

**From:** Tracy Martin <tracyamartin@hotmail.com>  
**Sent:** Wednesday, August 26, 2020 4:41 PM  
**To:** WEC\_CFFF\_EIS Resource; Donoghue, Joseph  
**Subject:** [External\_Sender] Docket Number 70-1151: NRC-2015-0039  
Comments Regarding Scope of Environmental Impact Statement for  
WEC License Renewal  
**Attachments:** COSCAPA\_Comments Regarding Docket 70-1151-Scope of EIS for WEC  
License Renewal.pdf

To Whom it May Concern:

The attached letter contains the concerns of the Council of South Carolina Professional Archaeologists (COSCAPA) regarding the preparation of the EIS for the renewal of the Westinghouse Electric Company's license to operate the Columbia Fuel Fabrication Facility. We ask that as you move to determine the scope of the EIS for the Westinghouse facility that you please consider the archaeological resources in the vicinity.

Sincerely,  
Tracy Martin  
President  
COSCAPA

**Federal Register Notice:** 85FR46193  
**Comment Number:** 13

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## **The Council of South Carolina Professional Archaeologists**

**To:** Nuclear Regulatory Commission

**From:** The Council of South Carolina Professional Archaeologists

**Date:** August 26, 2020

**RE:** Comments Regarding Docket Number 70-1151: NRC-2015-0039 Scope of Environmental Impact Statement for WEC License Renewal

The Council of South Carolina Professional Archaeologists (COSCAPA) is a professional organization of archaeologists that promotes archaeological conservation, assists cultural resource management programs, and seeks to improve the quality of archaeological research in the State of South Carolina. As an interested party, COSCAPA offers the following comments for the preparation of an Environmental Impact Statement (EIS) for the renewal of the Westinghouse Electric Company's license to operate the Columbia Fuel Fabrication Facility (CFFF) in Hopkins, South Carolina.

The October 2019 draft Environmental Assessment (EA) was published with the Nuclear Regulatory Commission's (NRC's) Federal Register Notice (85 FR 46193). The EA (ML19228A278) asserted a finding of no significant impact for the historic and cultural resources within the CFFF. Ms. Diaz Toro's July 31, 2020 email to Ms. Elizabeth Johnson indicates that the NRC intends to maintain this finding for the re-licensing Environmental Impact Statement (EIS). However, information published in the EA shows that the NRC did not correctly evaluate effects of re-licensing on historical and cultural resources. It is evident that there were insufficient actions taken to adequately identify the project area or the cultural and historical resources contained therein.

NEPA requires that analysis determine if an action significantly affects the qualities of the human environment. This includes the consideration of the degree to which the action may adversely affect cultural and historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP). The EA limited the discussion of significant historic properties to only include cultural resources already listed on the NRHP. This limitation is unreasonable since no archaeological surveys have been conducted within the CFFF site or in the immediate vicinity. An evaluation of potential adverse effects to historic or cultural resources cannot be made since the CFFF property has not been inventoried and full extent of potential contamination has not been identified or inventoried.

The South Carolina State Historic Preservation Office (SHPO), has asserted that the CFFF site has high likelihood for the presence of significant archaeological properties (see page 3-35 of the EA). COSCAPA supports this position and recommends that the Environmental Impact Statement (EIS) consider the effects of re-licensing on unidentified and unassessed cultural resources located within the re-licensing Area of Potential Effect (APE). Further work (e.g. field survey and background research) is needed to satisfy the reasonable and good faith identification standard. A review of the South Carolina digital site files, ArchSite, identifies eight recorded, but unevaluated, archaeological sites within one-kilometer of the CFFF. These sites were not assessed for the NRHP and excluded from the resources listed in Section 3.9 of the EA. However, fieldwork at one of these sites, site 38RD397, produced significant research contributions which



## The Council of South Carolina Professional Archaeologists

have also been published as an article in a national peer-reviewed journal, *Historical Archaeology*. Thus, the site is likely eligible for the National Register due to its research potential (Criterion D). The CFFF is at the edge of the Congaree River floodplain and Mill Creek flows through the property. In the Upper Coastal Plain of South Carolina, the edges of floodplains and permanent streams were intensively utilized by prehistoric and historic peoples. Local geomorphology also indicates that this property has the potential for deeply buried prehistoric archaeological deposits along the southeastern side of Mill Creek. Finally, Sunset Lake, to the south of the facility, resembles a late eighteenth or nineteenth century mill pond and the 1825 Richland District Map place Ward's Mill near this location.

The EIS should include consideration of effects stemming from 1) monitoring program construction; 2) the remediation efforts planned for decommissioning of the site, and 3) terrestrial and underwater areas affected by CFFF contaminants. Section 3.2 of the EA identifies soil contamination from VOC, inorganic, and radiological contaminants. These contaminants can lead to the degradation of archaeological deposits and subsequent remediation (i.e., removal of contaminated soils) during decommissioning would also irrevocably disturb an unknown number of unassessed cultural resources.

The NRC must ensure that historic and cultural resources are protected from harm. The EA and NRC correspondence with the SHPO gloss over this responsibility by stating that the construction contractor would follow an unspecified "procedure to avoid subsurface objects" (ML20226A249). The proposed use of Ground Penetrating Radar (GPR) to avoid impacts to cultural resources, in Section 4.9 (p 4-11) of the EA, is also vague and inaccurate. GPR can detect subsurface features such as wells, privies, and deep pits, but the data must be interpreted by a trained archaeological geophysical specialist. The specialist must process the data before it can be interpreted and confirmed through excavation. It is also important that contrary to Section 4.9, GPR does not detect below ground artifact deposits.

In summary, the NRC's intention to reassert the finding of no significant impacts, as stated in the draft EA, does not adequately address the potential impacts of re-licensing upon historical and cultural resources. We strongly believe the NRC must inventory and evaluate all historic and cultural resources located within the re-licensing APE for NRHP eligibility. The NRC cannot assess re-licensing adverse effects until the inventory and evaluations are completed.

Signed,

Tracy Martin

COSCAPA President

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