

# **Uranium One Proposed Ludeman Satellite In Situ Recovery NRC Documentation of NHPA Section 106 Review (Draft Cultural Resources Sections of Environmental Assessment)**

This document contains sections related to historical and cultural resources from Chapter 3, “Affected Environment,” and Chapter 4, “Environmental Impacts,” and Chapter 5, “Cumulative Impacts,” of the U.S. Nuclear Regulatory Commission (NRC) staff’s draft environmental assessment (EA) for the proposed Ludeman Satellite In Situ Recovery license amendment. These sections include the staff’s documentation of its consultation activities pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). For clarity, some additional text not specifically related to cultural resources (such as definitions related to impacts and general information pertaining to cumulative impacts) is provided. The “References” section at the end of this document contains all of the references cited in the sections provided below.

## **Historical and Cultural Resources**

The NRC staff concludes that impacts to historic and cultural resources from the construction, operations, aquifer restoration, and decommissioning of the proposed Ludeman ISR Satellite Project would be SMALL. This conclusion is based on the following factors: (i) the NRC would require by license condition that Uranium One avoid two sites located within the direct area of potential effects (APE) that are eligible for listing on the National Register of Historic Places, as determined through NRC consultation with Native American Tribes and concurred by the Wyoming State Historic Preservation Office (SHPO); (ii) the area of ground disturbance would not change during operations, aquifer restoration, and decommissioning phases; (iii) Uranium One has committed to an inadvertent discovery plan to address the potential identification of previously unrecorded historic and cultural resources during any phase of the project; and (iv) no paleontological resources were identified within the proposed project area; however, if inadvertent paleontological resource discovery occurs, NRC-approved procedures would be followed to address any disturbance in excess of a few feet. Should the licensee determine the need to expand ground-disturbing activities outside the currently defined APE for direct impacts, additional review under Section 106 of the NHPA would be necessary, including consultation with Native American Tribes.

## **3 AFFECTED ENVIRONMENT**

### **3.8 Cultural and Historical Resources**

This section describes the historic properties that may be affected by the proposed Ludeman ISR Satellite Project. The National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their undertakings on historic properties. Historic properties are defined as resources that are eligible for listing on the National Register of Historic Places (NRHP). The criteria for eligibility are listed in 36 CFR 60.4 and include (A) association with significant events in history; (B) association with the lives of persons significant in the past; (C) embodiment of distinctive characteristics of type, period, or construction; and (D) sites or places that have yielded or are likely to yield important information (ACHP, 2012). The historic preservation review process (NHPA Section 106) is outlined in regulations the Advisory Council on Historic Preservation (ACHP) issued in 36 CFR Part 800, “Protection of Historic Properties.” The issuance of a source materials license or license amendment is a federal action (undertaking) that could affect either known or undiscovered historic properties located on or

near the proposed Ludeman Project site. In accordance with the provisions of the NHPA, the NRC is required to make a reasonable effort to identify historic properties in the area of potential effects (APE). The APE for this review is an area that may be impacted by construction, operations, aquifer restoration, and decommissioning activities associated with the proposed action. If historic properties are present or affected, the NRC is required to document identification efforts and findings with the Wyoming State Historic Preservation Office (WY SHPO) and to assess and resolve possible adverse effects of the undertaking before proceeding with licensing. These efforts and findings are discussed in the next sections. The Ludeman project encompasses approximately 7,633 ha [18,861 ac] of which 890 ha [2,200 acres] would be directly impacted by project activities. The potential for direct impacts is limited to the 890 ha [2,200 acres] area where proposed ground disturbing construction activities could occur. Indirect impacts are considered for the entire area within 3.2 km [2 mi] of the Ludeman Project.

### **3.8.1 Class III Cultural Resource Report**

Between June and October 2008, Ethnoscience, Inc. of Billings, Montana, completed a Class III Cultural Resource Inventory for the Ludeman Project area. The inventory was conducted for 8,048 ha [19,888 ac], which includes approximately 421 ha [1,040 ac] of land within the Ludeman project area that are not going to be used by Uranium One (2010; Uranium One, 2015a). From this inventory, 26 prehistoric sites, 25 historic sites, and one multicomponent site were identified. Two previously recorded prehistoric sites and one previously recorded historic site within the Ludeman project area were not found during the inventory. In addition, 59 prehistoric isolates were recorded, which are not eligible for listing on the NRHP. A list of the prehistoric and historic sites within the Ludeman project area is provided in Table 3-7, including the three previously recorded sites that Ethnoscience, Inc. did not identify.

Forty of the sites were recommended not eligible for listing on the NRHP. Ethnoscience, Inc. stated that 10 sites required further investigation to ascertain eligibility information; thus, the NRHP eligibility recommendations for those sites were unevaluated.

A segment of the NHRP-listed historic Bozeman Trail (site 48CO0165) crosses the far eastern portion of the Ludeman Project site. Ethnoscience, Inc. stated that the segment of the trail within the project area was identified during the Class III survey, however it did not retain sufficient integrity to be recommended as a contributing element of the larger Bozeman Trail. In addition, a segment of a previously recorded historic telegraph line (site 49CO2908) may occur within the Ludeman Project area; however, Ethnoscience, Inc. did not identify its location during the inventory. The telegraph line was previously recommended as eligible for listing on the NRHP. Because no evidence for this site was found during the Class III survey, Ethnoscience, Inc. recommended this site no longer exists within the survey area.

### **3.8.2 Section 106 Consultation**

The NRC staff made a reasonable and good faith effort to identify Native American Tribes for inclusion in the Section 106 consultation process and to provide the identified Native American Tribes a reasonable opportunity to participate in the Section 106 consultation process, as required by 36 CFR 800.2(c)(2)(ii)(A).

The NRC staff initially contacted 22 Native American Tribes on August 8, 2012, to initiate consultation and request any information regarding cultural resources potentially affected by the

proposed Ludeman project (EA Table A-1). Follow-up calls were made to the Tribes, and by January 25, 2013, 17 of the 22 Tribes had expressed interest in continued consultation, and 16 of those Tribes were interested in site tours and in-person meetings.

Following the NRC staff's requests for additional information (RAIs) and Uranium One's responses submitted between 2012 and 2015, the NRC staff transmitted the Class III Cultural Resource Survey to the Tribes on June 5, 2015 (EA Table A-1). A response to the Class III Survey report from the Northern Arapaho on June 17, 2015, noted concern that traditional cultural properties (TCPs) were not addressed as a resource type during the survey, in addition to concerns about the potential impacts to the three sites identified in the survey. The Northern Cheyenne Tribe expressed similar concerns about the lack of consideration of TCPs in a response on June 22, 2015.

Following receipt of Uranium One's revised amendment application in June 2017, the NRC staff resumed consultation with Native American Tribes in August 2017 and supplied a revised version of the Class III Cultural Resource Survey report and area of potential effects (APE) on September 19, 2017. Follow-up calls were made to Tribes on November 2 and 3, 2017, and a tribal webinar was held on November 8, 2017, to discuss the proposed Ludeman project and the Class III Cultural Resource Survey findings. Webinar attendees included NRC staff, NRC

<b>Table Error! No text of specified style in document.-1. Prehistoric and Historic Sites Within the Proposed Ludeman Project Area</b>			
<b>Site ID</b>	<b>Period</b>	<b>Site Type</b>	<b>NRHP Eligibility Recommendation*</b>
48CO0165	Historic	Trail (Bozeman)	Eligible, non-contributing
48CO0393	Prehistoric	Culture material scatter	Not eligible
48CO0394	Prehistoric	Lithic scatter	Not eligible
48CO0398	Multicomponent	Stone feature	Not eligible
48CO0803	Historic	Farmstead (Leuenberger Ranch)	Unevaluated
48CO2492	Prehistoric	Lithic scatter	Not eligible
48CO2908	Historic	Telegraph line	Eligible, non-contributing
48CO3007	Prehistoric	Stone feature	Unevaluated
48CO3008	Prehistoric	Stone feature	Unevaluated
48CO3009	Prehistoric	Stone feature	Not eligible
48CO3010	Historic	Farmstead	Not eligible
48CO3011	Prehistoric	Stone feature	Not eligible
48CO3012	Historic	Depression, etc.	Not eligible
48CO3013	Historic	Farmstead	Not eligible
48CO3014	Historic	Farmstead	Not eligible
48CO3015	Historic	Farmstead	Not eligible
48CO3016	Historic	Windmill	Not eligible
48CO3017	Historic	Windmill	Not eligible
48CO3018	Prehistoric	Stone feature	Unevaluated
48CO3019	Prehistoric	Lithic scatter	Unevaluated
48CO3020	Prehistoric	Lithic scatter	Not eligible
48CO3021	Historic	Foundations	Not eligible
48CO3022	Historic	Depression	Not eligible
48CO3023	Historic	Windmill	Not eligible
48CO3024	Historic	Foundation	Not eligible
48CO3025	Prehistoric	Stone feature	Not eligible
48CO3026	Prehistoric	Stone feature	Not eligible
48CO3027	Historic	Windmill	Not eligible
48CO3028	Prehistoric	Stone feature	Not eligible
48CO3029	Prehistoric	Lithic scatter	Unevaluated
48CO3030	Prehistoric	Stone feature	Not eligible

Table Error! No text of specified style in document.-1. Prehistoric and Historic Sites Within the Proposed Ludeman Project Area			NRHP Eligibility Recommendation*
Site ID	Period	Site Type	
48CO3031	Prehistoric	Culture material scatter	Not eligible
48CO3032	Prehistoric	Stone feature	Unevaluated
48CO3033	Prehistoric	Lithic scatter	Unevaluated
48CO3034	Historic	Farmstead	Not eligible
48CO3035	Prehistoric	Stone feature	Not eligible
48CO3036	Prehistoric	Stone feature	Eligible <sup>†</sup>
48CO3037	Prehistoric	Stone feature	Eligible <sup>†</sup>
48CO3038	Historic	Windmill	Not eligible
48CO3039	Historic	Stone feature, historic debris	Not eligible
48CO3040	Historic	Foundation, culture material scatter	Not eligible
48CO3041	Historic	Depression	Not eligible
48CO3042	Historic	Culture material scatter	Not eligible
48CO3043	Historic	Culture material scatter	Not eligible
48CO3044	Historic	Culture material scatter	Not eligible
48CO3045	Prehistoric	Stone feature	Not eligible
48CO3046	Prehistoric	Stone feature	Not eligible
48CO3047	Prehistoric	Stone feature	Not eligible
48CO3048	Prehistoric	Stone feature	Unevaluated
48CO3049	Historic	Culture material scatter	Not eligible
48CO3050	Historic	Cairn	Not eligible
48CO3275	Prehistoric	Lithic scatter	Not eligible
*SHPO concurrence for the previously recorded sites is not provided.			
<sup>†</sup> SHPO eligibility concurrence provided on May 23, 2018 (WY SHPO, 2018).			

contractors, representatives from Uranium One, and representatives of three Tribes: the Northern Cheyenne, Chippewa Cree, and Rosebud Sioux. Several tribal members raised concerns regarding the importance of stone feature sites to Tribes, the limited nature of testing conducted during the Class III Cultural Resource Survey, and the lack of testing prior to making “Not Eligible” recommendations for the stone feature sites. All three Tribes expressed interest in a site visit, which had been previously scheduled for November 14, 2017.

Follow-up calls were conducted on November 13, 2017, and the site visit was held in Casper, Wyoming, at the proposed Ludeman project site on November 14, 2017. Representatives from one tribe, the Northern Cheyenne, were able to attend, in addition to NRC staff and contractors and representatives from Uranium One and their consultants. Following a morning meeting in which the project and report were discussed, a field visit to five stone feature sites was conducted, including 48CO3036 and 48CO3037, which are within the direct APE. Tribal members noted that additional stone features were present on site in addition to several surface artifacts. Tribal members expressed interest in the stone feature sites identified during the Class III Cultural Resource Survey and expressed their desire that they be avoided by any direct impacts of the proposed project. By letter dated December 8, 2017, the NRC staff requested that the Northern Cheyenne Tribe document their concerns in writing regarding the eligibility of sites visited as well as any preferred avoidance buffer. The Northern Cheyenne Tribe provided the requested comments and recommendations in a letter dated February 23, 2018. The Northern Cheyenne Tribe stated that both sites 48CO3036 and 48CO3037 are of significance to the tribe and, therefore, recommended that both sites be determined eligible for listing on the NRHP under Criteria A and D due to their association with past events and their potential to yield information significant to prehistory. As a result of these comments, the NRC

submitted revised site information and determinations that the two sites are eligible for listing on the NRHP under Criteria A and D to the WY SHPO on March 23, 2018 (NRC, 2018c). The WY

SHPO concurred with the NRC's determinations of eligibility for sites 48CO3036 and 48CO3037 (WY SHPO, 2018).

## 4 ENVIRONMENTAL IMPACTS

The NRC staff reviewed the applicant's environmental report; collected information from federal, state, and local government agencies; and evaluated the environmental impacts to the various resources of the affected environment from the proposed action.

The NRC staff used the guidance outlined in NUREG-1748 (NRC, 2003b) in its evaluation. In accordance with this guidance, the staff evaluated the direct effects and indirect effects that each resource area may encounter from the proposed action and the No-Action alternative. The NRC staff categorizes the impacts in terms of small, moderate, or large, defined as follows:

- SMALL—environmental effects are not detectable or are so minor that they will neither destabilize nor noticeably alter any important attribute of the resource.
- MODERATE—environmental effects are sufficient to alter noticeably, but not to destabilize important attributes of the resource.
- LARGE—environmental effects are clearly noticeable and are sufficient to destabilize important attributes of the resource.

### 4.9 Historic and Cultural Resources

This section describes potential environmental impacts to historic, cultural, and paleontological resources at the proposed Ludeman ISR Satellite Project during each phase of the facility lifecycle under Uranium One's preferred liquid waste management option. The NRC staff considered each of Uranium One's liquid waste management options (EA Section 2.1.7) and has provided a comparison of the impacts for each option in EA Table 4-1. The impacts to historic, cultural, and paleontological resources associated with the No-Action Alternative are also evaluated in this section. Predominantly, these impacts could result from the loss of or damage to historic, cultural, and archaeological resources, as well as temporary restrictions on access to these resources.

As part of the pre-licensing activities, licensees are required by NRC to conduct the appropriate historic and cultural resource surveys. The eligibility evaluations of historic properties for listing in the National Register of Historic Places (NRHP) or as a traditional cultural property (TCP) under criteria in Title 36 of the *Code of Federal Regulations* (CFR) 60.4(a)–(d) are conducted as part of a site-specific environmental review because most TCPs are identified through consultation. To determine whether significant historic and cultural resources are to be avoided or mitigated, consultations involving the NRC, the licensee, Wyoming State Historic Preservation Office (WY SHPO), and Native American Tribes occur as part of the site-specific review. If discovery of previously undocumented historic or cultural resources are identified during construction activities, NRC requires licensees to stop work and notify the appropriate federal, tribal, and state agencies, with regard to appropriate mitigation measures. Construction activities, including wellfields, facilities, liquid waste management systems, and access roads, have the potential to directly affect archaeological sites identified within the Ludeman project area. Of the archaeological sites identified during the Class III inventory, four

are located in proximity to areas where construction would occur (EA Section 3.8). One of these resources is a livestock watering station, including a windmill and tank, site 48CO3027, located within the monitor well ring of Wellfield 4. A prehistoric stone ring feature, site 48CO3009, is located within the monitor well ring of Wellfield 3. Both of these sites have been recommended not eligible to the NRHP. The remaining two sites, 48CO3036 and 48CO3037, are prehistoric rock features and lithic scatters that were identified within the direct area of potential effect. Site 48CO3036 was initially recommended not eligible, and the Class III Cultural Resource Report recommended further investigations at 48CO3037. However after consultation with the Northern Cheyenne Tribe stated that both sites 48CO3036 and 48CO3037 are of significance to the tribe and recommend that both sites be determined eligible for the NRHP under Criteria A and D due to the sites' association with past events and their potential to yield information significant to prehistory. As a result of these comments, the NRC determined that the sites are eligible and submitted revised site forms and determinations of eligibility to the WY SHPO. The WY SHPO concurred with the NRC's determinations of eligibility for sites 48CO3036 and 48CO3037 (WY SHPO, 2018). Therefore, the NRC will require by license condition that Uranium One commit to avoid sites 48CO3036 and 48CO3037 during all phases of the project. Because of the avoidance measures previously described, the NRC staff concludes that there would be no impact from construction on the NRHP eligible sites, and impacts to historic and cultural resources would be SMALL.

The footprint for operations would be the same as that considered for the construction phase. There would be no impacts on NRHP-eligible sites from the operation of the facility, nor from the aquifer restoration or decommissioning phases. Uranium One has committed to an inadvertent discovery plan to address the potential identification of previously unrecorded historic and cultural resources during any phase of the project. The inadvertent discovery plan includes a stoppage of work and notification of appropriate authority parties (federal, tribal, and state agencies) (Uranium One, 2017e). Therefore, the NRC staff concludes that there would be no impacts to the NRHP eligible sites, and impacts to historic and cultural resources at the Ludeman ISR Satellite Project for operations, aquifer restoration, and decommissioning would be SMALL.

Although no paleontological resources were identified, should there be an inadvertent discovery of a paleontological resource, NRC-approved procedures would be followed to address any disturbance in excess of a few feet. Therefore, the NRC staff concludes that the impact from all phases on paleontological resources would be SMALL.

Under the No-Action Alternative, the Ludeman site would not be licensed, and there would be no associated construction, operation, aquifer restoration, or decommissioning; therefore, there would be no archaeological sites, isolated cultural resources, TCPs, or paleontological resources affected by the proposed action. Cultural impacts from current land activities, such as CBM extraction, oil and gas extraction, and cattle ranching, would continue.

## 5 CUMULATIVE IMPACTS

### 5.9 Historic and Cultural Resources

Cumulative impacts on historic and cultural resources were assessed within a study area that encompasses a 16-km [10-mi] radius around the proposed Ludeman ISR Satellite Project. This area delineates the geographic boundary used for the cumulative analysis of historic and cultural resources. The study area covers a larger spatial extent than either the direct or indirect area of potential effects (APE), to evaluate activities outside of the proposed project area. The assessment of cumulative impacts on historic and cultural resources beyond 16 km [10 mi] was not undertaken because, at this distance, the impacts on historic and cultural resources from the proposed Ludeman Project on other past, present, and reasonably foreseeable future action (RFFAs) would be minimal. The timeframe for this analysis is 2013 to 2030, based on the estimated operating life of the proposed project.

Most of the cumulative impacts on historical and cultural resources in the study area were considered to be from future grazing activities and energy development (e.g., ISR projects, CBM projects, wind projects, and oil and gas operations), which are expected to continue at the same or reduced intensity for the foreseeable future. Potential impacts to cultural and historic resources could also result from increased land area access and surface-disturbing activities associated with new projects in the study area. Impacts from these activities would result primarily from the loss of or damage to historical, cultural, and archaeological resources; temporary restrictions on access to these resources; or from erosion and destabilization of land surfaces. As new developments start, the NRC staff anticipates that activities associated with surface-disturbing activities would be surveyed for historic and cultural resources, as appropriate. All applicants for ISR facilities would conduct appropriate historic and cultural resource surveys as part of pre-license application activities. Therefore, the NRC staff concludes that impacts to historical and cultural resources resulting from other past, present, and reasonably foreseeable future land use activities, ISR projects, CBM projects, and oil and gas operations would be SMALL to MODERATE. Impacts to cultural resources can be minimized for proposed projects located on federal or tribal lands or that are part of a federal action, because such projects are subject to the National Historic Preservation Act (NHPA), the Section 106 consultation process, and other applicable statutes.

As discussed in EA Section 4.9, four sites (one watering station and three prehistoric stone feature sites) identified within the Ludeman Project site area are located in proximity to areas where construction activities would occur. Two of these resources have been recommended not eligible to the National Register of Historic Places (NRHP). As a result of tribal consultation, two prehistoric stone feature sites (48CO3036 and 48CO3037) were determined eligible by the NRC. The WY SHPO (2018) concurred with these determinations. As a result of these determinations, the NRC will require by license condition that Uranium One commit to avoid sites 48CO3036 and 48CO3037, which would result in no impact to the NRHP eligible sites from the Ludeman project, and reduce the potential cumulative impacts on those resources. The licensee commits to stop work and notify the NRC, the WY SHPO, and other appropriate agencies if previously unidentified sites are encountered during any phase of the project. As stated in EA Section 4.9, the NRC staff concludes that for all phases of the proposed Ludeman Project, including preconstruction activities, the impact to historical and cultural resources would be SMALL and there would be no impact to the NRHP eligible sites.



Based on this information, the NRC staff concludes that the cumulative impacts to historical and cultural resources as the result of the addition of the proposed Ludeman ISR Satellite facility to the Willow Creek license would have a SMALL incremental effect on the MODERATE cumulative impacts resulting from other past, present, and RFFAs.

## REFERENCES

ACHP. "Consultation With Indian Tribes in the Section 106 Review Process: A Handbook." Washington, DC: Advisory Council on Historic Preservation. June 2012.

NRC. NUREG-1748, "Environmental Review Guidance for Licensing Actions Associated with NMSS Programs, Final Report." Washington, DC: U.S. Nuclear Regulatory Commission. August 2003b.

Uranium One. "Re: Waste Issues." ML101330405. Email (May 12) D. Wichers, Senior Vice President, *In-Situ* Recovery Operations to Shroff, Behram. Casper, Wyoming: Uranium One Americas. 2010.

Uranium One. "Letter from S. Schierman, Uranium One USA to Elise Striz, NRC, dated June 8, 2015, RE: Request for Additional Information Responses for SUA-1341 License Amendment Application." ML15170A372, Package No. ML15170A384. 2015a.

## APPENDIX A—CONSULTATION CORRESPONDENCE

<b>Author</b>	<b>Recipient</b>	<b>Date of Letter</b>	<b>ADAMS Accession Number</b>
U.S. Nuclear Regulatory Commission (L. Camper)	Fort Belknap Community Council (T. King)	July 30, 2012	ML12138A247
U.S. Nuclear Regulatory Commission (L. Camper)	Cheyenne River Sioux Tribe (K. Keckler)	August 8, 2012	ML12219A109
U.S. Nuclear Regulatory Commission (L. Camper)	Chippewa Cree Tribe (B. Sun Child)	August 8, 2012	ML12219A118
U.S. Nuclear Regulatory Commission (L. Camper)	Flandreau-Santee Sioux Tribe (A. Reider)	August 8, 2012	ML12219A236
U.S. Nuclear Regulatory Commission (L. Camper)	Kiowa Indian Tribe of Oklahoma (R. Twohatchet)	August 8, 2012	ML12219A277
U.S. Nuclear Regulatory Commission (L. Camper)	Lower Brule Sioux Tribe (M. Jandreau)	August 8, 2012	ML12219A287
U.S. Nuclear Regulatory Commission (L. Camper)	Crow Tribe (C. Black Eagle)	August 8, 2012	ML12219A124
U.S. Nuclear Regulatory Commission (L. Camper)	Crow Creek Sioux Tribe (B. Sauze)	August 8, 2012	ML12219A173
U.S. Nuclear Regulatory Commission (L. Camper)	Standing Rock Sioux Tribe (C. Murphy)	August 8, 2012	ML12220A026
U.S. Nuclear Regulatory Commission (L. Camper)	Northern Arapaho (J. Shakespeare)	August 8, 2012	ML12219A311
U.S. Nuclear Regulatory Commission (L. Camper)	Rosebud Sioux Tribe (R. Bordeaux)	August 8, 2012	ML12219A320
U.S. Nuclear Regulatory Commission (L. Camper)	Fort Peck Tribes (A.T. Stafne)	August 8, 2012	ML12219A246
U.S. Nuclear Regulatory Commission (L. Camper)	Eastern Shoshone Tribe (M. LaJeunesse)	August 8, 2012	ML12219A147
U.S. Nuclear Regulatory Commission (L. Camper)	Santee Sioux Tribe of Nebraska (R. Trudell)	August 8, 2012	ML12219A345
U.S. Nuclear Regulatory Commission (L. Camper)	Sisseton-Wahpeton Tribe (R. Shephard)	August 8, 2012	ML12219A369
U.S. Nuclear Regulatory Commission (L. Camper)	Cheyenne and Arapaho Tribes (J. Prairie Chief-Boswell)	August 8, 2012	ML12219A078
U.S. Nuclear Regulatory Commission (L. Camper)	Spirit Lake Tribe (R. Yankton)	August 8, 2012	ML12219A379
U.S. Nuclear Regulatory Commission (L. Camper)	Oglala Sioux Tribe (J. Yellow Bird Steele)	August 8, 2012	ML12219A346

<b>Author</b>	<b>Recipient</b>	<b>Date of Letter</b>	<b>ADAMS Accession Number</b>
U.S. Nuclear Regulatory Commission (L. Camper)	Northern Cheyenne Tribe (L. Spang)	August 8, 2012	ML12219A327
U.S. Nuclear Regulatory Commission (L. Camper)	Mandan, Hidatsa & Arikara Nation Three Affiliated Tribes (G. Tex Hall)	August 8, 2012	ML12220A035
U.S. Nuclear Regulatory Commission (L. Camper)	Yankton Sioux Tribe (T. Cournoyer)	August 8, 2012	ML12220A085
U.S. Nuclear Regulatory Commission (L. Camper)	Turtle Mountain Chippewa Tribe (M. St. Claire)	August 8, 2012	ML12220A048
U.S. Nuclear Regulatory Commission (L. Camper)	Pawnee Nation of Oklahoma (M. Gover)	March 12, 2013	ML13071A676
U.S. Nuclear Regulatory Commission (L. Camper)	Ponca Tribe of Nebraska (R. White)	March 12, 2013	ML13072A041
U.S. Nuclear Regulatory Commission (L. Camper)	Sisseton-Wahpeton Oyate Tribes (R. Shepherd)	March 12, 2013	ML13072A128
U.S. Nuclear Regulatory Commission (L. Camper)	Northern Cheyenne Tribe (J. Robinson)	March 12, 2013	ML13071A645
U.S. Nuclear Regulatory Commission (L. Camper)	Mandan, Hidatsa & Arikara Nation Three Affiliated Tribes (G. Tex Hall)	March 12, 2013	ML13072A154
U.S. Nuclear Regulatory Commission (L. Camper)	Lower Brule Sioux Tribe (M. Jandreau)	March 12, 2013	ML13072A280
U.S. Nuclear Regulatory Commission (L. Camper)	Kiowa Indian Tribe of Oklahoma (A. Poppah)	March 12, 2013	ML13072A203
U.S. Nuclear Regulatory Commission (L. Camper)	Cheyenne and Arapaho Tribes (J. Chief-Boswell)	March 12, 2013	ML13072A006
U.S. Nuclear Regulatory Commission (L. Camper)	Comanche Nation Tribe (W. Coffey)	March 12, 2013	ML13072040
U.S. Nuclear Regulatory Commission (L. Camper)	Flandreau-Santee Sioux Tribe (A. Reider)	March 12, 2013	ML13072A147
U.S. Nuclear Regulatory Commission (L. Camper)	Oglala Sioux Tribe (B. Brewer)	March 12, 2013	ML13071A653
U.S. Nuclear Regulatory Commission (L. Camper)	Eastern Shoshone Tribe (D. Sinclair)	March 12, 2013	ML13072A131
U.S. Nuclear Regulatory Commission (L. Camper)	Chippewa Cree Tribe (K. Blatt)	March 12, 2013	ML13072A035
U.S. Nuclear Regulatory Commission (L. Camper)	Cheyenne River Sioux Tribe (K. Keckler)	March 12, 2013	ML13052A578
U.S. Nuclear Regulatory Commission (L. Camper)	Turtle Mountain Band of Chippewa (R. McCloud)	March 12, 2013	ML13072A174
U.S. Nuclear Regulatory Commission (L. Camper)	Crow Tribe (D. Coyote)	March 12, 2013	ML13072A103
U.S. Nuclear Regulatory Commission (L. Camper)	Fort Belknap Tribe (T. King)	March 12, 2013	ML13072A162
U.S. Nuclear Regulatory Commission (L. Camper)	Shoshone-Bannock Tribes (N. Small)	March 12, 2013	ML10372A117
U.S. Nuclear Regulatory Commission (L. Camper)	Northern Arapaho Tribe (D. O'Neal, Sr.)	March 12, 2013	ML13071A636
U.S. Nuclear Regulatory Commission (L. Camper)	Confederated Salish & Kootenai Tribe (J. Durglo)	March 12, 2013	ML13072A062

<b>Table A-1. Chronology of Consultation Correspondence (Continued)</b>			
<b>Author</b>	<b>Recipient</b>	<b>Date of Letter</b>	<b>ADAMS Accession Number</b>
U.S. Nuclear Regulatory Commission (L. Camper)	Lower Sioux Tribe (D. Prescott)	March 12, 2013	ML13072A359
U.S. Nuclear Regulatory Commission (L. Camper)	Standing Rock Sioux Tribe (C. Murphy)	March 12, 2013	ML13072A137
U.S. Nuclear Regulatory Commission (L. Camper)	Blackfeet Tribe (W. Sharp, Jr.)	March 12, 2013	ML13071A668
U.S. Nuclear Regulatory Commission (L. Camper)	Santee Sioux Tribe of Nebraska (R. Trudell)	March 12, 2013	ML13072A107
U.S. Nuclear Regulatory Commission (L. Camper)	Spirit Lake Tribe (R. Yankton, Sr.)	March 12, 2013	ML13072A133
U.S. Nuclear Regulatory Commission (L. Camper)	Omaha Tribe of Nebraska (A. Sheridan)	March 12, 2013	ML13071A664
U.S. Nuclear Regulatory Commission (L. Camper)	Rosebud Sioux Tribe (C. Scott)	March 12, 2013	ML13072A065
U.S. Nuclear Regulatory Commission (L. Camper)	Crow Creek Sioux Tribe (B. Sazue, Sr.)	March 12, 2013	ML13072A119
U.S. Nuclear Regulatory Commission (L. Camper)	Apache Tribe of Oklahoma (D. Cabniss)	March 12, 2013	ML13071A646
U.S. Nuclear Regulatory Commission (L. Camper)	Fort Peck Tribes (F. Azure)	March 12, 2013	ML13072A179
U.S. Nuclear Regulatory Commission (L. Camper)	The Ute Tribe of the Uintah and Ouray Reservation (I. Cuch)	March 12, 2013	ML13072A195
U.S. Nuclear Regulatory Commission (L. Camper)	Yankton Sioux Tribe (T. Cournoyer, Sr.)	March 12, 2013	ML13072A269
Oglala Sioux Tribe (B. Brewer)	U.S. Nuclear Regulatory Commission (L. Camper)	March 29, 2013	ML13106A197
U.S. Nuclear Regulatory Commission (L. Camper)	Mandan, Hidatsa & Arikara Nation Three Affiliated Tribes (G. Tex Hall)	May 1, 2013	ML13122A142
U.S. Nuclear Regulatory Commission (L. Camper)	Santee Sioux Tribe of Nebraska (R. Trudell)	May 1, 2013	ML13114A794
U.S. Nuclear Regulatory Commission (L. Camper)	Turtle Mountain Band of Chippewa (R. McCloud)	May 1, 2013	ML13122A149
U.S. Nuclear Regulatory Commission (L. Camper)	Northern Arapaho Tribe (D. O'Neal, Sr.)	May 1, 2013	ML13122A030
U.S. Nuclear Regulatory Commission (L. Camper)	Crow Creek Sioux Tribe (B. Sazue, Sr.)	May 1, 2013	ML13123A138
U.S. Nuclear Regulatory Commission (L. Camper)	Comanche Nation Tribe (W. Coffey)	May 1, 2013	ML13122A437
U.S. Nuclear Regulatory Commission (L. Camper)	Eastern Shoshone Tribe (D. Sinclair, Jr.)	May 1, 2013	ML13123A146
U.S. Nuclear Regulatory Commission (L. Camper)	Yankton Sioux Tribe (T. Cournoyer, Sr.)	May 1, 2013	ML13122A193
U.S. Nuclear Regulatory Commission (L. Camper)	Apache Tribe of Oklahoma (D. Cabniss)	May 1, 2013	ML13122A054
U.S. Nuclear Regulatory Commission (L. Camper)	Oglala Sioux Tribe (B. Brewer)	May 1, 2013	ML13122A044
U.S. Nuclear Regulatory Commission (L. Camper)	Blackfeet Tribe (W.A. Sharp, Jr.)	May 1, 2013	ML13122A076
U.S. Nuclear Regulatory Commission (L. Camper)	Kiowa Indian Tribe of Oklahoma (A. Poppah)	May 1, 2013	ML13123A194

<b>Table A-1. Chronology of Consultation Correspondence (Continued)</b>			
<b>Author</b>	<b>Recipient</b>	<b>Date of Letter</b>	<b>ADAMS Accession Number</b>
U.S. Nuclear Regulatory Commission (L. Camper)	Fort Peck Tribes (F. Azure)	May 1, 2013	ML13123A183
U.S. Nuclear Regulatory Commission (L. Camper)	Cheyenne River Sioux Tribe (K. Keckler)	May 1, 2013	ML13122A311
U.S. Nuclear Regulatory Commission (L. Camper)	Flandreau-Santee Sioux Tribe (A. Reider)	May 1, 2013	ML13123A157
U.S. Nuclear Regulatory Commission (L. Camper)	Ponca Tribe of Nebraska (R. White)	May 1, 2013	ML13122A077
U.S. Nuclear Regulatory Commission (L. Camper)	Spirit Lake Tribe (R. Yankton, Sr.)	May 1, 2013	ML13122A121
U.S. Nuclear Regulatory Commission (L. Camper)	Pawnee Nation of Oklahoma (M. Gover)	May 1, 2013	ML13122A070
U.S. Nuclear Regulatory Commission (L. Camper)	Omaha Tribe of Nebraska (A. Sheridan)	May 1, 2013	ML13122A056
U.S. Nuclear Regulatory Commission (L. Camper)	Cheyenne and Arapaho Tribes (J. Chief-Boswell)	May 1, 2013	ML13122A297
U.S. Nuclear Regulatory Commission (L. Camper)	Rosebud Sioux Tribe (C. Scott)	May 1, 2013	ML13122A084
U.S. Nuclear Regulatory Commission (L. Camper)	Lower Brule Sioux Tribe (M. Jandreau)	May 1, 2013	ML13123A215
U.S. Nuclear Regulatory Commission (L. Camper)	Northern Cheyenne Tribe (J. Robinson)	May 1, 2013	ML13122A039
U.S. Nuclear Regulatory Commission (L. Camper)	Crow Tribe (D. Old Coyote)	May 1, 2013	ML13123A131
U.S. Nuclear Regulatory Commission (L. Camper)	The Ute Tribe of the Uintah and Ouray Reservation (I. Cuch)	May 1, 2013	ML13122A179
U.S. Nuclear Regulatory Commission (L. Camper)	Lower Sioux Tribe (D. Prescott)	May 1, 2013	ML13122A022
U.S. Nuclear Regulatory Commission (L. Camper)	Sisseton-Wahpeton Oyate Tribes (R. Shepherd)	May 1, 2013	ML13122A111
U.S. Nuclear Regulatory Commission (L. Camper)	Chippewa Cree Tribe (K. Blatt)	May 1, 2013	ML13122A429
U.S. Nuclear Regulatory Commission (L. Camper)	Confederated Salish & Kootenai Tribe (J. Durglo)	May 1, 2013	ML13123A117
U.S. Nuclear Regulatory Commission (L. Camper)	Standing Rock Sioux Tribe (C. Murphy)	May 1, 2013	ML13122A133
U.S. Nuclear Regulatory Commission (L. Camper)	Shoshone-Bannock Tribes (N. Small)	May 1, 2013	ML13122A094
U.S. Nuclear Regulatory Commission (L. Camper)	Fort Belknap Tribe (T. King)	May 1, 2013	ML13121A172
U.S. Nuclear Regulatory Commission (L. Camper)	Fort Peck Assiniboine/Sioux Tribe (D. Youpee)	June 5, 2015	ML15155B413
U.S. Nuclear Regulatory Commission (L. Chang)	Northern Cheyenne Tribe (J. Walksalong)	June 5, 2015	ML15156A442
U.S. Nuclear Regulatory Commission (L. Chang)	Three Affiliated Tribes (E. Crows Breast)	June 5, 2015	ML15156A500
U.S. Nuclear Regulatory Commission (L. Chang)	Cheyenne River Sioux Tribe (S. Vance)	June 5, 2015	ML15155B273
U.S. Nuclear Regulatory Commission (L. Chang)	Chippewa Cree Tribe (A. Windy Boy)	June 5, 2015	ML15155B294

<b>Table A-1. Chronology of Consultation Correspondence (Continued)</b>			
<b>Author</b>	<b>Recipient</b>	<b>Date of Letter</b>	<b>ADAMS Accession Number</b>
U.S. Nuclear Regulatory Commission (L. Chang)	Cheyenne and Arapaho Tribes (L. Gray)	June 5, 2015	ML15155B235
U.S. Nuclear Regulatory Commission (L. Chang)	Flandreau-Santee Sioux Tribe (J.B. Weston)	June 5, 2015	ML15155B403
U.S. Nuclear Regulatory Commission (L. Chang)	Turtle Mountain Band of Chippewa (B. Nadeau)	June 5, 2015	ML15156A512
U.S. Nuclear Regulatory Commission (L. Chang)	Northern Arapaho Tribe (Y. Soldier Wolf)	June 5, 2015	ML15155B433
U.S. Nuclear Regulatory Commission (L. Chang)	Oglala Sioux Tribe (M. Catches Enemy)	June 5, 2015	ML15135A048
U.S. Nuclear Regulatory Commission (L. Chang)	Kiowa of Oklahoma (A. Tah-bone)	June 5, 2015	ML15155B420
U.S. Nuclear Regulatory Commission (L. Chang)	Yankton Sioux Tribe (E. Chytka)	June 5, 2015	ML15156A586
U.S. Nuclear Regulatory Commission (L. Chang)	Fort Belknap Tribe (M. Belgarde)	June 5, 2015	ML15155B408
U.S. Nuclear Regulatory Commission (L. Chang)	Eastern Shoshone Tribe (W. Ferris)	June 5, 2015	ML15155B397
U.S. Nuclear Regulatory Commission (L. Chang)	Standing Rock Sioux (W. Young)	June 5, 2015	ML15156A486
U.S. Nuclear Regulatory Commission (L. Chang)	Rosebud Sioux Tribe (R. Eagle Bear)	June 5, 2015	ML15156A453
U.S. Nuclear Regulatory Commission (L. Chang)	Lower Brule Sioux Tribe (C. Green)	June 5, 2015	ML15155B426
U.S. Nuclear Regulatory Commission (L. Chang)	Santee Sioux Nation (R. Thomas)	June 5, 2015	ML15156A465
U.S. Nuclear Regulatory Commission (L. Chang)	Crow Creek Sioux Tribe (D. Zephier)	June 5, 2015	ML15155B310
U.S. Nuclear Regulatory Commission (L. Chang)	Oglala Sioux Tribe (M. Catches Enemy)	June 5, 2015	ML15155B284
U.S. Nuclear Regulatory Commission (L. Chang)	Apsaalooke (Crow) Nation (E. Bullchief)	June 5, 2015	ML15155B385
U.S. Nuclear Regulatory Commission (L. Chang)	Sisseton-Wahpeton Oyate Tribes (D. Desorosiers)	June 5, 2015	ML15160A424
U.S. Nuclear Regulatory Commission (L. Chang)	Wyoming State Historic Preservation Office (M. Hopkins)	December 3, 2015	ML15314A385
U.S. Nuclear Regulatory Commission (C. Román)	Wyoming State Historic Preservation Office (M. Hopkins)	September 1, 2017	ML17234A468
U.S. Nuclear Regulatory Commission (C. Román)	Sisseton-Wahpeton Oyate Tribes (D. Desorosiers)	September 19, 2017	ML17249A682
U.S. Nuclear Regulatory Commission (C. Román)	Rosebud Sioux Tribe (R. Eagle Bear)	September 19, 2017	ML17249A681
U.S. Nuclear Regulatory Commission (C. Román)	Fort Belknap Indian Community (M. Blackwolf)	September 19, 2017	ML17249A674
U.S. Nuclear Regulatory Commission (C. Román)	Kiowa Indian Tribe of Oklahoma (K. Poolaw)	September 19, 2017	ML17249A676
U.S. Nuclear Regulatory Commission (C. Román)	Cheyenne River Sioux (S. Vance)	September 19, 2017	ML17249A670
U.S. Nuclear Regulatory Commission (C. Román)	Northern Arapaho (Y. Soldier Wolf)	September 19, 2017	ML17249A678

<b>Table A-1. Chronology of Consultation Correspondence (Continued)</b>			
<b>Author</b>	<b>Recipient</b>	<b>Date of Letter</b>	<b>ADAMS Accession Number</b>
U.S. Nuclear Regulatory Commission (C. Román)	Fort Peck Tribes Assiniboine and Sioux Tribes (D. Youpee)	September 19, 2017	ML17249A675
U.S. Nuclear Regulatory Commission (C. Román)	Turtle Mountain Band of Chippewa (E. Nadeau)	September 19, 2017	ML17249A686
U.S. Nuclear Regulatory Commission (C. Román)	Eastern Shoshone Tribe (J. Mann)	September 19, 2017	ML17249A672
U.S. Nuclear Regulatory Commission (C. Román)	Spirit Lake Tribe (E. Longie)	September 19, 2017	ML17249A683
U.S. Nuclear Regulatory Commission (C. Román)	Three Affiliated Tribes (E. Crows Breast)	September 19, 2017	ML17249A685
Cheyenne and Arapaho Tribes (V. Richey)	U.S. Nuclear Regulatory Commission (A. Waldron)	November 3, 2017	ML17345A449
U.S. Nuclear Regulatory Commission (C. Román)	U.S. Fish and Wildlife Service (T. Abbott)	January 18, 2018	ML18018A872
U.S. Fish and Wildlife Service (T. Abbott)	U.S. Nuclear Regulatory Commission (C. Román)	January 29, 2018	ML18057A219
U.S. Nuclear Regulatory Commission (C. Román)	Wyoming State Historic Preservation Office (M. Hopkins)	March 23, 2018	ML18065A674
Wyoming State Historic Preservation Office (R. Currit)	U.S. Nuclear Regulatory Commission (C. Román)	May 23, 2018	ML18149A524