



DOE/EA-1199-R-001

IDAHO STATE HISTORICAL SOCIETY

To educate through the identification, preservation, and interpretation
of Idaho's Cultural Heritage.

Steve Guerber, Director

Philip E. Batt, Governor

April 8, 1997

Mr. Ernest J. Hughes, Director
Department of Energy
Argonne Group-West
P.O. Box 2528
Idaho Falls, Idaho 83403-2528

RE: Change in Status of the Experimental Breeder Reactor-II Facility at Argonne National Laboratory-West, Idaho National Engineering and Environmental Laboratory (INEEL);
Removal of EBR-II Cooling Tower

Dear Mr. Hughes:

Thank you for requesting our views on the proposed safe shutdown of Experimental Breeder Reactor-II Facility at Department of Energy's Argonne National Laboratory-West on the INEEL, Idaho. Taken as a whole, we view the INEEL as a historic district eligible for the National Register of Historic Places for its exceptionally significant role in the development of nuclear technology. Within this context, we recommend that EBR-II and its cooling towers be considered *eligible* as contributing elements of the INEEL National Register District.

In your letter of March 18, 1997, you provided a list of actions required in the shutdown process. After reviewing that list, we have concerns only about items #4 and #5. Item #4 calls for the removal of "other hazardous materials from the EBR-II reactor building, adjacent power plant, and associated facilities." Mr. Greg Bass of your office has assured us, through telephone consultation, that "hazardous materials" refers to materials such as cleaning solvents and asbestos pipe insulation, and that no equipment will be removed or altered in achieving this activity. Provided that this is the case, we feel this item can be completed without affecting the historic property.

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Historical Library and Archives
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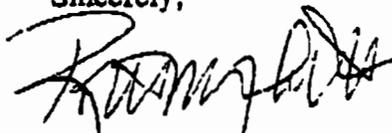
Item #5 calls for the demolition of the main cooling tower. Following Section 106 of the National Historic Preservation Act, we feel that removal of the cooling tower will constitute an *adverse effect* on the historic property. Cooling towers are an important visual aspect of the industrial and engineering landscape at the INEEL, and a threatened property type. Similar vintage cooling towers associated with the Naval Reactor Facility have already been lost. Therefore, removal of yet another cooling tower is of concern to us. Our first recommendation, then, is to retain and mothball the cooling towers along with the rest of EBR-II. Should Argonne demonstrate that this is not a feasible alternative, we will recommend that a two-party Memorandum of Agreement (MOA) be developed between our office and DOE stipulating Historic American Engineering Record (HAER) level documentation prior to demolition. Once we have reached agreement and signed the MOA, you will forward it to the Advisory Council on Historic Preservation for acceptance. For the specific documentation requirements, you will also have to contact Mr. Hank Florence, National Park Service, Seattle, Washington (206-220-4133). Documentation is typically completed after the MOA has been finalized.

For assistance in writing the MOA and completing the documentation, we strongly urge you to work with Julie Braun, Lockheed Technologies, or Patti Natoni, DOE-ID. Both parties have experience in Section 106 Review and working with agreement documents; their assistance will accelerate the process and eliminate unnecessary review and consultation time.

Please keep in mind that completing Section 106 Review is the responsibility of the Federal agency. The role of our office, the State Historic Preservation Office, is to assist the agency through the review process and to provide professional opinions and recommendations. For your reference, we have provided a brief description of the 106 review process.

We appreciate your cooperation. If you have any questions, feel free to contact either myself or Suzi Neitzel at 208-334-3847.

Sincerely,



Robert M. Yabe II
State Archaeologist and
Interim SHPO

RMY/spn

cc: Greg Bass, DOE/Argonne West
Julie Braun, Lockheed
Patti Natoni, DOE-ID