



Department of Energy

Washington, DC 20585

September 15, 2026

Diana Welling
State Historic Preservation Officer
Ohio History Connection
800 E. 17th Avenue
Columbus, OH 43211

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Vistra, Perry Nuclear Power Plant Power Uprate Project, Lake County, Ohio

Dear Ms. Welling,

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 Perry Nuclear Power Plant (PNPP) Power Uprate Project (the Project) located in Lake County, Ohio.

The purpose of this letter is to formally initiate consultation with the Ohio State Historic Preservation Officer (SHPO) 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 Historic Properties Affected for this Project. A Project map is included as Attachment 1, and an Ohio SHPO Project Summary Form is included as Attachment 2.

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 to support increased generating capacity and improved long-term plant performance and reliability. All Project modification activities will occur within the existing restricted owner-controlled area and protected area at the PNPP site. PNPP is an approximately 1,100-acre site located in the village of North Perry in Lake County, Ohio, situated on the southern shores of Lake Erie.

The first Project segment will be the construction of an office building and maintenance support building, located in an area that is currently an unused parking lot within the existing restricted owner-controlled area. Both buildings will measure 50 feet tall at their highest point. Construction of the buildings will require approximately 100,000 square feet of ground disturbance, including removal of pavement and base material, minor clearing of miscellaneous surface features, grading to establish the required building pad elevations and drainage, excavation for foundations and underground utilities, placement of structural fill as needed, installation of building foundations, and restoration or stabilization of disturbed areas following construction.

The second Project segment will be the construction of an auxiliary mechanical draft cooling tower adjacent to the existing onsite natural draft cooling tower. The new cooling structure will consist of a series of mechanical draft cooling cells, each measuring approximately 54 ft. by 54 ft. and 45 ft. high. The new structure will occupy approximately 70, 000 sq. ft. and connect to the basin of the currently operating natural draft cooling tower.

The third Project segment will be a series of modifications to existing plant systems and components within the boundaries of existing buildings and structures; no ground disturbance will be required. Modifications may include main turbine replacement, main generator rotor replacement, various main generator auxiliaries' upgrades, moisture Separator-Reheaters replacement, turbine control system upgrade, various pump and valve replacements, and in-vessel steam dryer replacement.

No new access roads or utility infrastructure will be required for construction, and no tree clearing is expected as part of the Project. Construction is anticipated to begin in October 2026.

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 within the existing PNPP 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: Eastern Shawnee Tribe of Oklahoma; Hannahville Indian Community, Michigan; Little

Traverse Bay Bands of Odawa Indians, Michigan; Miami Tribe of Oklahoma; 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 and Historic Architectural Resources

The proposed Project activities include construction of an office building and a maintenance support building, augmentation of the cooling tower, and modifications, upgrades, or replacements of existing facility components. All proposed Project construction activities will occur within the existing facility in areas that have been significantly previously disturbed by prior construction and development of the PNPP Site. As no new ground disturbance is required for the Project, the Project does not have the potential to cause effects on archaeological resources; therefore, an archaeological field survey is not warranted for this Section 106 review.

While the Project includes construction of new permanent above-ground buildings within the existing facility site, the new office and maintenance buildings (approximately 50 feet tall) and the augmented cooling tower (approximately 54 feet tall) would be of typical appearance for power plant facilities and would not alter the exterior of the PNPP facility in a manner that could substantively affect the character of the surrounding setting. External views of these new structures would largely be screened by mature vegetation surrounding the PNPP site and interceding buildings and infrastructure on the site. As such, the Project does not have the potential to cause visual and other non-physical effects on historic properties external to the PNPP facility. Furthermore, the Nuclear Regulatory Commission's 2025 Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 61, Regarding Perry Nuclear Power Plant, Unit 1, Final Report (NUREG-1437) reviewed information on historic properties and found that while there are historic buildings in the broader vicinity of the PNPP, none are located within the APE. DOE EDF confirms that none of the recorded historic resources surrounding the PNPP are within the 0.25-mile radius APE. Therefore, a historic architectural survey external to the PNPP facility is not warranted for this Section 106 review.

Lastly, construction of the PNPP facility was completed in 1985, and therefore the plant itself is not yet of age to be evaluated for eligibility for inclusion in the National Register of Historic Places (NRHP). The Applicant previously consulted the Ohio SHPO on this determination in a letter dated May 12, 2022, to which the SHPO responded in a letter dated September 28, 2022 (SHPO ID# 2014-LAK-29621). In an email to the Applicant dated October 13, 2022, the SHPO clarified their recommendation to wait until the PNPP

facility reaches 45-50 years of age (in 2031-2035) before considering evaluating its potential eligibility for the NRHP. This prior SHPO correspondence is included as Attachment 3 for reference.

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 Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Ohio SHPO on the Finding of No Historic Properties Affected, 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 Project Manager
Office of Energy Dominance Financing

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Attachments:

Attachment 1. Project Map

Attachment 2. Ohio SHPO Project Summary Form

Attachment 3. Prior 2022 SHPO correspondence (re: 2014-LAK-29621)