office of energy security

ENVIRONMENTAL IMPACT STATEMENT SCOPING WORKSHEET

Chapter 1 -Comment Sheet		
Section Number	Category	Detail
1.1	Project Description	Historic information on power uprates at Pressure Water Reactors. New information gained from, or lessons learned from, similar uprates from other plants worldwide.
1.1.1	Description of Power Generating Equipment	Narrative that discusses system component replacement, age, monitoring/inspections (pool, etc.)
1.1.1	Description of Power Generating Equipment	Address concerns reported for Reactor 1 groundwater leaks and PWR containment sump and the pressure water sump. (source: Union of Concerned Scientists, Nuclear Power Information Tracker, accessed on 10/22/08: http://ucsusa.wsm.ga3.org/clean_energy/nuclear_safety/reactor-map/reactors/prairie-island-unit-1.html)
1.1.4	Wastewater	Discuss use of water treatment chemicals and levels of discharge. Document status of CR6.
1.1.6	Fuel Supply	Summary of nuclear cycle and pollution and health impacts. Include carbon footprint of entire chain.
2.0	Regulatory Framework	Description of the status of Yucca Mountain and alternate plans for disposition and long term storage of nuclear waste. Specifically describe timeline of the ISFSI relative to the status of Yucca Mountain.
2.4	Other Permits	Narrative on how the various permitting agencies (MDNR, WDNR, US COE, MPCA) coordinate the issuing of permits for water appropriation and water (quality) discharge so as to assure that with multiple permitees and multiple permits the river is protected.
3.0	Alternatives to the EPU	Describe smaller scale options, distributed generation alternatives
3.0	Alternatives to the EPU	Describe other biomass and energy efficiency options considered. Biomass proposal in CON application was a single plant using only wood.
3.0	Alternatives to the EPU	Describe transmission alternatives versus generation alternatives (i.e. CAPX 2020)
3.0	Alternatives to the EPU	Discuss options of energy efficiency and demand side management. Consider if energy efficiency and DSM could replace PINGP with a .5% annual sales increase in these programs from initial resource plan. Xcel Energy is on record as pursuing an additional .2% from the initial resource plan's 1.1% energy efficiency and DSM used in the CON and EAW after the Office of Energy Security found it would be cost-effective. The state goal of 1.5% of annual energy sales should be considered as an alternative to the 164MW.
3.0	Alternatives to the	Discuss future demand forecast with updated information.

Chapter 1 -Comment Sheet		
Section Number	Category	Detail
	EPU	Provide an analysis of whether or not 164MW are needed given Xcel Energy's new demand forecast which is 600MW less than proposed in the CON application and draft EAW. In the CON and draft EAW, Xcel Energy's demand forecast is 2800MW; however, in their September Resource Plan reply comments they provide an updated forecast of 2200MW.
3.0	Alternatives to the EPU	Evaluate options for heat recovery from wastewater versus discharge of heat to atmosphere or Mississippi River (possible mitigation measure).
3.0	Alternatives to the EPU	Analyze alternative of 164MW of gas from increased capacity at Black Dog Power Plant with its conversion to natural gas. Xcel Energy plans to convert a coal-fired power plant to combined cycle natural gas and increase its capacity. The draft EIS scope should include achieving some and all of the proposed 164MW from Black Dog.
3.0	Alternatives to the EPU	Analysis of optimized alternative sources (possibly a combination of sources) under the new demand forecast with consideration for the State's commitment to clean, safe, affordable energy which includes considering first conservation and DSM and renewable energy.
4.0	Environmental Setting	Include, by reference, the Minnesota Department of Natural Resources letter to the Minnesota Department of Commerce dated October 7, 2008, and the Wisconsin Department of Natural Resources letters to the US Nuclear Regulatory Commission dated September 8, 2008, and to Minnesota Pollution Control Agency dated April 3, 2000,
4.0	Environmental Setting	Establish the current extent of thermal and radioactive discharges into the environment. This is the baseline for ongoing study and analysis of impacts. Specifically include maps of plume extensions in surface water, in groundwater and in the air.
4.0	Environmental Setting	Include baseline information related to air, water, and other natural resources. Include interactions of the various resources.
4.0	Environmental Setting	Document endangered and protected species.
4.0	Environmental Setting	Identify and document plants, animals, and other materials used for consumption (i.e. medicine and food) by Prairie Island Indian Community members and others.
4.0	Environmental Setting	Include, by reference, National Weather Service information about wind patterns.
4.0	Environmental Setting	Include, by reference, US Army Corps of Engineers/USGS historic and ongoing data on Lake Pepin ice cover.
4.0	Environmental Setting	Include, by reference, National Weather Service, US Army Corps of Engineers, USGS historic and ongoing data on flooding and drought on the Upper Mississippi River watershed.
5.0	Human and	Describe pollution and health impacts along the entire nuclear

Chapter 1 -Comment Sheet		
Section Number	Category	Detail
	Environmental Impacts	chain.
5.0	Human and Environmental Impacts	Describe monitoring: How about testing of human breast milk and baby teeth.
5.0	Human and Environmental Impacts	Describe past and current radiological monitoring for the facility including air, water, milk and other monitoring associated with the site. Provide data and information about standard methods being used and under what permit the monitoring is being done. Incorporate information, by reference, about the best available technology for modeling and monitoring, both protocols and instrumentation. Provide a summary of the referenced information.
5.0	Human and Environmental Impacts	Evaluate the potential change in electromagnetic field (EMF) relative to the 164 EPU uprate.
5.0	Human and Environmental Impacts	Include data about the incidence of adverse health effects, including Downs Syndrome, Hodgkin's Disease, thyroid disease, breast cancer, prostate cancer, leukemia and other types of cancer, and include Department of Health data by reference. Specifically include infant and childhood cancers.
5.0	Human and Environmental Impacts	Describe the clean fill gravel removed from site and where it will go.
5.0	Human and Environmental Impacts	Cross reference long term storage issues discussed in Chapter 2.
5.0	Human and Environmental Impacts	Describe were radiated solid waste goes. Describe liquid emissions and their sources, including tritium, and where it goes. Specifically identify the fraction of discharge listed on 8.25 of CON that is not tritium. Describe gaseous emissions, how vented, and where it goes. Provide data and information about standard methods being used and what monitoring is being done. Incorporate information, by reference, about the best available technology for modeling and monitoring, both protocols and instrumentation. Provide a summary of the referenced information.
5.1.1	Water Surface Water	Analysis of entire thermal plume and its affect on the ecology of the river, both upriver and downriver, and Sturgeon Lake and Lake Pepin. Describe current and past monitoring. Reference existing data. Describe how the MPCA, DNR, US Army Corps of Engineers and other regulatory agencies coordinate their various duties to make decisions about issuing permits.
5.1.1	Water Surface Water	Vertebrates and invertebrates. Affect on distribution of aquatic organism or indirect impacts such as increased exposure to

Chapter 1 -Comment Sheet		
Section Number	Category	Detail
		predators.
5.1.1	Water Surface Water	Ice cover. Affect on the characteristics of ice, evaporation rates, and the length of ice cover season on Lake Pepin. Cultural (recreation), safety, and impact on local microclimate (ex: affect on agricultural or horticultural crops such as apples and grapes).
5.1.1	Water Resources	Impacts under conditions of stream flow reversal on PINGP
5.1.1	Water Surface Water	Distribution of sediment. Affect on the hydrodynamics of river which then affect sediment in the immediate channel and downstream.
5.1.1	Water Surface Water	Dissolved oxygen. Affect on dissolved oxygen levels.
5.1.1	Water Surface Water	Endrocrine disruptors. Interaction with a municipal wastewater discharge plume means organisms congregate in the water may be subject to prolonged exposure to chemicals.
5.1.1	Water Surface Water	Phytoplankton and Zooplankton. Affect on production of organisms that ultimately lead to a decrease in light and oxygen in the river and Lake Pepin.
5.1.1	Water Surface Water	Parasites. Thermal effluent can influence the prevalence and abundance of parasites of fish.
5.1.1	Water Surface Water	Discuss alternatives to thermal discharge such as heat recovery from water.
5.1.1	Water Surface Water	Need for analysis regarding these issues using the best available technology for water dispersion monitoring and modeling (ex: secure services of the U of MN research center at St. Anthony Falls)
5.11	Water Surface Water	Use best available technology for monitoring natural resource impacts (ex: water temperature, flow, depth, turbidity, river topography, meteorological conditions, chemistry, organisms, recreation)
5.1.1	Water Surface Water	Describe water consumption (seasonally, annually, life of plant)
5.1.1	Water Surface Water	Describe and analyze effect of increase in water temperature and quantity.
5.1.1	Water Surface Water	Discuss relationship with Lake Pepin Total Maximum Daily Load (TMDL)
5.1.1	Water Surface Water	Identify impacts under conditions of stream flow reversal on PINGP
5.1.1	Water Surface Water	Address all impacts on the Mississippi River both upstream and downstream (including Sturgeon Lake and the main river channel)
5.1.1	Water Surface Water	Affect of water treatment chemicals used in PINGP and levels of discharge.
5.1.1	Water Surface Water	Confirm accuracy of the methods and measurements providing PINGP's compliance with all operating permits using best available technology.

Chapter 1 -Comment Sheet		
Section Number	Category	Detail
5.1.1	Water Surface Water	Impact of additional water withdrawal/discharge on the river navigation and channel maintenance.
5.1.1	Water Surface Water	Describe how the need for cooling water for operation of the plant will be managed during times of drought or river level drawdown (i.e. does Xcel's mandate to produce electricity preempt competing demands for water from the river?).
5.2	Biological Resources	Discuss historic, current, and future required monitoring programs (biological, physical & chemistry)
5.2	Biological Resources	Incorporate and address Wisconsin DNR concerns including 2001 recommendations regarding monitoring locations of thermal plume (specifically note the requested changes for locations of monitoring stations), and impacts on Lake Pepin downstream such as habitability and temperature reaching upper limit of fish tolerance.
5.2	Biological Resources	Incorporate and address US Army Corps of Engineers/USGS/Minnesota DNR draw reports of temperature and ice condition downstream of plant and in Lake Pepin.
5.2	Biological Resources -Rare and Unique Natural Resources	Describe impacts on the Higgins eye pearly mussel.
5.3	Culture, Archeological, and Historic Resources	Describe cultural and archeological resources that were on the site at the time of the Original Land Survey. Identify those that have been impacted or obliterated since, and list those that remain. Describe the impact on local residents. Include oral tradition. Describe mitigation measures that could reduce lingering impacts on local residents.
5.3	Culture, Archeological, and Historic Resources	Discuss the social, cultural, and spiritual impacts of the plant as it relates to protection of natural resources as described in other sections in this worksheet.
5.3	Culture, Archeological, and Historic Resources	See comments on social and psychological impact analysis for Prairie Island Indian Community in the Addendum. This item needs further scoping with the Prairie Island Indian Community and may involve NRC and environmental justice considerations.
5.3	Culture, Archeological, and Historic Resources	Describe impacts on the Higgins eye pearly mussel. The Higgins eye pearly mussel is a quite essential part of the Prairie Island Indian Community's culture. The pearl of this mussel is held in high esteem and adorned with honor.
5.3	Culture, Archeological, and Historic Resources	Discuss the impact of the physical presence of the PINGP in the local landscape. Consider the perspective of nearby residents reflected in this observation, "From personal experience, I have had to wait for the sun to rise above the Nuclear Plant's generating towers before I could offer my morning prayer to Tunkasida."
5.5	Health & Safety	Radiation impacts on nearby residents.
5.5	Health & Safety	Describe plant security and ability of the plant and the

Chapter 1 -Comment Sheet		
Section Number	Category	Detail
		community to respond. Describe the NRC requirements for the plant and say if they are current.
5.5	Health & Safety	Discuss availability of monitoring data (air, water) relative to the radiation monitoring program.
5.5	Health & Safety	Reference program models for involvement of a spectrum of local residents in monitoring baseline and ongoing physical, mental and spiritual health. This includes, but is not limited to, capturing and analyzing data, and addressing any found shortcomings. Example: Have monitor subjects be actual local human beings including a Prairie Island Indian Community child with a baseline genetic marker, adult, and elder, and then monitor their health effects.
5.5	Health & Safety	Investigate ways that Xcel Energy can mitigate some of the mental, physical, emotional, and spiritual health concerns of the Prairie Island Indian Community through the use of mediation and healing initiatives. We believe this to be a positive opportunity for all parties. Mitigation strategies should include a conclusive study on disruption of the Prairie Island Indian Community's natural cyclical life cycle.
5.5	Health & Safety	Describe the impact of PINGP on neighbors living in a constant state of fear (i.e. radiation, nuclear incident, terroristic attack).
5.5	Health & Safety	Describe monitoring of plants, animals and other materials used in traditional medicines by Prairie Island Indian Community members that are not typically monitored by the State of Minnesota or Xcel.
5.6	Land Use Recreational Areas	Discuss the impact of the physical presence of the PINGP in the local landscape. Consider the perspective of recreational users, both residents and visitors, as reflected in this observation, "From personal experience, I have had to wait for the sun to rise above the Nuclear Plant's generating towers before I could offer my morning prayer to Tunkasida."
6.0	Summary of mitigating measures and unavoidable impacts	Summarize, and include by reference, current German studies on conclusive reports of higher incidents of childhood cancer within 3.2 mile radius of nuclear power plants.
6.0	Unavoidable impacts	Discuss unavoidable impacts that are in the future and include studies by whatever entity studies the impacts of radiation exposure to dry cask storage. How these future conclusive comprehensive studies will expose the harmful side effects of radiation exposure to human beings, especially those at a marginalized population i.e. Native Americans federally recognized by the United States government the Prairie Island Indian Community.
5.6 6.0 5.8	Displacement Unavoidable impacts Socioeconomics	Discuss potential impacts on the Prairie Island Indian Community which is located in close proximity of Northern States Power Company (Xcel Energy). Any unavoidable

Chapter 1 -Comment Sheet		
Section Number	Category	Detail
		nuclear accident could put the Prairie Island Indian Community into a dead zone. This could possibly shut down the Community's Treasure Island Casino and have vast socioeconomic factors: ruin to the tribe's financial stability.
5.3 5.8 5.2	Culture, Archeological, and Historic Resources Socioeconomic Biological Resources	Include all conclusive studies and guarantees related to safety for the Prairie Island Indian Community. Loss of time spent on focusing on how this 20 year license will affect our Prairie Island Indian Community's children. The Prairie Island Indian Community has a rare and rich culture to focus on and practice every day. The issue in dealing with Xcel's uprate interrupts the natural, cultural way of life. As this issue has of the Nuclear power plant has for the whole time it has its footprint next to the Prairie Island Indian Community. This burden of what are the current effects of the radiation exposure and the uncertainty of a major accident is constantly a great factor of stress and worry on every Prairie Island Indian Community member's mind. We, the people, understand that the Nuclear power plan is one major accident away from creating a dead zone for the community's livelihood, culture, and distinct identity.
5.5	Health & Safety	Include all baseline studies on psychological effects on the Prairie Island Indian Community and incorporate into mitigation plans.

office of energy security

ENVIRONMENTAL IMPACT STATEMENT SCOPING WORKSHEET

Chapter 2 -Comment Sheet		
Section Number	Category	Detail
2.0	Minnesota Regulatory Process & Permits & Approvals	The Advisory Task Force (ATF) requests an extension of the Scoping period. Combining the three (3) Xcel requests puts this Scoping and EIS process beyond the capability of ATF members to adequately address in the limited time allotted.
2.0	Regulatory Framework	Incorporate US Army Corps of Engineers perspective into EIS
2.0	Regulatory Framework	Expand discussion related to location in the floodplain (same as 1991). Discuss 0.2% annual chance (500-year) along with 1% annual chance (100-year) flood.
2.0	Regulatory Framework	Provide a rationale for the decision to not include transportation of spent fuels in the scope of the EIS despite impacts on the state and Prairie Island tribe and a precedent of the state legislature and Prairie Island tribe weighing in on issues related to the "temporary" storage of this waste within the state and Prairie Island community.
2.2	Minnesota Regulatory Process	Incorporate the 1991 Prairie Island Environmental Impact Statement (EIS) by reference.
3.0	Project Description	Describe cask types; maintenance/inspection requirements, life expectancy
3.2	Spent Fuel Inventory	Describe maintenance of casks
3.2	Spent Fuel Inventory	Describe cumulative impacts of current and proposed casks
3.2	Spent Fuel Inventory	Describe the cumulative effect of increasing the number of casks to 98 which is the full capacity of the ISFSI pad.
3.3	ISFSI	Describe the design standards for the anticipated lifetime of any storage container at the PINGP plant. Describe how they would need to be engineered and built for long term storage. What is the expected life span of the TN-40 casks used at PINGP?
3.4	Plant Closure & Final Decommissioning	Describe funds available for decommissioning and comment on their adequacy. Describe federal or other sources of funds available. Include the total cost for PINGP decommissioning with closure in 2034. Include fund balance in the existing local PINGP decommission fund.
3.4	Plant Closure & Final Decommissioning	Describe how 98 casks could be permanently stored at PINGP if the DOE Yucca Mountain project does not move forward as anticipated in 20-30 years.

Chapter 2 -Comment Sheet		
Section Number	Category	Detail
3.4	Plant Closure & Final Decommissioning	Describe the process of decommissioning with a total of 98 casks on site (i.e. 64 more than are there now).
4.0	Analysis of Proposed Project	Describe current and proposed security of the ISFSI
4.4	Traffic	Describe plans for handling traffic in the event that an incident closes roads.
4.8	Cumulative Impacts	Evaluate cumulative impacts of the total number of casks, not just the 35 additional casks. What will the impacts be for the 64 casks, 98 casks, decommission casks, and any future relicense casks. Permanent storage has a much different set of issues and impacts associated with it then does a 20-40 year storage term. Refer to the EIS for Prairie Island 4/12/91: 4.14 "Army Corps of Engineers predict a 500 year flood elevation of approx. 690 feet. The ISFSI is proposed to be built at am elevation of 693 feet or greater…". At a maximum flood scenario the lower half of the casks would be standing in water. 706.7 feet peak. See "Probable Maximum Flood Study, Mississippi River at Prairie Island Minnesota. Appendix F in Updated Safety Analyses Report December 1985. Every single year there is a 20% chance of a flood occurring based on historical data. Historical and current data needed regarding the flood probabilities for the PINGP ISFSI.
4.8	Cumulative Impacts	Describe future plans for plant renewal or expansion. Comment specifically on the possibility of future expansion past 2033-2034 and provide details of all possible impacts.
5.0	Radiation Environmental Impacts	Provide data and analysis related to background radiation and cumulative impacts.
5.0	Radiation Environmental Impacts	Describe impact on children and expectant mothers.
5.3	Analysis of Potential Impacts of ISFSI Incidents	Analyze related to all potential incidents. Include existing research by reference.
5.2	Expected Radiation from ISFSI	Provide data related to tritium levels and sources.
5.2	Expected Radiation from the ISFSI	Summarize, and include by reference, current data needed regarding all radiation monitoring both within and outside the ISFSI.
5.2	Expected Radiation from the ISFSI	Describe risks to children and expectant mothers.
5.3	Analysis of Potential Impacts of Storage	Describe the procedure for transfer of an assembly from pool to cask and transfer of cask to storage pad.

Chapter 2 -Comment Sheet		
Section Number	Category	Detail
	Installation Incidents	Describe the associated risks.
5.3	Analysis of Potential Impacts of ISFSI Incidents	Describe risks associated with crane incidents.
5.3	Analysis of Potential Impacts of ISFSI Incidents	Describe risks association with transportation to pad incidents.
5.3	Analysis of Potential Impacts of ISFSI Incidents	Analysis of potential impacts of storage installation incidents Recognition and evaluation of psychological stressors impacting immediate site residents (children, families, elderly).
5.4	Analysis of Potential Impacts of Incidents at the plant	Analysis of potential impacts, including behavioral health impacts, of incidents at the plant. Summarize, and include by reference, any existing plan to address psychological stressors on immediate site population related to any reported incidents.
5.4	Analysis of Potential Impacts of Incidents at the Plant	Describe and analyze potential failures including, but not limited to, failure during loading spent fuel into casks, failure when moving loaded cask out of fuel pool, failure when sealing, failure when moving loaded cask onto transportation system, failure when transporting loaded cask to dry cask storage facility, failure when lifting cask from transportation to storage location, seal failure, load drop, cask tip-over, fuel loading error, failure due to corrosion, mis-loading error, crane failure, failure of defective boom, cable, or sheaves, failure due to overloading, operator error, cask tip-over prior to sealing, cask failure due to load drop from maximum height, cask failure due to heat decay, o-ring failure, failure of monitoring system, failure of vacuum gauges, water trapped in internal cask components, cask not sealed properly, failure of cask integrity due to material degradation, long term internal corrosion of cask creates leak paths, erosion of the pad foundation or soil, explosions, flood water over vents. Describe the structural analysis of both the TN-40 and the TN-40HT. Confirm that this analysis includes an accident analysis. Provide information about the length of time between complete burial of a cask and cask seal failure (reportedly 60 hours). Describe what procedures are in place to address this possible scenario.
5.5	Existing Radiation & Radioactivity Monitoring near the Plant	Describe past and current internal and external monitoring. Provide data and information about standard methods being used and under what permit the monitoring is being done. Incorporate information, by

Chapter 2 -Comment Sheet		
Section Number	Category	Detail
		reference, about the best available technology for monitoring, both protocols and instrumentation. Provide a summary of the referenced information.
5.5	Existing radiation & Radioactivity Monitoring	Describe how independent monitoring is used at other plants.
5.6	Additional Monitoring Recommendations for Storage Installation	Summarize, and include by reference, test results for testing cask to failure, seal leaks, damaged casks, damaged assemblies, failure of monitoring systems, and all the scenarios mentioned in 5.4 above. Confirm the validity of the statement that there are no credible events that could result in the release of radioactivity from the TN-40 or TN-40HT cask cavity, nor in unacceptable increases in direct radiation due to loss of cask shielding. Describe what radiation & airborne radioactivity monitors are required at the ISFSI.
6.0	Analysis of ISFSI Alternatives	Describe and analyze alternatives for storage of spent fuel, both on and off-site. (ex: Skull Valley)
6.0	Analysis of ISFSI Alternatives	Address the issue of permanency of storage.
6.0	Analysis of ISFSI Alternatives	Describe alternatives to dry cask storage including, but not limited to, re-racking.
6.3	Private Fuel Storage Initiative	Describe any PFS locations being looked into at this time. Consideration: In September 2006 The Dept. of Interior disapproved the PFS Goshute project lease & the use of public lands for transport. Due to the uncertainty surrounding this project, PFS <u>is not</u> an alternative to additional spent fuel storage at PINGP.
6.4	Yucca Mountain	Include an analysis of the potential for the ISFSI facility to become a de facto permanent storage site. Despite over twenty (20) years of work on the Yucca Mountain project, uncertainty still plagues the science and engineering of the proposed project. The NRC has not done an EIS for <u>long-term</u> storage at the reactor site. The Yucca Mountain facility will be filled to capacity by 2040. The PINGP high-level nuclear waste will leave the state of Minnesota no earlier than 2041 at best. Acceptance of the PINGP waste to the Yucca Mountain facility maybe questionable. Are there any Xcel plans for long-term storage if the acceptance to Yucca Mountain is delayed indefinitely? If no plans are in place, this issue should be made mandatory. Yucca Mountain calculates in 10,000 to 100,000 years

Chapter 2 -Comment Sheet		
Section Number	Category	Detail
		spans…PINGP calculates in 50 to 100 year spans. It is unknown when, if ever, the DOE may remove PINGP's spent fuel. The method of dry cask storage has not been evaluated as a permanent method. Are there any figures of testing the dry casks to failure? Storage canisters and their performance over a long period of time are in question. What is the cask life-span versus duration of storage? It is so unlikely that the DOE will ever open the Yucca Mountain repository that the PINGP ISFSI may become a permanent facility. The PINGP ISFSI can be expanded incrementally as needed. The interim storage proposed at PINGP in reality will become permanent by default. In a worst case scenario, if there is a cask failure, what are the cask unload plans? Yucca Mountain cask acceptance is for the first 29 casks only. There are no plans for acceptance of any additional casks or spent fuel at the PINGP plant. What are PINGP's plans for long-term storage of <u>all</u> the casks over the original 29 casks? It is imperative for the EIS to address whether ISFSI design or operation is adequate for long term, permanent storage.
6.4.1	Yucca Mountain	Describe how siting considerations for temporary storage are different than siting considerations for a permanent facility. In1993, the Minnesota Court of Appeals re. dry cask storage on PINGP said.." …the proposed facility is probably classified as one in which waste is permanently stored…"
6.4.2	Yucca Mountain and Transportation	Discuss issues related to transportation of spent nuclear fuel from Minnesota to the Yucca Mountain Repository. A difficult, but real reality for nuclear generation is the lack of long-term, permanent storage for the radioactive waste. While this is in part a federal issue, the ATF finds impacts on the state and Prairie Island tribe and a precedent of the state legislature and Prairie Island Indian Community weighing in on issues related to the "temporary" storage of this waste within the state and Prairie Island Indian Community.
7.0	Analysis of Alternative to the PINGP	Consider renewable alternatives, such as wind, & biomass.