

9/1/2011
76 FR 54502 (64)

Gallagher, Carol

From: Julie Longenecker [julielongenecker@ctuir.org]
Sent: Tuesday, November 15, 2011 3:19 PM
To: Doyle, Daniel
Cc: Ellen Kennedy; Teara Farrow Ferman; Audie Huber; Julie Longenecker
Subject: FW: Comments of the EIS for the License Renewal for the Columbia Generating Station

Dan,
Below are the comments from the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), Cultural Resources Protection Program (CRPP) Richland Office, on the Draft Supplemental EIS for License Renewal of the Columbia Generating Station for Public Comment. Thank you for your phone calls and correspondence in August and September. I understand the deadline for comments is Nov. 16th, but if you have any questions regarding the comments below, please call or email me today or tomorrow at (541) 429-7977, julielongenecker@ctuir.org and we can get them straightened out. If I am not available, please call Ellen Kennedy at (541) 429-7976, Ellenkennedy@ctuir.org.

Thank you,
Julie Longenecker

Subject: Comments of the EIS for the License Renewal for the Columbia Generating Station

- Include a description of the cooling tower plume in Section 2.2.8.4 Visual and Aesthetic Resources. This plume is quite visible from many places in the region depending upon the time of year and is within the viewshed of both Rattlesnake Mountain and Gable Mountain, traditional cultural properties that are important places to the CTUIR. Include a discussion of this plume and an analysis of potential visual impacts to these properties in the Historic and Archaeological Resources sections.
- CTUIR Cultural Resources Protection Program (CRPP) would like to receive a list of artifacts recovered from 45BN257 during archaeological excavations that occurred prior to the construction of the intake and outfall structures. According to the EIS, these are currently stored within DOE's Hanford Site Cultural and Historic Resources Program Collection.
- CTUIR CRPP recommends that CGS lands be re-surveyed for cultural resources since it has been over 30 years since they were surveyed. CRPP recommends that that this become a condition of the relicensing activity or that a separate PA be developed by NRC and Energy Northwest in consultation with Tribes and SHPO.
- CTUIR CRPP recommends that area next to the Columbia River be monitored annually for cultural resources. Archaeological material may continue to be exposed. CRPP recommends that that this become a condition
- of the relicensing activity or that a separate PA be developed by NRC and Energy Northwest in consultation with Tribes and SHPO.
- On page 2-67, lines 30-32 describe several artifacts as having been observed in the vicinity of the current locations of the intake and outfall structures prior to construction. Although the artifacts were not recorded as part of a site, what happened to these artifacts? Provide a list of these artifacts and confirm if these artifacts were collected and if they are stored with the artifacts from 45BN257 within DOE's Hanford Site Cultural and Historic Resources Program Collection.
- Will these collections be maintained by DOE for ENW and are there agreements in place that direct DOE to protect these collections? Who is responsible for their protection?
- P 2-68, line 27 state that a 1999 survey recorded 45BN706 (lithic core) and 45BN760 (anvil stone). Confirm if these artifacts were collected and if not, how is Energy Northwest protecting them? If so, were they added to DOE's collection?

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Add: D. Doyle (DIP)
S. Freeman (S2FI)

- P.2-68, line 32 indicates that two lithic flakes were observed in the general location of 45BN257. Confirm if these artifacts were collected and if not, how is Energy Northwest protecting them? If so, were they added to DOE's collection?
- As the leasee, is it Energy Northwest's responsibility is it to maintain archaeological site records, collections etc. for the CGS site? Or is it DOE's? Is there an agreement or procedure in place that governs this? CTUIR CRPP recommends that a formal agreement be developed to clarify roles and responsibilities of Tribes, Energy Northwest, NRC and DOE on the CGS site regarding human remains, archaeological sites, collections and cultural resources compliance. CRPP recommends that this agreement be part of the condition of the NRC relicensing activity or that a separate PA be developed by NRC and Energy Northwest in consultation with Tribes and SHPO outlining these.
- P. 4-27, line 26-28 indicates that tribes suggested that Energy Northwest work with tribes to develop cultural resources training for Energy Northwest staff. What is the status of this training and when will it occur? CTUIR CRPP recommends that this be a requirement as part of the license renewal or be addressed in a PA developed by NRC in consultation with Tribes and SHPO outlining these.
- The CTUIR CRPP would like to receive and review Energy Northwest's cultural resources protection procedure and be formally consulted on the implementation of this procedure. Does the procedure call for coordination and/or consultation with CTUIR CRPP? CRPP recommends that this procedure be part of a separate PA developed by NRC and Energy Northwest in consultation with SHPO and Tribes.
- The CTUIR CRPP would like to meet with the Energy Northwest personnel who oversee the implementation of the cultural resources protection procedure as well as establish a long-term consultation process and relationship between local staff at Energy Northwest and CTUIR CRPP.
- p.4-27-4-28 of the EIS mentions the MOA for Energy Northwest's communication facility located on Rattlesnake Mountain that was signed by DOE, Energy Northwest and SHPO. CRPP would like to remind Energy Northwest and DOE of stipulation B.2 in the MOA committing Energy Northwest and DOE to evaluating technologies as they become available that enable relocation of this facility off of Rattlesnake Mountain. CRPP recommends that this MOA be tied to the NRC relicensing conditions, as operation of the communications facility is part of the relicensing action either as a condition of the license or through the development of a PA by NRC and Energy Northwest in consultation with Tribes and SHPO.
- P. 2-68, line 37- the survey was completed by the CTUIR not for the CTUIR.