

# Cultural Resources Correspondence

*Braidwood Station Environmental Report*

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**Exelon Generation**

November 09, 2012

Ms. Anne E. Haaker  
Deputy State Historic Preservation Officer  
Preservation Services Division  
Illinois Historic Preservation Agency  
1 Old State Capitol Plaza  
Springfield, Illinois 62701-1507

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**SUBJECT:** Exelon Generation, LLC - Braidwood Station Units 1 and 2 License  
Renewal Application. Request for Information on Historic and  
Archaeological Resources

Dear Ms. Haaker:

Exelon Generation, LLC (Exelon) plans to apply to the U.S. Nuclear Regulatory Commission (NRC) for renewal of the operating licenses for Braidwood Station (Braidwood) Units 1 and 2, in June 2013. The existing operating license for Unit 1 will expire on October 17, 2026, and the existing operating license for Unit 2 will expire on December 18, 2027. Renewed licenses would allow Braidwood Units 1 and 2 to operate until 2046 and 2047, respectively.

As part of the license renewal process, the NRC requires license renewal applications to include environmental reports assessing the impacts from license renewal activities on historic and archeological resources on the Braidwood site and within the transmission line right-of-way (ROW) that connects the plant to the transmission system. Pursuant to the National Environmental Policy Act (NEPA), this letter seeks input from the Illinois SHPO regarding such effects in the vicinity of Braidwood. Later, the NRC may also request an informal consultation with your office in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470), and the federal Advisory Council on Historic Preservation regulations (36 CFR 800).

### **Project Features**

Braidwood is located in northeastern Illinois, about 60 miles southwest of Chicago, in Will County. The property is approximately 1 mile from the town of Godley, 2 miles from the town of Braidwood, and 6 miles from the town of Wilmington, as shown in Figure 1.

The Braidwood site property includes approximately 4,457 acres, of which approximately 2,537 acres comprise the cooling pond. Formerly a strip mine, the cooling pond was created during 1980 through 1981 by pumping water from the Kankakee River into the mine excavations. Braidwood is situated in an area of relatively flat to rolling terrain. Agriculture is the dominant land use within a 6-mile radius of the site.

The nuclear generating facilities at Braidwood are sited in the northwest quadrant of the site and include the two reactor containment buildings and related structures, a switchyard, administration buildings, warehouses, and other features. The cooling pond makeup water intake and blowdown discharge pipelines run in a ROW from the northeast site boundary to a location on the Kankakee River approximately 5 miles east.

Two 345-kilovolt (345-kV) electrical transmission lines collocated in a single ROW, shown on Figure 2, were constructed with the station to connect it to the electric grid at the location of the former Crete transmission substation (TSS) (now retired) and are considered to be within the scope of the license renewal project. The ROW, which is owned and maintained by Commonwealth Edison Company (ComEd), is referred to as the Braidwood-to-Crete (retired) ROW for purposes of the license renewal project, but it has also been referred to in other documentation as the Braidwood-to-Davis Creek ROW. The Braidwood-to-Crete (retired) ROW ranges from 315 to 455 feet wide and extends approximately 55.5 miles east of the station and passes through a region that is primarily agricultural or rangeland. The area is mostly remote, with low population densities. The ROW crosses Will and Kankakee counties as well as the Kankakee River. In locations where the ROW passes through farmland, the land generally continues to be used as farmland.

#### **Identification of Historic and Archeological Resources**

Using the National Register Information System (NRIS) on-line database, a search was conducted to identify any historic properties listed on the National Register of Historic Places (NRHP) within a six-mile radius of the Braidwood property, which encompasses the ROW for the cooling pond makeup water intake and blowdown discharge pipelines, and within two miles of the transmission line ROW of interest. No sites listed on the NRHP were found within this search radius.

A search of the Illinois State Archaeological Site Files identified 455 previously recorded archaeological sites within six miles of the Braidwood facility, or within two miles of the transmission line ROW of interest. No archaeological sites have been recorded on the Braidwood property. Twenty-one of the 455 previously recorded sites intersect the transmission line ROW. Table 1 lists the archaeological sites that intersect the transmission line ROW from Braidwood to the former location of the Crete substation.

#### **Activities During the License Renewal Term**

Renewal of the Braidwood Units 1 and 2 operating licenses will involve neither new construction, nor any land disturbing activities, changes to plant operations, or modifications of the transmission system that connects the plant to the regional electric grid. Operation and maintenance activities during the terms of the renewed licenses are only expected to occur in previously disturbed areas or existing ROWs. Hence, Exelon believes that continued operation and maintenance of Units 1 and 2 over the license renewal terms (i.e., an additional 20 years for each unit), including maintenance of the ROWs for the transmission line and cooling pond makeup water intake and blowdown discharge pipelines, would not adversely affect any archeological or historically significant resources. Even so, Exelon Generation is implementing specific procedures, including a Cultural Resources Management Plan (CRMP), for protecting cultural resources in undisturbed areas from activities related to operation and maintenance on the Braidwood plant site, including the ROW for the cooling pond makeup water intake and blowdown discharge pipelines. Therefore, effects on cultural resources from future activities would be identified in advance and avoided or appropriately mitigated.

In the case of the Braidwood-to-Crete (retired) ROW, ComEd has established maintenance procedures for transmission line ROWs that involve minimal land

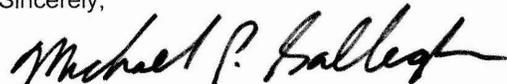
disturbance and are unlikely to result in inadvertent adverse impacts to potential historic or archaeological resources.

As stated earlier, this letter seeks input from the Illinois SHPO regarding the effects that license renewal activities may have on historic and archeologically significant resources in the vicinity of Braidwood. After your review of the information provided in this letter, Exelon would appreciate your sending a letter detailing any concerns you may have about historic and archaeological resources in the area of Braidwood, or within two miles of the ROW of interest, or alternatively, confirming that operation of Braidwood over the license renewal terms would have no effect on known historic or archaeological resources.

Because Exelon will incorporate a copy of your response, as well as this letter, into the Braidwood license renewal environmental report that will be submitted to the NRC as part of the Braidwood license renewal application, your response will be most helpful if it is received by December 14, 2012.

Please refer any questions regarding this submittal to Nancy Ranek, our License Renewal Environmental Lead, at (610) 765-5369. Thank you in advance for your assistance.

Sincerely,



Michael P Gallagher

Enclosures:

- Figure 1: Project Location Map
- Figure 2: Braidwood-to-Crete (retired) Transmission Line ROW
- Table 1: Archaeological Sites Located within 2 miles of the Braidwood Transmission Line ROW



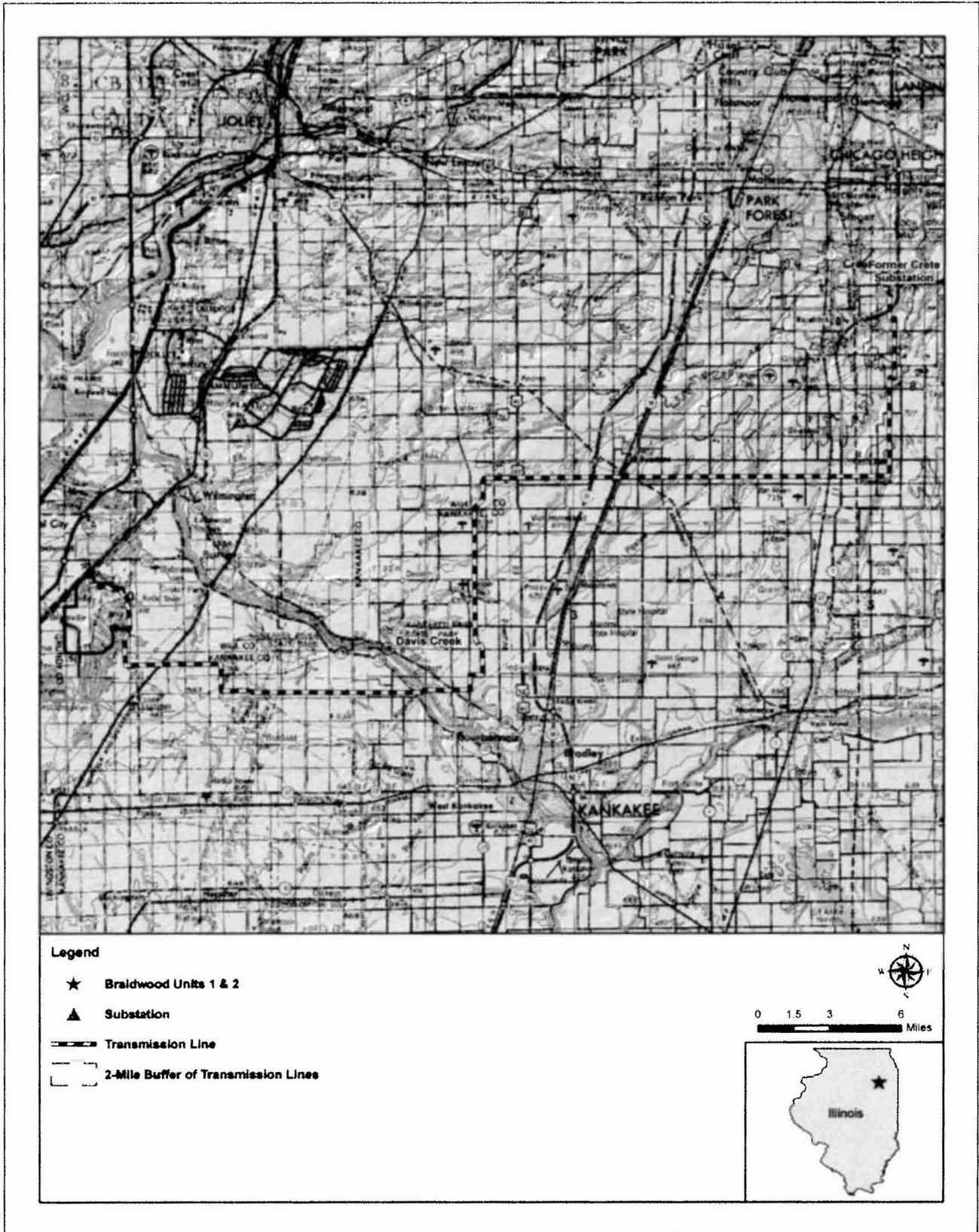


Figure 2: Braidwood-to-Crete (retired) Transmission Line ROW

**Table 1: Archaeological Sites Located within 2 miles of the Braidwood Transmission Line ROW.**

<b>Site Number</b>	<b>Site Type</b>
11KA179	Prehistoric
11KA180	Prehistoric
11KA181	Prehistoric
11KA288	Archaic and Woodland
11WI233	Early Woodland Habitation
11WI234	Prehistoric and Historic
11WI236	Archaic and Middle Woodland
11WI237	Late Archaic Habitation
11WI238	Prehistoric Habitation
11WI2136	Prehistoric Unknown
11WI2139	Prehistoric Unknown
11WI2140	Prehistoric Unknown
11WI2149	Historic
11WI2151	Archaic
11WI2156	Early Archaic
11WI2157	Prehistoric Unknown
11WI2158	Historic
11WI2169	Prehistoric Unknown
11WI2427	Middle Archaic
11WI2429	Prehistoric Unknown
11WI3362	Early Industrial



**Illinois Historic  
Preservation Agency**

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Will County  
Braidwood  
SE of SR 129  
NRC

PLEASE REFER TO: IHPA LOG #007111312

Operating license renewal, Exelon Generation, LLC

November 15, 2012

Michael P. Gallagher  
Exelon Generation, LLC  
200 Exelon Way  
Kennett Square, PA 19348

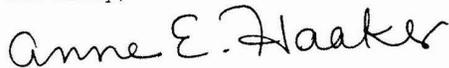
Dear Mr. Gallagher:

We have reviewed the documentation submitted for the referenced project(s) in accordance with 36 CFR Part 800.4. Based upon the information provided, no historic properties are affected. We, therefore, have no objection to the undertaking proceeding as planned.

Please retain this letter in your files as evidence of compliance with section 106 of the National Historic Preservation Act of 1966, as amended. This clearance remains in effect for two (2) years from date of issuance. It does not pertain to any discovery during construction, nor is it a clearance for purposes of the Illinois Human Skeletal Remains Protection Act (20 ILCS 3440).

If you are an applicant, please submit a copy of this letter to the state or federal agency from which you obtain any permit, license, grant, or other assistance.

Sincerely,



Anne E. Haaker  
Deputy State Historic  
Preservation Officer

*A teletypewriter for the speech/hearing impaired is available at 217-524-7128. It is not a voice or fax line.*

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