

From: Judge, Christopher <judgec@email.sc.edu>
Sent: Monday, September 20, 2021 1:08 PM
To: WEC_CFFF_EIS Resource
Cc: Diaz Toro, Diana
Subject: [External_Sender] WFFF EIS Comments
Attachments: WFFF EIS Comments Sep 16 2021.docx

My comments are attached. Thank you

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Comment Number: 12

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Subject: [External_Sender] WFFF EIS Comments
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From: Judge, Christopher

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Recipients:

"Diaz Toro, Diana" <Diana.Diaz-Toro@nrc.gov>

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"WEC_CFFF_EIS Resource" <WEC_CFFF_EIS.Resource@nrc.gov>

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MEMORANDUM:

TO: Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear 16 Regulatory Commission
Washington, D.C. 20555-0001.

FROM: Christopher Judge
2118 Robin Road
Columbia, SC 29204

RE: *Environmental Impact Statement for the License Renewal of the Columbia Fuel Fabrication Facility in Richland County, South Carolina*

DATE: 9/16/2021

40 year License Comments

Regards Archaeological and Historical Resources:

- 1) Extend the comment period deadline until after the Intensive Archaeological Survey of WFFF is completed, reviewed by SHPO, and made available to the public for review.
- 2) Expand the Area of Potential Effect (APE) to include Green Hill Mound (38RD4), an important archaeological resource, Native American cemetery, and a significant ancestral site to local Native American populations including the Pine Hill Tribe.
- 3) Discontinue the installation of test wells in proximity to Denley Cemetery. Consider that as yet unidentified unmarked graves are likely to exist at the cemetery. Consider that the ground is disturbed not only by the drilled hole, but the machinery needed to drill the holes.
- 4) All ground disturbances at WFFF should be monitored by a professional archaeologist.
- 5) Consider the effect of actions by WFFF on cultural resources in the built area and maintained grounds area of WFFF. Spanish explorer Hernando DeSoto trekked through and camped in this area in Late April of A.D. 1540, just prior to visiting Native towns known as Aymay (at junction of Congaree and Wateree Rivers) and Cofitachequi (centered near Camden on Wateree River). The history of the Spanish in South Carolina has been marginalized by a greater emphasis on British Colonization that occurred over 100 years later in time. The area was also home to the Congaree Indian Tribe whose scant historical documentation could be greatly augmented by archaeological research. Their villages are thought to be located in this vicinity. If these areas at WFFF cannot be accessed safely for archaeology, creative mitigation measures should be considered in consultation with SHPO.

- 6) 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.
- 7) Seriously consider the fact, mentioned by most who commented during the webinar, that a 40 year license is far too long of a period of time, for the operation of this facility. This is an issue of public health.

Comments on the Webinar for draft EIS for the WFFF held on August 26, 2021

The webinar held on August 26, 2021 by NRC to solicit Public Comments was needlessly convoluted in its design and execution. I had great difficulty navigating into the webinar and four times the passcode published by NRC did not work. I finally made it in. However, at this point there was no audio, and I was subsequently alerted by a panelist that the audio was only available by phone. Thus, I joined the presentation well after it had begun. I was in email contact with several people during the webinar, including a Chief of an SC tribe, who were unable to gain access to the video portion of the webinar.

NRC should hold another meeting using a more friendly platform such as Zoom with audio and video available in the same place.

Specific Webinar Comments:

In the slide show presented by NRC during the Webinar on August 26, 2021 under the following heading: *Historic and Cultural Resources Information Gathering, Consultation, and Outreach--*

An agency called the *South Carolina Department of Archaeology and Historic Preservation* was listed as being consulted by NRC along with the South Carolina Institute of Archaeology and Anthropology and the State Historic Preservation Office. No such agency exists to my knowledge. I have worked as a professional archaeologist in SC for over 35 years. At this point in the process this seems like an avoidable mistake.

In another slide it stated impacts to Cultural Resources would be small to moderate at WFFF during the 40 year license. Small and moderate impacts are still impacts.

I tried to use the Q&A chat to communicate my thoughts. As I typed, my comments were erased, overridden repeatedly by a message limiting the number of characters, and obliterated causing me to start over. Towards the end, one of the hosts, offered that the Q&A chat box was not a place to submit comments from the public.

Respectfully;

Chris

Christopher Judge