

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8406010128 DOC. DATE: 84/05/29 NOTARIZED: NO DOCKET #  
 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275  
 AUTH. NAME AUTHOR AFFILIATION  
 SCHUYLER, J.O. Pacific Gas & Electric Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Forwards analysis supporting util conclusion that plant operation & maint will not affect archaeological characteristics of SLO-2 site & State of CA ltr concurring w/util conclusion.

DISTRIBUTION CODE: C001S COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 6  
 TITLE: Licensing Submittal: Environmental Rept Amdt & Related Correspondence

NOTES: J Hanchett 1cy PDR Documents.

05000275

	RECIPIENT		COPIES			RECIPIENT		COPIES	
	ID	CODE/NAME	LTR	ENCL		ID	CODE/NAME	LTR	ENCL
	NRR LB3 BC	18	1	1	NRR LB3 LA	19	1	1	
	SCHIERLING, H	04	1	1					
INTERNAL:	ELD/HDS2		1	0	NRR/DE/AEAB	08	1	1	
	NRR/DE/EEB	06	1	1	NRR/DE/EHEB		1	1	
	NRR/DE/SAB	07	1	1	NRR/DSI/METB		1	1	
	NRR/DSI/RAB	09	1	1	<u>REG FILE</u>		1	1	
	RGNS		1	1					
EXTERNAL:	ACRS	20	6	6	LPDR	03	2	2	
	NRC PDR	02	1	1	NSIC	05	1	1	
	NTIS		1	1					
NOTES:			1	1					

TOTAL NUMBER OF COPIES REQUIRED: LTR 24 ENCL 23

APPROVED BY: [Signature] DATE: 1/15/68  
FOR THE DIRECTOR OF THE NATIONAL SECURITY AGENCY  
FROM: [Signature] DATE: 1/15/68  
SUBJECT: [Signature] DATE: 1/15/68

It is noted that the above information is being furnished to you for your information and is not to be disseminated outside your organization.

This information is being furnished to you for your information and is not to be disseminated outside your organization.

Very truly yours,  
[Signature]

COPIES	TO	BY	DATE	INITIALS	REMARKS
1	SECRETARY	[Signature]	1/15/68	[Signature]	
1	ADJUTANT GENERAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF STAFF	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BUREAU	[Signature]	1/15/68	[Signature]	
1	CHIEF OF DIVISION	[Signature]	1/15/68	[Signature]	
1	CHIEF OF SECTION	[Signature]	1/15/68	[Signature]	
1	CHIEF OF OFFICE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF UNIT	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BRANCH	[Signature]	1/15/68	[Signature]	
1	CHIEF OF GROUP	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ELEMENT	[Signature]	1/15/68	[Signature]	
1	CHIEF OF DETACHMENT	[Signature]	1/15/68	[Signature]	
1	CHIEF OF SQUAD	[Signature]	1/15/68	[Signature]	
1	CHIEF OF PLATOON	[Signature]	1/15/68	[Signature]	
1	CHIEF OF COMPANY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BATTALION	[Signature]	1/15/68	[Signature]	
1	CHIEF OF REGIMENT	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BRIGADE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF DIVISION	[Signature]	1/15/68	[Signature]	
1	CHIEF OF CORPS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ARMY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF NAVY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF AIR FORCE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF SPACE FORCE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF NATIONAL GUARD	[Signature]	1/15/68	[Signature]	
1	CHIEF OF RESERVE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF MILITARY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF CIVILIAN	[Signature]	1/15/68	[Signature]	
1	CHIEF OF GOVERNMENT	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BUSINESS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF INDUSTRY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ACADEMY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF RESEARCH	[Signature]	1/15/68	[Signature]	
1	CHIEF OF DEVELOPMENT	[Signature]	1/15/68	[Signature]	
1	CHIEF OF INNOVATION	[Signature]	1/15/68	[Signature]	
1	CHIEF OF EDUCATION	[Signature]	1/15/68	[Signature]	
1	CHIEF OF CULTURE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ARTS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF LETTERS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF SCIENCE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF TECHNOLOGY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ENVIRONMENT	[Signature]	1/15/68	[Signature]	
1	CHIEF OF HEALTH	[Signature]	1/15/68	[Signature]	
1	CHIEF OF WELFARE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF SOCIETY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF COMMUNITY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF RELIGION	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ETHICS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF MORALS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF VALUES	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BELIEFS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF OPINIONS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ATTITUDES	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BEHAVIORS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ACTIONS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF REACTIONS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF RESPONSES	[Signature]	1/15/68	[Signature]	
1	CHIEF OF FEELINGS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF EMOTIONS	[Signature]	1/15/68	[Signature]	
1	CHIEF OF MENTAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF PHYSICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF PSYCHOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF SOCIOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF POLITICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ECONOMIC	[Signature]	1/15/68	[Signature]	
1	CHIEF OF LEGAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF HISTORICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF GEOGRAPHICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF CLIMATOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF METEOROLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ASTRONOMICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF COSMOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF PHYSICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF CHEMICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BIOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF MEDICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF VETERINARY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF AGRICULTURAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF FORESTRY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF FISHERIES	[Signature]	1/15/68	[Signature]	
1	CHIEF OF MARINE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF COASTAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF OCEANOGRAPHICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF METEOROLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF CLIMATOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF ASTRONOMICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF COSMOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF PHYSICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF CHEMICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF BIOLOGICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF MEDICAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF VETERINARY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF AGRICULTURAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF FORESTRY	[Signature]	1/15/68	[Signature]	
1	CHIEF OF FISHERIES	[Signature]	1/15/68	[Signature]	
1	CHIEF OF MARINE	[Signature]	1/15/68	[Signature]	
1	CHIEF OF COASTAL	[Signature]	1/15/68	[Signature]	
1	CHIEF OF OCEANOGRAPHICAL	[Signature]	1/15/68	[Signature]	

# PACIFIC GAS AND ELECTRIC COMPANY

PG&E + 77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

J. O. SCHUYLER  
VICE PRESIDENT  
NUCLEAR POWER GENERATION

May 29, 1984

PGandE Letter No.: DCL-84-196

Mr. George W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-76  
Diablo Canyon Unit 1  
Determination of Effect for SLO-2

Dear Mr. Knighton:

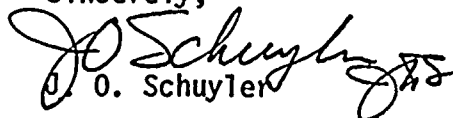
In response to your letter dated February 27, 1984, enclosed is an analysis supporting PGandE's conclusion that operation and maintenance of Diablo Canyon Power Plant will not affect the archaeological characteristics of the SLO-2 site. The State of California's letter concurring with PGandE's conclusion is also enclosed.

PGandE met with the California State Historic Preservation Officer's (SHPO) staff on April 17, 1984. During this meeting, PGandE and the SHPO discussed the analysis performed to make the finding for the determination of effect. At this meeting, PGandE and the SHPO also discussed the Archaeological Resources Management Plan. PGandE's letter of April 30, 1984 transmitted the analysis to the SHPO. PGandE's analysis is provided in Enclosure 1 to this letter, and the SHPO's concurrence with PGandE's analysis is provided in Enclosure 2.

PGandE believes that the material enclosed provides the NRC staff with sufficient information to complete the requirements of Section 106 of the National Historic Preservation Act.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

  
J. O. Schuyler

Enclosures

cc: Marion Mitchell-Wilson  
J. B. Martin  
Service List

840601012B	840529
PDR ADDCK	05000275
P	PDR

Cool  
1/1



1. 2.

3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100.

101. 102.

103. 104. 105.

106. 107. 108.

## ENCLOSURE 1

ADDITIONAL INFORMATION PURSUANT TO 36 CFR 800 PROCEDURES

PGandE's analysis, applying the Criteria of Effect of 36 CFR 800.3(a), as required by 36 CFR 800.4(b), indicates that the operation and maintenance of the Diablo Canyon Power Plant will not affect the characteristics of the SLO-2 site that qualified that property under criterion D of 36 CFR 60.6 as eligible for listing on the National Register. Rather, PGandE believes that even with the activities contemplated on and around the SLO-2 site during operation of Diablo Canyon, the SLO-2 site will retain the ability to yield information important in prehistory and that the cultural deposit at SLO-2 will remain undisturbed. PGandE's determination is based upon the fact that much of the cultural resource material is either precluded from casual access by security measures or lies protected by up to 25 feet of soil fill material. Also, PGandE and the NRC have imposed numerous restrictions on the use of the SLO-2 area and other control measures to ensure that the site is protected. The scope of the undertaking and the limitations on the use of the SLO-2 site and the control procedures associated are summarized below.

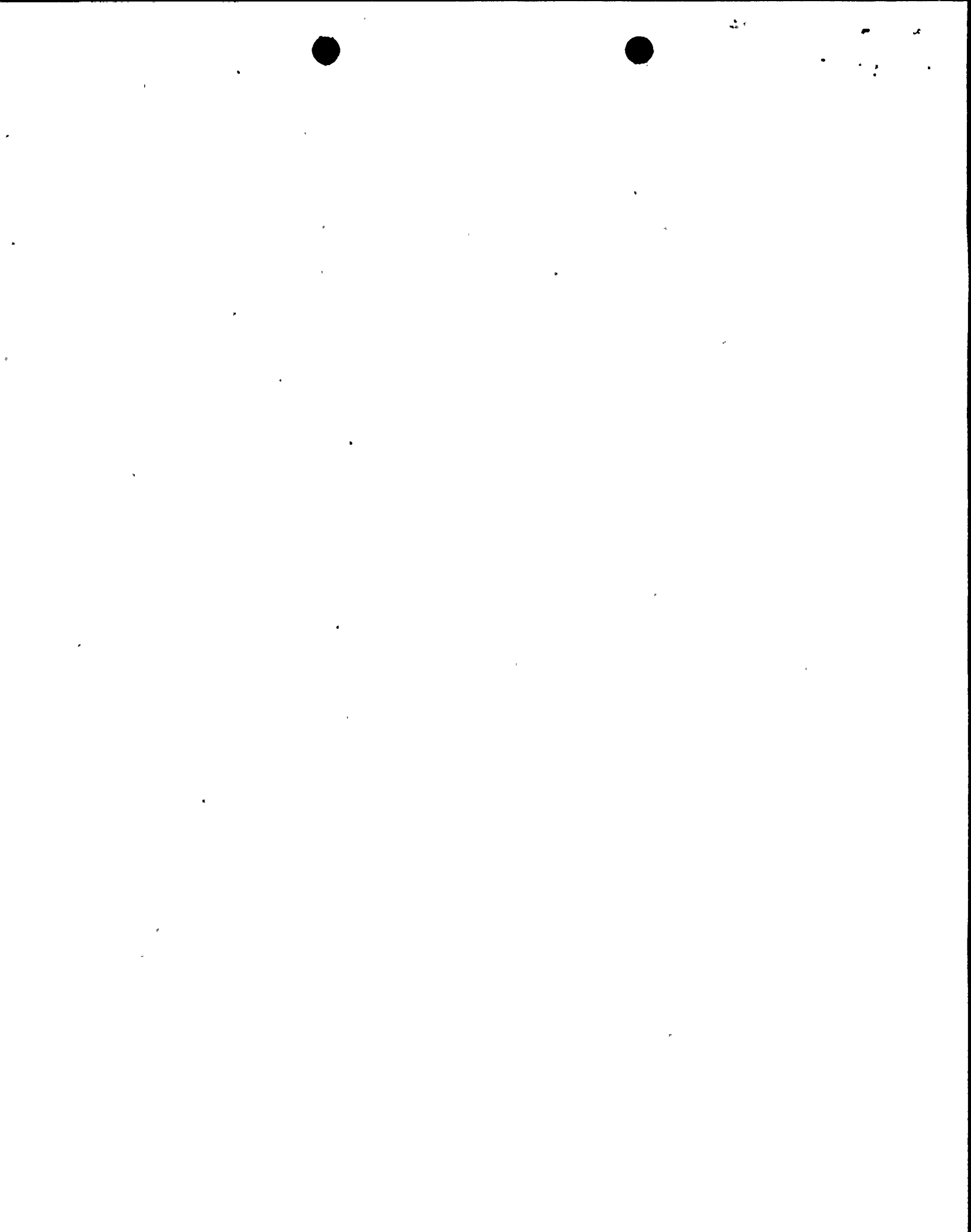
## PROPOSED UNDERTAKING - OPERATION OF DIABLO CANYON POWER PLANT

PGandE expects shortly to receive authorization to operate Unit 1 of the Diablo Canyon Power Plant at its full electrical capacity of 1084 Mw. Operation of the Diablo Canyon plant will be conducted in accordance with the rules and regulations promulgated by the NRC and will be subject to any license requirements and conditions imposed by the NRC.

In connection with the licensing of the Diablo Canyon Power Plant the NRC has heretofore imposed conditions on the operational activities at the plant so as to protect the environment, including the archaeological resources located within the SLO-2 site. In particular, Section 4.2.2 of the Environmental Protection Plan (Non-Radiological) which appears as Appendix B to Facility Operating License No. DPR-76 which will govern operation of Unit 1, requires PGandE to avoid disturbances of the SLO-2 site in accordance with the Archaeological Resources Management Plan (ARMP) drafted by PGandE and submitted to the NRC in April 1980. Under that plan the following limited activities are anticipated to occur within the surveyed boundaries of the SLO-2 site and its immediate vicinity during operation of the Diablo Canyon Power Plant:

Security Activities

PGandE is required to control and secure access to the plant site in conformity with NRC regulations. Security personnel use the paved Fields Access Road to cross the SLO-2 site on their way to the perimeter guard station north of SLO-2. Security personnel will also periodically patrol the two paved roads within the SLO-2 boundary by vehicle and by foot. Such security activities will not cause surface disturbance of the SLO-2 area.



A portion of the SLO-2 area, also covered by soil fill, will be used as a temporary helipad if the need arises. The overall security plan for the plant contains provisions for the use of such a helipad under certain conditions.

#### Water Chemistry Monitoring Activities

PGandE is required to monitor a variety of water chemistry characteristics in connection with operation of the Diablo Canyon Power Plant. These activities will entail periodic access across SLO-2. Specifically, the lined wastewater holding pond immediately outside the northeast boundary of SLO-2 will require periodic monitoring and maintenance. The pond level is checked daily and the contents tested periodically. If the water level or quality dictates that pumping is required, tank trucks would use the paved Fields Access Road to the truck transfer station to receive water pumped from the holding pond. The truck transfer station and the surrounding area are on a paved portion of the fill cap within SLO-2.

If replacement of the pipeline between the truck transfer station and the pond is required the pipe would be placed within the existing pipe route. The initial excavation of the route was monitored by an archaeologist, during which no cultural material was encountered.

In addition to the wastewater pond monitoring, four groundwater monitoring stations located adjacent to the holding pond will be periodically checked. Access to the three monitoring wells which are located within SLO-2 is restricted to points from the road.

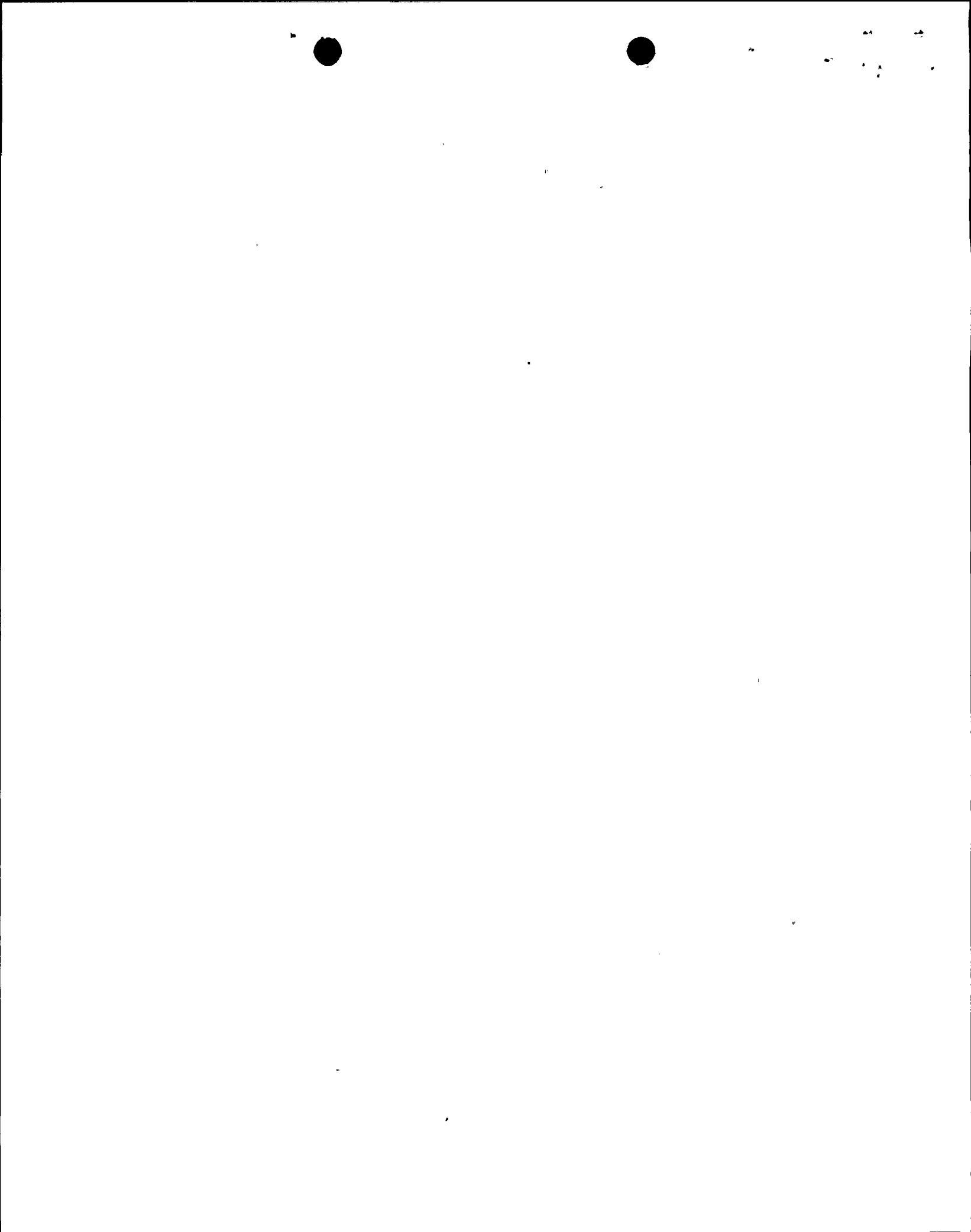
#### Maintenance, Storage and General Activities

The ARMP provides for storage of materials on the portion of SLO-2 which is protected by the fill cap. PGandE is currently preparing a topographic map which will more precisely define the extent and depth of the fill cap. The use of this map will ensure that activities on the SLO-2 site are confined to the extent practicable to areas protected by the deepest portions of the fill cap.

In addition to the pipeline to the wastewater holding pond, there is one underground telephone conduit that parallels the Fields Access Road. No replacement of the conduit is anticipated. If replacement should become necessary, the new line would be located within the existing route and the replacement would be monitored by an archaeologist. In addition, there are several overhead transmission lines that will require periodic maintenance. Since access to the poles is by road, no disturbance of the SLO-2 site resulting from the maintenance is anticipated.

Storage of materials and sandblasting to prepare material for painting will occur within a restricted area of SLO-2 protected by the fill cap.

The several paved roads within the SLO-2 boundary will be used during wastewater pond and groundwater monitoring, biological monitoring, cultural resources monitoring, and maintenance and security activities. All vehicular traffic across SLO-2 will continue to be restricted to existing roads and the fill cap. Maintenance of those roads will be restricted to above ground treatments.





Fire control will be conducted in accordance with the ARMP. Fire control measures will be restricted to mowing of grass and brush. Consistent with the ARMP, use of herbicides or discing for fire control will continue to be prohibited.

Erosion control measures have been taken at SLO-2 to preserve the integrity of the site. Run-off from the watershed east of SLO-2 is directed along a concrete ditch outside the site to Fields Access Road. PGandE believes that the actions taken to date will effectively control erosion within the SLO-2 site. The cultural resources photo monitoring of the site will be utilized to assess the ongoing effectiveness of the erosion control measures.

#### Biological Monitoring Activities

Marine biologists are required to periodically travel along a paved road within the SLO-2 boundary located to the north of Diablo Cove to obtain access to Diablo Cove for testing purposes. Since travel between the paved road and the cove is restricted to foot traffic, no effect on the SLO-2 site is expected from this activity.

#### Cultural Resources Monitoring Activity

On a regular basis, PGandE's staff archaeologists or a qualified consultant will monitor on-site activities and take comparative photographs of the site at numerous fixed locations. These photos, used in conjunction with aerial photographs and the updated topographic map, will confirm that the integrity of the archaeological site is being maintained. Travel to each photo monitoring station is by foot; therefore, no effect on SLO-2 is expected from this activity.

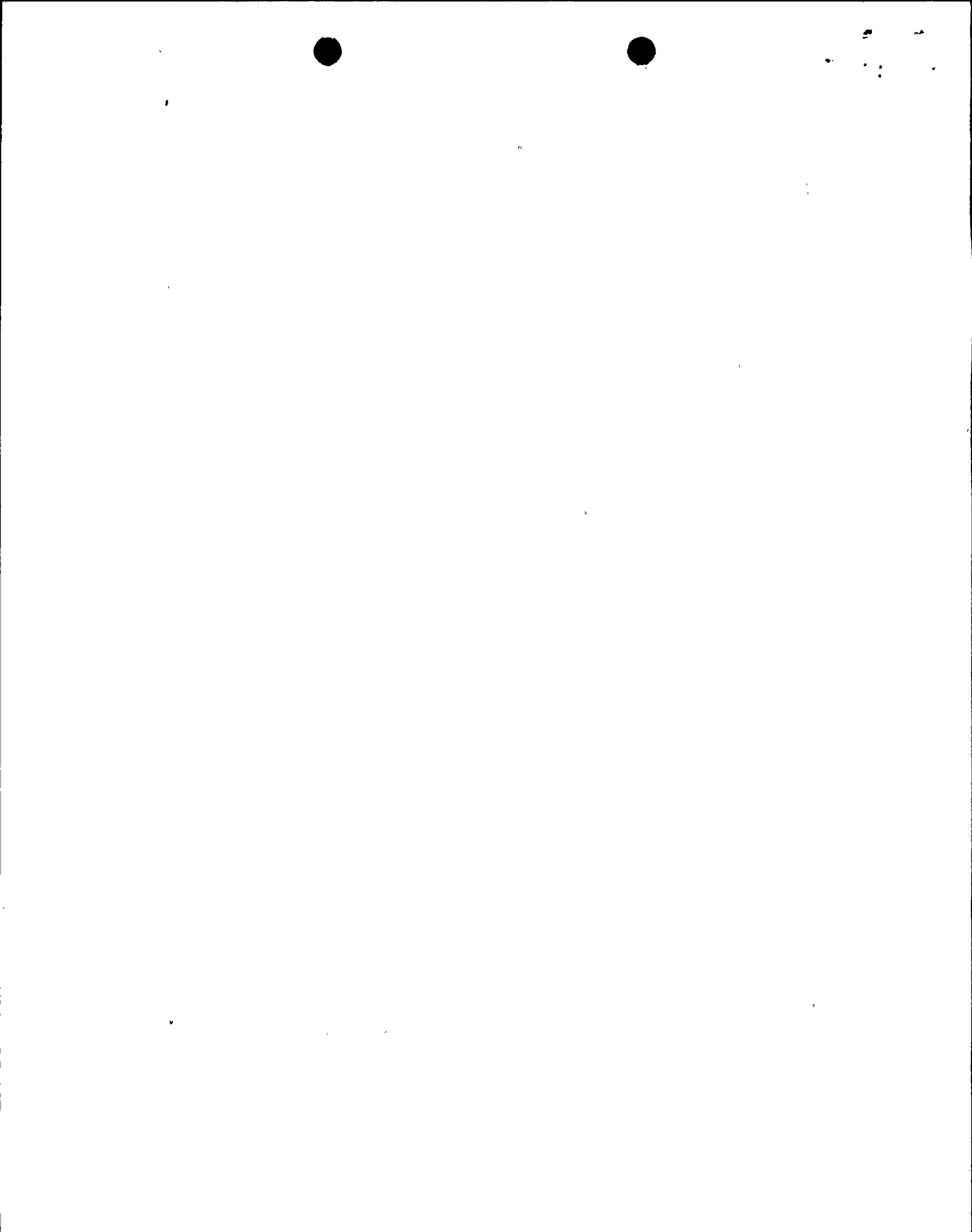
### MANAGEMENT PLAN IMPLEMENTING PROCEDURES

Although PGandE has heretofore confined its activities within the SLO-2 area to those provided for or contemplated by the ARMP, PGandE has recognized that more detailed operational guidelines would be helpful in assuring that the ARMP is properly adhered to and implemented. Accordingly, PGandE is developing additional procedures to more clearly delineate the scope of the ARMP. These implementing procedures will specify the activities which are authorized for the SLO-2 site, the procedures for reviewing and adjusting the types of activities permitted, and the documentation and notification procedures associated with those activities.

As discussed with the California State Office of Historic Preservation (SOHP) staff on April 17, 1984, PGandE anticipates and invites the participation of the SOHP in the development and review of the implementing procedures.

### NATIVE AMERICAN ACCESS ACTIVITIES

In conjunction with PGandE's ongoing efforts to responsibly and appropriately preserve the integrity of the cultural resources at the SLO-2 site, PGandE has also made provisions for periodic access to the site by Native American representatives of the Chumash Indian Tribe. Under the provisions of an access agreement signed in 1982 with the Santa Ynez Band of Mission Indians, Chumash representatives have the right to visit the SLO-2 site quarterly to conduct traditional religious ceremonies. This access agreement will continue

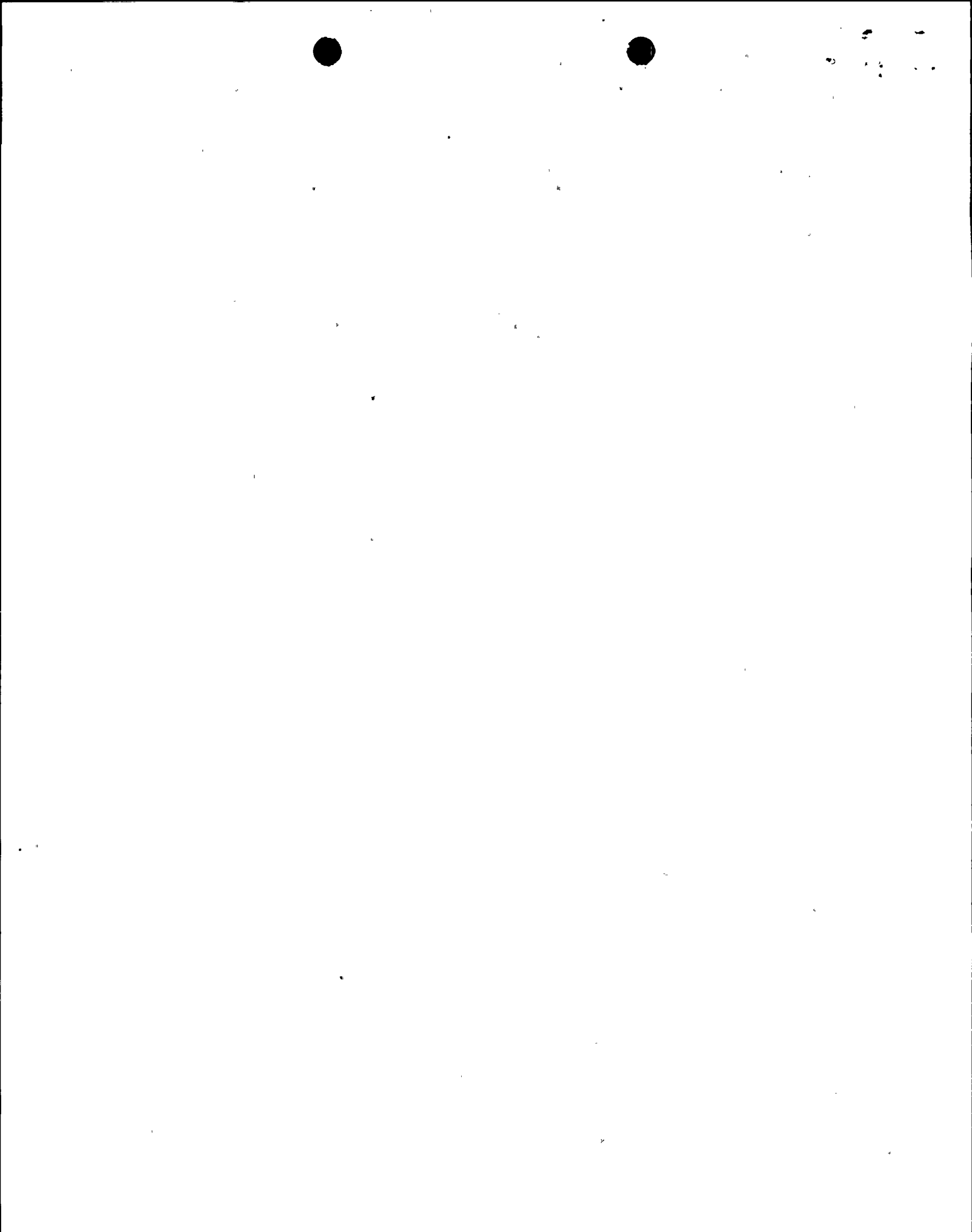


in place indefinitely and notwithstanding that Diablo Canyon will have been placed in operation. We have contacted the Santa Ynez Band of Mission Indians to confirm that the access agreement will continue to be honored and to advise the Santa Ynez Indians of our discussions with the SOHP staff on the broader issues of continued protection of the SLO-2 site. PGandE met with the Santa Ynez Mission Indians on May 14, 1984 to brief them further on our protection plans.

#### ANALYSIS OF EFFECT

As mentioned at the outset of this letter, PGandE has evaluated the activities which are expected to occur on and around the SLO-2 site during operation of the Diablo Canyon Power Plant and has concluded that those activities will not affect the cultural resources at the SLO-2 site. In arriving at this conclusion, PGandE has considered the limited scope of the permitted activities to be carried on at the SLO-2 site, the presence of a substantial protective soil fill covering, the protections afforded by the ARMP (as detailed and supplemented by implementing procedures), and the erosion control program which has already been implemented. The cultural resources at that site will neither be destroyed nor altered as a result of operation of the plant nor will the site be subjected to neglect or deterioration other than as might otherwise occur from natural forces. Rather, PGandE believes that those cultural resources will remain in their present protected state and that the SLO-2 site will retain its ability to yield the information important in prehistory which made the site eligible for inclusion within the National Register under criterion D.

PGandE believes that with the ARMP and implementing procedures in place the foregoing determination will remain appropriate throughout the period of operation of the Diablo Canyon Power Plant. PGandE recognizes, however, that in the event it subsequently appears that operation of the plant has an effect upon the SLO-2 site, further consultations with the NRC and the SOHP would be appropriate to ensure that any mitigative actions warranted are properly evaluated and implemented. We would expect that the ARMP implementing procedures would provide for this possibility and will detail the necessary actions to be taken to initiate the consultations.



ENCLOSURE 2

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GEORGE DEUKMEJIAN, Governor

## OFFICE OF HISTORIC PRESERVATION

DEPARTMENT OF PARKS AND RECREATION

POST OFFICE BOX 2390

SACRAMENTO, CALIFORNIA 95811

(916) 445-8006



REPLY TO: NRC831005A

RECEIVED

MAY 10 1984

Mr. Roger J. Peters  
Pacific Gas and Electric  
77 Beale Street  
San Francisco, CA 94106

Dear Mr. Peters:

Thank you for the opportunity to comment on the effects that the operation and maintenance of Diablo Canyon Nuclear Power Plant will have on cultural resources. If the Archeological Resources Management Plan and the commitments made in your letter of April 30, 1984 are implemented, cultural resources will be adequately considered. Thus I concur with your determination that the operation and maintenance of Diablo Canyon Nuclear Power Plant will not have an effect on cultural resources listed on or eligible for inclusion in the National Register of Historic Places.

Should the archeological monitoring program find that cultural resources are being affected, Pacific Gas and Electric thru the Nuclear Regulatory Commission will request the comments of this office and the Advisory Council on Historic Preservation. At that time, if it is determined that cultural resources are being adversely affected, these effects will be mitigated thru the appropriate actions.

I would like to thank Pacific Gas and Electric for your presentation on April 17, 1984. It served to be very helpful in providing the information and background necessary to concur in this determination. If my staff can be of any further assistance, please contact Hans Kreutzberg or Dwight Dutschke at (916) 322-9624.

Sincerely,

A handwritten signature in cursive script that reads "Marion Mitchell-Wilson".

Ms. Marion Mitchell-Wilson  
Deputy State Historic Preservation Officer  
Acting Chief, Office of Historic Preservation

Handwritten marks and scribbles in the top right corner.

