



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 13, 2025

Jaime Loichinger, Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637

SUBJECT: REQUEST TO INITIATE SECTION 106 CONSULTATION FOR THE LONG MOTT GENERATING STATION CONSTRUCTION PERMIT APPLICATION REVIEW IN CALHOUN COUNTY, TEXAS (DOCKET NUMBER: 50-614)

Dear Jaime Loichinger:

The U.S. Nuclear Regulatory Commission (NRC) staff is conducting an environmental review for an advanced nuclear reactor construction permit application submitted by Long Mott Energy, LLC, in a letter dated March 31, 2025, pursuant to Title 10 of the *Code of Federal Regulations* Part 50. The Long Mott Generating Station (LMGS), if licensed, would be located in Calhoun County, Texas. The purpose of this letter is to initiate Section 106 consultation under the National Historic Preservation Act of 1966, as amended (NHPA).

Long Mott Energy is participating in the U.S. Department of Energy's (DOE) Advanced Reactor Demonstration Program, which will partially fund construction of the LMGS. This financial assistance is a federal action, and the DOE is a cooperating agency on the NRC's review under the National Environmental Policy Act of 1969, as amended (NEPA). The NRC is the lead Federal agency for both the NEPA review and the NHPA Section 106 consultation. DOE will assist the NRC in the Section 106 review process. The NRC's proposed undertaking is the issuance of a construction permit for four Xe-100 advanced nuclear reactor modules. The DOE's undertaking is to provide funding that will support the construction of the LMGS. This NHPA Section 106 consultation will address both the NRC and DOE undertakings.

Construction of the LMGS would occur on approximately 1,537 acres in Calhoun County, Texas, adjacent to Seadrift Operations (SDO) in Seadrift, Texas (see Enclosure 1). SDO manufactures chemical products and is owned and operated by the Union Carbide Corporation, a wholly owned subsidiary of The Dow Chemical Company. The proposed LMGS site is located approximately 3.2 miles north of Long Mott, approximately 7.7 miles northwest of Seadrift, and approximately 8.2 miles southwest of Port Lavaca. The site is owned and managed by The Dow Chemical Company and is mainly comprised of cultivated cropland and existing industrial infrastructure, consisting of plant facilities, paved areas, and holding ponds. A portion of the site supports the existing SDO facility. The proposed four Xe-100 reactor modules are intended to supply electrical power and steam to the adjacent SDO facility. Each Xe-100 reactor module would be capable of producing 80 megawatts-electric of electrical power or approximately 200 megawatts-thermal of steam. The area of potential effects (APE) for the project consists of the 1,537-acre site and represents the location and extent of areas required for all LMGS-

related construction and operation activities (see Enclosure 2). A 0.5-mile (0.8 km) buffer has been incorporated to account for potential indirect impacts to architectural resources and historic properties, if present.

Application documents for the LMGS are available through the NRC's Agencywide Documents Access and Management System (ADAMS), accessible at <https://adams-search.nrc.gov/home>.

- The LMGS construction permit application is available at ADAMS Accession No. [ML25090A057](#).
- The environmental report portion of the application is available under [ML25090A063](#).
- The archaeological and architectural survey reports are available under [ML25090A066](#).

The LMGS application and additional NRC project information is also available on the Internet at <https://www.nrc.gov/reactors/new-reactors/advanced/who-were-working-with/applicant-projects/long-mott.html>.

As part of the NRC's construction permit application review, the NRC staff is preparing an environmental assessment (EA) to determine whether an environmental impact statement (EIS) is necessary, or a finding of no significant impact (FONSI) is warranted, to satisfy the NRC's obligations under NEPA. In accordance with Title 36 of the Code of Federal Regulations (36 CFR) Section 800.8(c), the NRC intends to comply with Section 106 of the NHPA through the NEPA process in lieu of the procedures set forth in 36 CFR 800.3 through 800.6. Therefore, the EA will include the identification of historic properties and historic and cultural resources, an assessment of impacts, and a determination. During the preparation of the EA, the NRC will follow the procedure requirements and standards set out in 36 CFR 800.8(c). In 2023, Long Mott Energy, LLC, contracted environmental firm WSP to complete archaeological and architectural surveys in support of their construction permit application to the NRC. The results of both surveys, including the identification of historic and cultural resources, along with historic properties, will serve as the basis for NRC's preliminary determination and Section 106 finding of effect in the forthcoming EA.

Pursuant to 10 CFR 51.28(a) and 36 CFR 800.2(c)(2)(ii), the NRC is ensuring that Indian Tribes who might attach religious and cultural significance to historic properties in the APE are afforded the opportunity to identify their concerns, provide advice on the identification and evaluation of historic properties, including those of traditional, religious, and cultural importance, and, if necessary, participate in the resolution of any adverse effects to such properties.

By February 2026, the NRC staff expect to complete the draft historic and cultural resources section of the EA, which will include identification of historic and cultural resources and historic properties at the LMGS; an analysis of potential effects of the proposed action, including potential effects on historic and cultural resources and historic properties; and the NRC staff's preliminary NHPA Section 106 determination. The NRC staff will share with your office the draft historic and cultural resources section for review and comment, and will also make it available for the public to comment on potential effects to historic properties per 36 CFR 800.2(d).

The NRC expects to complete its preliminary EA by April 2026. At that time, the NRC will determine whether to prepare an EIS, or to finalize the EA and issue a FONSI. The final historic and cultural resources section, updated based on input from NHPA consulting parties and public comments, will be included in the final NEPA document.

The NRC invites you to submit any comments or concerns that you may have to offer on the NRC's Section 106 consultation and historic and cultural resources evaluation within 30 days of receipt of this letter. Any comments, questions, or concerns related to this letter may be submitted to Sarah Lopas, Section 106 Project Lead by phone at 301-415-6360 or via email at Sarah.Lopas@nrc.gov; or the Environmental Project Manager, Joe O'Hara, by phone at 301-415-6854 or via email at Joe.Ohara@nrc.gov.

Sincerely,



Signed by Davis, Desiree
on 08/13/25

Desiree Davis, Acting Chief
Environmental Technical Review Branch 1
Division of Rulemaking, Environmental,
and Financial Support
Office of Nuclear Material Safety
and Safeguards

Docket No. 50-614

Enclosures:

1. LMGS Surrounding Region – Map
2. LMGS Areas of Potential Effect – Map

cc: LMGS GovDelivery

e106@achp.gov

Bill Marzella, Program Analyst
BMarzella@achp.gov

Gretchen Applegate
Gretchen.applegate@hq.doe.gov

Jay Summers
Jay.Summers@hq.doe.gov

Shaina Aguilar
Shaina.Aguilar@hq.doe.gov

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