



In response reply to  
2003-PIK-16662

May 16, 2018

Cinthy I. Román, Chief  
Environmental Review Branch  
Division of Fuel Cycle Safety, Safeguards, and Environmental Review  
Office of Nuclear Material Safety and Safeguards  
United States Nuclear Regulatory Commission  
Washington, DC, 20555-0001

Re: Disposal of Waste from the Lead Cascade Facility (Docket Number: 70-7003)  
Portsmouth Gaseous Diffusion Plant (PORTS), Pike County, Ohio

Dear Ms. Román,

This is in response to correspondence from your office dated April 9, 2018 (received April 16) regarding the above referenced undertaking. The comments of the Ohio State Historic Preservation Office (SHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108); the Nuclear Regulatory Commission (NRC) serves as the lead federal agency.

The undertaking involves decontaminating and decommissioning the American Centrifuge Operating Lead Cascade Facility within the Portsmouth Gaseous Diffusion Plant Reservation (PORTS) located in Pike County, Ohio.

In our correspondence dated May 8, 2017, the SHPO finds that the PORTS is eligible for the listing in the National Register of Historic Places. Therefore, under the Section 106 regulations, PORTS constitutes an historic property. The Cascade Lead Facility is within the PORTS and is part of an historic property.

The proposed decontamination work sets in motion direct and foreseeable consequences that will result in substantial changes in, around, and to an historic property. These changes will diminish the historic property's capacity to convey its significance. The opinion of the SHPO is that the direct and foreseeable changes constitute an adverse effect that should be resolved through consultation. Consequently, the SHPO is unable to concur with the No Adverse Effect finding by NRC for the undertaking at PORTS.

In addition, the SHPO recommends that NRC initiate and carry out a consultation that seeks input from parties that have raised concerns about the effects of this undertaking on historic properties. This consultation must provide opportunities for consulting parties to understand the basis of the decisions that have been made and will be made. Also, this consultation must afford consulting parties ample opportunities to offer ideas and recommendations for the NRC to integrate into its planning as this undertaking unfolds.

Ms. Cinthya I. Román  
May 16, 2018  
Page 2

Finally, as previously stated in our correspondence dated May 8, 2017, the SHPO recommends that NRC request the participation of the Advisory Council on Historic Preservation (ACHP) in the consultation regarding this undertaking.

Please contact David Snyder at (614) 298-2000 or [dsnyder@ohiohistory.org](mailto:dsnyder@ohiohistory.org) with any questions.

Thank you for your cooperation.

Sincerely,



Diana Welling,  
Department Head & Deputy State Historic Preservation Officer for  
Resource Protection and Review

DW/ds (OHPO Serial Number 1073541)

cc via email: Sarah Stokley, Advisory Council on Historic Preservation