



**GULF STATES UTILITIES COMPANY**

POST OFFICE BOX 2951 • BEAUMONT, TEXAS 77704

AREA CODE 713 838-6631

November 2, 1982  
RBG-13,676  
File G9.5

Mr. R. L. Tedesco, Assistant Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Tedesco:

River Bend Station-Units 1 and 2  
Docket Nos. 50-458/50-459

The enclosed Report on Transmission Line Construction Activities within the Port Hudson National Historic Landmark is submitted in accordance with a stipulation contained in your August 21, 1980 letter transmitting a Memorandum of Agreement for protection of the subject area during the construction phase of the River Bend Station associated undertaking.

Gulf States Utilities concludes the cultural resources within this area to have been minimally impacted by our construction activities and that this report fulfills our obligations as stipulated in the Memorandum of Agreement.

Sincerely,

*William J. Leed Jr.*  
for J. E. Booker  
Manager-Engineering,  
Nuclear Fuels & Licensing  
River Bend Nuclear Group

JEB/<sup>me</sup>JWC/kt

Enclosure

COO2

REPORT ON TRANSMISSION LINE CONSTRUCTION  
ACTIVITIES WITHIN THE PORT HUDSON  
NATIONAL HISTORIC LAND MARK  
BY  
GULF STATES UTILITIES COMPANY

INTRODUCTION

On August 11, 1980 a Memorandum of Agreement (MOA) was finalized between the Nuclear Regulatory Commission (NRC, previously the AEC), the Advisory Council on Historic Preservation (ACHP), and the Louisiana State Historic Preservation Office (SHPO) to mitigate or avoid adverse effects of GSU's then proposed transmission line and expanded corridor through the Port Hudson National Historic Landmark ("Landmark"). In accepting the terms and stipulations of the MOA, GSU agreed in its August 21, 1980 letter to the NRC to provide a written report, within 60 days of completion of construction activities. This report presents a background of significant events which led up to the execution of the MOA and a description of actions GSU has taken to fulfill the terms of it.

BACKGROUND

During the late 1960's GSU constructed two transmission lines through the boundaries of what is now designated as the Landmark. GSU was aware of the potential for historical significance of the Battlefield area during the time of our original route selection and had, in fact, worked with the State of Louisiana in the routing of the original right-of-way. Relocations and adjustments were made at that time to avoid any conflicts and to provide for a compatible

relationship of our right-of-way with the proposed State facilities.

When GSU prepared its application to the NRC for a Construction Permit for its proposed River Bend Station (RBS) the Battlefield area was neither included in nor labeled as eligible for inclusion in the National Register of Historic Places. According to the Atomic Energy Act of 1954 and the National Environmental Policy Act of 1969, the NRC as the lead agency for licensing nuclear power plant projects assessed the environmental impacts related to the construction of the station and its associated transmission lines and published a Final Environmental Statement (FES), in September 1974. The ACHP provided its comments on the FES to the NRC by letter dated November 11, 1974.

In July, 1977 GSU requested a permit from the U. S. Army Corps of Engineers to construct towers to span the Mississippi River on one of the RBS associated transmission lines. In response to this request the SHPO, in a September 1, 1977 letter to the NRC, objected to the issuance of any federal licenses or permits until he had reviewed cultural resources surveys on the transmission line routes. The ACHP also requested, on September 15, 1977, that the NRC comply with the ACHP's regulations in 36CFR800 to determine if the project would have any effect on properties determined eligible for inclusion in the National Register of Historic Places.

In late 1977, GSU contracted with Mr. Robert Neuman to provide an archaeological and historic survey of all the RBS

associated transmission line routes. By August, 1978 Mr. Neuman had completed the cultural resources surveys. On March 6, 1979 GSU transmitted to the NRC these reports along with comment letters from the SHPO dated September 21 and , 1978 and GSU's response letter (including commitments to address the SHPO's recommendations) dated February 5, 1979.

On August 16, 1979 the NRC made an adverse effect determination for the portion of GSU's proposed route traversing the Landmark. This letter prohibited commencement of construction (which involved widening the existing right-of-way to accomodate the new RBS transmission Line 352) pending resolution of the issue pursuant to 36CFR800 procedures.

In order for the NRC to prepare a Preliminary Case Report (PCR) for ACHP comment, GSU supplied the NRC on November 30, 1979 and March 7, 1980 information concerning alternate routes to avoid the Landmark, alternate construction methods that could be used on the proposed route, environmental and economic costs comparisons, and a discussion of the need for the line.

A meeting was held between GSU and the SHPO on April 23, 1980 to clarify the clearing and construction commitments established to mitigate adverse effects on the Landmark. GSU's letter of April 28 and the SHPO's response of April 30, 1980 confirm those details agreed upon in the meeting.

On June 2, 1980 the NRC transmitted the completed PCR and a draft MOA to the ACHP for comment. The NRC concluded in the

PCR that the proposed route and method was "acceptable and on balance, of less impact and disruption and, therefore, preferable." By August 11 the MOA had been executed by all parties and on August 21 the NRC transmitted it to GSU requesting the stipulations therein be accepted. GSU responded in agreement on the same day and on September 16 the NRC notified GSU that the issue had been concluded to their satisfaction and that the order suspending construction activities within the landmark was rescinded. Conscious of the terms of the MOA, GSU began construction on March 13, 1981.

#### DESCRIPTION OF NATIONAL HISTORIC LANDMARK

Refer to Preliminary Case Report

#### MEASURES TAKEN TO FULFILL THE TERMS OF THE MOA

Prior to commencing clearing activities, GSU's inspectors received copies of the clearing specification and were told to be especially aware of the following:

1. Littering on ROW and access areas.
2. Controlling operations during inclement weather to minimize damage to the terrain.
3. Controlling the release of chemicals and other fluids on the ROW and adjacent areas. Oil, grease, motor fuel, solvents and the containers of any of the above were not to be released on the ROW.

4. Burning of trees and debris to be done only with necessary permits.
5. Controlling clearing operations to minimize damage to foliage outside ROW.
6. Methods of erosion control could consist of the following:
  - A. Contouring and terracing hills and slopes
  - B. Application of fertilizers, seed and mulch:
    1. Cultipacking vegetative mulch
    2. Cultipacking seed and fertilizer on asphaltic mulch
7. Repairs to erosion control projects after line construction is complete.
8. Close monitoring of clearing operations in the historical areas by a qualified archeologist (Mr. Bob Neuman).

A contract was signed with Ike Jackson and Sons, Inc. on February 26, 1980 for right-of-way clearing. Clearing activities in the Landmark commenced on March 13, 1981, and were completed on December 4, 1981. Inspectors monitored the clearing activities closely and obtained cooperation from the clearing contractor in minimizing adverse environmental effects within construction areas.

At all historical sites, trenches and breastworks were marked by flagging to keep mechanical equipment a minimum of 25 feet from the sites. All sites were hand cleared. In areas cleared by hand, trees were cut 12 inches above grade and dragged from the site for disposal. The right-of-way was cleared by hand from Sandy Creek to Site #7 (approximately 1,000 ft.) due to the possibility of other sites in the area.

Erosion control measures used in the battlefield included the application of 1,000 lbs per acre of 8-8-8, 20 lbs per acre of Bermuda, 10 lbs per acre of Bahia and 10 lbs per acre of carpet grass from Thompson Creek to structure 39. As a cover control, 2400 gallons of asphaltic mulch per acre was also applied to this area.

Culverts were installed in creeks and ditches to allow passage of equipment without damaging the banks. No new access roads were required.

Mr. Neuman, monitored the clearing operations through the Landmark. (See Attachment 1).

On April 10, 1981, a possible historical site was discovered near structure 47. Mr. Neuman was notified and the site inspected. The site was later designated 16 EBR-52 by the SHPO (See Attachment 2). The site was dealt with in accordance with MOA stipulations.

A contract was signed with the L. E. Myers Company on May 28, 1980, for line construction. Construction activities in

the Port Hudson Battlefield area commenced on August 6, 1981 and was completed on July 26, 1982.

During construction of Line 352, it was determined that structure 36 fell within the boundaries of Site #7.

Structure 36 was relocated and structure 36-A added to keep Site #7 clear of structures within 25 feet perimeter.

On March 1, 1982, a dozer was inadvertently driven over the toe of a breastwork during the erection of structure 47 near Site #16 EBR-52. Mr. Neuman and Dr. Kass Byrd from the State were notified and visited the site on March 4 to assess the damage. The incident was reported to the NRC on March 18. (See Attachment 3). The site was subsequently repaired, seeded with Bermuda grass and fenced to keep cattle from disturbing the grass until it establishes a good growth and root system.

The transmission lines were energized on May 5, 1982.

Repairs to the erosion control areas are scheduled to begin shortly and be completed before the end of the year.

#### SUMMARY

The purpose of the communications described in the Background section of this report, and the regulations in 36CFR800 and their parent statutes and orders, is to protect cultural resources. The purpose of the terms of the MOA, as agreed to in consultation between GSU and the SHPO, and the measures taken to fulfill those terms, as described in this report, was to protect the cultural resources of the



Landmark during the clearing and construction of RBS associated transmission Line 352.

GSU has been and continues to be sensitive to the need to protect cultural resources. In support of this:

- 1) GSU worked with the State of Louisiana in routing the original transmission lines through the Port Hudson Battlefield area.
- 2) GSU cooperated with interested parties in the identification of cultural resources and in the development of mitigative actions to protect them.
- 3) GSU conscientiously carried out the terms of the MOA.
- 4) GSU has developed procedures to protect these resources throughout the operating life of this transmission line.

GSU concludes the impact to the Landmark due to the construction of this transmission line has been minimal. GSU further considers its obligation related to 36CFR800 compliance to be complete.

LOUISIANA STATE UNIVERSITY  
AND AGRICULTURAL AND MECHANICAL COLLEGE

BATON ROUGE . LOUISIANA . 70803

*School of Geoscience*



August 10, 1982

Summary Report of Cultural Resource Survey and Monitoring along  
Gulf States Utilities Transmission Lines 752 and 352 Right-of-Ways,  
Louisiana.

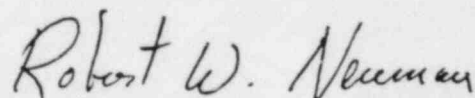
During the summer of 1978 Gulf States Utilities (GSU) contracted with this author to conduct a cultural resource survey in order to determine whether or not any historically significant sites or pre-historic archaeological deposits would be impacted by the construction in the proposed right-of-ways of transmission lines 752 and 352. The survey was completed and a detailed report was submitted to GSU. Eight locations of historical and archaeological significance were found to be situated within or very near to the proposal right-of-ways. The report contained individual site descriptions, their locations and recommendations for their safety and preservation.

In accordance with the recommendations GSU contracted an archaeologist to monitor construction activities, as they approached the site locations, to insure against site disturbance. GSU took particular care to hand-clear the trees and understory vegetation which mantled some of the sites. Between September 6, 1979 and March 4, 1982 the archaeologist visited the site locations, reconnoitered the right-of-

ways and met with GSU personnel on 21 occasions. Also during this time another site, a Civil War earthwork, was located and reported to GSU. Except for one instance all of the known sites were carefully protected from damage. In that instance, a Civil War earthwork was very superficially impacted by construction activities. GSU immediately reported the occurrence to the contracting archaeologist and the State Archaeologist, the end result being that the matter was mutually resolved by all parties through the State Historic Preservation Officer.

From the time of the initial cultural resource survey up until this report GSU cooperated in every manner to insure that the site locations will be protected. They have, to the best of their ability, followed the recommendations put forth in the survey report to guard the sites during the transmission line construction and assure their preservation for the future.

Respectfully submitted,



Robert W. Neuman  
Curator of Anthropology

RWN/cp



**GULF STATES UTILITIES COMPANY**

POST OFFICE BOX 2951 • BEAUMONT, TEXAS 77704

AREA CODE 713 838-6631

March 18, 1982

Mr. R. L. Tedesco, Assistant Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Tedesco:

River Bend Station-Units 1 & 2  
Docket Nos. 50-458/50-459

In order to protect historic resources within the Port Hudson Battlefield National Historic Landmark and to comply with the Advisory Council on Historic Preservation (ACHP) regulations in 36 CFR 800, the NRC entered into an agreement with the ACHP and the Louisiana State Historic Preservation Officer (State). The terms and stipulations of this Memorandum of Agreement (MOA) were addressed to GSU by the NRC and accepted by GSU in our letter to you dated August 21, 1980.

The stipulations regarding the construction of our then-proposed transmission line were developed in a meeting between GSU and the State in a meeting on April 23, 1980. These stipulations were primarily concerned with activities associated with the corridor clearing phase of construction. One commitment was that no bulldozing or heavy equipment would be allowed within 25 feet of the breastworks. This commitment was not deviated from during the clearing phase. However, on March 1 a dozer was inadvertently driven over the toe of a breastwork in erecting a nearby structure. The dozer was not equipped with a blade and the physical damage was limited to the track depressions left in the soil. Upon realizing their error the crew filled in and dressed the depressions. (See enclosed photos)

This ridge was not originally identified as being a breastwork but during the clearing phase it was suspected of being a breastwork remnant and was investigated by our archaeological consultant, Mr. Robert Newman. After having been positively identified, the breastwork was reported to the State, given the designation 16EBR52, and subjected to the same stipulations as the previously identified breastworks.

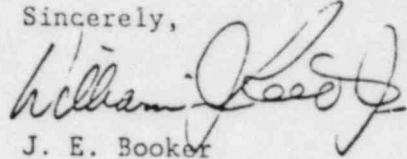
After the March 1 incident Mr. Newman and Dr. Kass Byrd from the State were notified. On March 4 they visited the location to assess the damage. Neither considered the damage significant (See

8203240256

Attachments 1 and 2). On Friday, March 5, Mr. Lorenzo Wilborn of the Office of Inspection and Enforcement, Region IV was contacted by phone and the circumstances of the incident were explained. At the direction of Mr. Wilborn, GSU similarly informed Mr. Bob Perch, NRC River Bend Licensing Project Manager, on Monday, March 8.

GSU submits this account and the attached documentation in accordance with Mr. Perch's request.

Sincerely,



J. E. Booker  
Manager-Engineering & Licensing  
River Bend Nuclear Group

JEB/*JWC*/kt

Attachments

Enclosure



DAVID C. TREEN  
Governor

STATE OF LOUISIANA  
DEPARTMENT OF CULTURE, RECREATION AND TOURISM  
OFFICE OF PROGRAM DEVELOPMENT

ROBERT B. DeBLIEUX  
Assistant Secretary

MRS. LAWRENCE H. FOX  
Secretary

March 11, 1982

Gulf States Utilities Co.  
P. O. Box 2431  
Baton Rouge, LA 70821  
ATTN: Ben Exner  
Government Street

Re: 230 KV Lines 352/353  
Gulf States Utilities Co.  
Port Hudson Battlefield

Dear Mr. Exner:

Thank you for bringing to our attention the disturbance of one of the earthworks in the Port Hudson Battlefield during recent construction activities associated with the above-referenced transmission lines. We appreciate your quick notification and will be happy to work with you towards resolving the matter.

As a result of the on-site inspection conducted on March 4th by Dr. Kathleen Byrd, State Archaeologist, and Mr. Duke Rivet, Staff Archaeologist, of the Division of Archaeology, it is our opinion that immediate action should be taken to stabilize that portion of the earthworks affected. This should take the form of some type of erosion control measure.

Additionally, steps should be taken to document what has occurred relative to the stipulations contained in the Memorandum of Agreement signed for the project. The latter process will have to be coordinated with our office and the Advisory Council on Historic Preservation.

Should you have any questions or require any assistance, do not hesitate to contact my staff in the Division of Archaeology.

Sincerely,

Robert B. DeBlieux  
State Historic Preservation Officer

RBD:PGR:tb

Observations and Recommendations Relative to Site 16EBR52 at the  
Port Hudson Battlefield National Historic Landmark, Louisiana.

On the morning of March 4, 1982, Mr. Ben Exner, Gulf States Utilities, telephoned my residence and informed me that a section of the earthwork at site 16EBR52, along Transmission Line 352 in the Port Hudson Battlefield area, had been disturbed by earth-moving equipment. Mr. Exner requested that I visit the site immediately, evaluate the damage, and offer recommendations as to resources to minimize further disruption of the earthwork.

Inasmuch as the site is a part of a National Historic Landmark and because of the Memorandum of Agreement among the Nuclear Regulatory Commission, the Advisory Council on Historic Preservation and the Louisiana State Historic Preservation Officer, I contacted the State Archaeologist, Dr. Kathleen M. Byrd, and requested that she visit the site along with Mr. Exner and me.

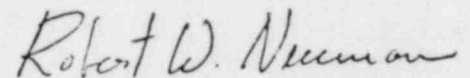
On the afternoon of March 4, 1982, Mr. Exner, Dr. Byrd and her assistant Phillip Rivet and I met at site 16EBR52. The damage done to the earthwork amounted to superficial scraping of an area about 15 feet in length at the west end, or terminus, of the earthwork. No artifacts were reported, nor were any found during our site visit, furthermore the main structure of the earthwork had not been diminished. The impacted zone was photographed and I recommend that it be treated promptly with an erosion deterrent, e.g., asphaltic mulch over a fiberglass mat. Dr. Byrd agreed and Mr. Exner replied that

he would pass this recommendation along to the Gulf States  
Utilities officials immediately.

In summary, the earthwork at 16EBR52 was accidentally scraped  
during construction operations along Transmission Line 352. It  
has been judged that the impact was superficial and did not  
seriously damage the integrity of the site. To further minimize  
the impact it is recommended that the scraped area be coated  
immediately with an erosion deterrent.

rwn/ek

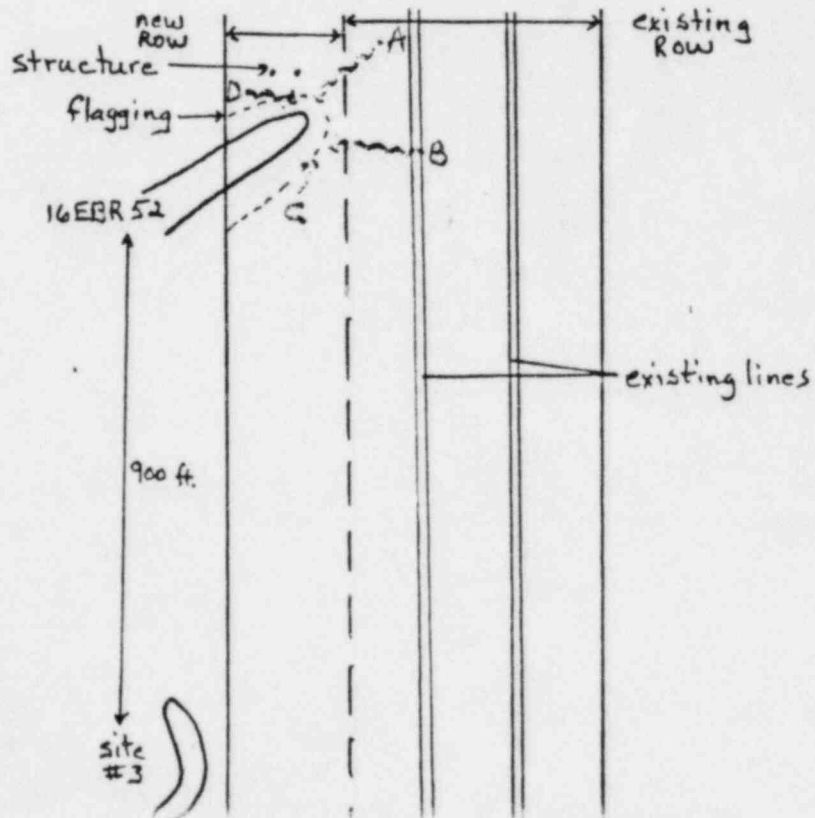
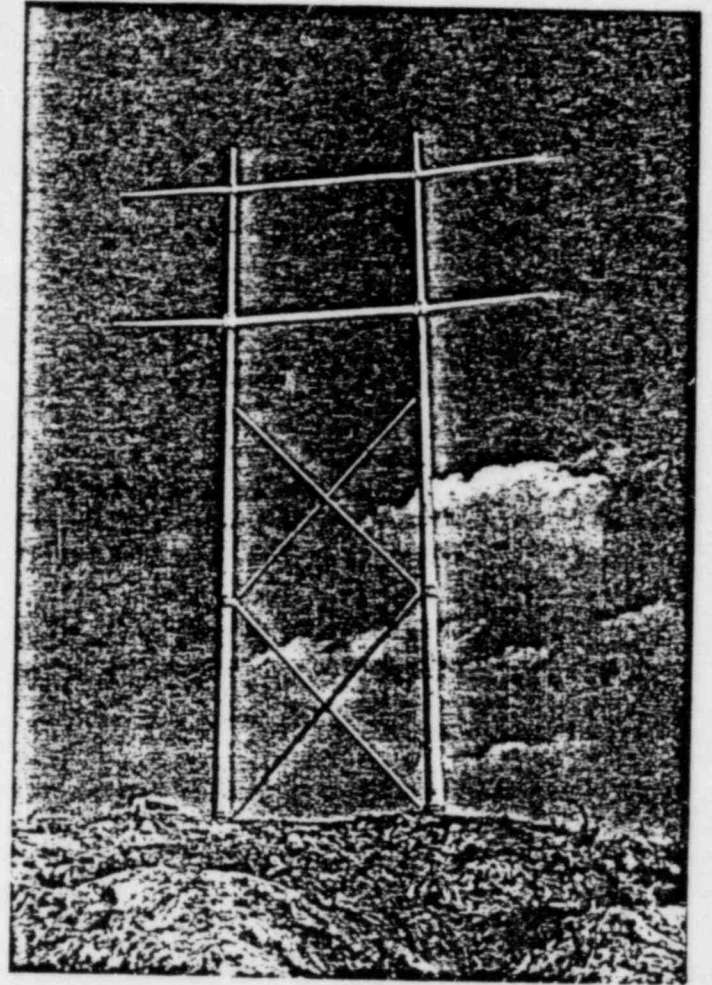
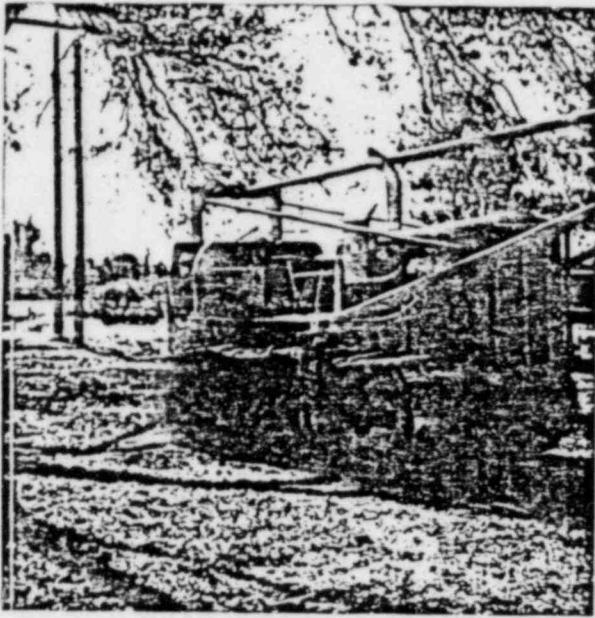
Respectfully submitted,



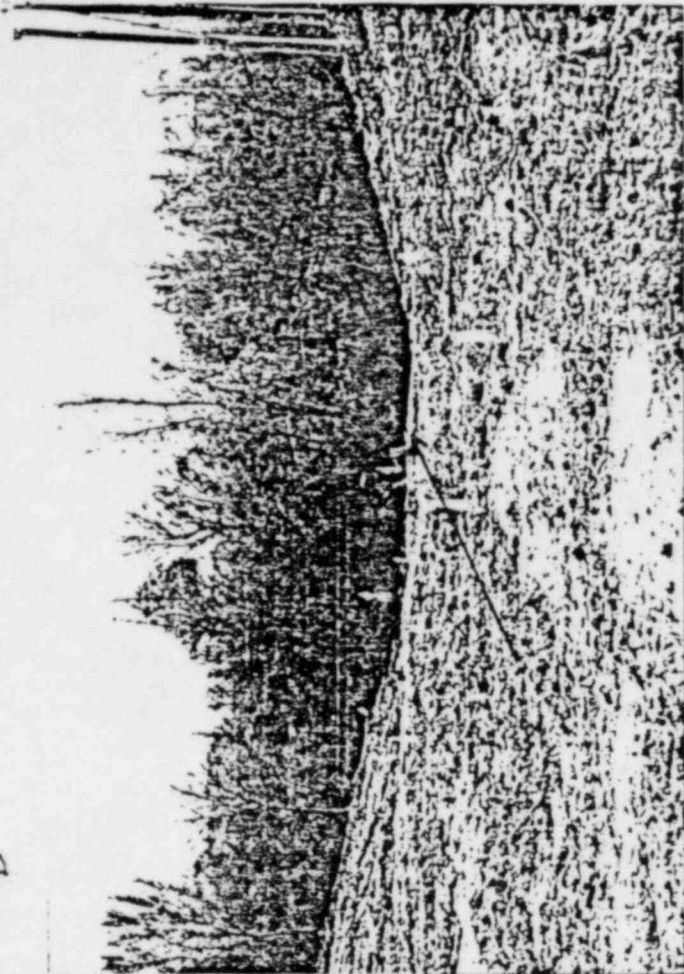
Robert W. Neuman  
Curator of Anthropology

3/11/82

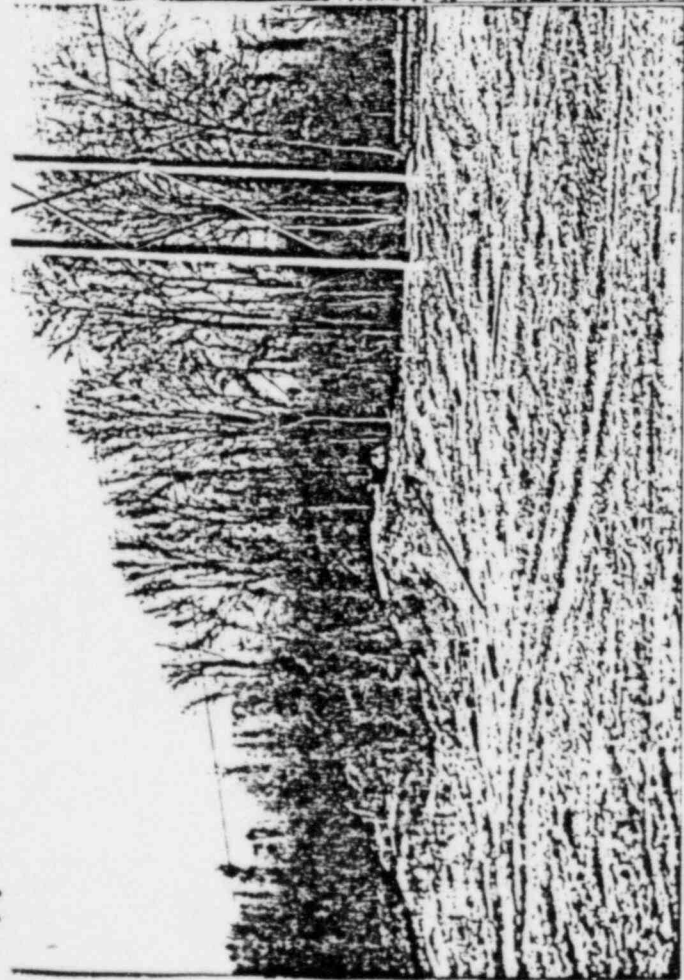




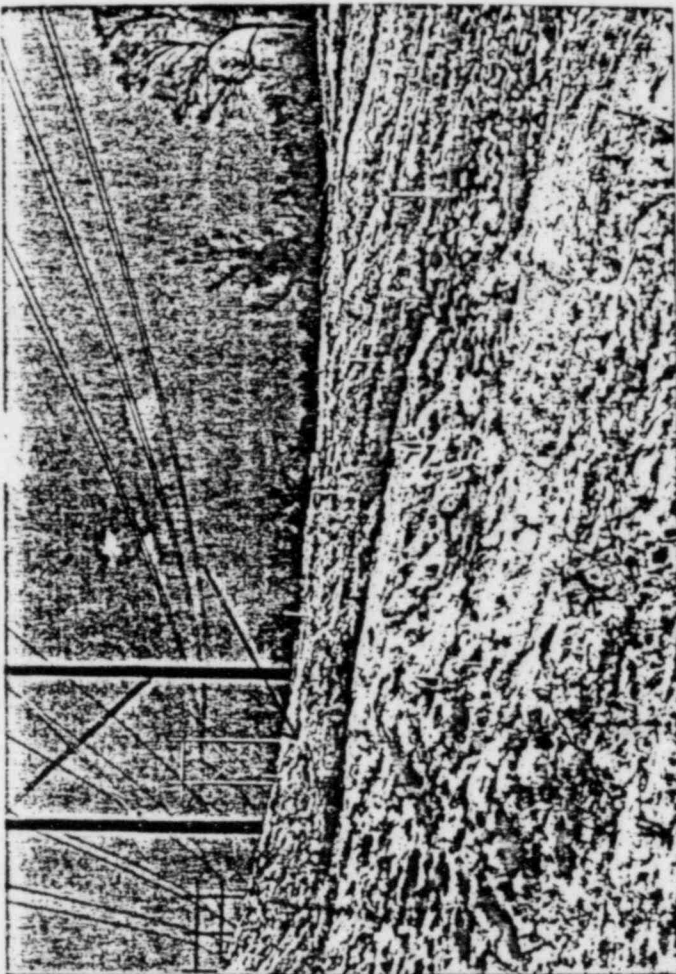
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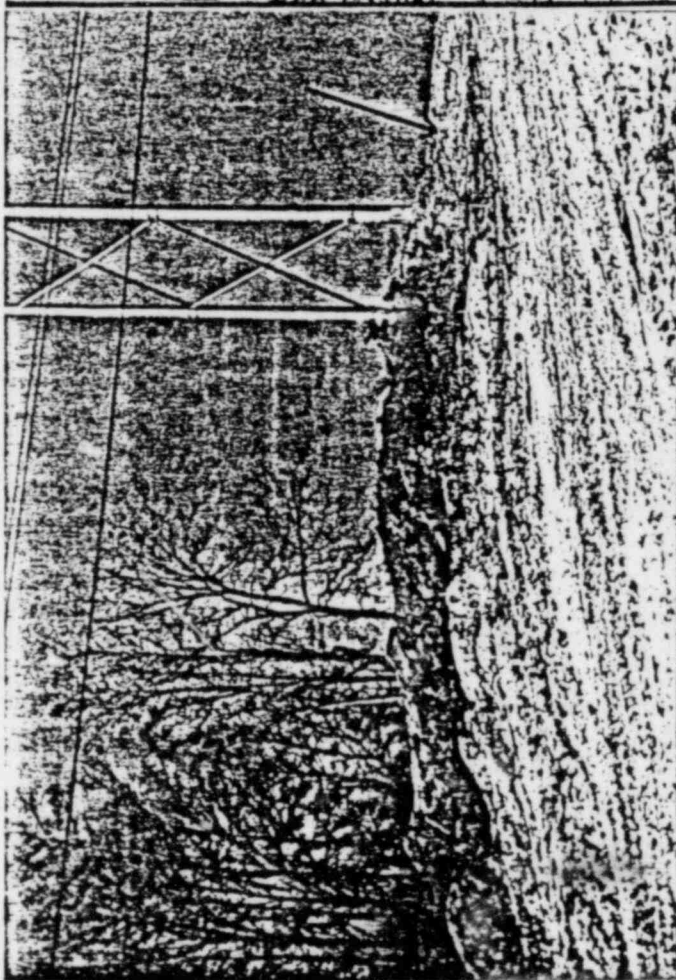
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C



B



Reservoir \_\_\_\_\_ Site No. 16 EBR 52

State LOUISIANA Parish EAST BATON ROUGE

1. Map reference USGS Port Hudson 2. Type of site Historic

3. Cultural affiliation CIVIL WAR

4. Location \_\_\_\_\_

IRREGULAR Sec. 61 T. 45 R. 2W

5. Owner and address \_\_\_\_\_

6. Previous owners \_\_\_\_\_

7. Tenant \_\_\_\_\_

8. Informants FRED BENTON

9. Previous designations for site NONE

10. Site description EARTHEN BREASTWORK REMNANTS  
CA. 2 METER HIGH, 6-8 METERS WIDE AT THE  
BASE

11. Position of site and surroundings AT THE EDGE OF HARDWOOD  
FOREST AREA OVERLOOKING AN UNNAMED INTERMITTENT  
STREAM. 32.7 FROM NEAREST GSU POLE TO EARTHWORKS

12. Area of occupation \_\_\_\_\_

13. Depth and character of fill \_\_\_\_\_

14. Present condition GOOD

15. Previous excavations SOME POT-HOLING.

16. Material collected NONE

17. Material observed NONE

Recorded by ROBERT W. NEUMAN Date 4/10/81

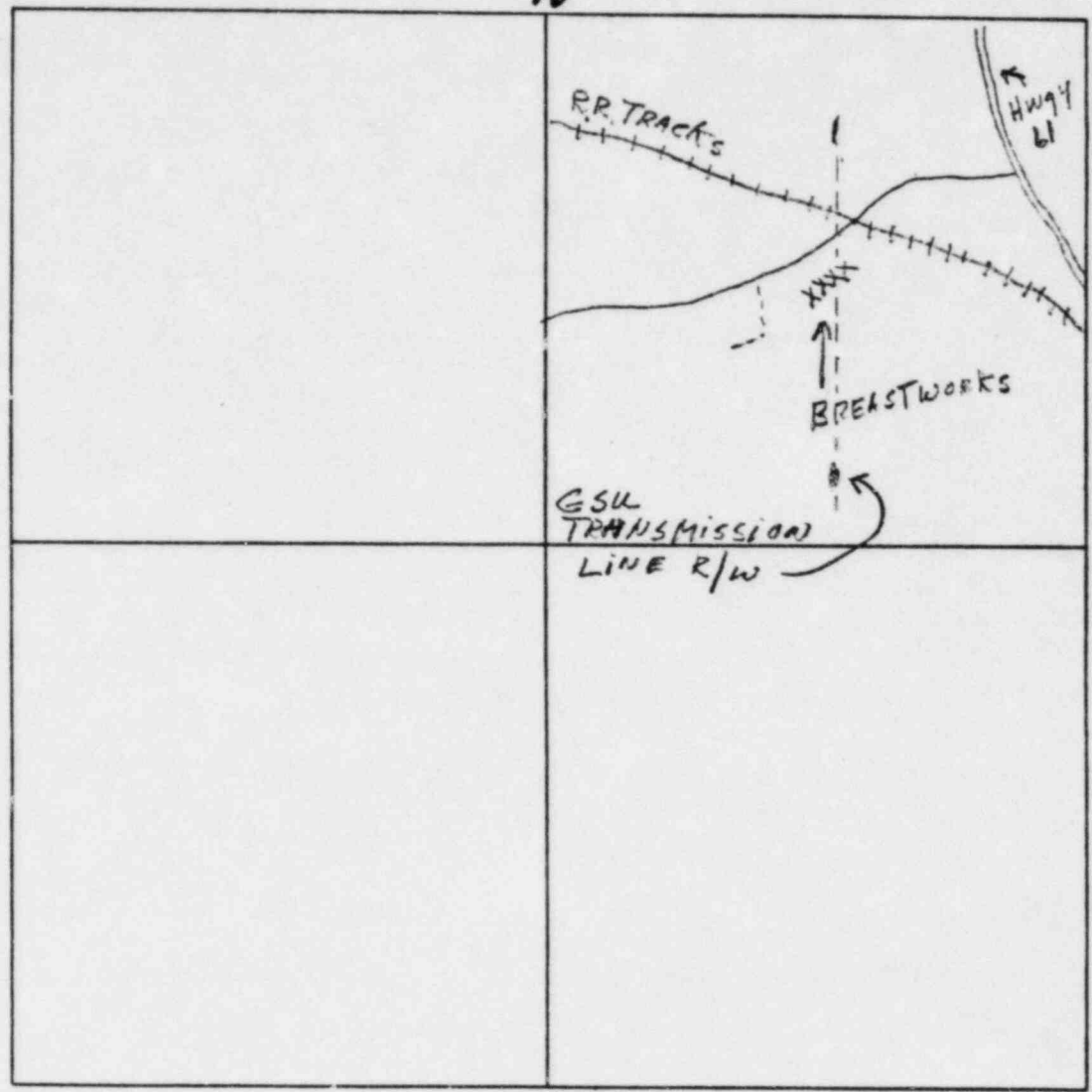
State

Parish

Reservoir

Site No.

2



Scale 1:24000  
When entire square represents a section, 1" = 1000'

- 18. Material reported and owner \_\_\_\_\_
- 19. Recommendations for further work \_\_\_\_\_
- 20. Photograph Nos. \_\_\_\_\_
- 21. Maps of site \_\_\_\_\_
- 22. Approach to site:
- 23. Remarks: VIA GSK TRANSMISSION R/W.