



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 15, 2011

Ms. Jean Cutler
Deputy State Historic Preservation Officer
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd floor
400 North Street
Harrisburg, PA 17120-0093

SUBJECT: LIMERICK GENERATING STATION LICENSE RENEWAL ENVIRONMENTAL
REVIEW (FILE NO. ER 2004-2024-091-B)

Dear Ms. Cutler:

The U.S. Nuclear Regulatory Commission (NRC or the staff) is conducting an environmental review of the effects of renewing the operating licenses for Limerick Generating Station, Units 1 and 2 (Limerick). Limerick is located in Limerick Township of Montgomery County, Pennsylvania, approximately 35 miles upriver from Philadelphia. Limerick is operated by Exelon Generation Company, LLC (Exelon). The application for renewal was submitted by Exelon in a letter dated June 22, 2011, pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54).

The NRC has established that, as part of the staff's review of any nuclear power plant license renewal action, a site-specific Supplemental Environmental Impact Statement (SEIS) to its "Generic Environmental Impact Statement for License Renewal of Nuclear Plants," NUREG-1437, will be prepared under the provisions of 10 CFR Part 51, the NRC's regulation that implements the National Environmental Policy Act of 1969 (NEPA). In accordance with 36 CFR 800.8(c), the NRC staff is using the process required by NEPA for the preparation of the SEIS to comply with the obligations required under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), in lieu of the procedures set forth in 36 CFR 800.3 through 800.6. Accordingly, the NRC staff is identifying parties who may wish to consult with the staff on the proposed action and is inviting them to do so. Consultation will include participation in the scoping process; identification of historic properties at the Limerick plant site; assessment of the effects of the proposed action on any historic properties identified; and development of alternatives and proposed measures that might avoid, minimize, or mitigate any adverse effects of the proposed action on historic properties. The SEIS will include analyses of potential impacts to historic properties that reflect consultation and will document the NRC staff's determination regarding potential impacts to historic properties as a result of license renewal.

Through this letter, the NRC staff is initiating consultation under Section 106 of the NHPA with the Pennsylvania Historical & Museum Commission and you, in your position as the Deputy State Historic Preservation Officer, regarding the Limerick license renewal application. In the context of NHPA, the NRC staff has determined that the area of potential effects (APE) for a license renewal action is the area at the power plant site and its immediate environs that may be impacted by post-license renewal land-disturbing operations or projected refurbishment

activities associated with the proposed action. The APE may extend beyond the immediate environs in those instances where post-license renewal land-disturbing operations or projected refurbishment activities specifically related to license renewal may potentially have an effect on known or proposed historic sites. This determination is made irrespective of ownership or control of the lands of interest.

The applicant corresponded with your office by letter dated January 19, 2011. Your office replied by letter dated February 16, 2011, that there are historic resources eligible for the National Register of Historic Places located in the area, but that there will likely be no effect on the properties. To avoid any duplication of effort, you may confirm that the previously provided information to Exelon from your office is still current rather than completing a new review. If any information is not current, please provide any applicable updates. Both letters from Exelon and the February 2011 letter from the Pennsylvania Historical and Museum Commission are attached for your reference.

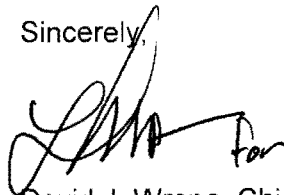
To complete consultation under 36 CFR 800.8(c), the NRC staff will forward the draft SEIS to consulting parties for review and comment and will address the comments in the final SEIS. Your office will receive a copy of the draft SEIS along with a request for comments after it is issued. This draft SEIS will include identification of historic properties, assessment of impacts, and our preliminary determination of their suitability for listing in the National Register of Historic Places. The anticipated publication date for the draft SEIS is July 2012.

The NRC staff plans to hold two public license renewal overview and environmental scoping meetings on September 22, 2011. The first session will be held in the afternoon, and an identical session will be held later that evening. Both sessions will be held at the Sunnybrook Ballroom, 50 Sunnybrook Road, Pottstown, PA 19464. The afternoon session will be from 2:00 PM until 4:00 PM, and the evening session will be from 7:00 PM until 9:00 PM. In addition, the NRC plans to hold a one hour Open House prior to each meeting to answer public questions. You and your staff are invited to attend the public meetings and Open House.

The Limerick license renewal application is available on the internet at <http://www.nrc.gov/reactors/operating/licensing/renewal/applications/limerick.html>.

If you have any questions or require additional information, please contact Mrs. Lisa Regner, License Renewal Project Manager, by phone at 301-415-1906 or by e-mail at Lisa.Regner@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Wrona', with a stylized flourish at the end.

David J. Wrona, Chief
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

cc: Listserv

Michael P. Gallagher, PE
Vice President
License Renewal Projects

Telephone 610.765.5958
www.exeloncorp.com
michaelp.gallagher@exeloncorp.com

Exelon Nuclear
200 Exelon Way
KSA/2-E
Kennett Square, PA 19348

January 19, 2011

Ms. Jean Cutler
Deputy State Historic Preservation Officer
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd floor
400 North Street
Harrisburg, PA 17120-0093

Re: Renewal of Operating Licenses for Limerick Generating Station, Units 1 and 2
Request for Information on Historic and Archaeological Resources

Dear Ms. Cutler,

In mid-2011, Exelon Generation Company, LLC (Exelon Generation; a subsidiary of Exelon Corporation) plans to apply to the U.S. Nuclear Regulatory Commission (NRC) for renewal of the operating licenses for Limerick Generating Station, Units 1 and 2 (LGS). The existing license for Unit 1 will expire on October 26, 2024 and the existing license for Unit 2 will expire on June 22, 2029. The renewal term for each unit would be an additional twenty years beyond the existing license expiration date.

The NRC requires that license renewal applications include environmental reports assessing potential environmental impacts from license renewal activities. One such impact would be effects of license renewal activities on historic or archaeological resources (10 CFR 51.53). Accordingly, we are contacting you to obtain input for use in addressing these effects in the LGS license renewal environmental report. Later, NRC may also request an informal consultation with your office under Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470), and Federal Advisory Council on Historic Preservation regulations (36 CFR 800).

Project Features

LGS existing features that are relevant to the effects of license renewal on historic and archaeological resources include the following:

1. The LGS plant site, which hosts the two generating units, is located on Exelon Generation-owned properties that are mostly situated in Limerick Township, Montgomery County, but some of which are in the adjacent Lower Pottsgrove Township, Montgomery County and directly across the Schuylkill River in East Coventry Township, Chester County.
2. The LGS makeup water supply system, which conveys water from approved sources to LGS for use in its circulating water system, is composed of the following components:
 - o The Perkiomen Pumphouse, located in Graterford Township, Montgomery County, and an associated underground 7.6-mile long Perkiomen Pumphouse-to-LGS pipeline; both are located along an easement held by Exelon Generation within an electrical transmission line right-of-way (ROW) controlled by PECO, a subsidiary of Exelon Corporation;
 - o The Bradshaw Reservoir and Bradshaw Pumphouse, which are both situated in Plumstead Township, Bucks County, on Exelon Generation-owned properties totaling 42-acres;
 - o The Bedminster Water Processing Facility, which is situated in Bedminster Township, Bucks County, on a 3-acre Exelon Generation-owned property; and
 - o An underground water transmission main, which is routed within a natural gas pipeline ROW along an easement held by Exelon Generation that runs from the Bradshaw Pumphouse to the East Branch Perkiomen Creek by way of the Bedminster Facility.

The buried Perkiomen Pumphouse-to-LGS water pipeline and the underground water transmission main are located below ground within ROWs that exist for other purposes, and their operation requires no independent vegetation management or ground disturbing activities along these ROWs. Hence, these underground components of the makeup water supply system are assumed to have no effects on archaeological and historical resources.

3. The LGS transmission system is composed of the following components:
 - o Two electrical transmission lines constructed to connect the LGS main power transformers with two electrical substations (these components are located on the LGS plant site); and
 - o Four 230-kiloVolt (kV) and one 500-kV electrical transmission lines, with associated structures and offsite electrical substations, constructed to connect the onsite electrical substations to the regional electricity grid.

All offsite substations and transmission lines are operated by PECO and are located in ROWs situated in Montgomery and Chester Counties either on PECO-owned properties or on properties for which PECO holds permits, grants, easements, or licenses. Onsite transmission lines traverse only land disturbed during initial plant construction.

Figures 1 through 9, showing the locations of the existing LGS project features, are provided in Attachment 3.

Activities During the License Renewal Terms

LGS license renewal will involve no new construction, refurbishment, ground disturbing activities, changes to operations, or changes to existing land-use conditions. Operation and maintenance activities during the terms of the renewed LGS licenses are only expected to occur in previously disturbed areas or existing ROWs. Hence, no new adverse impacts to known or undocumented archaeological or historical resources are anticipated from license renewal. Notwithstanding, to protect such resources that may be located in previously undeveloped areas on Exelon Generation-owned properties associated with LGS, Exelon Generation has developed a comprehensive Cultural Resources Management Plan ("CRMP"), which will be in place during the period of extended operation. In addition, Exelon Generation has obtained a Historic Architectural Assessment of extant structures contained within the Fricks Lock Historic District, located on Exelon Generation-owned property in East Coventry Township, Chester County. Discussions with township officials are in progress regarding future management of this historic district.

Identification of Cultural Resources

Using the Pennsylvania Cultural Resources Geographic Information System ("CRGIS") on-line database, historic properties and archaeological sites listed on and determined eligible for the National Register of Historic Places within a six-mile radius of the LGS plant site have been identified and are listed in the enclosed Attachment 1, Tables 1 through 3. Exelon Generation will provide this information to the NRC in the LGS license renewal environmental report. Additionally, the NRC will be informed about cultural resources investigations that have been performed previously on land now occupied by the LGS plant site, the LGS makeup water supply system, and the LGS transmission system ROWs. Such investigations are described in the enclosed Attachment 2.

Because license renewal involves no new construction, refurbishment, ground disturbing activities, changes to operation, or changes to existing land use conditions, Exelon Generation does not expect LGS license renewal to adversely affect archeological or historic resources located near the LGS plant site, makeup water supply system, or transmission system ROWs. Nevertheless, we are requesting your help to identify issues we may have overlooked that need to be addressed in the LGS license renewal environmental report. We are also interested in learning of any information your staff believes could help expedite the NRC's review of the LGS license renewal application. Hence, in closing, we would appreciate receiving a response from you detailing such issues and information for the LGS plant site, makeup water supply system and transmission system. We would also welcome your confirmation of our conclusion that LGS license renewal would not adversely affect cultural resources.

Because we plan to incorporate a copy of your response, as well as this letter, into the LGS license renewal environmental report that will be submitted to the NRC as part of the LGS license renewal application, your response will be most helpful if we receive it by March 10, 2011.

Please call Nancy Ranek (610-765-5369), our License Renewal Environmental Lead, if there are questions or you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Gallagher". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael P. Gallagher

Enclosures:

- Attachment 1: Tables 1-3, Historic above-ground resources and archaeological sites within a 6-mile radius of Limerick Generating Station
- Attachment 2: Previous Cultural Resource Impact Investigations of LGS Features
- Attachment 3: Figures Depicting LGS Project Features (Figures 1 through 9)

Attachment 1

Historic above-ground resources and archaeological sites
Within a 6-mile radius of Limerick Generating Station

<u>Table 1</u>	Historic above-ground resources within a 6-mile radius of Limerick Generating Station that are listed in the National Register of Historic Places.....	2
<u>Table 2</u>	Historic above-ground resources within a 6-mile Radius of Limerick Generating Station determined eligible for Listing in the National Register of Historic Places.....	4
<u>Table 3</u>	Archaeological sites within a 6-mile Radius of Limerick Generating Station that have been determined eligible for Listing in the National Register of Historic Places.	7

Table 1 Historic above-ground resources within a 6-mile radius of Limerick Generating Station that are listed in the National Register of Historic Places

Site Name	Location	PHMC Key #
Fricks Locks Historic District	Fricks Locks Road, End, 1/4 Mile East of Sanatoga Road, East Coventry Twp., Chester Co.	116261
Hare's Hill Road Bridge	East Pikeland Twp., Chester Co.	001553
Kimberton Historic District (Boundary Increase)	Hares Hill Road, Prizer Road, and Kimberton Road, East Pikeland Twp., Chester Co.	001562
Kimberton Village Historic District	Intersection of Kimberton Road & Hares Hill Road, East Pikeland Twp., Chester Co.	104837
Prizer's Mill Complex	Mill Lane, East Pikeland Twp., Chester Co.	001580
Rapp's Covered Bridge	Rapp's Dam Road, East Pikeland Twp., Chester Co.	000375
Hall's Bridge	East Vincent Twp., Chester Co.	001551
Kennedy Covered Bridge	Seven Stars Road, East Vincent Twp., Chester Co.	050742
Parker's Ford	Old Schuylkill Road, East Vincent Twp., Chester Co.	079670
River Bend Farm	Sanatoga Road, East Vincent Twp. Chester Co. (Not in East Vincent Twp.)	050884
Vincent Forge Mansion	Cook's Glen Road, East Vincent Twp., Chester Co.	082618
Pottstown Landing Historic District	Main Street, North Coventry Twp., Chester Co.	104047
Coventryville Historic District	Route 23, South Coventry, Warwick, and East Nantmeal Twps., Chester Co.	001531
French Creek Farm	Kimberton Road, West Vincent Twp., Chester Co.	095688
Simon Meredith House	Pughtown Road, South Coventry Twp., Chester Co.	050889
Stephen Meredith House	South Coventry Twp.	079484
Nathan Michener House	Ridge Road, South Coventry Twp., Chester Co.	001574
S.R. 7015	West Vincent Twp., Chester Co.	132272
William and Mordecai Evans House	206 Main Street, Limerick Twp., Montgomery Co.	079687
Isaac Hunsberger House	545 West Ridge Pike, Limerick Twp., Montgomery Co.	087972
Sanatoga Union Sunday School	2341 East High Street, Lower Pottsgrove Twp., Montgomery Co.	084422

Site Name	Location	PHMC Key #
Sunnybrook Park & Ballroom; Sunnybrook Convention Center; Colonial Restaurant; Sunnybrook	99 Sunnybrook Road, Lower Pottsgrove Twp., Montgomery Co.	140507
Long Meadow Farm – Plank House and Barn	New Hanover Twp., Montgomery Twp.	000561
High Street Historic District; Hill Historic District	631-1329 High Street, Pottstown Borough, Montgomery Co.	096230
Jefferson School	Pottstown Borough, Montgomery Co.	118680
John Potts House; Pottsgrove Mansion	High Street, Pottstown Borough, Montgomery Co.	000565
Old Pottstown Historic District	Manatawny Creek, Beech Street, Adams Street, Apple Street, and Hanover Street, Pottstown Borough, Montgomery Co.	064416
Old Pottstown Historic District Boundary Increase	High & South Hanover Streets, Pottstown Borough, Montgomery Co.	077112
Pottstown Roller Mill	Pottstown Borough, Montgomery Co.	000566
Reading Railroad: Station (Pottstown)	High Street, Pottstown Borough, Montgomery Co.	064347
William Grubb Mansion	1304 East High Street, Pottstown Borough, Montgomery Co.	096664
Continental Stove Works; Buckwalter Stove Company	1st Street, Royersford Borough, Montgomery Co.	082496
Augustus Lutheran Church	Trappe Borough, Montgomery Co.	000789 (NHL)
Henry Melchior Muhlenberg house	201 West Main Street, Trappe Borough, Montgomery Co.	079790
Henry Antes House	Upper Frederick Twp., Montgomery Co.	000788 (NHL)
Bridge in Upper Frederick Twp.	L.R. 46007, Crossing Swamp Creek, Upper Frederick Twp., Montgomery Co.	000217
John Englehardt Homestead	Keyser Road, 1 mile South of Obelisk, Upper Frederick Twp., Montgomery Co.	000533
Sunrise Mill	Neiffer Road, at Swamp Creek Road, Upper Frederick Twp., Montgomery Co.	000575

Table 2 Historic above-ground resources within a 6-mile Radius of Limerick Generating Station determined eligible for Listing in the National Register of Historic Places.

Site Name	Location	PHMC Key #
John Mattis Farm	250 Kolb Road, East Coventry Twp. Chester Co.	121479
Bridge	S.R. 7015, East Coventry Twp., Chester Co.	132046
Schuylkill Navigation Company Canal	East Coventry Twp., Chester Co.	140714
Daniel H. Kulp House	131 Mack Road, East Coventry Twp., Chester Co.	141504
Queen Anne House	East Rapp's Dam Road, East Pikeland Twp., Chester Co.	022358
Bernard Property	Hares Hill Road, East Pikeland Twp., Chester Co.	105434
Pennhurst State Hospital & Home	East Vincent Twp., Chester Co.	064464
Pennhurst State Hospital	East Vincent Twp., Chester Co.	064464
Jonathon Rogers or Jacob Beaver House	West Seven Stars Road, East Vincent Twp., Chester Co.	079511
Egress Acres	East Vincent Twp., Chester Co.	097182
William Yeager Farm	Hoffecker Road, East Vincent Twp., Chester Co.	097300
Frank Titanic Property	Bertolet School Road, East Vincent Twp., Chester Co.	097518
Samuel Rosen Farm	Ellis Wood Road, East Vincent Twp., Chester Co.	097621
Camp Sankanac	66 Bertolet School Road, East Vincent Twp., Chester Co.	101617
Bridge	S.R. 7015 Crossing Pigeon Creek, East Coventry Twp., Chester Co.	132046
S.R. 7015	East Vincent Twp., Chester Co.	132082
Isaac Schlichter House & Barn	Stony Run Road, East Vincent Twp., Chester Co.	105032
Parsonage, Falkner Swamp Reformed Church	117 Cross Road, New Hanover Twp., Montgomery Co.	079899
Elliott Farm	North side of Fagleysville Road/Wagner Road, New Hanover Twp., Montgomery Co.	105340
Ira Gruber Estate	Schuylkill Road, North Coventry Twp., Chester Co.	022543

Site Name	Location	PHMC Key #
Farmers Hall	Church Street, North Coventry Twp., Chester Co.	079383
Shaner's Bakery	482 Laurelwood Road, North Coventry Twp., Chester Co.	096338
Walters Tract Subdivision	1338 West Schuylkill Road, North Coventry Twp., Chester Co.	105024
S.R. 0724	Laurel Locks Farm, North Coventry Twp., Chester Co.	127053
Kenilworth Historic District	Schuylkill Road, North Coventry Twp., Chester Co.	140712
Schuylkill Navigation Company Canal	North Coventry Twp., Chester Co.	140714
Spring City Historic District	Spring City Borough, Chester Co.	000042
Textile Mill	Spring City Borough, Chester Co.	105474
Gilbert Farm	1447 Grosser Road, Douglass Twp., Montgomery Twp.	085684
Georg Michael Kuntz Homestead	Limerick Twp., Montgomery Co.	079713
Williams Evans House	61 South Reed Road, Limerick Twp., Montgomery Co.	085618
Hood Mansion	Sanatoga Road, Limerick Twp., Montgomery Co.	096337
Property A	Limerick Twp., Montgomery Co.	097192
Linfield Road House	Linfield Road, Limerick Twp., Montgomery Co.	097304
Limerick Historic District	Ridge Pike at U.S. 422, Limerick Twp., Montgomery Co.	097846
Fruitville Road Stone Arch Bridge	Fruitville Road, Limerick Twp., Montgomery Co.	121481
(Not named in CRGIS record)	52 Keen Road, Limerick Twp., Montgomery Co.	140444
Old Perkiomen Copper Mine	Bounded Roughly by Swamp Creek, Mine Run, and Perkiomen Creek, Lower Frederick Twp., Montgomery Co.	111282
Saylor Property	1559 North Pleasant View Road, Lower Pottsgrove Twp., Montgomery Co.	121767
Jacobs Aircraft Engine Company Property	351-375 Armand Hammer Boulevard, Lower Pottsgrove Twp., Montgomery Co.	124550
The Hill School	High St. Pottstown Borough, Montgomery Co.	050663
Henry Potts House	720 High Street, Pottstown Borough Montgomery Co.	086593

Site Name	Location	PHMC Key #
Glasgow Village	1300 Glasgow Street, Pottstown Borough, Montgomery Co.	091053
Charlotte Street Historic District	220-878 Charlotte Street, Pottstown Borough, Montgomery Co.	102254
W.W. Rupert Elementary School	Pottstown Borough, Montgomery Co.	115932
Pottstown Conservation District	Pottstown Borough, Montgomery Co.	119061
Pottstown Industrial Historic District	Queen Street, Moser Street, and Susquehanna River, Pottstown Borough, Montgomery Co.	121485
S.R. 7046	Pottstown Borough, Montgomery Co.	136796
W.L. Latshaw House (Meridan Youth Services)	134 North 4th Avenue, Royersford Borough, Montgomery Co.	085452
Diamond Glass Co.	200-280 First Avenue, Royersford Borough, Montgomery Co.	141672
Lamb Tavern	724 Main Street, Trappe Borough, Montgomery Co.	079653
Deweese Tavern & Dwelling	301-307 Main Street, Trappe Borough, Montgomery Co.	079622
Village of Trappe Historic District	151-724 Main Street, 18-24 East 3rd Avenue, 20-60 West 5th Avenue, 15-71 West 7th Avenue, Trappe Borough, Montgomery Co.	106251
Senator Lewis Royer Farm	96 East 3rd Street, Trappe Borough, Montgomery Co.	106257
Jan Neuss Log House	Colonial Road, Upper Frederick Twp., Montgomery Co.	079781
Bertolet's Mennonite Meeting House	Colonial Road, 1 mile West of Route 73, Upper Frederick Twp., Montgomery Co.	096922
(Not named in CRGIS record)	2nd Avenue, Upper Providence Twp., Montgomery Co.	000216
Vanderslice/Custer Farm; Guy F. & Eleanor Wagner	357 Greenwood Avenue, Upper Providence Twp., Montgomery Co.	103213
Hildebidle Property; Mourar Property	1637 Yeager Rd. Upper Providence Twp., Montgomery Co.	104182
S.R. 7046	Upper Providence Twp., Montgomery Co.	136891
Gudebrod Brothers Silk Company	Old Reading Pike, West Pottsgrove Twp., Montgomery Co.	091862

Table 3 Archaeological sites within a 6-mile Radius of Limerick Generating Station that have been determined eligible for Listing in the National Register of Historic Places.

Site Name	Location	PHMC Site #
Hartenstine Heritage Site 2	Limerick Twp., Montgomery Co.	36MG0345
Hartenstine Heritage Site 3B	Limerick Twp., Montgomery Co.	36MG0347
Potts-Saylor Mill Race	Pottstown Borough, Montgomery Co.	36MG0277

Attachment 2

**Previous Cultural Resource Impact Investigations
of LGS Features**

Attachment 2 – Previous Cultural Resource Impact Investigations of LGS Features

LGS Plant Site

In 1972, Charles H. Holzinger of Franklin & Marshall College and geologist James A. Humpreville were contracted by the engineering firm Buchart-Horn, Inc. to conduct an archaeological survey of the LGS plant site (roughly equivalent to today's Phase I investigation), as well as of the associated Perkiomen Pumphouse, located on Perkiomen Creek. This study¹ was performed after the start of initial clearing activities for the plant's construction, and sought to identify any prehistoric Native American archaeological sites contained within the property (no attempt was made to document historic period resources). Researchers conducted background research, interviewed local collectors, inventoried privately held artifact collections, and completed a field reconnaissance of the property in conjunction with limited subsurface testing (coring, test units, and mechanical trenching). The completion of this study resulted in the identification of four discreet areas of prehistoric occupation, three of which were located on the western shores of the Schuylkill River, in the vicinity of Frick's Lock in Chester County. The other artifact locus was situated on the eastern side of the Schuylkill, in Montgomery County. All of these sites had previously been identified by local artifact collectors; associated diagnostic tools dated those occupations to the Archaic, Early Woodland, and Middle Woodland culture periods.

In December 1986 John Milner Associates, Inc. completed an architectural and historical analysis of the Frick's Lock District, located in the East Coventry Township section of the Limerick property. This investigation² incorporated documentary research and on-site investigations to assess the historical and architectural significance of this 18-acre agricultural hamlet and commerce center. This study identified a total of 20 historic buildings and six historic structures that contributed to the overall significance of this district. The buildings examined were all built between 1757 and 1937 and form part of cohesive farming hamlet that documents the local evolution of rural domestic and agricultural architecture in this vicinity. Other structures identified within the district were directly related to this community's association with the Schuylkill Navigation Company's Girard Canal (ca. 1820-1890), and include the infilled remains of Locks no. 54 and 55 and the former Lock Keeper's House. The report of this investigation determined that the Frick's Lock District demonstrated considerable integrity with respect to the individual buildings present and its general setting as a whole, and concluded that the district did meet the criteria for listing in the National Register of Historic Places. The Frick's Locks Historic District was placed on the NRHP in 2003 under National Register Criteria A and C.

In 2010, Abplanalp completed the *Historic and Architectural Survey of Frick's Lock Historic District* for Frens & Frens Architects on behalf of Exelon.³ The purpose of the study was to evaluate the integrity and historic significance of the architectural resources within the historic

¹ Holzinger, Charles H. and James A. Humpreville. 1972. *Archaeological Report, Limerick Generating Station Site, Montgomery and Chester Counties, PA*. Report prepared for Buchart-Horn, Inc. and the Philadelphia Electric Company.

² O'Bannon, Patrick. 1987. *Architectural and Historical Documentation of the Frick's Lock District, East Coventry Township, Chester County, Pennsylvania*. Report prepared for the Philadelphia Electric Company. John Milner Associates, Inc.

³ Abplanalp, Kathleen M. 2010. *Historical and Architectural Survey of Frick's Lock Historic District, East Coventry Township, Pennsylvania*. Report prepared for Exelon Nuclear.

district and assess the continued viability of the district as a property listed on the NRHP. The study concluded that the current historic district boundaries appear appropriate.

LGS Makeup Water Supply System

Archaeological survey was conducted for the vicinity of the Bradshaw Reservoir prior to its construction (ER No. 1981-0382-017).⁴ Fieldwork consisted of surface survey and the excavation of one test pit. No artifacts were found. A map of the exact survey area was not included in the report. The CRGIS shows a small area of survey extending into the western portion of the Bradshaw Reservoir area.

No previous archaeological surveys are shown in the CRGIS in the area of the Bedminster Water Processing Facility.

The Perkiomen Pumphouse was surveyed as part of the 1972 Buckhart-Horn survey discussed above. The survey found the area to be largely disturbed by sewer construction. No archaeological resources were identified.

LGS Transmission System

Archaeological surveys were conducted during the mid- to late 1980s for five transmission lines: Lines 220-60, 220-61, 220-62, 220-63, and 5031. Reports of the surveys were reviewed under ER No. 1981-2021-042. The goals of these investigations were to locate, identify, and evaluate archaeological resources within the transmission line rights-of-way. If a significant archaeological resource was located within a right-of-way and could not be avoided, a Phase III data recovery program was developed and implemented for the resource. All mitigative measures were reviewed and approved by the PHMC.

Line 220-60 extends along a 7.4-linear-mile corridor on the eastern side of the Schuylkill River from the Limerick 230-kV Substation southeast to the Cromby Substation located at Exelon Generation's Cromby Generating Station in East Pikeland Township, Chester County.⁵ Eleven archaeological sites were investigated. None of the potentially significant sites extended into the areas of proposed transmission line structures. Hence, construction of Line 220-60 was found to have no effect on significant archaeological resources.

Line 220-61 extends for a distance of 8.53 linear miles on the west bank of the Schuylkill River from the Limerick 230-kV Substation south to the Cromby Substation.⁶ Ten archaeological sites were investigated. Archaeological data recovery was completed to mitigate potential adverse effects at one significant prehistoric archaeological resource, the Frick's Lock Site (36CH103).

⁴ Neshaminy Water Resources Authority. 1979. Environmental Report on Neshaminy Water Supply System, Bucks County, Pennsylvania.

⁵ Zatz, K. L., K. M. Joire', and R. F. Hoffman. 1984. A Descriptive Report of an Archaeological Investigation for the 220-60 Transmission Line Right-of-Way in Association with the Limerick Nuclear Generating Station, Montgomery and Chester Counties, Pennsylvania. Report submitted to the Philadelphia Electric Company. John M. Milner Associates, West Chester, PA.

⁶ Zatz, K. L., K. M. Joire', and R. F. Hoffman. 1984. A Descriptive Report of an Archaeological Investigation for the 220-61 Transmission Line Right-of-Way in Association with the Limerick Nuclear Generating Station, Montgomery and Chester Counties, Pennsylvania. Report submitted to the Philadelphia Electric Company. John M. Milner Associates, West Chester, PA.

The remaining nine archaeological sites were determined to not extend into areas of proposed transmission line structures. Hence, construction of Line 220-61 was found to have no adverse effect on significant archaeological resources.

Line 220-62 extends for a distance of 16 linear miles from the Cromby Substation eastward to the North Wales Substation in Upper Gwynedd Township, Montgomery County.⁷ Seventeen previously unrecorded sites were found, along with one isolated find. Investigations revealed that no potentially significant sites were present within the areas of proposed transmission line structures. Therefore, construction of Line 220-62 was found to have no adverse effect on significant archaeological resources.

Line 220-63 extends for a distance of 14 linear miles from the Cromby Substation east to the Plymouth Meeting Substation in Plymouth Township, Montgomery County.⁸ Presently, this line is segmented, with the first segment (Line 220-63) extending from the Cromby Substation to the Barbadoes Substation and the second segment (Line 220-64) extending from the Barbadoes Substation to the Plymouth Meeting Substation. Fourteen archaeological sites and two lithic scatters were identified. Site 36MG156 was considered eligible for the National Register. The significant data was recovered during the Phase I and II investigations and no further work was conducted. Data recovery was completed at the Indian Point Site (36CH53), a significant prehistoric site dating to the Early-Middle Woodland period. The remaining 12 sites were found not to extend into areas of proposed transmission line structures. Therefore, construction of Line 220-63 was found to have no adverse effect on significant archaeological resources.

Archaeological survey for Line 5031 covered 16 linear miles, extending from the Limerick 500-kV Substation to the Whitpain Substation in Whitpain Township, Montgomery County.⁹ Approximately three miles of the ROW is shared with Line 220-62 and was surveyed as part of that archaeological project. Two archaeological sites were investigated, neither of which was considered eligible for the National Register. Hence, construction of Line 5031 was found to have no adverse effect on significant archaeological resources.

⁷ Zatz, Karyn L., K. M. Joire', R. F. Hoffman, and M. Parrington. 1984. *A Descriptive Report of an Archaeological Investigation for the 220-62 Transmission Line Right-of-Way in Association with the Limerick Nuclear Generating Station, Montgomery and Chester Counties, Pennsylvania*. Report submitted to the Philadelphia Electric Company. John M. Milner Associates, West Chester, PA.

⁸ Zatz, K.L., K.M. Joire', R.F. Hoffman, and M.J. Rast. 1985. *A Descriptive Report of an Archaeological Investigation for the 220-63 Transmission Line Right-of-Way in Association with the Limerick Nuclear Generating Station, Montgomery and Chester Counties, Pennsylvania*. Report submitted to the Philadelphia Electric Company. John M. Milner Associates, West Chester, PA.

⁹ Zatz, K.L., J.A. Robertson, and T.L. Struthers. 1989. *A Descriptive Report of an Archaeological Investigation for the 5031 Transmission Line Right-of-Way in Association with the Limerick Nuclear Generating Station, Montgomery County, Pennsylvania*. Report submitted to the Philadelphia Electric Company. John M. Milner Associates, West Chester, PA.

ATTACHMENT 3

Figures Depicting LGS Project Features

Figure 1 LGS Plant Site Property Boundaries

Figure 2 Perkiomen Pumphouse

Figure 3 LGS Makeup Water Supply System

Figure 4 Bradshaw Reservoir and Bradshaw Pumphouse Properties

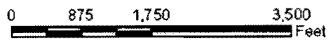
Figure 5 Bedminster Water Processing Facility Property

Figure 6 Limerick to Cromby 230 kV Transmission Line Route

Figure 7 Cromby to North Wales 230 kV Transmission Line

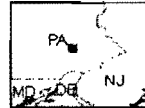
Figure 8 Cromby to Plymouth Meeting 230 kV Transmission Line Route

Figure 9 Limerick to Whitpain 500 kV Transmission Line Route



Exelon.

Reference:
 DVRFC 2005 Aerial Imagery
 ESRI 2009 Streets and Roads
 NAD 1983 State Plane Pennsylvania South
 Projection: Lambert Conformal Conic
 Linear Unit: Foot US
 Total Exelon Generation-owned property
 645 acres



Legend

- Exelon Generation Property Boundary
- County Boundary
- Municipal Boundary
- 2500 Ft Radius Exclusion Area
- Conrail Line

Figure 1 LGS Plant Site Property Boundaries
 Exelon Generation
 Limerick Generating Station
 Limerick Township, Montgomery County, PA



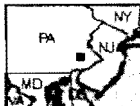
0 1,000 2,000 4,000 Feet

Exelon.

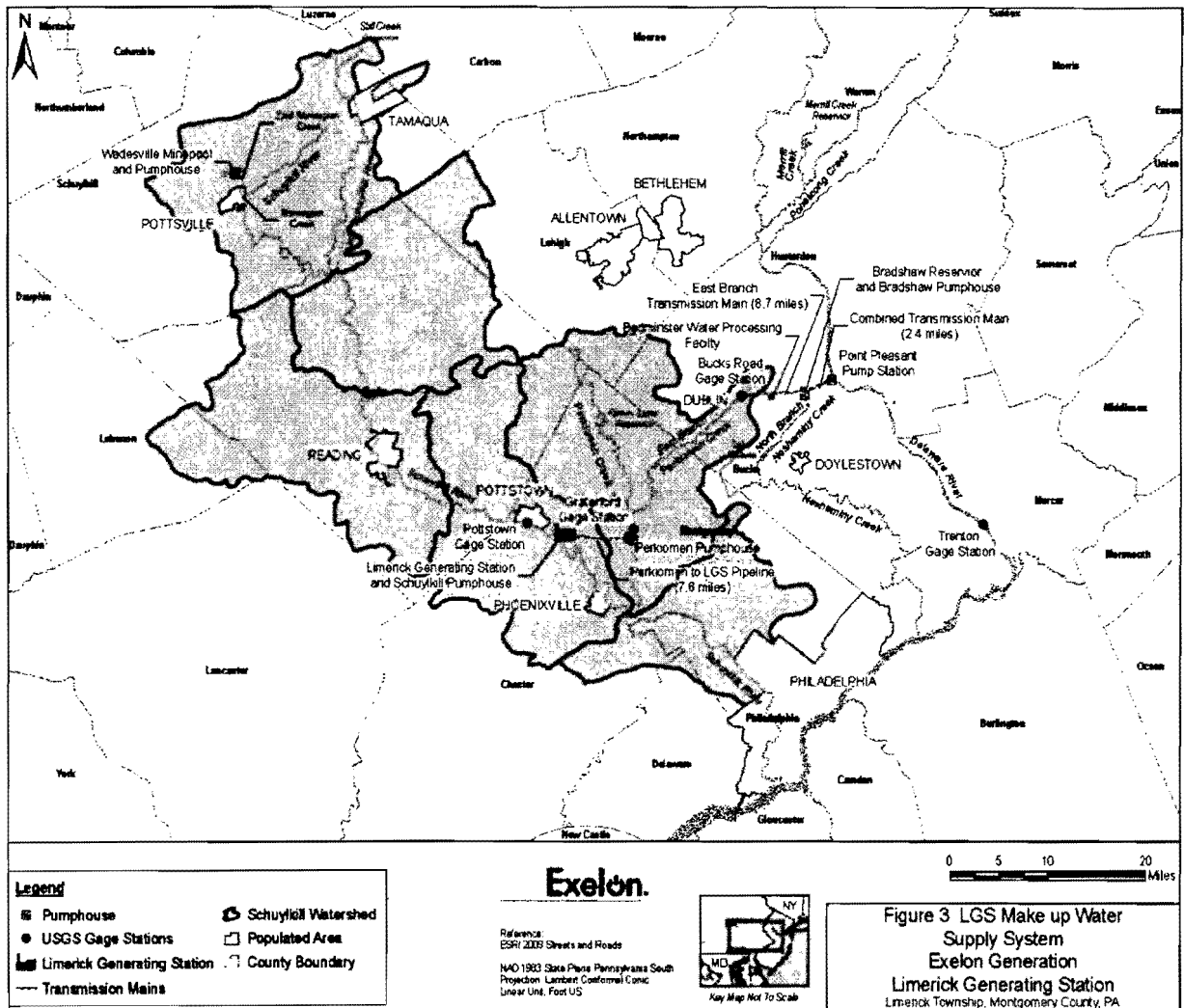
Legend
■ Pumpouse Location

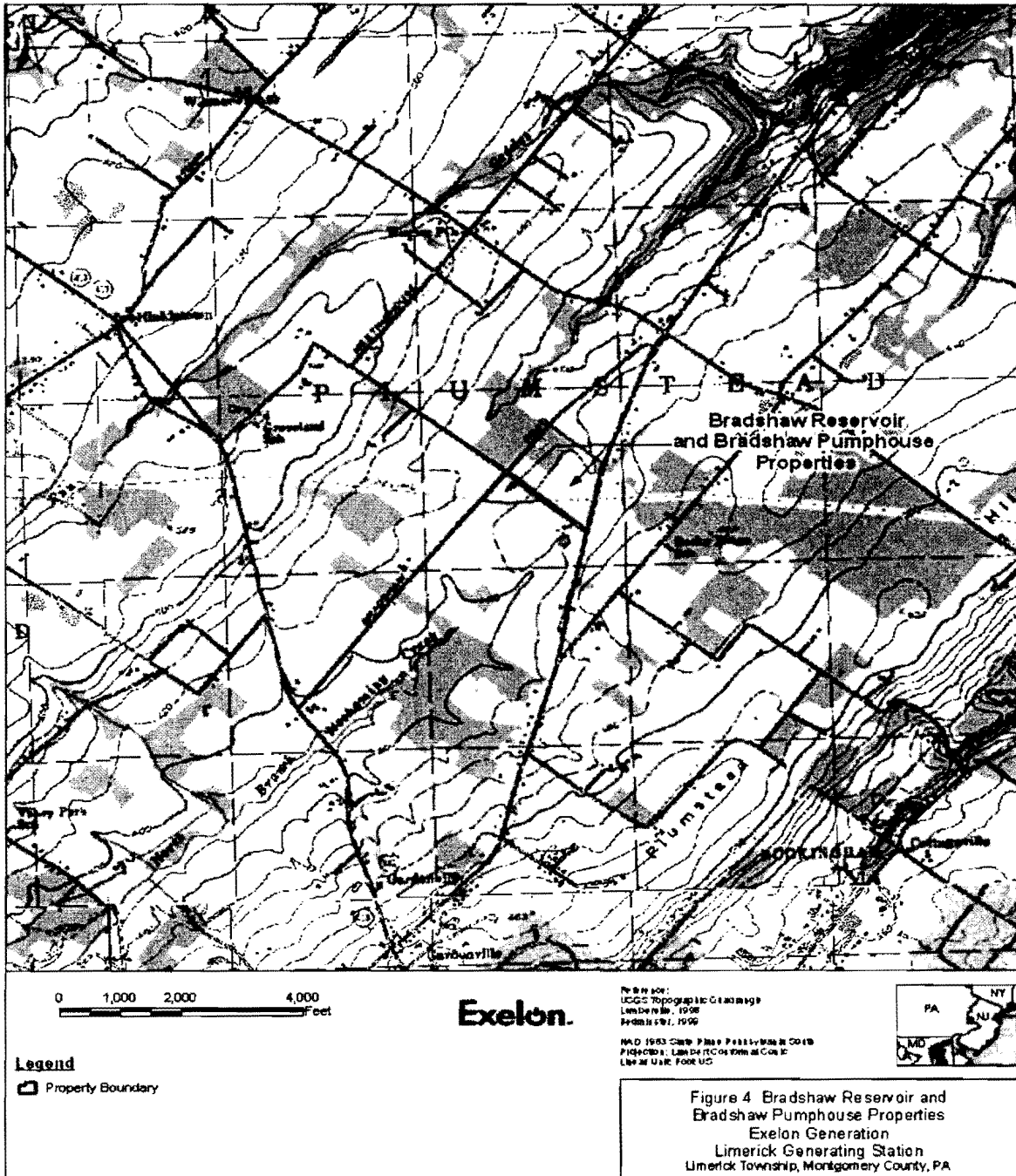
Reference:
USGS Topographic Quadrangle
Collegeville, 1958

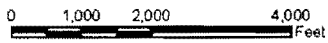
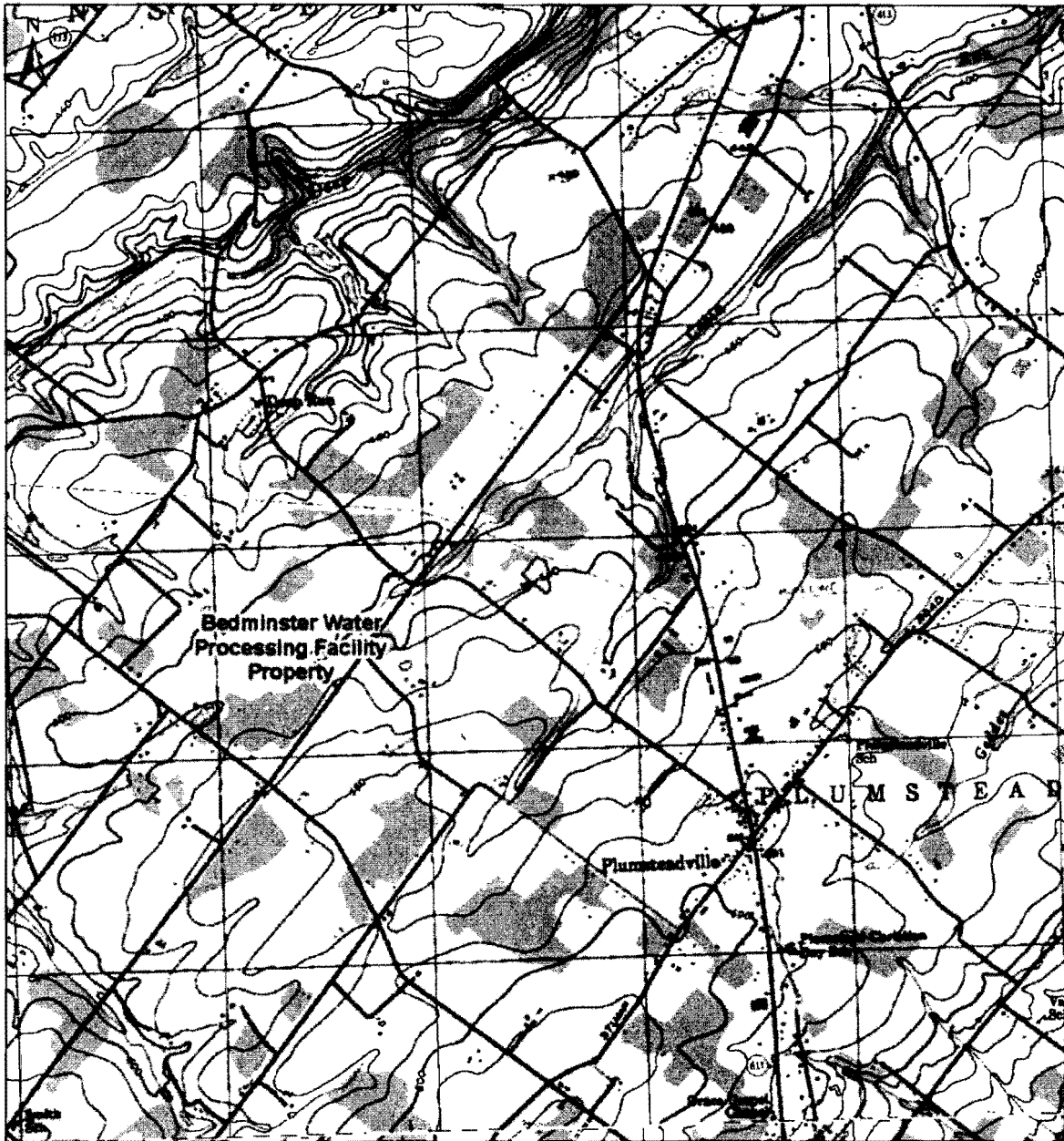
NAD 1983 State Plane Pennsylvania South
Projection Lambert Conformal Conic
Linear Unit: Foot US



**Figure 2 Perkioemen Pumpouse
Exelon Generation
Limerick Generating Station**
Limerick Township, Montgomery County, PA



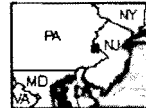




Exelon.

Reference:
USGS Topographic Quadrange
Lumberville, 1998
Bedminster, 1999

NAD 1983 State Plane Pennsylvania South
Projection: Lambert Conformal Conic
Linear Unit: Foot US



Legend


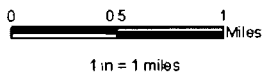
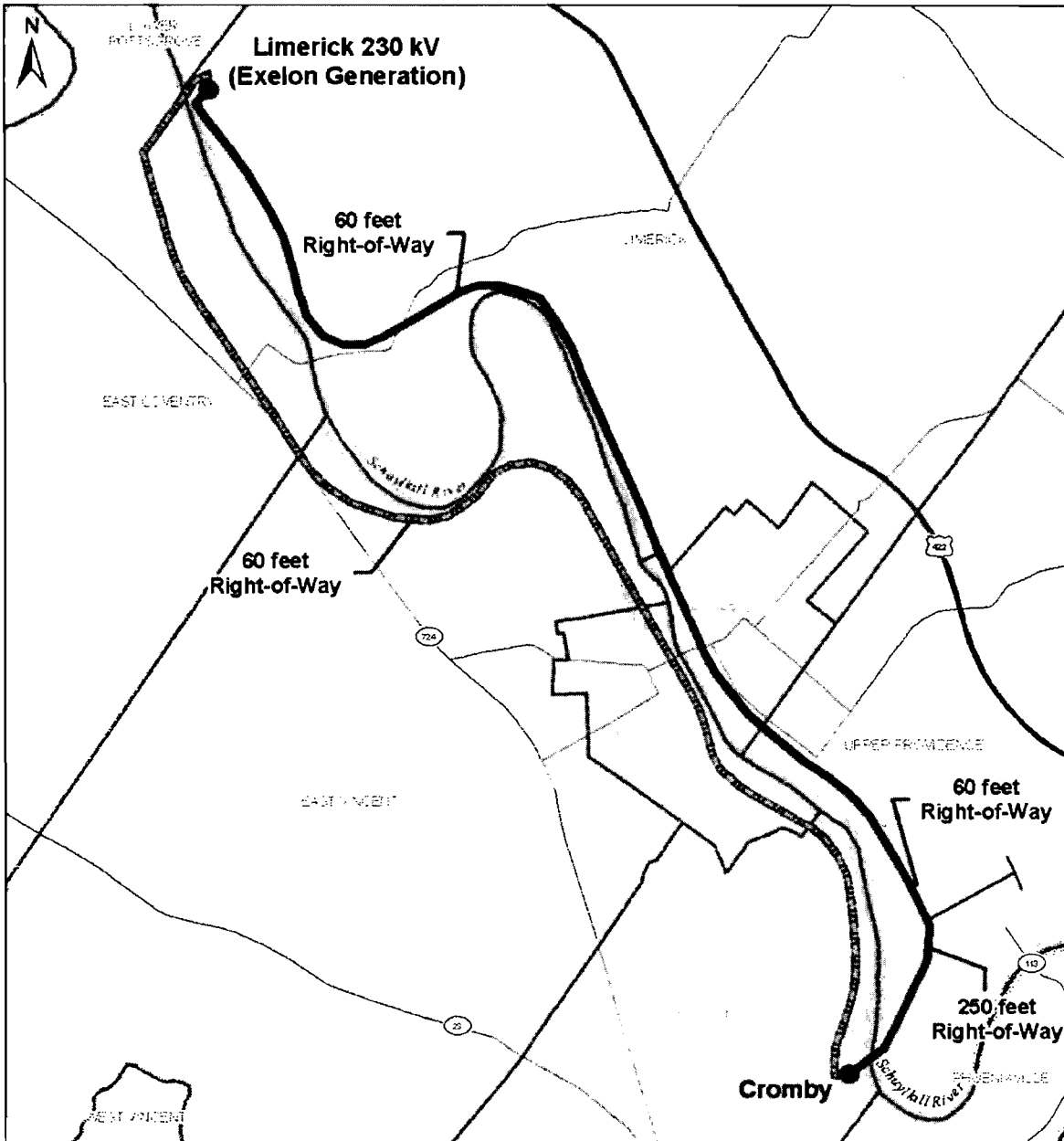
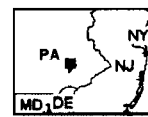
 Property Boundary

Figure 5 Bedminster
Water Processing Facility Property
Exelon Generation
Limerick Generating Station
Limerick Township, Montgomery County, PA



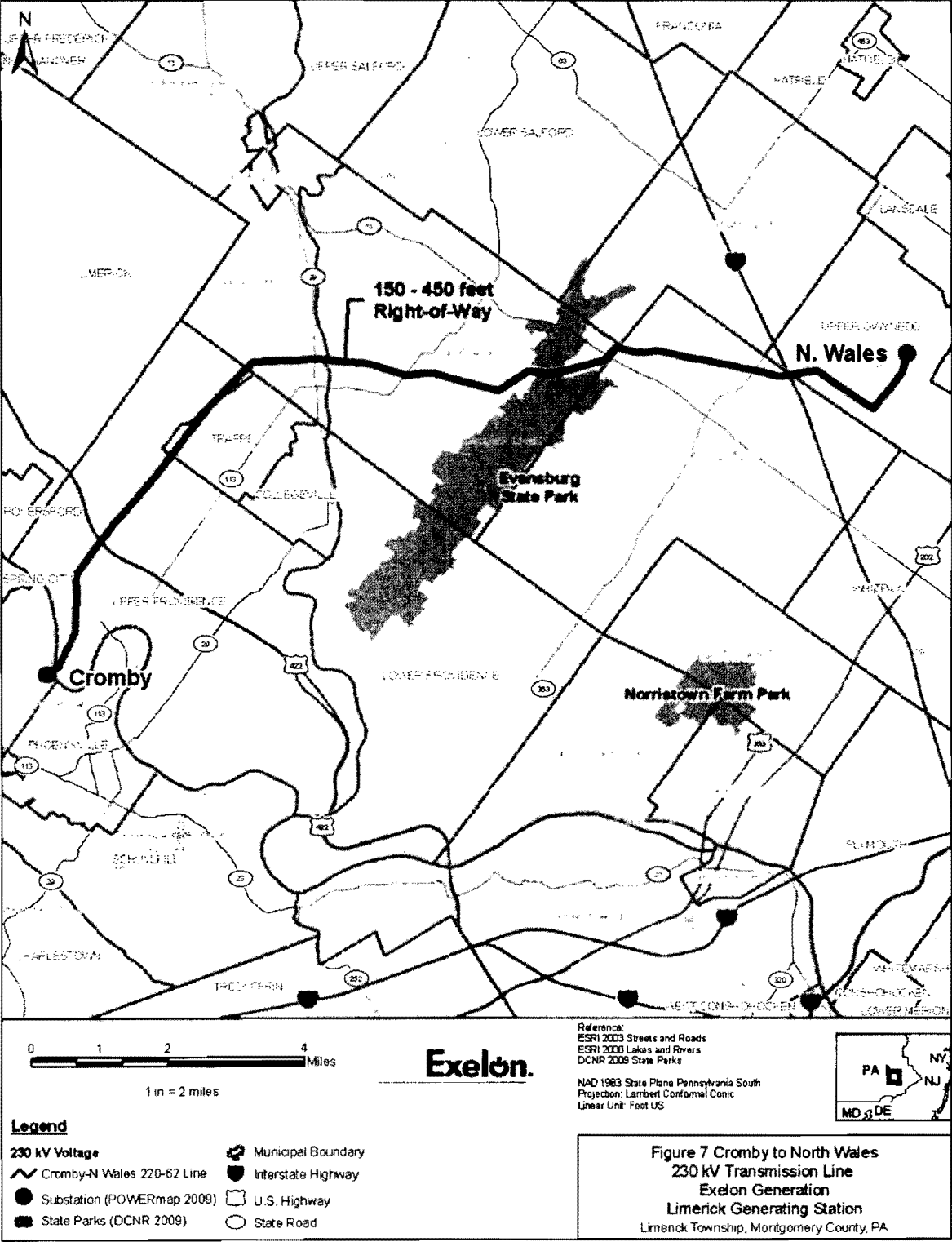
Exelon.

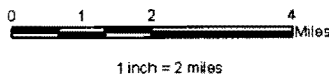
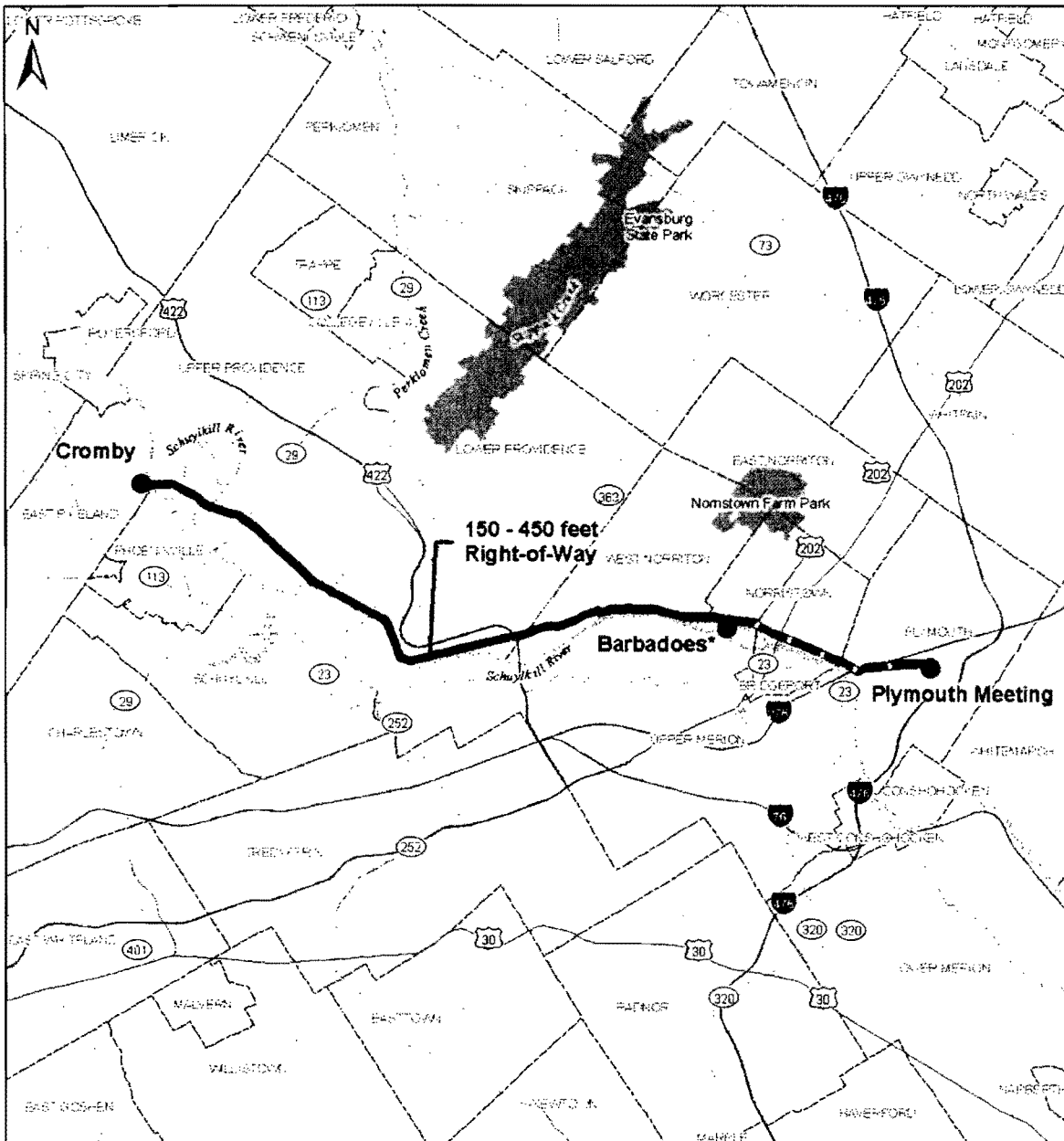
Reference:
 ESRI 2003 Streets and Roads
 ESRI 2008 Lakes and Rivers
 NAD 1983 State Plane Pennsylvania South
 Projection: Lambert Conformal Conic
 Linear Unit: Foot US



- Legend**
- 230 kV Voltage**
 - ~ Limerick-Cromby 220-60 Line
 - ~ Limerick-Cromby 220-61 Line
 - Substation (POWERmap 2009)
 - ⬡ Municipal Boundary
 - ⬢ Interstate Highway
 - ⬢ U.S. Highway
 - State Road

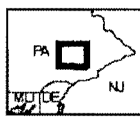
**Figure 6 Limerick to Cromby
 230 kV Transmission Line Route
 Exelon Generation
 Limerick Generating Station
 Limerick Township, Montgomery County, PA**





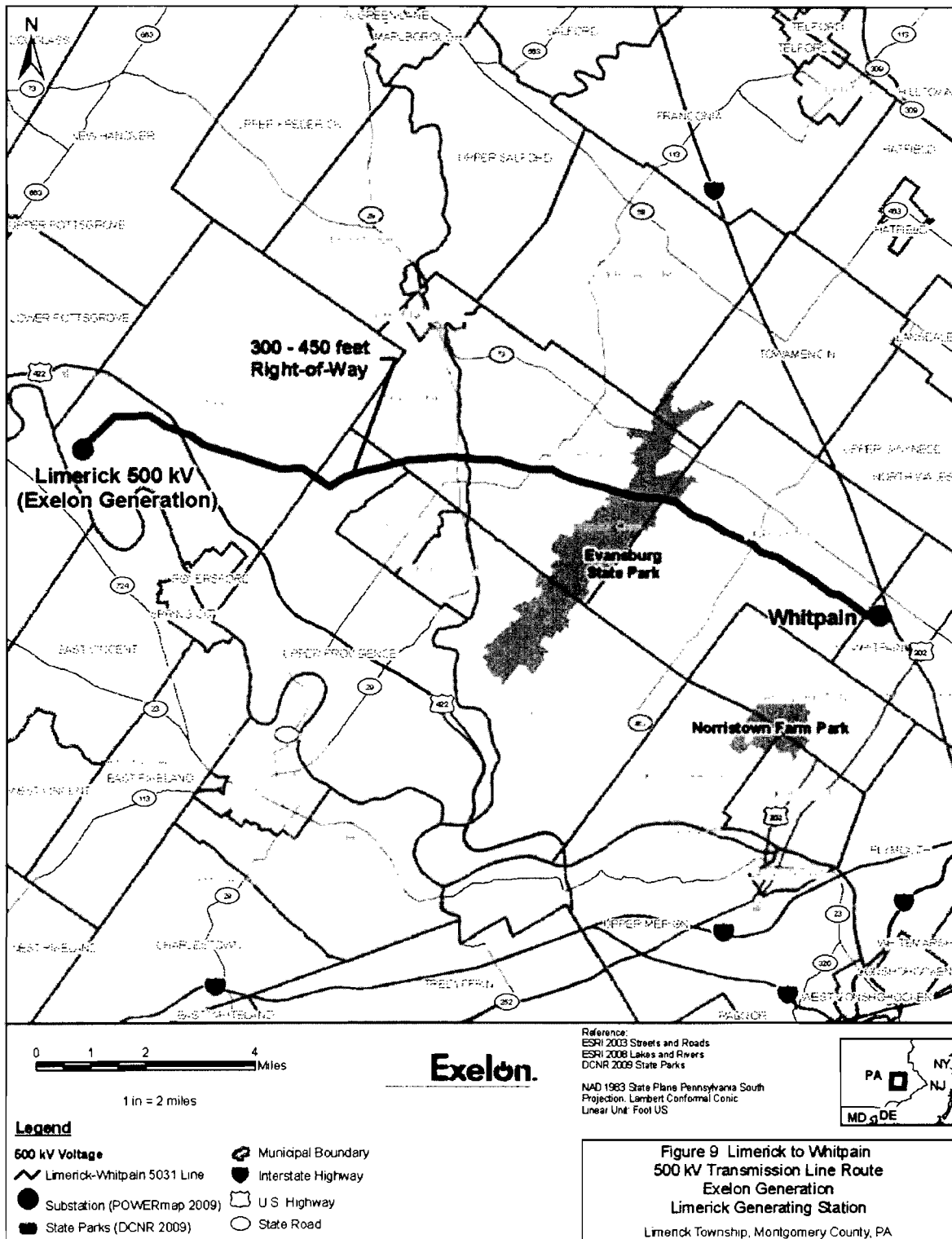
Exelon.

Reference
 ESRI 2003 Streets and Roads
 ESRI 2008 Lakes and Rivers
 DCNR 2009 State Parks
 NAD 1983 State Plane Pennsylvania South
 Projection: Lambert Conformal Conic
 Linear Unit: Foot US
 Note: *Location of Barbadoes substation
 not confirmed



- Legend**
- 230 kV Voltage
 - Cromby-PlymMeeting 220-63
 - Cromby-PlymMeeting 220-64
 - Substation (POWERmap 2009)
 - State Parks (DCNR 2009)
 - Interstate Highway
 - U.S. Highway
 - State Road

**Figure 8 Cromby to Plymouth Meeting
 230-kV Transmission Line Route
 Exelon Generation
 Limerick Generating Station
 Limerick Township, Montgomery County, PA**





Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

February 16, 2011

Handwritten:
MCMC
2.23.11

Michael P. Gallagher
Exelon Nuclear
200 Exelon Way, KSA/2-E
Kennett Square, PA 19348

Re: File No. ER 2004-2024-091-B
NRC: Renewal of Operating
Licenses for Limerick Generating
Station, Units 1 & 2, Limerick,
Londonderry & Peach Bottom Twps.
Montgomery Co.

Dear Mr. Gallagher:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation. These requirements include consideration of the project's potential effect upon both historic and archaeological resources.

There may be historic buildings/structures/districts/objects eligible for the National Register of Historic Places located in the project area. However, due to the nature of the activity, it is our opinion that there will be no effect on these properties. Should the scope and/or nature of the project activities change, the Bureau for Historic Preservation should be contacted immediately.

In our opinion no archaeological investigations are necessary in this project area.

If you need further information in this matter please consult Susan Zacher at (717) 783-9920.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology &
Protection

DCM/tmw

activities associated with the proposed action. The APE may extend beyond the immediate environs in those instances where post-license renewal land-disturbing operations or projected refurbishment activities specifically related to license renewal may potentially have an effect on known or proposed historic sites. This determination is made irrespective of ownership or control of the lands of interest.

The applicant corresponded with your office by letter dated January 19, 2011. Your office replied by letter dated February 16, 2011, that there are historic resources eligible for the National Register of Historic Places located in the area, but that there will likely be no effect on the properties. To avoid any duplication of effort, you may confirm that the previously provided information to Exelon from your office is still current rather than completing a new review. If any information is not current, please provide any applicable updates. Both letters from Exelon and the February 2011 letter from the Pennsylvania Historical and Museum Commission are attached for your reference.

To complete consultation under 36 CFR 800.8(c), the NRC staff will forward the draft SEIS to consulting parties for review and comment and will address the comments in the final SEIS. Your office will receive a copy of the draft SEIS along with a request for comments after it is issued. This draft SEIS will include identification of historic properties, assessment of impacts, and our preliminary determination of their suitability for listing in the National Register of Historic Places. The anticipated publication date for the draft SEIS is July 2012.

The NRC staff plans to hold two public license renewal overview and environmental scoping meetings on September 22, 2011. The first session will be held in the afternoon, and an identical session will be held later that evening. Both sessions will be held at the Sunnybrook Ballroom, 50 Sunnybrook Road, Pottstown, PA 19464. The afternoon session will be from 2:00 PM until 4:00 PM, and the evening session will be from 7:00 PM until 9:00 PM. In addition, the NRC plans to hold a one hour Open House prior to each meeting to answer public questions. You and your staff are invited to attend the public meetings and Open House.

The Limerick license renewal application is available on the internet at <http://www.nrc.gov/reactors/operating/licensing/renewal/applications/limerick.html>. If you have any questions or require additional information, please contact Mrs. Lisa Regner, License Renewal Project Manager, by phone at 301-415-1906 or by e-mail at Lisa.Regner@nrc.gov.

Sincerely,
/RA/
 David J. Wrona, Chief
 Projects Branch 2
 Division of License Renewal
 Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

cc: Listserv

ADAMS Accession No. ML11221A264 (LTR) ML11256A316 (PKG) ML11256A302 (ENCL.)

*concur via email

OFFICE	LA:DLR*	PM:DLR:RPB2	BC:DLR:RPB2
NAME	IKing	LRegner	DWrona
DATE	9/8/11	9/15/11	9/15/11

Letter to J. Cutler from L. Regner, dated September 15, 2011

SUBJECT: LIMERICK GENERATING STATION LICENSE RENEWAL APPLICATION
REVIEW (FILE NO. ER 2004-2024-091-B)

HARD COPY:

L. Regner

E-MAIL:

PUBLIC

RidsNrrDirResource

RidsNrrDirRpb1 Resource

RidsNrrDirRpb2 Resource

RidsNrrDirRerb Resource

RidsNrrDirRarb Resource

RidsNrrDirRapb Resource

DLR_RPOB Resource

RidsOpaMail

RidsOgcMailCenter

LRegner

RKuntz

PBamford

MSmith, OGC

EDiPaolo, RI

NSieller, RI

NMcNamara, RI

DScrenci, RI

NSheehan, RI