



Department of Energy

Washington, DC 20585

April 9, 2026

Barbara Frederick
Environmental Review Division Manager
Pennsylvania Historical and Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, Pennsylvania 17120

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, Westinghouse, American Nuclear Dominance Procurement Project, Westmoreland 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 ANDP HOLDCO LLC, Westinghouse (the Applicant) for the American Nuclear Dominance Procurement (ANDP) Project (the Project), located in Westmoreland 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 Historic Properties Affected for this Project.

Project maps are included as Attachment 1 and have been uploaded to the PA-SHARE Project File in association with this request for consultation.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for the undertaking (i.e., the Project), which includes the procurement of Long-Lead Items (LLI) necessary for up to ten (10) AP1000 pressurized water reactors to be installed at multiple nuclear energy generating sites across the United States. The LLI includes roughly 150 procurement items including, but not limited to: large structural modules, reactor pressure

vessels, reactor internals, reactor coolant pumps, steam generators, containment vessel, control rod drive mechanisms, and the steam turbine generator package.

The expectation is that all LLI will be shipped directly from the supplier to the project site. However, as a contingency if a project site is not available, the completed LLI may be shipped to Westinghouse's Waltz Mill Facility for temporary storage. **Potential temporary storage at the Westinghouse Waltz Mill Facility comprises the scope of this Section 106 review.** No off-site storage, warehouse facilities, or other storage beyond direct delivery to a project site or temporary storage at Waltz Mill (if necessary) are contemplated as part of this Project.

The Westinghouse's Waltz Mill Facility is located at 680 Waltz Mill Road, Madison, PA 15663. The Waltz Mill Facility is the global center of excellence for Westinghouse outage services performed throughout the Americas and Asia. This facility serves as the hub for reactor and steam generator services; shop, service center and training operations for rotating equipment, reactor coolant pumps and motors; inspection services; and welding, machining and installation services. The facility already performs the function of storage for both safety-related and non-safety related nuclear power plant components. Attachment 1 shows the location of existing component storage, and the footprint for additional laydown areas to potentially be used for LLI storage if needed.

The existing storage space is approximately 45,000 square feet (approximately 1 acre), although only a small portion is currently utilized. The additional laydown areas comprise up to 180,000 square feet (approximately 4.1 acres) of primarily flat, grassy area with some portions of minor shrubbery or small trees. Depending on the classification level of required storage, the storage will either be simple outdoor laydown or a tented enclosure for basic weather protection. Additional storage does not require modification or expansion of the existing Waltz Mill facility, nor would any substantial site clearing, fill, or excavation be required to utilize the additional laydown areas.

Creation of temporary laydown areas (if necessary) would involve minor ground disturbance in the form grubbing/clearing followed by grading to create a relatively flat surface with natural drainage. Typically gravel or engineered fill is utilized to facilitate an even surface and minimize erosion and avoid standing water. Appropriate controls (stormwater pollution prevention, etc.) are utilized during grading activities as required by local, state, and federal regulations. If additional storage area for LLI requiring weather protection and/or ventilation is required, temporary structures will be procured and erected as-needed. These types of enclosures (tents) can be quickly procured and erected, and later taken down and stored or returned with no impact to the surrounding environs.

The site has existing transportation infrastructure, with direct access to Interstate 70. Access to rail or waterways is not required for this project. The site also has extensive utility infrastructure that is more than adequate for the needs of this project. No additional transportation or utility infrastructure will be added to the site as a part of this project. No additional leases or zoning is required for the site. The project does not require and will not use a water supply for storage and maintenance of the LLIs. Similarly, there are no point source discharges, injection wells, or major air emission sources.

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 proposed footprints of the potential laydown areas, as depicted in Attachment 1, and totaling approximately 5.1 acres.

Because the Project only involves potential temporary equipment storage, and no new permanent above-ground installations are proposed, visual and other non-physical effects are not anticipated. Therefore, the APE does not include a radial distance buffer surrounding the Project.

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 four (4) federally recognized Tribes to see if they have an interest in the Project: Delaware Nation, Oklahoma; Delaware Tribe of Indians; The Osage Nation; 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 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 and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or deemed necessary.

Records Search

As part of the Section 106 identification process, DOE EDF utilized contractor staff whose credentials meet the Secretary of the Interior's Professional Qualification Standards for Archaeology to conduct a desktop cultural resources review of the Project. Review of the PHMC's online PA-SHARE database was conducted on April 1, 2026, to identify previous surveys and previously recorded cultural resources and historic properties within a 0.5-mile radius of the Project. The results of the PA-SHARE records search are provided in Attachment 2 and summarized below.

This background research identified six (6) previous surveys and a total of 13 previously recorded archaeological sites within a 0.5-mile radius of the Project, several of which are nearby the APE but none of which overlap or are within the APE. A total of 13 previously

recorded individual historic aboveground resources and one (1) historic district were identified within a 0.5-mile radius of the Project, all but one (1) of which are outside the current Project's APE. The single previously recorded historic resource overlapping the APE is the Westinghouse Waltz Mill site itself (Resource Number 2017RE02251), which was evaluated in 2017 and determined not eligible for the NRHP. No cemeteries are located within the 0.5-mile search radius. The APE is mapped as having low-to-moderate archaeological potential in the Statewide Pre-Contact Probability Model layer (PHMC 2026).

Environmental Context

The Project is situated within the Pittsburgh Low Plateau Section of the Appalachian Plateaus Physiographic Province, characterized as having a smooth to irregular, undulating surface; narrow, relatively shallow valleys; strip mines and reclaimed land of low to moderate local relief, and underlain by Shale, siltstone, sandstone, limestone, and coal (Sevon 2000). Geologically, the Project area is underlain by the Casselman Formation, which consists of cyclic sequences of shale, siltstone, sandstone, red beds, thin, impure limestone, and thin, nonpersistent coal of Pennsylvanian age (Berg et al. 1980; Miles and Whitfield 2001).

The Project is within the Pittsburgh Low Plateau Level 4 Ecoregion within Western Allegheny Plateau Level 3 Ecoregion, which is characterized as unglaciated terrain with rounded hills, narrow valleys, fluvial terraces, entrenched rivers, general farming, land slides, and bituminous coal mining. Hilltop elevations commonly range from 1,100 to 1,400 feet (366-396 meters). Base-poor Ultisols are common. Gilpin, Ernest, Wharton, Hazleton, Weikert, Cavode, and Rayne soils occur and are derived primarily from Pennsylvanian sandstone, shale, and coal of the Conemaugh and Allegheny Groups. Entisols (Udorthents) are locally common and are byproducts of bituminous coal mining. The potential natural vegetation of this ecoregion is mapped as mostly Appalachian Oak Forest (dominants: white and red oaks); some Mixed Mesophytic Forest also occurs in the south. Today, farming is more common than woodland. General farming and dairy operations predominate but are often handicapped by sloping terrain, soil wetness, low soil fertility, and a short growing season (Woods et al. 1999).

The U.S. Department of Agriculture (USDA)-Natural Resources Conservation Service (NRCS) SoilWeb app was reviewed to identify expected soil profiles in the APE (USDA-NRCS 2026). The easternmost laydown area (see Attachment 1, Page 1 and Figure 1a) includes Ernest silt loam and Urban Land-Wharton Complex. The Ernest soil series is described as an Ap-horizon (disturbed or "plow zone") overlying sequential Bt- and Btx-horizons, while the Wharton series is described as an Ap-horizon overlying sequential Bt-horizons and BC/C horizon. "Urban Land" is a classification assigned to areas where human development has so altered the landscape that natural soil properties are largely obscured or no longer extant. The two western laydown areas (see Attachment 1, Page 1 and Figure 1b) both contain Wharton silt loam soils, described above. The northernmost of these two laydown areas increases in slope toward the north, with the northern margin of

the APE mapped as Gilpin-Upshur complex, 15-25 percent slopes, channery silt loam; described as an Ap-horizon overlying sequential Bt-horizons and C/R horizons.

Land Use History

A review of historic aerial photographs and topographic maps (NETR Online 2026) was conducted to assess the land-use history of the Project area, or more specifically to assess the degree of previous ground disturbance within the APE. The easternmost laydown area (see Attachment 1, Page 1 and Figure 1a) appears to be entirely agricultural in aerial photographs from 1952-1973. Different arrangements of what are presumably farm buildings surrounding the Project APE can be seen in the aerial photographs from 1952-1973, but in the 1986 aerial photograph, modern site construction has been completed and trees planted where they appear to stand today. Historic topographic maps from 1902-1954 depict isolated buildings to the southwest of the Project; the 1955 topographic map is the first to indicate a road or driveway leading to a building (domestic/farm), matching the 1952 and 1957 aerial photographs. The 1970 topo map reflects the expanded construction visible in the 1969 aerial photo. The 1994 topo map reflects the modern conditions first seen in the 1986 aerial photo.

The two western laydown areas (see Attachment 1, Page 1 and Figure 1b) appear historically clear cut and/or in pasture in aerial photographs from 1952-1993. Initial construction of the Waltz Mill Facility appears to have started by 1957, with multiple facility buildings visible in aerials from 1969, 1973, 1986, and 1993. The facility footprint continues to develop and expand toward the APE through the 2000s, reaching its current layout by 2006. The southern of the two western laydown areas was graded for construction activity in 1986/1993, and re-graded and graveled in the 2005 aerial photograph. The northern of the two western laydown areas was graded/cleared in 2002, and again re-graded and graveled in the 2014 aerial photograph. Grass appears to have grown through the gravel from the 2015 aerial photograph to present, indicating that while the surface appears grass-covered, the soil has been extensively disturbed and capped with gravel multiple times. No buildings are indicated in the vicinity of these two laydowns area in topographic maps from 1902-1965; buildings related to the Waltz Mill Facility are indicated on topographic maps beginning in 1970.

Conclusion

Due to the degree and extent of prior ground disturbance related to construction of the Waltz Mill Facility, it is unlikely that the Project APE contains intact subsurface archaeological deposits or remnant surface features of the historic agricultural activity that took place here through the early-to-mid twentieth century. Construction activities using heavy equipment such as repeated grading and graveled have likely obliterated the native soil profiles expected for this area. As the APE is mapped as having low-to-moderate archaeological probability, no previously recorded archaeological resources are present in the APE, and the APE has been significantly previously disturbed by modern construction activity, the field conditions of the APE are not conducive for the preservation of intact, significant archaeological sites that could be considered eligible for the National Register

of Historic Places (NRHP). As such, no further archaeological work is warranted for this Project.

The APE does not contain any unrecorded historic-aged standing structures, and as discussed above, all previously recorded historic resources that were identified within the 0.5-mile search radius surrounding the Project are situated outside of the APE, with the exception of the Westinghouse Waltz Mill Site itself (Resource Number 2017RE02251), which was previously determined not eligible for the NRHP in 2017. Because the Project will not introduce new or novel visual changes to the surrounding setting, no visual or other non-physical effects are anticipated, and no further work to identify aboveground historic properties is warranted for this Project.

Requesting your Concurrence and Next Steps

Based on DOE EDF's review of the 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 Pennsylvania 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 202-586-7272587- or via email at EDF_Environmental@doe.gov.

Sincerely,

Alicia Williamson
Senior Environmental Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Project Maps

Attachment 2. PA-SHARE Records Search Results

References Cited

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