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Environmental Consulting

May 5, 2015

Sarah Birtchet
Texas Historical Commission
History Division
P.O. Box 12276
Austin, TX 78711

Re: Project Review under Section 106 for a Proposed Consolidated Interim Spent Fuel Storage Facility in Andrews County, Texas

Dear Ms. Birtchet:

Waste Control Specialists LLC (WCS) intends to file an application for a license for the independent storage of spent nuclear fuel and reactor-related, greater-than-Class C wastes at a site in western Andrews County, Texas (see **Figure 1**, attached). These activities are regulated by the U.S. Nuclear Regulatory Commission (NRC); the project is therefore subject to Section 106 of the National Historic Preservation Act. This letter addresses historic resources; archeological resources are being coordinated under separate cover. The site is in the northwestern-most corner of Andrews County and is immediately adjacent to the Texas/New Mexico state line; this project is also being shared with the New Mexico State Historic Preservation Office (SHPO).

A previous license for disposal of low-level radioactive waste on the WCS complex was coordinated with the Texas Historical Commission (THC) and the New Mexico SHPO in 2006. The THC and New Mexico SHPO concurred that there would be no historic properties affected on July 20, 2006, and July 21, 2006 respectively.

Project Description

WCS is requesting authorization from the NRC to construct and operate a Consolidated Interim Spent Fuel (CISF) storage facility for spent nuclear fuel on approximately 100 acres of land within the approximately 14,000-acre complex owned by WCS (see **Figure 2**). The project is located in a remote area approximately five miles east of Eunice, New Mexico and north of Highway 176 (also named Highway 87). The area is surrounded by a high density of oil wells to the west and some oil wells to the north; there is little development to the south and east, excluding portions of the existing WCS facility. Operations at the WCS facility began in 1994; none of the development is historic-age.

The proposed facility would house a dry cask storage system. WCS is exploring several different options for the system. One option would be an above-ground system utilizing several low-rise buildings (see **Figure 3**), while another option would store the casks underground. Both the above-ground and below-ground design options are assumed to require the presence of a crane approximately 60 feet in height during the operating license timeframe.

Historic Resources Area of Potential Effect

The Area of Potential Effect (APE) for direct impacts is proposed as the project footprint (see **Figure 4**). Taking into consideration the height of the crane that would be required, the height of the potential above-ground facility, and the relatively flat surrounding terrain, the APE for indirect/visual impacts is

proposed as a one-mile radius from the proposed project footprint (see **Figure 4**). WCS anticipates that the NRC will issue a Final Environmental Impact Statement and License by April 1, 2019. Therefore, a historic-age date of 1974 (45 years prior to 2019) is proposed.

According to a search of the digital Sites Atlas maintained by the THC, no known historic cemeteries, Official State Historical Markers (OSHM), State Antiquities Landmarks (SALs), or properties or districts listed on the National Register of Historic Places (NRHP) are located within the APE for direct or indirect impacts. The nearest previously identified resource is the OSHM for Andrews County, located approximately 17 miles southeast of the project area.

Adjacent to the WCS facility to the west is a large uranium enrichment plant called the National Enrichment Facility, operated by Urenco. This facility was developed within the past 15 years. The proposed project area is located in a very remote area of Texas with little development aside from the non-historic age WCS and Urenco facilities. The proposed project would not result in a direct effect to any historic resources. There do not appear to be any historic resources 45 years or older (dating to 1974 or earlier) within the one-mile indirect effects APE.

The nearest developed area is Eunice, New Mexico, which is located approximately five miles west of the proposed site. There are two large visual obstructions between viewers in Eunice and the proposed crane at the site: red soil mounds approximately 100 feet in height on WCS property, and the Urenco facility (see **Figure 5**). Based on information from WCS, the soil mounds will be in place indefinitely or potentially utilized as fill. As illustrated in **Photos 3-5** in the attached photo sheets, the red soil mounds and the Urenco facility are visible from the outskirts of Eunice but tend to dissolve visually into the horizon. Excluding the crane, the CISF storage facility would be approximately 30 feet above the surface and less visible from Eunice than existing features and structures.

Request for Concurrence

It is the professional opinion of CMEC cultural resources personnel that further historic resources investigations are not warranted prior to construction. We ask for your concurrence with this finding.

Should you have any questions, please contact me at EmilyR@coxmclain.com or 512-338-2223.

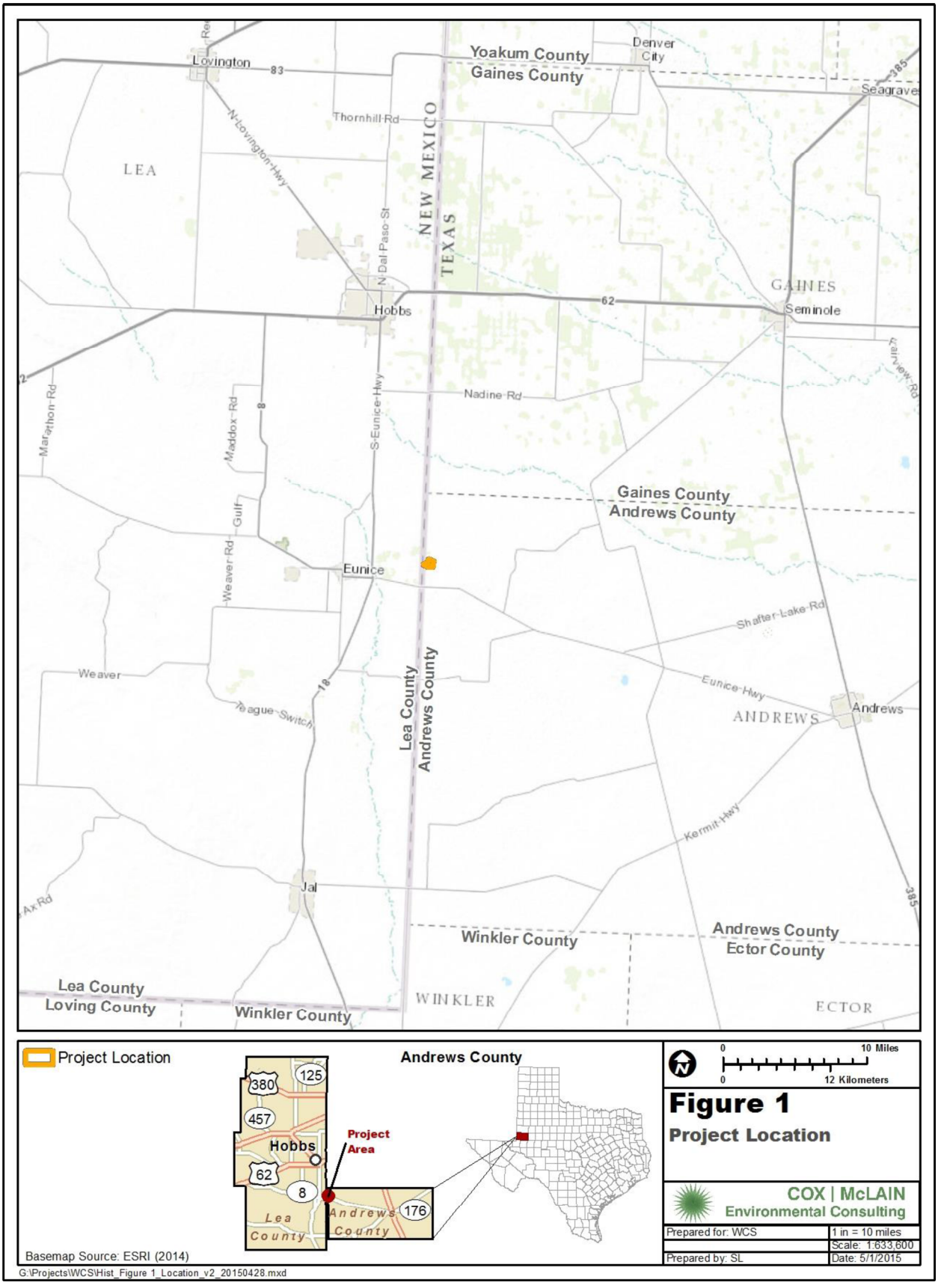
Sincerely,

Emily Reed

Emily Reed, Architectural Historian
Cox|McLain Environmental Consulting, Inc.

Attachments

Figure 1: General Project Location Map
Figure 2: Detail Facility Map
Figure 3: Potential CISF Storage Facility Site Design Renderings
Figure 4: Proposed APE for Historic Resources
Figure 5: Viewshed Analysis
Contextual Photographs


Lovington
83
Yoakum County
Gaines County
Denver City
385
Seagraves
Thornhill Rd
N Lovington Hwy
LEA
NEW MEXICO
TEXAS
N Dal Paso St
Hobbs
62
GAINES
Seminole
Fairview Rd
Marathon Rd
Maddox Rd
8
S Eunice Hwy
Nadine Rd
Gaines County
Andrews County
Gulf
Weaver Rd
Eunice
Shafter Lake Rd
Weaver
18
Teague Switch
Lea County
Andrews County
Eunice Hwy
ANDREWS
Andrews
Kermit Hwy
Jal
Ax Rd
Winkler County
Andrews County
Ector County
Lea County
Loving County
Winkler County
WINKLER
ECTOR
Project Location
Andrews County
125
380
457
Hobbs
62
8
Project Area
Lea County
Andrews County
176
Basemap Source: ESRI (2014)
0
10 Miles
0
12 Kilometers
Figure 1
Project Location
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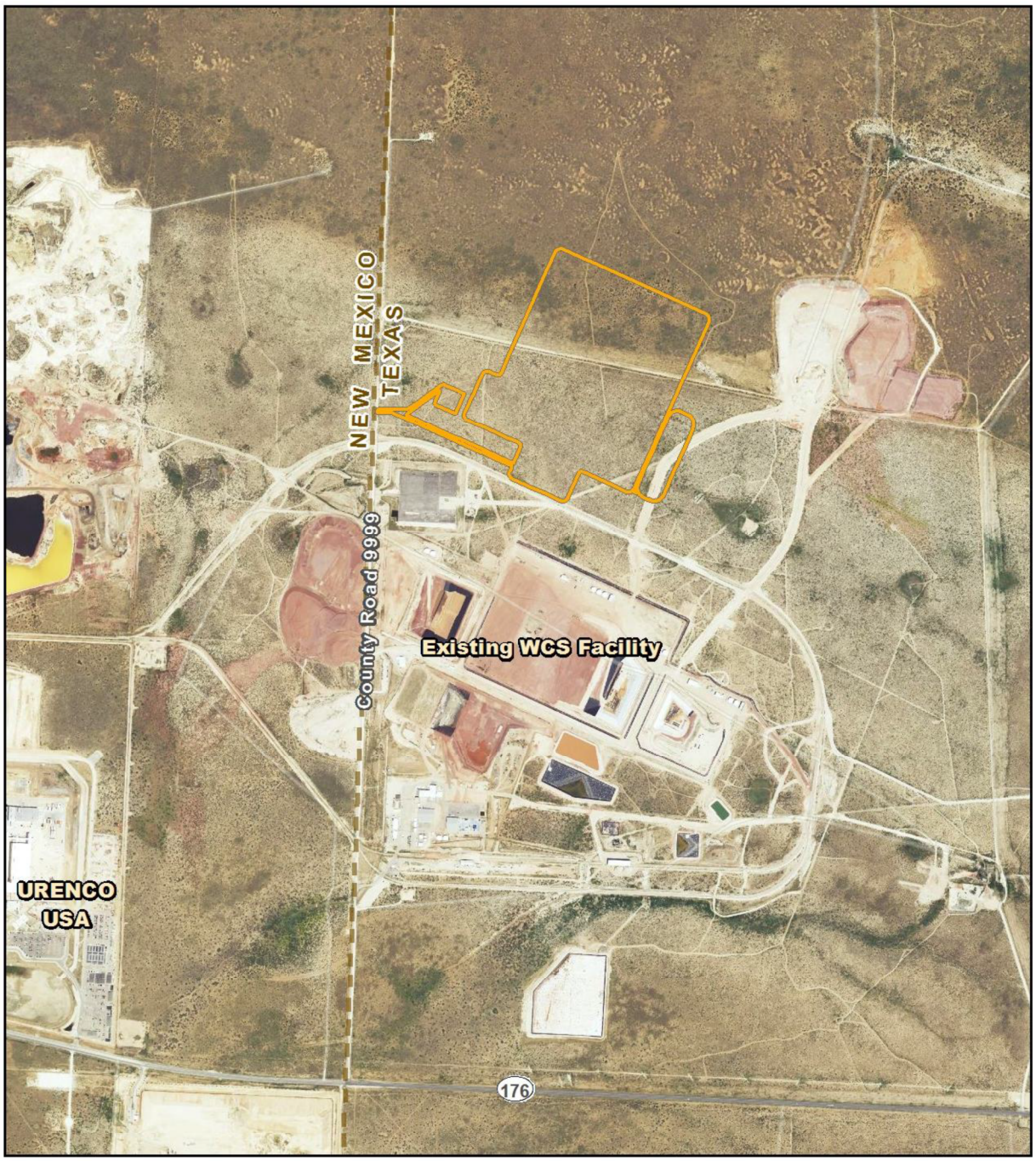
Prepared for: WCS
1 in = 10 miles
Scale: 1:633,600
Prepared by: SL
Date: 5/1/2015
G:\Projects\WCS\Hist_Figure 1_Location_v2_20150428.mxd



Project Footprint

0 2,000 Feet
0 600 Meters

Figure 2

Aerial Photograph

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Prepared for: WCS	1 in = 2,000 feet
	Scale: 1:24,000
Prepared by: SL	Date: 5/4/2015

Aeria Source: NAIP (2014)

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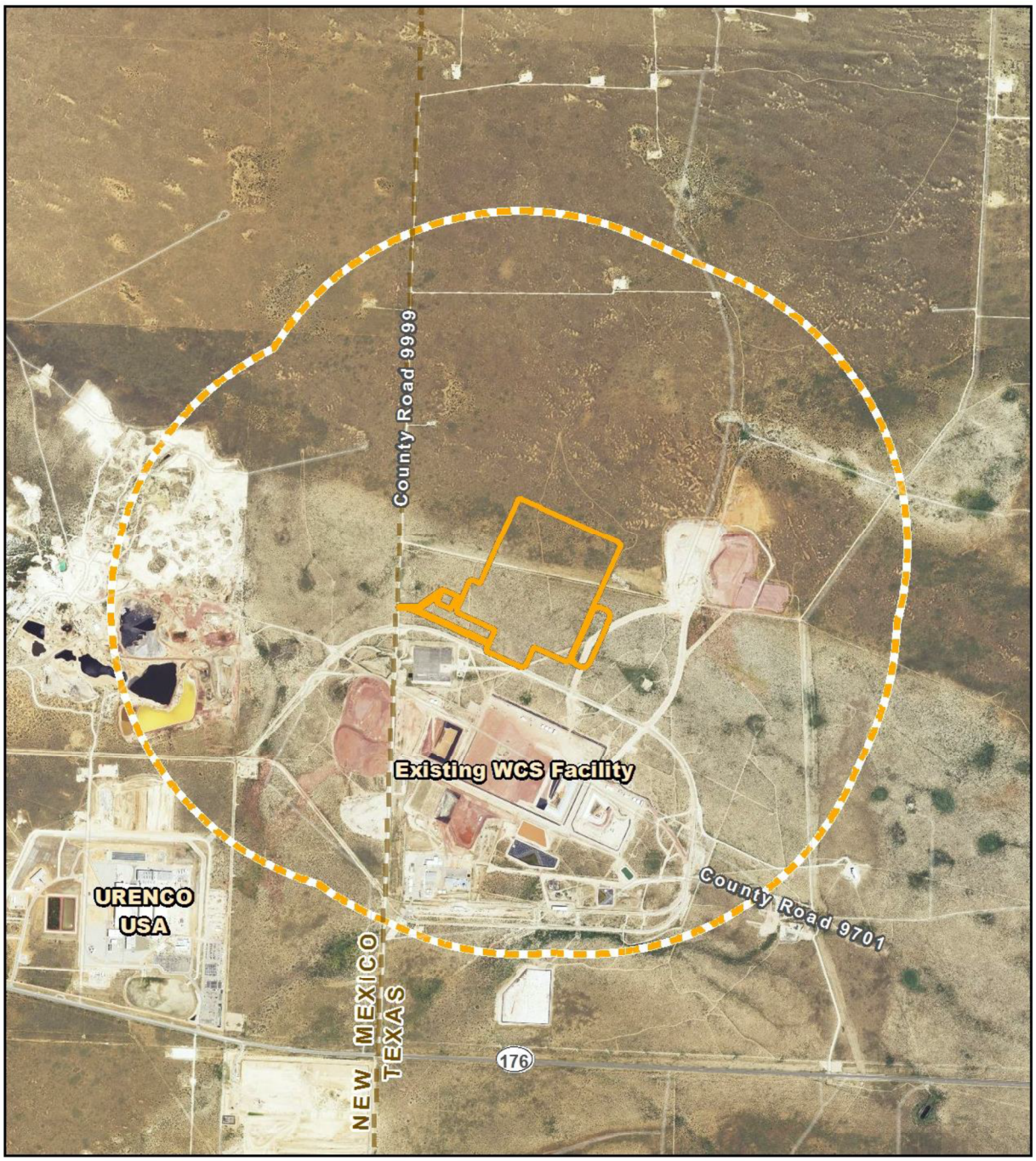
AMERICA'S NUCLEAR SOLUTION

POTENTUAL ISFSI SITE RENDERINGS

Figure 3
Potential Storage Facility Site Design Renderings



APE for Direct Impacts (project footprint)
APE for Indirect/Visual Impacts (1-mile radius)

Note: no previously recorded
Texas resources mapped
within either APE

Sources: THC (2015), TARL (2015)
Aerial Source: NAIP (2014)

0 3,000 Feet
0 800 Meters

Figure 4

Location of Historic Area of Potential Effect

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Prepared for: WCS	1 in = 3,000 feet
	Scale: 1:36,000
Prepared by: SL	Date: 5/4/2015

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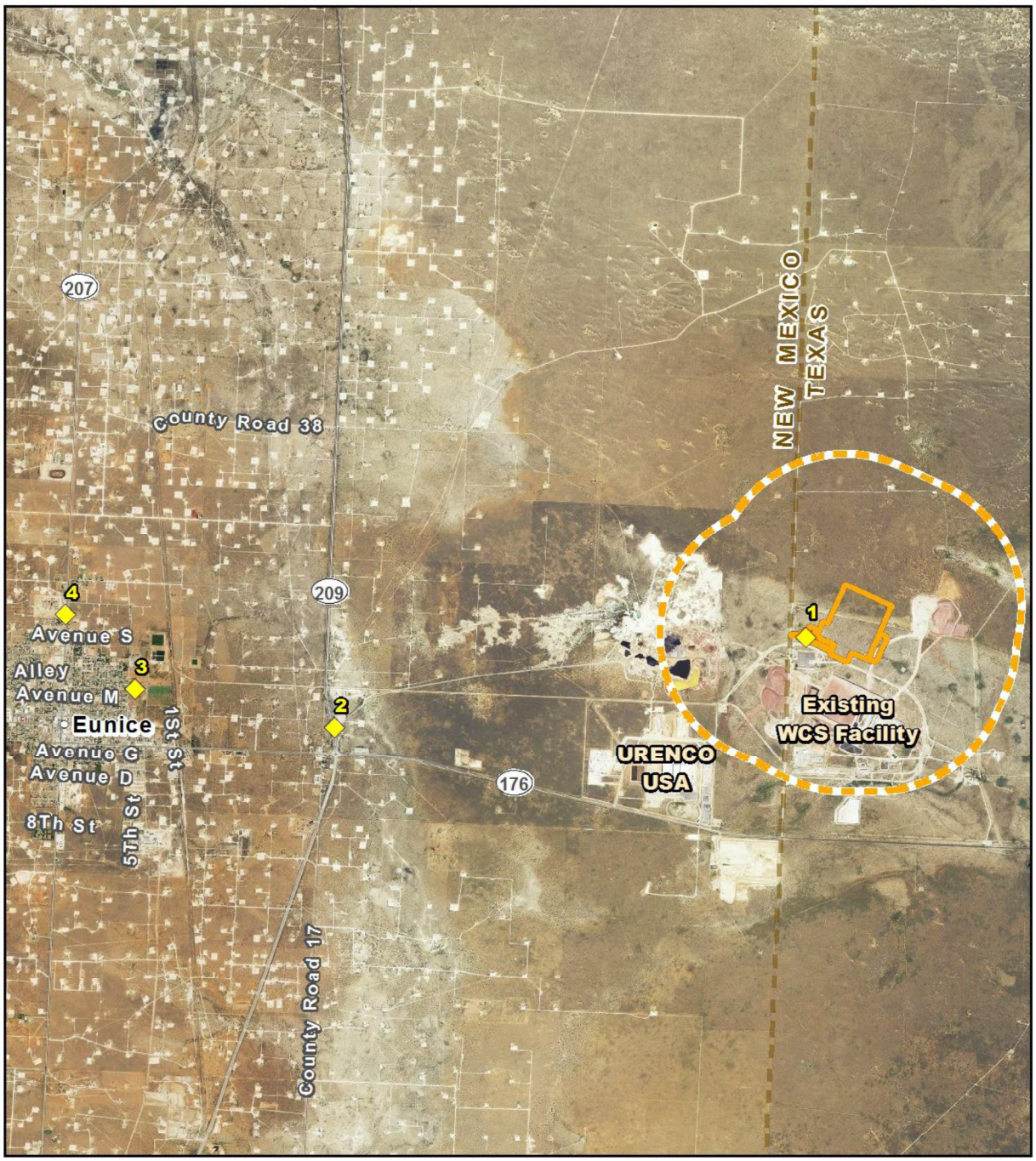

APE for Direct Impacts (project footprint)
APE for Indirect/Visual Impacts (1-mile radius)
Photo Location

0 1.25 Miles
0 1.5 Kilometers

Figure 5
Viewshed Analysis

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Prepared for: WCS	1 in = 1.25 miles
	Scale: 1:79,200
Prepared by: SL	Date: 5/1/2015

Source: CMEC (2015)
Aerial Source: NAIP (2014)

G:\Projects\WCS\Hist_Figure 5_Viewshed Analysis_20150430.mxd

Contextual Photographs

Photo 1. View of proposed site, looking north.