

Bill Storm, Project Manager
Minnesota Dept. of Commerce
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Via email.

August 21, 2009

Re: Public Comments on Final Environmental Impact Statement for Prairie Island Nuclear Generating Plant, Extended Power Uprate, PUC Docket Nos. E002/CN-08-509 and E002/GS-08-690; Request for Additional Dry Cask Storage, PUC Docket No. E002/CN-08-510.

Dear Mr. Storm,

The deficiencies that I have brought to you during previous meetings and letters seem to not be included in the above mentioned Final EIS. I believe by not addressing these issues concerning PINGP's in that you are not following the letter of the law for the State of Minnesota for the MPUC in which the Minnesota Dept. of Commerce's Office of Energy Security (OES) is charged to do during the EIS process, so I will remind you of this Statute.

2008 Minnesota Statute 216B.243 Subd. 3b (b) (Public Utilities -CERTIFICATE OF NEED FOR LARGE ENERGY FACILITY. - Nuclear power plant; new construction prohibited; relicensing.) states; "Any certificate of need for additional storage of spent nuclear fuel for a facility seeking a license extension shall address the impacts of continued operations over the period for which approval is sought."

Source: (www.revisor.leg.state.mn.us/statutes/)

By not addressing the issues in the Final EIS that I brought up in my ALJ hearing testimony, the compact disk and latter the email letter to the Hon. Richard C. Luis during the ALJ hearings you are not easily informing the MPUC as to impacts of continued operations of PINGP over the period of its license extension. The summary below as to the information omitted from the Final EIS is needed so that the MPUC can fulfill its duty under MN Statute 216B.243 Subd. 3b (b) as far as reliability and cost of electricity generated from PINGP over the extended license period.

- 1) Technological issues with RCPB still exist in the US and internationally along with the NRC regulatory problems addressed by the GAO, the request for the EPU is not only premature but not technically justifiable and therefore not responsible to do from a nuclear safety standpoint or from a cost of generation.

Reactor Coolant Pressure Boundary(RCPB) documents:

- NRC Bulletins: 2001-01, 2002-01, 2003-02, 2003-04, MRP-139
- NRC Reg. Guides: RG 01-193, RG 1.147, RG 1-45
- EPRI MRP-48

- ASME Section XI
 - ASTM STP 1170
 - IAEA: IAEA TSR-429, TECDOC-1435, Pub-1382 (NP-T-3.11)
 - GAO-06-1029 NRC oversight of nuclear power plant safety has improved but refinements are needed.
 - How could the EPU affect safety and reliability PINGP during the relicensing period and therefore the cost of the electricity generated by PINGP or its replacement power in the future.
 - How could the above issues affect PINGP according to: MN Statue 216.B244 “Nuclear Plant Capacity Requirements”
- 2) Increased generation of existing equipment that doesn't include EPU of the reactor. What is the expected contribution of each EPU modification separately so that each can be compared to the total 164 MW EPU total and what is the cost per MW of each modification. Why are these modifications not listed as alternative to the UPU?
- Existing LP turbine upgrade of 15 MW a unit.
 - High Pressure Turbines and Moisture Separator/Reheaters (MSR) of 54 MW and 57 MW respectively.
- 3) Social, cultural and economic factors affecting PIIC with continued operation of PINGP.
- Lack of trust issues of PIIC community members towards Xcel due to original siting of PINGP.
 - Lack of trust of PIIC members that Xcel will not protect archaeological and cultural artifacts due to past undisclosed remains and artifacts removal.
 - Lack of trust due to belated information of abnormal plant operations.
 - Prejudice and lack of sensitivity of Xcel employees towards PIIC community members.
 - State of Minnesota reluctance in allowing Indian Tribes to put land into trust even though Xcel and the PIIC have a agreement so that the PIIC gets money to purchase land away from PINGP for members who do not care to live by the plant.
 - Tabled and tabulated comparison of total monies received in the past and future from PINGP operations to government bodies such as; the State of MN, Goodhue County, City of Red Wing, ISD 256 and the PIIC.
- 4) Cost of upgrading PINGP electrical, instrument and control, and mechanical safety and support systems due to obsolescence and reliability issues which I estimate will cost hundreds of millions of dollars more.
- What are the projected costs associated with upgrading PINGP systems over the lifetime of plant extension?
 - Again how could the above issues affect PINGP according to: MN Statue 216.B244 “Nuclear Plant Capacity Requirements” if equipment is not upgraded?
- 5) What are the true costs of operating PINGP over the duration of the relicensing period?
- What are the projected costs associated with upgrading PINGP systems over the lifetime of plant extension?
 - Again how could the above issues affect PINGP according to: MN Statue 216.B244 “Nuclear Plant Capacity Requirements” if equipment is not upgraded?

- How could the EPU affect safety and reliability PINGP during the relicensing period and therefore the cost of the electricity generated by PINGP or its replacement power in the future.

Mr. Storm your inclusion and independent analysis of the previously and above discussed issues by me would be greatly appreciated. I believe it is the OES and MPUC's legal, moral and ethical job to do so.

Thank You,

Michael Childs Jr.