

**From:** James Stewart <stewart.archaeology@gmail.com>  
**Sent:** Friday, September 17, 2021 2:00 PM  
**To:** WEC\_CFFF\_EIS Resource  
**Subject:** [External\_Sender] Docket Number 70-1151; NRC-2015-0039 Council of South Carolina Professional Archaeologists Comments Regarding the Columbia Fuel Fabrication Facility  
**Attachments:** COSCAPA\_EIS\_Response\_9\_17\_21.pdf

Hello,  
Please add the attached comments to the filings for NRC-2015-0039. These comments are in regard to the creation of an environmental impact statement for the Westinghouse Electric Company's Columbia Fuel Fabrication Facility re-licensing.

Kind Regards,  
James Stewart  
COSCAPA Secretary

**Federal Register Notice:** 86FR43277  
**Comment Number:** 10

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

**To:** Nuclear Regulatory Commission

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

**Date:** September 17, 2021

**RE:** Docket Number 70-1151: NRC-201500039 Scope of Environmental Review for WEC License Renewal

The Council of South Carolina Professional Archaeologists (COSCAPA) has reviewed the Draft Environmental Assessment (EA) and Public Meeting Presentation for the proposed relicensing of the Westinghouse Electric Company Columbia Fuel Fabrication Facility (WFFF) in Hopkins, South Carolina. 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. COSCAPA has identified several issues with the proposed 40-year re-license plan that we would like addressed.

1. The WFFF property is in a setting that has significant potential for precontact and historic occupations. The area was home to the Congaree Indian Tribe, of which very little historic information remains. Their villages are thought to be in the area and our knowledge of them could be greatly augmented by archaeological research. Hernando De Soto also journeyed through the region in A.D. 1540 before visiting the Native American towns of Aymay (at the junction of the Congaree and Wateree Rivers) and Cofitachequi (near Camden on the Wateree River). Any sites with preserved Spanish components would be greatly beneficial to our understanding of European exploration of the area. The South Carolina State Historic Preservation Office (SHPO) has asserted that the WFFF site has high likelihood for the presence of significant archaeological properties (see page 3-35 of the EA). COSCAPA endorses this position and recommends that Nuclear Regulatory Commission (NRC) delay the Environmental Impact Statement (EIS) until the Area of Potential Effect (APE) is correctly defined and intensively surveyed for cultural resources. We believe that the APE should be expanded to include archaeological site 38RD4 (Green Hill Mound). This site is an important archaeological resource, Native American cemetery, and has traditional significance for local Native American groups, including the Pine Hill Tribe. The EIS cannot move forward until cultural resources within the APE have been evaluated for National Register of Historic Places (NRHP) eligibility. Only then, can the NRC assess the effects of re-licensing upon cultural resources within the WFFF APE.
2. The APE includes the Denley Cemetery. This cemetery contains the remains of African American and, potentially, Native American interments. In rural South Carolina historic cemeteries, lower status individuals were buried in unmarked graves around the margins of a core family plot. Considering this pattern, the Denley Cemetery likely includes unmarked interments outside of the area set aside for the cemetery. It is our



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recommendation that the installation of test wells or any other ground disturbance (including the use of heavy machinery or vehicles) stop until the actual boundaries of the cemetery are determined. We also note that it is a felony under South Carolina law (S.C. Code of Laws, Section 16-17-600) to destroy or desecrate human remains. Consequently, we encourage the NRC to use remote-sensing and/or penetrometer testing to identify the actual boundaries of the resource before ground disturbance re-commences.

3. Finally, the late discovery plan does not adequately define the procedures needed to protect sensitive cultural resources from unintended damage. We recommend that this document be revised to include monitoring by a qualified professional archaeologist.

The WFFF re-licensing has skipped a vital step in their assessment of effects. The NRC has applied too many assumptions into the decision-making process. The federal agency cannot assess effects without an intensive survey of the APE. It cannot equate the absence of previously recorded resources with evidence that there are significant resources within the APE. It is our recommendation that the EIS comment period should be extended until after an intensive cultural resource investigation of the WFFF APE is completed, reviewed by SHPO, and made available for the public to review. Planning of this survey could include a professional examination of the Denley Cemetery and the development of a comprehensive late discovery plan.

Signed,

Tracy Martin, MA, RPA

COSCAPA President

James Stewart, MA, RPA

COSCAPA Secretary

Rebecca Shepherd, MA, RPA

COSCAPA Vice-President