



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

July 28, 2023

Hannah Pell
TMI-2 Energy Solutions
121 W Trade Street
Suite 2700
Charlotte PA 282020000

RE: ER Project # 2021PR03278.010, TMI-2 Decommissioning Project, Dauphin County, Pennsylvania, Nuclear Regulatory Commission, Conoy Township, Lancaster County; Additional Information

Dear Ms. Pell,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Archaeological Resources

Identification of Historic Properties

In our opinion, the identification of archaeological historic properties has not yet been completed for this project and it is impossible for us to comment on the presence or absence of archaeological resources without a clearly defined APE. As we understand from Attachment 2 in the letter dated July 10, 2023 (TMI2-RA-COR-2023-0013), the operational area of TMI-2 is being defined as the limits of disturbance for this undertaking. Please provide a clear figure illustrating the limits of this operational area, as it will be the basis of the Area of Potential Effects (APE) for directly affecting archaeological resources.

In a letter dated October 27, 2022 (TMI2-RA-COR-2022-0022), it notes "One archaeological site within the TMI-1 and TMI-2 operational area (identified on the National Register of Historic Places [NRHP] as 36DA50) is believed to remain intact." 36DA0050 has not yet been evaluated for its eligibility for listing on the NRHP. If 36DA0050 is within your project APE, it is our opinion that either a) Phase I and II excavations should be conducted to delineate and evaluate this resource for the NRHP or b) an archaeological avoidance plan should be implemented to ensure 36DA0050 is not adversely affected by the undertaking.

It is also our opinion that other potentially intact archaeological resources could be located within the APE/operational area. A Phase IA archaeological survey may be appropriate to determine if intact soils with the potential for archaeological resources are present within the APE, depending on the limits of the APE.

Above Ground Resources

Identification of Historic Properties

Based on the additional information received, available within our files, and observed during the PA SHPO site visit to Three Mile Island on April 5, 2023, it is our opinion that **Three Mile Island: Unit 2**

(Resource #2010RE03382) remains individually **eligible** for listing in the NRHP under Criterion A in the area of Industry for its association with the sequence of events that took place from March 28, 1979 through April 4, 1979 during and immediately after the most serious accident in U.S. commercial nuclear power plant operating history. The property meets Criterion Consideration G as an exceptional property of recent history. The events of TMI-2 shaped the modern regulation of commercial nuclear generating facilities. Please note that we disagree with the recommendation that the observation center is non-contributing. In our opinion, the boundary should include those buildings and structures directly associated with TMI-2 and the events of March 28-April 4, 1979, and the immediate aftermath. Based on our files, the proposed boundary therefore consists of four non-contiguous areas totally 13.3 acres and including: 1) TMI-2 Reactor Containment Building, 2) TMI-2 Turbine Building, 3) TMI-2 Control Service Building, 4) TMI-2 Natural Draft Cooling Towers, 5) TMI-2 Mechanical Draft Cooling Tower, 6) TMI-2 Intake Screen and Pump House, 7) Fuel Handling Building, 8) TMI-2 Auxiliary Building, and 9) Observation Center. We agree that TMI-1 appears to have functioned independently of TMI-2 and that the property in its entirety as an above ground resource does not appear to possess significance with regards to the commercial nuclear industry and associated development; please note the area has not been fully evaluated for archaeological potential (as noted above).

Continued Consultation

We look forward to continued consultation, including the meeting schedule for August 2, 2023, with you, NRC, ACHP, and other consulting parties for the project regarding identification of historic properties (archaeology) and assessments of effects. Since it is currently unknown if TMI-2 Solutions will source additional fill from Three Mile Island outside the operational area, we agree that a programmatic agreement is likely appropriate; however, the operational area is currently known and, in our opinion, the identification and evaluation of archaeological resources within the operational area should be conducted as discussed above.

The letter dated July 10, 2023 (TMI2-RA-COR-2023-0013) also states "TMI-2 Solutions has proactively established a Cultural Resources Protection Plan." Our office has not reviewed such a plan and would appreciate the opportunity to review and comment on this plan as part of continued consultation.

For questions concerning this review and/or for future consultation, please contact Justin McKeel at jusmckeel@pa.gov (archaeology resources) and/or Emma Diehl at emdiehl@pa.gov (above ground resources).

Sincerely,



Emma Diehl

Environmental Review Division Manager