

From: JUDGE, CHRIS <judgec@email.sc.edu>
Sent: Sunday, August 30, 2020 11:17 AM
To: WEC_CFFF_EIS Resource
Cc: kquattrone@governor.sc.gov; Hannah, Roger; NRCExecSec Resource
Subject: [External_Sender] Docket ID NRC–2015– 0039

Addendum to an email response to the NRC Docket ID NRC–2015– 0039 from Christopher Judge dated August 23, 2020 at 12:20pm (EST)

Re: Docket ID NRC–2015– 0039/Westinghouse Fuel Fabrication Facility EIS, Hopkins, SC.

Date: August 30, 2020

To: The Honorable Kristine Svinicki, Chair, US Nuclear Regulatory Commission

cc. Annette L. Vietti-Cook, NRC Executive Secretary, Roger Hannah, Senior Public Affairs Officer Region II-Atlanta, Governor Henry McMaster via kquattrone@governor.sc.gov

I recommend that the Nuclear Regulatory Commission (NRC) consider expanding the scope of the Environmental Impact Statement (EIS) for the Westinghouse Fuel Fabrication Facility (WFFF) near the Congaree River in Richland County, South Carolina to consider archaeological and historical resources as environmental resources as they are part and parcel of the natural environments where they occur. Archaeologists in South Carolina agree that there is a high potential for significant archaeological and historic resources to be located both on and close to the WFFF. To that end, expanding the area of potential effect (APE) to places that could become contaminated and effectively destroyed by spills, leaks, clouds or other onsite and offsite impacts not involving direct ground disturbance, seems a reasonable and warranted approach. Potential adverse effects may occur indirectly from the permit undertaking for operation of the WFFF over the next 40 years, that likely would diminish the integrity of both known and unknown onsite as well as offsite cultural resources.

I recommend expanding the boundary of the APE all the way to the Congaree River for some distance both downriver and upriver. Obviously, previous testing for ground water impacts from the WFFF have been installed off site of the WFFF and the same consideration and coverage should be afforded cultural resources. A small number of large acreage land holdings are situated between WFFF and the Congaree River and permission should be sought for access to survey these properties for cultural resources that could be affected by contamination from the WFFF.

Further placement and installation of subsurface monitoring wells certainly has the potential to disturb human remains in unmarked Native American and African American cemeteries. These resources should be identified, tested, assessed, and impacts mitigated now rather than after sustaining damaging and potentially hazardous impacts. Such a goal could be achieved by conducting intensive archaeological surveys in large areas and clearing them as part of this current licensing process as the license, if issued, will permit the operation of the WFFF for 40 years.

Efforts to include relevant and interested tribal entities in the EIS process and the identification of Traditional Cultural Properties in the APE need to be thorough and rigorous.

Finally as part of this EIS public review process, I recommend the formation of a Stakeholders Committee composed of landowners, Federally recognized tribes, State recognized Native American communities, South Carolina State Historic Preservation Office, South Carolina Institute of Archaeology and Anthropology, Congaree National Park, Friends of Congaree Swamp, professional archaeologists, historians, cultural anthropologists and other interested parties to explore the impact and mitigation of effects to cultural resources in the vicinity of the WFFF over the next 40 years.

Sincerely;

Christopher Judge

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