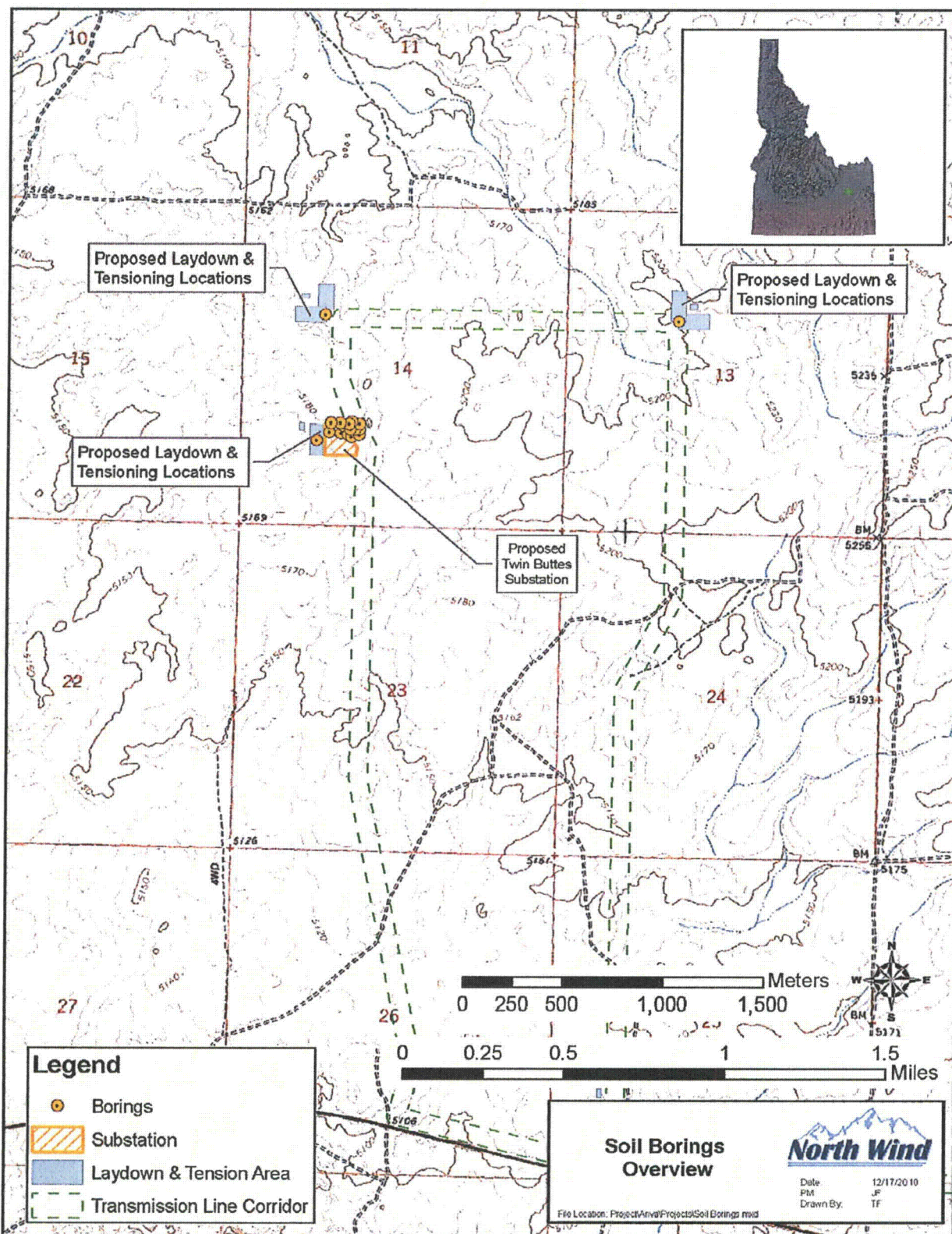
The plan states that monitoring is to occur during ground disturbing activities by a qualified archaeologist and that historic properties are to be avoided.

Ground conditions were snowy; however, the substrate was visible as it was drilled by a tracked drill rig. No cultural sites or features were encountered during monitoring.

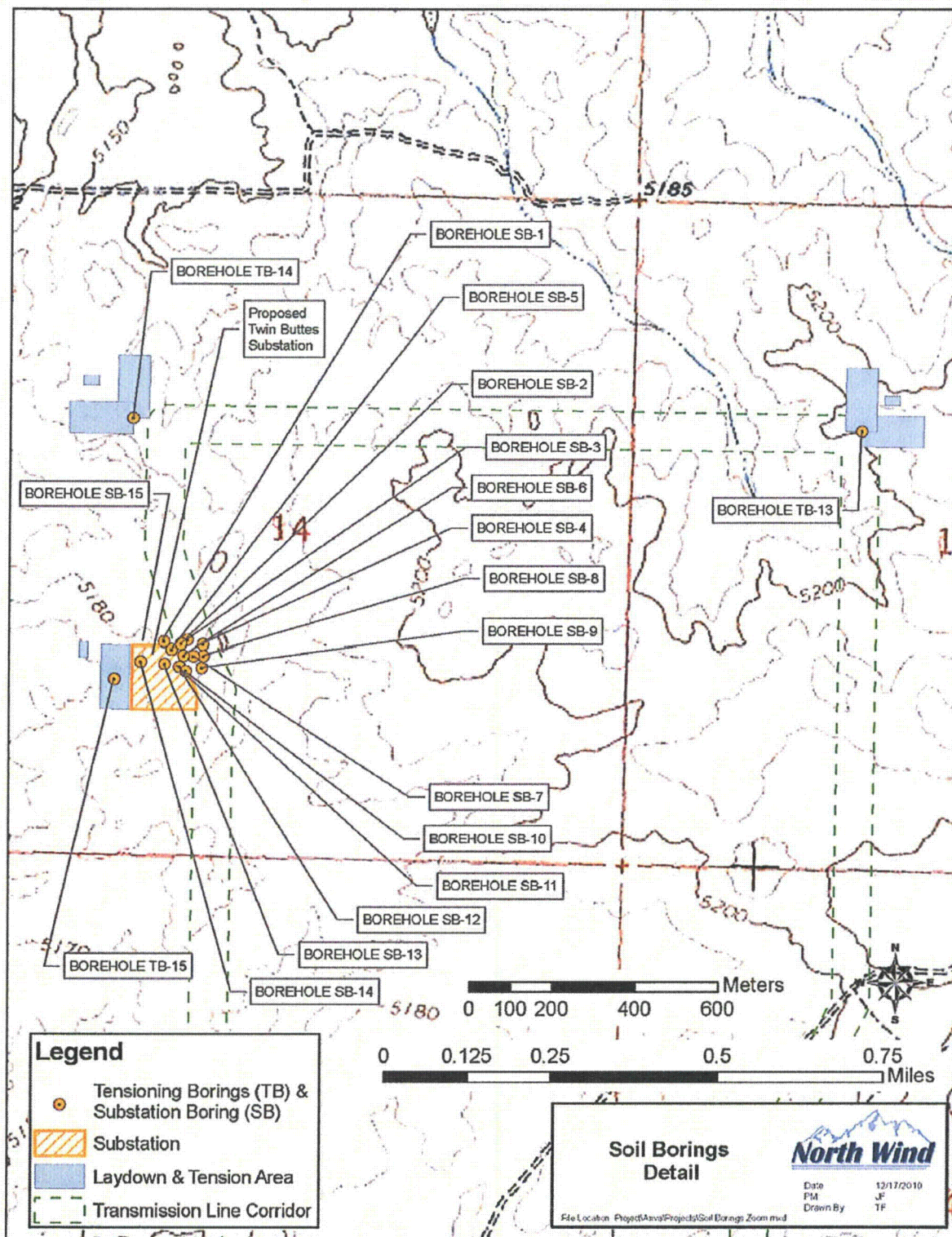
Please contact me if you have any questions or concerns.

Sincerely,

Jeff Shelton
Archaeological Crew Chief



Map showing location of the monitored borehole tests project area. Taken from the Kettle Butte (1991), Idaho, quadrangle, USGS 7.5' Series (1:24,000 Scale).



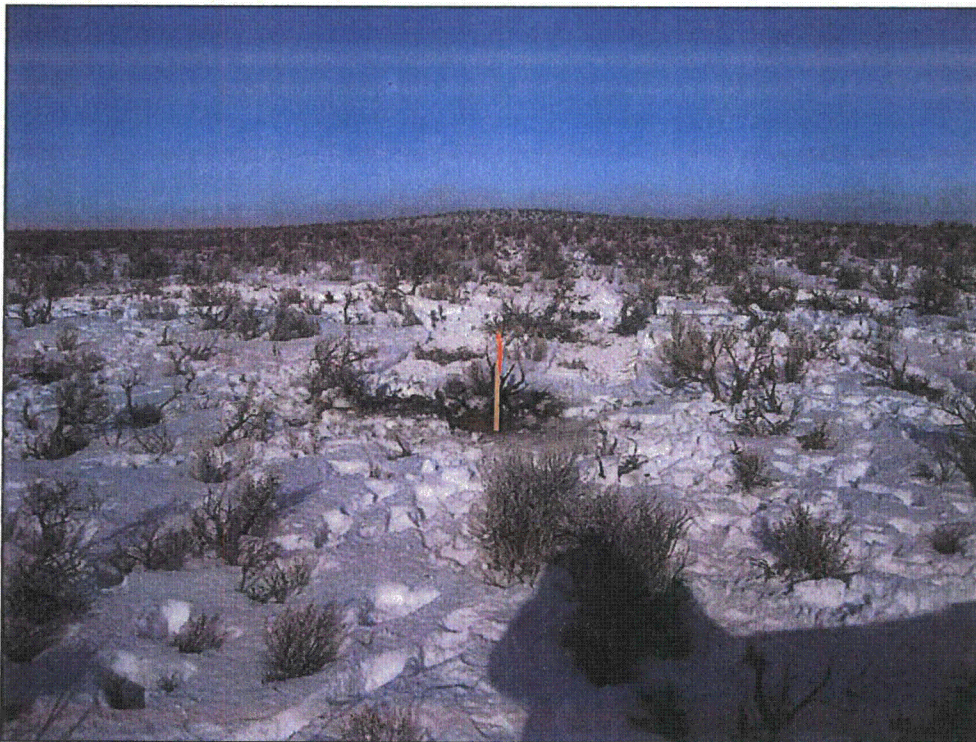
Zoomed in map of the showing the locations of the monitored borehole tests in the project area. Taken from the Kettle Butte (1991), Idaho, quadrangle, USGS 7.5' Series (1:24,000 Scale).



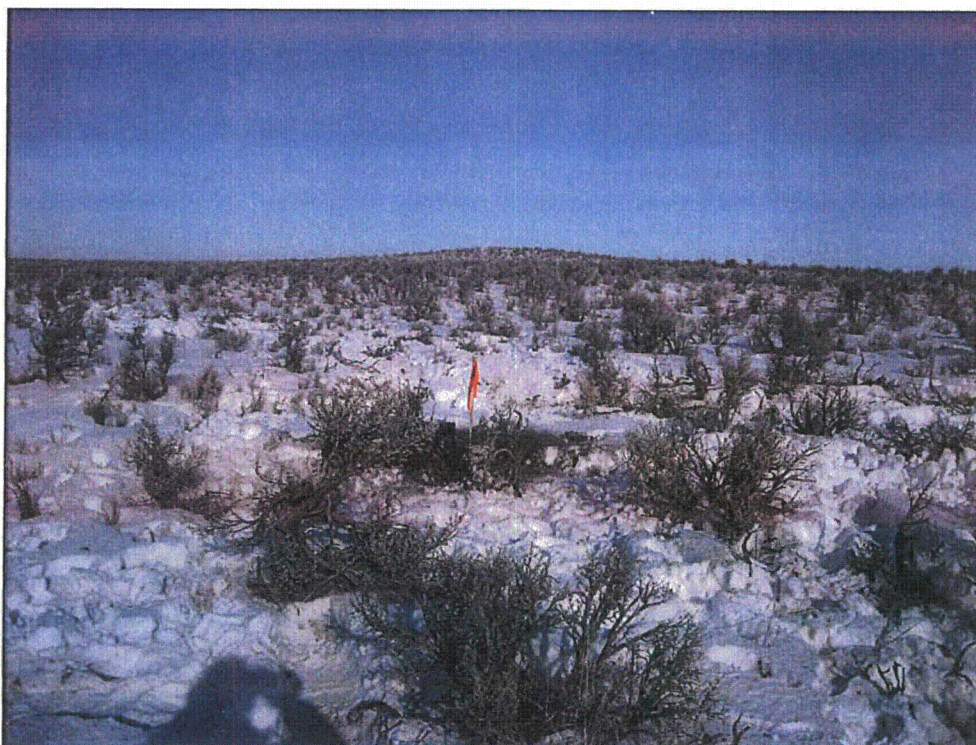
View northwest of the Substation Borehole Test project area.



View north of borehole SB-1.



View north of borehole SB-2.



View north of borehole SB-3, which is representative of the remaining locations.