



November 5, 2015

Andrew Persinko  
Acting Director  
Division of Decommissioning, Uranium Recovery, and Waste Programs  
Office of Nuclear Material Safety and Safeguards  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Re: Invitation for Section 106 Consultation Pursuant to the National Historic Preservation Act Regarding the U.S. Army's Request for Amendment of Materials License No. SUC-1593 to Include Additional Sites that Possess Depleted Uranium from the Davy Crockett Weapon System (HC #69185)

Dear Mr. Persinko:

Thank you for your correspondence dated October 21, 2015 (received by our office on October 29, 2015) initiating consultation under Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR part 800 for the above referenced undertaking.

While the issuance of an amendment by the Nuclear Regulatory Commission (NRC) for Source Material License No. SUC-1593 qualifies as an undertaking as defined by 36 CFR 800.16(y) of the Section 106 regulations, we wonder whether this issuance has the potential to cause effects to historic properties. If the amendment has no potential to effect historic properties located within the Fort Carson Military Reservation, the NRC may not have any further obligations under the Section 106 regulations pursuant to 36 CFR 800.3(a)(1). If, however, and as an example, the issuance of the license amendment may trigger future remediation activities, additional Section 106 consultation would be required for what are termed "reasonably foreseeable effects" that may occur later in time, that are removed in distance as well as those that are cumulative as per 36 CFR 800.5(a)(1).

To facilitate further consultation under Section 106, as appropriate, we request additional information regarding how NRC defined the area of potential effects as presumably the nature and dispersal of spotting rounds containing uranium may be difficult to accurately demarcate. With regards to historic property identification, much of Fort Carson has already been surveyed and additional on the ground inventory may not be necessary. Regardless, we suggest that you request a formal record or file search to receive historic property and inventory information via this link: <http://www.historycolorado.org/oaHP/file-search>. You will need to provide our office Public Land Survey System (PLSS) information, Universal Transverse Mercator (UTM) coordinates, or Geographic Information Systems (GIS) polygons rather than Latitude and Longitude coordinates as were provided by your letter. Likewise, our office maintains a listing of tribes who have a legacy of occupation within our state and this information is available via the following link: [http://www.historycolorado.org/sites/default/files/files/OAHP/crforms\\_edumat/pdfs/1550.pdf](http://www.historycolorado.org/sites/default/files/files/OAHP/crforms_edumat/pdfs/1550.pdf). Our final suggestion is that you reach out to Fort Carson directly so that they may facilitate a meaningful exchange of information and we suggest that you contact Wayne Thomas, Chief, NEPA and Cultural Management Branch, at (719) 526-1852 or [george.w.thomas16.civ@mail.mil](mailto:george.w.thomas16.civ@mail.mil).

Thank you for the opportunity to comment. If we may be of further assistance please contact Mark Tobias, Section 106 Compliance Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto:mark.tobias@state.co.us).

Sincerely,

  
fr Steve Turner/AIA  
State Historic Preservation Officer  
ST/mt