



March 7, 2022

Eric Poplin
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Re: Westinghouse Columbia Fuel Fabrication Facility (CFFF)
Draft Cultural Resources Survey
Richland County, South Carolina
SHPO Project No. 15-EJ0022

Dear Eric Poplin:

Thank you for providing electronic and paper copies of the draft *Cultural Resources Survey of the Westinghouse Electric Company's Columbia Fuel Fabrication Facility, Richland County, South Carolina* dated February 2022. The State Historic Preservation Office (SHPO) is providing comments for the U.S. Nuclear Regulatory Commission (NRC) pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes including those with state recognition, local governments, or the public. We understand that the NRC is coordinating Section 106 review with the National Environmental Policy Act (NEPA) environmental review.

We appreciate that Westinghouse had this survey conducted to help address concerns that have previously raised about the potential for unidentified cultural resources at the CFFF site. Our office previously reviewed and provided comments on the Westinghouse CFFF Survey Research Design along with Christopher Judge, Archaeologist with USC Lancaster.

We provided copies of the draft report for review to Christopher Judge, State Archaeologist Jon Leader, and Chief Michelle Wise Mitchum of the Pine Hill Indian Tribe. Both Mr. Judge and Chief Mitchum have provided their comments to you and are also being sent as attachments for your convenience. Please consider their comments and address in a revised draft report. For example, please incorporate the information provided by the Pine Hill Indian Tribe into the historical context section.

The draft report includes findings from:

- Architectural survey of the CFFF,
- Archaeological survey of 197 acres of the CFFF with high potential for archaeological resources and 379 acres of the CFFF with low potential for archaeological resources, and
- Documentation of Denley Cemetery (SHPO Site No. 8119/38RD1518) including Ground Penetrating Radar (GPR), detailed mapping, and collection of inscriptions and information on all markers.

The survey identified five new archaeological sites (38RD1512 – 38RD1516) and recommends that they are not eligible for the listing in the National Register of Historic Places (NRHP). To assist in our evaluation, please address how the Pre-Contact components of sites might be related to Green Hill Mound (38RD0004) and other prehistoric sites in lower Richland County.

The survey recorded four above-ground sites – three related to the prior agricultural use of the property (SHPO Site Nos. 8120, 8690, 8691), and the CFFF facility itself (SHPO Site No. 8689). A previously recorded resource, SHPO Site No. 3577, an unnamed canal and dike, was revisited. Our office would concur with the recommendations that 3577, 8120, 8690, and 8691 do not meet the criteria for listing in the NRHP and are not eligible.

To further assist in our review of the report's recommendation that the CFFF (SHPO Site No. 8689) does not meet the criteria for listing in the NRHP, we request that additional context about the development and construction of this industrial complex be incorporated into the report. Our office did limited research using online access to local newspapers (Columbia Record, and The State, see attached) about the development and use of the facility. We note that the aerial photographs provided in Figure 4.10 (page 61) show that alterations have occurred that have likely affected the historic integrity of the complex.

We appreciate the additional documentation provided on the Denley Cemetery (SHPO Site No. 8119/38RD1518). The report notes that cemeteries are not ordinarily considered eligible for the NRHP, and recommends that the cemetery does not meet the criteria for listing in the NRHP. Based on the information provided, our office would concur with this evaluation. Regardless of the cemetery's NRHP status, state laws protect cemeteries and burials, and we appreciate the protection provided by Westinghouse for the cemetery.

The survey also makes recommendations regarding any future potential ground-disturbing activities to account for the possibility of deeply buried deposits in two areas.

Disturbed areas inside the security fence: “Prior to future ground disturbing activities in the disturbed areas inside the security fence that will extend more than four feet below the present ground surface, these plans should be reviewed to determine if there is a possibility of archaeological deposits at that locale.” Please clarify who would carry out this review, and provide a map of these areas.

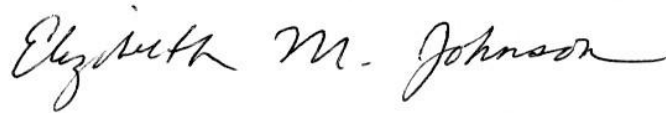
Sandy levee ridges in Congaree River flood plain: “Should land-disturbing activities be planned for these portions of the CFFF that will extend more than three feet below the

present ground surface, appropriate testing of these locales should be undertaken to ensure that no NRHP-eligible sites are affected.” Please provide a map of these ridges.

In addition to the above requests, we have two additional technical comments (see below) that we ask be addressed in the revised report. We also ask that the report address the comments provided by the outside reviewers, and include as appropriate the information in the responses provided by Westinghouse on February 21, 2022 (LTR-RAC-22-12).

Please refer to SHPO Project Number 15-EJ0022 in any future correspondence regarding this project. If you have any questions, please contact me at (803) 896-6168 or ejohnson@scdah.sc.gov.

Sincerely,



Elizabeth M. Johnson
Director, Historical Services, D-SHPO
State Historic Preservation Office

Cc: Chief Michelle Wise Mitchum, pinehillndn@yahoo.com
Christopher Judge, judgec@email.sc.edu
Diana Diaz-Toro, Diana.Diaz-Toro@nrc.gov

Attachments:

- February 27, 2022 review by Christopher Judge
- February 28, 2022 letter from Chief Michelle Mitchum
- SHPO background research in local newspapers related to CFFF

Technical Comments

Page 8: Figure 2.2. In the lower left of the tract are areas that appear to be portions of the areas of high probability described in the report as “elevated landforms in the Congaree River flood plain”. Were these areas between the portions of the site noted as “Swamp” fully tested at 30m intervals? The mapping of the shovel tests indicates one transect? Please clarify and/or adjust the map.

Page 43: Bottom of page references Figure 3.11 as the Hopkins quadrangle. Figure 3.11 is actually an aerial view, should it be 3.12?