



March 14, 2025

Michelle Rome, Chief  
Environmental Review Technical Branch 1  
Division of Rulemaking, Environmental, and Financial Support  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

RE: TerraPower Natrium Reactor Project – Sodium Test and Fill Facility – Supplemental Review of the Permanent Electrical Distribution Line

Dear Ms. Rome:

Enclosed for your review and comment is a Class III cultural resources report prepared by Tetra Tech following the results of their field survey; the Department of Energy's Office of Clean Energy Demonstrations (OCED) has entered into a cost-share partnership with TerraPower, which includes the supplemental review of the permanent electrical distribution line and fiber optic cable for the Sodium Test and Fill Facility (TFF) located on private land in Lincoln County, Wyoming. Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR 800, OCED began its initiation of consultation on August 5, 2024, and on August 8, 2024, the Wyoming State Historic Preservation Office (WY SHPO) concurred with the delineation of the Area of Potential Effect (APE) and stated that a Class III survey is required. The Comanche Nation provided comments on August 29, 2024, stating that no properties were identified in the project APE after a review of their office's site files.

Pursuant to 36 CFR 800.2(c) the consulting parties for this project includes: the Apache Tribe of Oklahoma, the Cheyenne and Arapaho Tribes, the Comanche Nation, the Confederated Tribes of the Goshute Reservation, the Crow Creek Sioux Tribe, the Crow Tribe of Indians, the Eastern Shoshone Tribe, the Fort Belknap Indian Community, the Northern Arapaho Tribe, the Northwestern Band of the Shoshone Nation, the Shoshone-Bannock Tribes, the Skull Valley Band of Goshute Indians, the Ute Indian Tribe, as well as the U.S. Nuclear Regulatory Commission (NRC), the Wyoming Department of Transportation (WYDOT), and the WY SHPO.

### **Assessment Results**

In September of 2024, Tetra Tech conducted a field survey which included a systematic survey of the newly added APE, which is located along the westside of Hwy 189, (see Appendix B- Project direct APE map). Results of that survey are summarized below:

#### ***48LN740 (multicomponent site, previously determined eligible)***

Tetra Tech expanded the 48LN740 site boundary on the westside of Hwy 189 where a small surface scatter of cultural material was identified along the site's western boundary (see Figure 5, page 41). In reviewing previous cultural resource reports, Tetra Tech determined that this newly identified cultural material had actually been previously documented in 1991 by the Office of the Wyoming State Archaeologist (OWSA) as 48LN2336 which was mis-plotted in the WyoTrack system. At the time of its original recording, a single shovel test had been placed within those site boundaries and no subsurface cultural material was identified. More recently, OWSA conducted fieldwork within the Hwy 189 right-of-way (ROW) as part of a WYDOT wildlife crossing project (Page

and Kelley 2024) and as part of that site visit, which was limited to the Hwy 189 ROW itself, OWSA updated 48LN740 site boundaries by amalgamating georeferenced maps from their office's original site recording in 1984, a site revisit by Mariah Associates in 1994, as well as Tetra Tech's observed surface scatter site boundary which they documented during their 2022 site visit. WYDOT's consultation with WY SHPO resulted in a WY SHPO concurrence letter stating that the portion of 48LN740 located within the WYDOT Hwy 189 ROW corridor is considered non-contributing to the sites overall eligibility (Currit 2024; Currit, personal communication February 14, 2024).

Please see Figure 5, page 41 of this cultural resources report which outlines the OWSA amalgamated site boundary, Tetra Tech's 2022 observed surface scatter boundary, Tetra Tech's identified location of aeolian deposits where subsurface cultural material was identified, and this project's APE. Within the newly added APE, along the westside of Hwy 189, the proposed ground disturbing activities, trenching and horizontal directional drilling of electrical and fiber optic conduit, would be limited to the Skull Point Rd and Hwy 189 ROWs which are considered to be highly disturbed, and which do not contribute to 48LN740's eligibility. On the eastside of Hwy 189, the conduit would exit the ROW corridor and interconnect into the TFF building. This area falls within OWSA's amalgamated site boundary, however no cultural material has been observed in this location and Tetra Tech did not identify sediments in which subsurface materials are known to be present. As the proposed project activities would be limited to these non-contributing portions of 48LN740, the proposed project would have *no adverse effect* on this historic property.

***48LN2697 (linear historic site, previously determined eligible)***

Segment 4 of 48LN2697, the Cumberland Branch of the Union Pacific Railroad, was previously recorded in the APE and which is located east of Hwy 189 (see Figure 8 and Appendix B maps). Segment 4 has been abandoned and dismantled and the remnants that make up this segment lack the integrity in which it would contribute to the site's overall eligibility. As there are no contributing portions of the railroad that fall within the APE, the proposed project would continue to have *no effect* to the eligible portions of this historic property.

***48LN8976 (historic site, previously determined not eligible)***

One historic site, 48LN8976 is located within this APE along the eastside of Hwy 189; (See Figure 10 and Appendix B maps) the site was previously determined as *not eligible* for listing in the National Register of Historic Places (NRHP). The proposed project would have *no effect* to this resource.

***IR\_WY\_2024\_1131, 1132, and 1133 (isolated resources, determined not eligible)***

A total of three newly recorded isolated resources (IR\_WY\_2024\_1131-1133) consisting of precontact and historic age cultural material, were recorded within the newly added APE on the westside of Hwy 189 (see Appendix B map). These three isolated resource finds are not considered eligible for inclusion in the NRHP as they do not possess the qualities required for listing in the NRHP under Criterion A, B, C, or D (36 CFR 60.4); the proposed project would have *no effect* to these isolated finds.

***48LN3203 (lithic landscape, previously determined not eligible)***

Additionally, the Hams Fork, Conglomerate Lithic Landscape (48LN3203) was also identified within the APE. The Hams Fork has previously been determined as *not eligible* for listing in the NRHP; however, its presence within a project APE must be noted per WY SHPO guidelines.

### OCED Determination of Effect

Therefore, as per §36 CFR 800.5(b), the proposed undertaking, the permanent electrical distribution line and fiber optic cable for the TFF will result in a determination of **no adverse effect** to historic properties. The existing cultural resources monitoring plan which includes an inadvertent discovery plan of procedures, will remain in use to include these supplemental activities.

This determination has also been forwarded to the parties listed above for review. If you have any questions, and if you would like to participate in cultural monitoring, please do not hesitate to contact me at [amy.shanahan@hq.doe.gov](mailto:amy.shanahan@hq.doe.gov) or 240-937-9605. Alternatively, you may contact the OCED project NEPA Compliance Specialist, Gretchen Applegate at (240) 252-0399 or [gretchen.applegate@hq.doe.gov](mailto:gretchen.applegate@hq.doe.gov).

Sincerely,

Amy Shanahan  
Cultural Resources Specialist

### References:

Page, Michael and Erin Kelley

2024 *Results of a Class III Cultural Resource Inventory: US Highway 189, Wildlife Crossings, Uinta and Lincoln Counties, Wyoming. Prepared by the Office of the Wyoming State Archaeologist. Report on file with the Wyoming State Historic Preservation Office, Cheyenne, WY (DBI WY 2023 586).*

Reiss, David

1991 Archaeological site form 48LN2336. Site form is on file with the Wyoming State Historic Preservation Office, Cheyenne, WY.

### Enclosure:

Karpinski, Mark

2025 *A Class III Cultural Resource Inventory for TerraPower, LLC's Test and Fill Facility Project Supplemental Review of the Permanent Electrical Distribution Line, Lincoln County, Wyoming. Prepared by Tetra Tech (DBI WY 2024 456).*

ecc: (w enclosure)

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