

From: [Andrew Beaudoin](#)
To: [Beau Goldstein](#)
Cc: [Ashley Waldron](#); [Colleen A. Bell](#); [Desiree Davis](#)
Subject: [External_Sender] RE: Clinton Power Station Unit 1 License Renewal
Date: Thursday, August 21, 2025 12:45:56 PM
Attachments: image002.png
image004.png

Good Afternoon,

Thank you for the response and updated information. The Osage Nation Tribal Historic Preservation Office looks forward to working together with the NRC, in the future, on any proposed work at the CPS.

Thank you,

Andrew Beaudoin

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From: Beau Goldstein <Beau.Goldstein@nrc.gov>
Sent: Thursday, August 21, 2025 2:32 PM
To: Andrew Beaudoin <andrew.beaudoin@osagenation-nsn.gov>
Cc: Ashley Waldron <Ashley.Waldron@nrc.gov>; Colleen A. Bell <colleen.bell@osagenation-nsn.gov>; Desiree Davis <Desiree.Davis@nrc.gov>
Subject: Clinton Power Station Unit 1 License Renewal

Good day,

Thank you for your written correspondence dated August 8, 2025 regarding the Clinton

Power Station (CPS) license renewal. During the proposed license renewal period, the applicant, Constellation Energy Generation (CEG), would continue operations at CPS; CEG proposes no new ground disturbing activities during the license renewal period. The notice of availability of the final supplemental environmental impact statement (FSEIS) was mailed to the Osage Nation's Principal Chief on August 7, 2025 (letter dated August 5, 2025) and the letter was also sent by email to the Osage Nation's Tribal Historic Preservation Officer on August 7, 2025 (see attached). The FSEIS is available at [ML25212A224](https://www.nrc.gov/reactors/operating/licensing/renewal/applications/clinton.html). Section 3.9 of the FSEIS includes a description of the Area of Potential Effects (APE), identification efforts conducted since the 1970s, and previously identified cultural resources. Additional project-related information can be found on the NRC's webpage:

<https://www.nrc.gov/reactors/operating/licensing/renewal/applications/clinton.html>

Although the sacred mound referenced in your correspondence dated August 8, 2025, is located outside the APE for the license renewal undertaking, CEG has several administrative controls and environmental procedures that aim to identify, protect, and minimize potential impacts to historic properties within the CPS site. Procedure SA-AA-117, "Excavation, Trenching, and Shoring," outlines work practices for excavation, trenching, and shoring. The procedure defines Cultural, Historical, and Paleontological resources and aims to protect against impacts to sites and unanticipated discoveries of historic and cultural resources. The procedure is used in conjunction with CEG's Excavation Permit. Procedure EN-AA-103-F-02, "Environmental Screening Checklist," oversees the environmental checklist process. The "Land" section of the procedure addresses potential impacts as a result of ground-disturbing activities. Procedure EN-AA-103, Environmental Review, oversees the aforementioned environmental checklist process. The document provides a process for screening proposed activities to determine if an activity requires further evaluation for environmental impacts and risk. Last, EN-AA-103-0001, Environmental Evaluations, provides environmental personnel with direction on performing environmental evaluations to identify the environmental and regulatory impacts, if any, of proposed activities. Upon discovery of human remains, CEG would engage their site security team, who would then engage the local law enforcement. If remains are over 100 years old, the Illinois SHPO would take over jurisdiction. If the remains are considered less than 100 years old, the coroner would maintain jurisdiction. In Illinois, human remains and associated burial artifacts are protected by the State's Human Skeletal Remains Protection Act.

Should CEG propose previously unanalyzed ground disturbing activities at the CPS facility that require NRC authorization as part of a license amendment request or a subsequent license renewal application, consistent with its licensing process, the NRC

staff will review the proposed activity at that time, including determining whether it is an undertaking per 36 CFR 800.3. If it is an undertaking, then the NRC would follow the National Historic Preservation Act (NHPA) Section 106 process, including initiating any necessary consultations.

Regards,

Beau J. Goldstein, RPA

Environmental Project Manager

U.S. Nuclear Regulatory Commission

Office of Nuclear Materials Safety and Safeguards

