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 SELLS, D.E. Environmental Projects Branch 2

SUBJECT: Comments NUREG-0564, App B re archaeological survey of Pond Hill Reservoir location. Plan is preliminary rept containing no factual info re prehistoric matl that might be found.

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DEPARTMENT OF ~~SOCIETY~~ PHILOSOPHY & ANTHROPOLOGY

17 April 1980

Mr. Donald E. Sells, Acting Branch Chief
 Environmental Projects Branch 2
 Division of Site Safety & Environmental Analysis
 U. S. Nuclear Regulatory Commission
 Washington, D. C. 20555 Docket Nos. 50-387 & 50-388

Dear Mr. Sells:

Thank you for sending me the supplement to the Draft Environmental Statement relating to the Susquehanna Steam Electric Station at Bell Bend (NUREG-0564, docket nos. above). This document concerns the possible construction of a reservoir at Pond Hill, across the river from the generating plant now under construction. I have read with great interest Appendix B, a plan for an archeological survey of the Pond Hill Reservoir location, by Curtis E. Larsen, who appears to be a competent "contract archeologist" in Jackson, Mich. My comments on this are: (A) this is merely a preliminary "phase zero" plan containing no factual information about prehistoric material that might be found, yet states that a report of "on-ground survey work.... will be submitted to PP & L in the spring of 1980"; and (B) although the Luzerne County Court House is mentioned as a source of cultural resource information (page B-3), neither the Wyoming Historical and Geological Society (which has published extensively on local archeology), nor the Frances Dorrance Chapter No. 11 of the Society for Pennsylvania Archeology, which usually meets in its building (on Franklin St. in Wilkes-Barre, next door to the Osterhout Library mentioned in your Notice of Availability, page 7590-01), is mentioned as an institutional source of information. Mr. Larson, being based in Michigan, would start from scratch, whereas members of these two organizations have devoted years of research to the history and pre-history of the Susquehanna valley, and are accustomed to record and publish their results on a professional level. Two members of SPA Chapter No. 11 are college teachers of archeology, and are experienced at directing both surveys and excavations. In this region we have an excellent tradition of collaboration between amateur and professional archeologists, who join in registering their findings with the Pa. Historical and Museum Commission. If Mr. Larsen is to do either inventory or salvage archeology, qualified local archeologists should make up his paid staff, rather than exclusively outsiders.

It is encouraging to learn that the Pennsylvania Power and Light Co. and its associates are now being encouraged by U. S. N. R. C. to work at such a professional level in surveying the archeological value of the Pond Hill location, presumably to be followed up by equally careful "Phase Three" excavation of any significant remains found within the "take area," dam site, etc. Unfortunately, I have been reliably informed that recent construction activities by PP & L

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on both sides of the river have been started in violation of Pennsylvania antiquities laws in force for over a decade, and such violations are still continuing at this writing. Steel towers for transmission lines have been erected on both sides of the river with excavations from which competent amateur archeologists saw important cultural artifacts, such as prehistoric pottery and, in one case at least, human bones from an Indian burial, with no attempt on the part of construction crews to salvage these materials. It was only after one of these amateurs made repeated approaches to the PP & L Co. headquarters in Allentown concerning disturbance of burials by tower construction across the river from Bell Bend that archeologists on the staff of the Pa. State Historical & Museum Commission were contacted, so that a salvage program paid for by PP & L was eventually set up in the summer of 1978. Why had PP & L failed to notify the State Museum before starting to dig for foundations? And why were the State archeologists so out of touch with PP & L's construction plans that they did not themselves previously initiate an intensive (at least Phase Two) survey that would surely have revealed these burials, in one of the richest known archeological areas in the Susquehanna valley? It has even been suggested that the Pa. State Museum archeological staff sought to limit the extent of the 1978 excavation, not because no more valuable early historic material could be found, but to save money for PP & L, and that their current disinterest in requiring PP & L to do salvage archeology at the recreational area now under construction on the right bank of the river has the same purpose. If I misunderstand the present role of the State Museum archeologists, I should apologize. I am sending a copy of this letter to Dr. Barry Kent in Harrisburg for his comments.

I believe the guidelines which should be followed in case of construction by utilities should be substantially those of the Interagency Archeological Service, U. S. Dept. of the Interior, Washington, D. C. 20242. If these guidelines are not being followed at Bell Bend I should appreciate knowing why. Specifically, I should like to hear from both the PP & L Co. and the Pa. State Museum why no salvage archeology is being done in the field between the Susquehanna Steam Electric construction site and the river. The same archeologists, Barry Kent and Ira F. Smith III, were on the staff when one or more sites, including "36 LU 16", were registered there. Archeological files in the state museum must still contain my own typed report on two testpits which my students and I sunk in that field, near the old Thomas Fahringer house, on Dec. 9, 1967. Accurate location data obtained with surveying instruments was included with the report. I retain the field notes and diagrams. Diagrams were drawn by an advanced student of art and archeology, David Gerhard, who has taught art at Middletown, PA. The vertical cross-section of one of the test pits distinguishes by color and texture four distinct soil levels within the first 22 inches. ~~#####~~ In the lower levels of this excavation, evidences of prehistoric human occupation included fire-cracked hearth stones, charcoal, and worked stone chips, such as rhyolite. In the surface of that part of the field several local collectors, including Gerhard, have found numerous "Archaic" period stone artifacts, such as a Brewerton Side-notched point, and various stone knives. In 1967, officials of the PP & L Co. were sufficiently impressed with what the BSC Archeology Project had found in the field now being developed for picnicing, etc. that the head real estate man of the company came from Allentown to meet with me, and it was implied that I and my student crew might be hired in the summer of 1968 to do salvage archeology there. This was not done largely because the archeological staff of the State Museum had other plans and declined to give even remote supervision to the project. To clarify the

statement I signed and gave to a representative of the PP & L Co. in 1967-68, to the effect that the BSC Archeology Project had no further plans to excavate in the area mentioned (36 LU 16), and that I felt no delay in construction plans would be needed, was based in part on my inability to gain the cooperation of the State Museum in this project, and in part on my understanding at the time that the entire area was about to be permanently fenced in and closed to the public because of impending construction plans. As shown by the site report I submitted to the State Museum, I certainly did not mean that the site was of no archeological interest.

Within the last few years, experienced amateur archeologists affiliated with Chapter No. 11 of the Society for Pa. Archeology have seen Indian pottery come out of the ground when steel transmission towers were constructed in the flat land between the Bell Bend generating plant and the river, at or near the place where picnic tables and shelters are now being built for a recreation area. This shows that "Woodland" period cultural remains, as well as those of the pre-agricultural "Archaic," are present in the vicinity of the area set aside for recreation. It is my strong recommendation that the PP & L Co. now revert to its usual conservation-minded role, as exemplified so well at the Indian Steps Museum farther down the Susquehanna, and at the Montour Preserve (where I have also recommended further archeological reconnaissance and a museum presentation of Indian history), by (A) funding thorough archeological salvage excavation on all parts of the flat area between highway #11 and the river, and (B) installing a "trailside" archeological museum exhibit of the archeology of the Bell Bend & Council Cup region. If visitors are to be invited, archeological interest should be an added attraction. Indirectly, visitors might come to feel that the vicinity of an atomic plant is not too dangerous after all.

Chapter No. 11 of the Society for Pennsylvania Archeology, based in Wilkes-Barre, is named for the late Frances Dorrance, who pioneered in legislation mandating preservation of historical and archeological materials and in making archeology an important concern of the Pa. State Historical & Museum Commission. It seems that the chapter of which Miss Dorrance remained for many years a member is called upon again to make sure that whatever possible is being done to safeguard the prehistoric and early historic cultural treasures of the Susquehanna valley, and to make them available for educational purposes. In order to suggest that the Chapter, of which I am a member, take appropriate action, I am sending a copy of this letter to its President, Mr. Theron I. Knouse, Jr., Wapwallopen, PA, 18660 (phone: 717-379-3949). Mr. Knouse is a serious student of colonial and prehistoric antiquities, with training and experience in archeology.

Sincerely,

Robert R. Solenberger

Robert R. Solenberger
Assoc. Prof. of Anthropology

cc: PP & L, Allentown
B. Kent, Harrisburg
T. I. Knouse, Wapwallopen