

From: Michelle Wise Mitchum <pinehillIndn@yahoo.com>
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To: WEC_CFFF_EIS Resource
Cc: Diaz Toro, Diana
Subject: [External_Sender] Letter from Pine Hill Indian Tribe regarding WFFF EIS
Comments
Attachments: Letter to US Nuclear Commission 9-20-21.pdf

Follow Up Flag: Follow up
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Please see attached letter to include in Westinghouse comments from Pine Hill Indian Tribe.

Chief Michelle Mitchum
803-662-3377

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Subject: [External_Sender] Letter from Pine Hill Indian Tribe regarding WFFF EIS
Comments
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"Diaz Toro, Diana" <Diana.Diaz-Toro@nrc.gov>
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Pine Hill Indian Tribe
The First People of Fort Jackson, South Carolina

September 20, 2021

Office of Administration
US Nuclear Regulatory Commission
Washington, DC 20555-0001

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

Dear US Nuclear Regulatory Commission:

Thank you tremendously for your maintenance of transparency on issues relating to WFFF and their quest to renew their license another 40 years. Please accept this letter to reiterate my past comments:

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. I join archaeologist Chris Judge in recommending that this document be revised to include monitoring by a qualified professional archaeologist.
- 7) 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. Considering all factors to date, and the uncertainty of the future, our position is to take NO ACTION and decommission this facility.

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

I restate in full all of my comments captured in the webinar held on August 26, 2021 by NRC to solicit Public Comments. Further, I recommend that it is the public's best interest for NRC hold another meeting using a more friendly platform such as Zoom with audio and video available in the same place to eliminate access problems experienced on August 26, 2021.

Additional Comments:

The Draft EIS issued in July 2021 indicates our Tribe being consulted by NRC along with the South Carolina Institute of Archaeology and Anthropology and the State Historic Preservation Office. This Tribe has not been consulted by NRC and we question the existence of the other agencies and/or inclusion of the other agencies alleged to be contacted.

In a slide presented during the August 26, 2021 webinar, NRC restated that impacts to Cultural Resources would be small to moderate at WFFF during the 40 year license. Small and moderate impacts are still impacts.

I trust you will consider the significance of all issues raised herein as you prepare an EIS for this dangerous facility.

Respectfully,

Chief Michelle Mitchum
Pine Hill Indian Tribe
Executive Director, Pine Hill Indian Community Development Initiative
Director, Pine Hill Health Network
Ambassador, Community Health Workers Institute, Center of Community Health Alignment,
UofSC Arnold School of Public Health