



May 12, 2022

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

Dear Eric Poplin:

Thank you for providing the revised draft *Cultural Resources Survey of the Westinghouse Electric Company's Columbia Fuel Fabrication Facility, Richland County, South Carolina* dated April 2022. We also received your letter describing how the comments from our office, Chris Judge of USC-Lancaster, and Chief Michelle Mitchum of the Pine Hill Indian Tribe were considered. 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.

Based on the additional information and context in the revised report, our office concurs with the recommendation that the Columbia Fuel Fabrication Facility (CFFF), SHPO Site No. 8689, does not meet the criteria for listing in the National Register of Historic Places as it “lacks integrity of design, workmanship, and building materials due to multiple exterior modifications to the office building, manufacturing plant, and the overall campus” as Westinghouse Electric has “expanded, altered, and modernized this facility since it was originally constructed.”

Our office recommends to Westinghouse and the NRC that as part of the relicensing process, the information related to cultural resources at the site including this survey, maps, and the referenced cultural resources protocols be gathered in one binder/folder, along with contact information for staff at NRC, SHPO, and Westinghouse, and be provided to our office, and any

other consulting parties, to ensure that each entity has current cultural resources documentation readily accessible. In addition, we would request that our office and other consulting parties be provided with an annual update indicating whether or not any cultural resources work has been undertaken or planned at the site. This annual update, which could take the form of a memo or letter, should also include a status update for the Denley Cemetery.

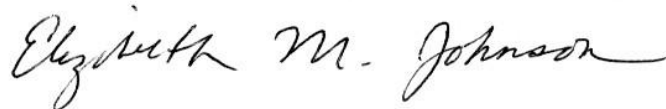
Our office accepts the revised report as final. To complete the reporting process, please provide at least three (3) hard copies of a final report: one (1) bound hard copy and a digital copy in ADOBE Acrobat PDF format for the SHPO; one (1) bound and one (1) unbound hard copies and a digital copy in ADOBE Acrobat PDF format for SCIAA. Investigators should send all copies directly to the SHPO. The SHPO will distribute the appropriate copies to SCIAA. Please ensure that a copy of our comments letter is included in the Appendices and Attachments of the final report.

Please provide GIS shapefiles for the surveyed area (and architectural sites as applicable). Shapefiles for identified archaeological sites should be coordinated with SCIAA. Shapefiles should be compatible with ArcGIS (.shp file format) and should be sent as a bundle in .zip format. For additional information, please see our [GIS Data Submission Requirements](#). Please provide final electronic copies of the survey forms and photographs for the above-ground resources following the [Electronic Submission Requirements for Planning Surveys and Review & Compliance Surveys](#).

Please ensure that all Final survey deliverables (reports, survey forms and photographs, and GIS shapefiles) are sent to the SHPO at the same time using the same medium (e.g., DVD-RW, thumb drive, or FTP/file sharing site) to assist in project tracking. Files should be sent to [rc@scdah.sc.gov](mailto:rc@scdah.sc.gov). This new email address is only to be used for submitting survey deliverables. Contact your assigned reviewer directly for any questions or concerns.

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](mailto:ejohnson@scdah.sc.gov).

Sincerely,



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

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