



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, TN 37902

September 6, 2013

Mr. E. Patrick McIntyre, Jr.  
Executive Director  
Tennessee Historical Commission  
2941 Lebanon Road  
Nashville, Tennessee 37243-0442

Dear Mr. McIntyre:

**TVA, SEQUOYAH NUCLEAR PLANT (SQN) OPERATING LICENSE RENEWAL, SITE 40HA22  
AND REVISION TO PHASE I CULTURAL RESOURCES SURVEY FINAL REPORT,  
HAMILTON COUNTY, TENNESSEE**

TVA is currently proposing to renew its operating license for Sequoyah Nuclear Plant (SQN) Units 1 and 2. The license renewal application (LRA) is under review by the United States Nuclear Regulatory Commission (NRC). In April 2010, TVA carried out a Phase I cultural resources survey within the SQN LRA area of potential effects (APE) and consulted with your office pursuant to 36 CFR Part 800.4(d)(1).

Information compiled during the literature review conducted by TRC at the Tennessee Division of Archaeology (TDOA) and the Tennessee Historical Commission (THC) in 2010, prior to the survey, showed that two previously identified archaeological sites were located in the APE (as it was defined at that time): 40HA20 and 40HA22. Site 40HA22 was excavated by Moore in 1913, and both sites were documented in 1936 by Buckner. Based on the literature review and on the observed extent of land disturbance resulting from the construction of SQN in 1968-1980, TRC concluded that both sites were non-extant. TRC's archaeological survey identified one previously unrecorded site, 40HA549, and recommended that site ineligible for listing in the National Register of Historic Places (NRHP). No historic architectural resources listed in (or eligible for listing in) the NRHP were identified in the APE. Map 1, which was presented in TRC's 2010 report, shows the recorded locations of all the cultural resources discussed in the report. In your letters to TVA dated May 5 and May 20, 2010, you agreed with our finding that the APE contained no historic properties.

Recently, new information has come to light about one of the archaeological sites discussed in the 2010 report: 40HA22. First, TVA discovered that 40HA22 is still extant. A surface scatter of prehistoric artifacts and the remnant of a prehistoric earthen mound were identified on TVA property near the recorded location of 40HA22. The mound and artifacts were noted by TVA staff during visits to the site vicinity in March and April of this year. TVA believes the mound and artifacts are the remnants of site 40HA22. However, this site is located outside the area where site 40HA22 is currently recorded in records archived at both of our agencies and at the University of Tennessee McClung Museum of Natural History and Culture. In fact, the site is located on a set of small islands in Chickamauga Reservoir. Map 2 shows the comparison: the

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location where 40HA22 was erroneously recorded previously, and the location where the site has recently been identified.

Second, TVA has discovered that, during the 2010 consultation, the SQN plant boundary (which is the basis of the LRA APE) was mistakenly shown to include the islands on which 40HA22 is now known to exist. At the time of our initial consultation with your office about this undertaking, TVA Cultural Compliance staff believed that these islands were part of the SQN plant boundary based on TVA's Chickamauga Reservation Land Record Map, dated 1959 and updated in 1978. However, TVA staff has recently learned that this was an error: the islands are not part of the SQN property boundary. (In October 2010, we submitted a copy of TVA's Draft Environmental Impact Statement for the SQN LRA to your office, and the map in that document presented the correct SQN property boundary.) The true location of 40HA22 is actually outside of the SQN property boundary, as shown in Map 2, and therefore the site is outside of the LRA APE.

The purpose of this letter is to reopen the consultation we completed in April 2010 regarding TVA's section 106 responsibilities in connection with the SQN LRA, in order to correct the errors concerning the APE and the status of 40HA22. TVA provided the new information about site 40HA22 to TRC and asked TRC to provide a revised version of the 2010 final cultural resources survey report. Enclosed are two copies of the draft report titled *Phase I Cultural Resources Survey of the TVA Sequoyah Nuclear Plant, Hamilton County, Tennessee-Revised Final Report*, along with two CDs containing electronic copies. This revised final report contains the new information on 40HA22 and presents the correct APE for the undertaking. Based on this new information, TVA has determined that 40HA22 is eligible for inclusion on the National Register of Historic Places (NRHP). However, based on the corrected APE (as shown in Map 2), the site is outside the APE and will not be affected by the undertaking. Therefore, TVA's finding presented in the April 13, 2010 letter to your office, that the APE contains no historic properties, remains valid despite the new information.

TVA is in the process of updating the site form for 40HA22. The update will include this new information about the site's condition and location, based on these recent discoveries. TVA will submit this updated site form to the Tennessee Division of Archaeology once it has been completed.

TVA currently has proposed no undertaking that would affect site 40HA22. If in the future TVA proposes any such undertaking, TVA will fulfill its responsibilities for the site pursuant to 36 CFR Part 800.

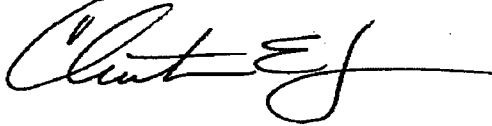
Pursuant to 36 CFR Part 800.3(f)(2), TVA is consulting with federally recognized Indian tribes regarding this new information and regarding historic properties within the proposed project's APE that may be of religious and cultural significance and are eligible for the NRHP.

Pursuant to 36 CFR Part 800.4(d)(1), we are seeking your concurrence with TVA's determination that no historic properties would be affected by the proposed undertaking.

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Should you have any questions or comments, please contact Richard Yarnell in Knoxville at [wryarnel@tva.gov](mailto:wryarnel@tva.gov) or (865) 632-3463.

Sincerely,

A handwritten signature in black ink, appearing to read "Clinton E. Jones", with a long horizontal flourish extending to the right.

Clinton E. Jones  
Senior Manager  
Biological and Cultural Compliance  
Environmental Permits and Compliance  
WT 11B-K

Enclosures

cc (Enclosures):

Ms. Jennifer Barnett  
Tennessee Division of Archaeology  
1216 Foster Avenue, Cole Bldg. #3  
Nashville, Tennessee 37210