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United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
WASHINGTON, D. C. 20240

IN REPLY REFER TO:

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FEB 02 1979

Mr. Harold R. Denton, Director
Division of Site Safety and
Environmental Analysis
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

We have reviewed Revision Number 5 of the Environmental Report (Construction Permit Stage) for New England Power 1 and 2 Nuclear Project, Charlestown, Rhode Island. We have the following comments.

The report revision needs additional work in its treatment of historic and archeological resources. In discussing transmission corridor impacts, it is noted on page F. 9-78 that, ". . . there would not be any impact on sites listed, nominated or pending nomination to date to the National Register of Historic Places . . ." for two transmission circuits, and there would be visual impacts on two listed sites for a third circuit. There would be no impacts on "cultural" (archeological?) sites (p. F. 9-79). However, there is no evidence that the State Historic Preservation Officer was consulted in making these determinations. There is also no mention of attempts to identify historic or archeological sites that may be eligible for inclusion in the National Register, under 36 CFR 800 and 36 CFR 63.

For the Rome Point site, the fact that the property is "owned by Applicant" (p. F. 9-91) does not absolve the Nuclear Regulatory Commission of historic preservation responsibilities. Although the site appears to have been adequately evaluated for historic site impacts, no such investigation seems to have been made for archeological sites.

The entire identification, evaluation, and consultation process should be clarified and documented. In addition, the appropriate State Historic Preservation Officer's recommendations should be followed concerning the need for archeological survey work as part of the identification of sites eligible for inclusion in the National Register.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

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Chris Therral Delaporte
Director

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