

**From:** <Jennifer.Scholl@CH2M.com>  
**To:** <Bbastian@energy.state.ca.us>  
**CC:** <MTrask@energy.state.ca.us>, <Ryasny@energy.state.ca.us>, <Ryork@energy....>  
**Date:** 3/18/2009 4:17 PM  
**Subject:** RE: GWF Hanford previously undisturbed areas

Beverly, thank you for taking the time to speak with me today and discuss your remaining cultural resource concerns on GWF Hanford. I have had a chance to coordinate with Mark Kehoe from GWF and provide the following response to your questions:

GWF has provided the CEC with all of the information that is currently on file at GWF to demonstrate what areas have been previously disturbed. At this point, we are willing to accept conditions that require cultural resources monitoring, only in the locations where we have not demonstrated previous grading below 4 feet. We do ask, however, if you would consider the discussion included in Section 3.3.5 of the GWF Hanford Petition for License Amendment, which states,

"3.3.5 Conditions of Certification

Because GWF Hanford will not result in any new impacts to cultural resources, no additional COCs are needed. Proposed changes to the language of existing COCs to reflect GWF Hanford are included in Attachment B. Due to the low cultural and historical resource sensitivity at the site and the fact that most disturbance will occur within areas that have been previously disturbed, GWF anticipates that consultation with the CEC CPM will occur to determine if and when construction monitoring will be required. Further, if no resources are found during construction, then preparation of a Final Cultural Resources Report should not be required."

If you have the same concerns on GWF Henrietta, we ask that you consider the similar discussion included in Section 3.3.5 of the GWF Henrietta Petition for License Amendment, which states,

"3.3.5 Conditions of Certification

Because GWF Henrietta will not result in any new impacts to cultural resources, no additional COCs are needed. Proposed revisions to the existing HPP COCs, to reflect GWF Henrietta, are discussed in Section 4.0. These expected minor revisions include allowing GWF to revise the existing cultural resource compliance program, coordinate with the CEC CPM to determine when, and if, resource monitoring is required (due to the low sensitivity), and allow GWF to forgo filing reports if no resources are encountered during implementation of GWF Henrietta."

Please feel free to contact me should you have any additional comments. We hope that this will allow you to complete your Staff Assessment analysis.

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-----Original Message-----

From: Beverly Bastian [mailto:Bbastian@energy.state.ca.us]  
 Sent: Wednesday, March 18, 2009 7:38 AM  
 To: Scholl, Jennifer/SBA  
 Cc: Matt Trask; Ron Yasny; Rick York  
 Subject: GWF Hanford previously undisturbed areas

Hi Jennifer,

In my analysis, have reached the conclusion that the construction of the proposed new steam turbine generator and air-cooled condenser, and the westward expansion of the stormwater retention basin, would entail excavations deeper than four feet in areas not previously disturbed below four feet in depth by HEPP construction. Can you confirm this for me? If I am incorrect, can you provide me with the information on which an alternative conclusion is based? Thanks.

Beverly

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