

This document filed to the ePUC

October 18, 2017

Judith C. Whitney, Clerk
Vermont Public Utilities Commission
112 State Street
Montpelier, VT 05620-2701

Re: Joint Petition of NorthStar Decommissioning Holdings, LLC, NorthStar Nuclear Decommissioning Company, LLC, NorthStar Group Services, Inc., LVI Parent Corp., NorthStar Group Holdings, LLC, Entergy Nuclear Vermont Investment Company, LLC, and Entergy Nuclear Operations, Inc., and any other necessary affiliated entities to transfer ownership of Entergy Nuclear Vermont Yankee, LLC, and for certain ancillary approvals, pursuant to 30 V.S.A. §§ 107, 231, and 232. PUC Docket No. 8880.

Dear Ms. Whitney,

The Vermont Division for Historic Preservation (VDHP) which often moves to intervene in Public Utility Commission proceedings in order to provide testimony regarding the impact of the proposed project on historic sites, elected not to intervene in this matter. At the time motions to intervene in this matter were due, VDHP reviewed the Petition and concluded that the proposed transfer of ownership did not have the potential to adversely affect historic sites, because the site has been significantly disturbed and the scope of work described as part of the decommissioning process did not indicate any plans to impact previously undisturbed areas. For these reasons, VDHP did not move to intervene.

Upon reviewing the pre-filed testimony of Rich Holschuh on behalf of Elnu Abenaki, VDHP realized that a full and complete description of the archaeological studies performed on the site to date could be useful to the Commission. Although no archaeological investigation was performed for the initial Vermont Yankee site development, there have been eight subsequent studies or assessments resulting in archaeological reports or memoranda about specific undertakings at the property. In all cases, the archaeological work did not identify any significant sites. However, several of the studies did identify sections of the property where there had been no prior disturbance. VDHP has also provided comments concerning other planned upgrades, which posed no effect to historic sites.



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More specifically, VDHP advises the Commission that it has, in its files, the following reports and memoranda regarding archaeological resources at the Vermont Yankee site:

- Phase I Investigation VY Low-Level Radioactive Waste Disposal Site, Hanson Engineers Inc. (August 1991)
- Phase I Investigation Proposed Office Building, Hartgen Archeological Associates, Inc. (April 1998)
- ARA letter report from Hartgen Archeological Associates, Inc. VYNPC Bulk Gas Storage Facility (January 17, 2001)
- ARA for VELCO Southern Loop Project (September 19, 2007)
- Phase I for VELCO Southern Loop Project (February 23, 2008)
- Geomorphological Summary, VELCO Vernon Substation Location, VY North Field, Louis Berger Group Inc. (June 23, 2009)
- VELCO Environmental Team Memorandum discussing environmental effects of temporary power placement for Vernon substation (July 31, 2009)
- ENVY Summary Report titled Review of New and Significant Information Supplement (Undated (2009 or later), most likely produced in conjunction with license renewal)

These documents provide considerable information regarding the archaeological context of the Vermont Yankee facility. VDHP would be pleased to provide any additional information the Commission might find useful. Thank you for your cooperation in protecting Vermont's irreplaceable historic and archeological heritage. R. Scott Dillon reviewed this project and prepared this letter. I concur with the findings and conclusions described above.

Sincerely:

VERMONT DIVISION FOR HISTORIC PRESERVATION

Laura V. Trieschmann

State Historic Preservation Officer

