



Department of Energy

Washington, DC 20585

October 5, 2026

Barbara Frederick
Environmental Review Division Manager
Pennsylvania Historical and Museum Commission
Pennsylvania State Historic Preservation Office

Submitted electronically via PA-SHARE

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Vistra Operations Company, Beaver Valley Power Station Power Uprate Project, Beaver County, Pennsylvania

Dear Ms. Frederick,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE) Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to Vistra Operations Company, LLC (Vistra, or the Applicant) for the Beaver Valley Power Station (BVPS) Power Uprate Project (the Project) located in Beaver County, Pennsylvania.

The purpose of this letter is to formally initiate consultation with the Pennsylvania State Historic Preservation Officer (SHPO), represented by the Pennsylvania Historical and Museum Commission (PHMC), under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents descriptions of the undertaking, the Area of Potential Effects (APE), and the efforts to identify historic properties, and seeks your concurrence with DOE's Finding of No Adverse Effect for this Project. A Project map is included as Attachment 1.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for undertaking (the Project), which includes plant modifications required for an extended power uprate (EPU) to support increased generating capacity and improved long-term plant performance and reliability. All modification activities will occur within the existing restricted owner-controlled area and protected area at the BVPS site. BVPS is an approximately 500-acre site located Shippingport Borough in Beaver County, Pennsylvania situated on the south bank of the Ohio river.

The Project consists of five segments:

1. Demolition of two connected warehouse buildings and construction of an office building in the former location of the demolished warehouses. The new building will measure approximately 40 feet tall at the highest point. Construction of the building will require approximately 60,000 square feet (1.4 acres) of ground disturbance.
2. Construction of a maintenance support building in an area previously used as a parking lot. The building will measure approximately 40 feet tall at the highest point. Construction of the building will require approximately 70,000 square feet (1.6 acres) of ground disturbance.
3. Demolition of an office building in the owner-controlled area to allow for expansion of the current parking lot. Construction will include approximately 60,000 square feet (1.4 acres) of ground disturbance.
4. A series of modifications to existing plant systems and components within existing plant buildings and structures including main turbine replacement, main generator rotor replacement, various main generator auxiliary upgrades, moisture Separator-Reheaters replacement, turbine control system upgrade, various pump and valve replacements, feedwater heater replacements, and other structural modifications. No ground disturbance will be required for these interior component modifications.
5. Construction of an auxiliary cooling tower on an existing slab that currently sits a temporary storage structure. The auxiliary cooling units will be mechanical draft cooling units to serve as augmentation of the existing natural draft cooling tower. The new cooling structures will consist of a series of mechanical draft cooling cells, each measuring approximately 54 feet by 54 feet and 45 feet high. The new structure will occupy approximately 60,000 square feet (1.4 acres).

No new access roads or utility infrastructure will be required for construction, and no tree clearing is expected as part of the Project. The Project is scheduled to take place from Fall 2026 through Summer of 2033.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The Project's APE includes the area where Project activities will occur, totaling approximately 5.8 acres within previously disturbed areas of the existing BVPS facility. A map of the Project is included as Attachment 1.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following six (6) federally recognized Tribes to see if they have an interest in the Project: Delaware Nation, Oklahoma; Delaware Tribe of Indians; Miami Tribe of Oklahoma; The Osage Nation; Seneca Nation of Indians; and Seneca-Cayuga Nation.

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and to identify any additional Tribes that may share an interest in the Project area so DOE EDF can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is necessary or requested.

Archaeological Resources

Proposed Project activities #1–4 above include demolition of existing buildings and construction of new buildings within the existing BVPS plant site. The approximately 5.8 acres of ground disturbance necessary to conduct these proposed activities will occur entirely within the existing BVPS plant site in areas that have been significantly previously disturbed by development and construction of the BVPS. Proposed Project activity #5 above includes replacements and upgrades to existing facility components, and no new ground disturbance is required for this portion of the Project. Due to the significant prior disturbance within the Project LOD, the potential to encounter intact, significant archaeological resources within the APE is very low. Furthermore, the BVPS has an Integrated Cultural Resources Management Plan that includes procedures to follow in the event of an unanticipated discovery during construction. As the potential for effects on archaeological sites is very low, DOE EDF concludes that an archaeological survey is not warranted for this Section 106 review.

DOE EDF reviewed the PA-SHARE database for previously recorded archaeological sites in the vicinity of the Project, which include 36BV0003 (undetermined), 36BV0004 (demolished), and 36BV0089 (undetermined); the two sites with undetermined eligibility are also likely now demolished due to the original construction of the BVPS. Furthermore, none of these sites are within the Project limits of disturbance and will be avoided by construction activity.

Historic Architectural Resources

The Project includes proposed demolition of existing buildings and new permanent above-ground construction within the BVPS site. The existing buildings are typical warehouses

and office buildings that do not have unique architectural characteristics or would otherwise be indicative or evidentiary of the BVPS' potential historic significance. The proposed new construction includes a new maintenance building, parking lot, and auxiliary cooling tower; all of which are typical features of power plants and would not alter the character or use of the BVPS or the surrounding setting exterior to the BVPS. Because the demolition and new construction activities would not be novel introductions to the plant or its setting, the Project does not have the potential to cause visual and other non-physical effects on historic properties external to the BVPS; therefore, a historic architectural survey external to the BVPS is not warranted for this Section 106 review.

DOE EDF reviewed the PA-SHARE database for previously recorded historic aboveground resources in the vicinity of the Project include the Shippingport Bridge (2018RE03413) and the Christler-Marker Cemetery (2021RE00108). The NRHP eligibility of both resources is undetermined; however, the Project will avoid physical impacts to these resources and, as described above, visual and non-physical effects would not alter the setting or character in a manner that would be considered adversely affecting the potential historic significance of these resources.

Lastly, the BVPS itself has not been previously evaluated for NRHP eligibility, and its potential eligibility status is unknown. As a point of reference, the nearby Shippingport Atomic Power Station (1983RE02011) has been previously determined not eligible for the NRHP. As discussed above, proposed Project components #1–4 (demolition and construction of new buildings) would not alter the use or character of the BVPS. While proposed Project component #5 (facility component modifications) could potentially alter the design, workmanship, or materials of the specific facility components proposed for modification, it is DOE EDF's understanding that those internal components would not be considered historically significant individually or as contributing elements that convey the potential historic significance of the BVPS overall, were it to be formally evaluated for the NRHP. Therefore, DOE EDF recommends that the NRHP eligibility of the BVPS remain "undetermined", and DOE EDF finds that the undertaking would not diminish the ability of the BVPS facility to convey its potential historic significance.

In summary, there are no historic properties in the APE; however, there are resources with unevaluated NRHP eligibility in the APE (i.e., "potential historic properties"). In accordance with 36 CFR § 800.4(b)(1), in consideration of the nature of the undertaking, the degree of Federal involvement, past research and studies, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the APE, DOE EDF concludes that the undertaking would **not adversely affect** these potential historic properties.

Requesting your Concurrence and Next Steps

Based on DOE EDF's efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Adverse Effect, consistent with 36 CFR § 800.5(d)(1). As part of the Section 106 process, DOE requests the concurrence of

the Pennsylvania SHPO on the Finding of No Adverse Effect, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter.**

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact me at 202-586-7272 or via email at EDF_Environmental@doe.gov.

Sincerely,

ALICIA

WILLIAMSON

Alicia Williamson

Senior Environmental Manager

Office of Energy Dominance Financing

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Attachments:

Attachment 1. Project Map