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October 7, 2008

–VIA E-MAIL & U.S. MAIL–

Mr. William Storm
Energy Facilities Permitting Division
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

RE: COMMENTS ON SCOPE OF ENVIRONMENTAL DOCUMENT FOR
PRAIRIE ISLAND NUCLEAR GENERATING PLANT

- EXTENDED POWER UPRATE - DOCKET NO. E002/CN-08-509
- ADDITIONAL DRY CASK STORAGE - DOCKET NO. E002/CN-08-510
- SITE PERMIT EXTENDED POWER UPRATE - DOCKET NO. E002/GS-08-690

Dear Mr. Storm

Northern States Power Company, a Minnesota corporation (“Xcel Energy” or the “Company”), offers the following Comments on the Draft Environmental Scoping Document for the above-referenced Prairie Island Nuclear Generating Plant projects. Our comments are organized into three categories: Section 1 contains general comments; Section 2 contains comments to the OES’s Chapter 1 Extended Power Uprate chapter; and Section 3 contains comments to the OES’s Chapter 2 Additional Dry Cask Storage.

Section 1: General Comments

As you know, Xcel Energy recently participated in very similar review processes for the Monticello Extended Power Uprate proceeding, which required the preparation of an Environmental Report (“ER”) for a Certificate of Need and Site Permit to implement a power uprate at our Monticello Nuclear Generating Plant (Docket Nos. E002/CN-08-185 and E002/GS-07-1567 respectively). Additionally, in 2006 we received Minnesota Public Utilities Commission approval to establish an Independent Spent Fuel Storage Installation (“ISFSI”) at Monticello (Docket E002/CN-05-123), which required the preparation of an Environmental Impact Statement (“EIS”). A review of the ER and the EIS for

those projects provides a good checklist for content issues to be included in this EIS.

We understand that there may be multiple subsections and discussions under each section of the August 25, 2008 draft outline of the EIS scope prepared by the OES. Therefore, a number of our comments may be items the OES intends to include in those subsections or discussions.

We agree with the OES that the items listed in the “Matters Not Within the Scope of the EIS” section are not applicable to the issues that should be addressed in this Environmental Impact Statement, and support their exclusion. Many of these items fall under the jurisdiction of the Nuclear Regulatory Commission and will be addressed by that agency during its review and approval of the Extended Power Uprate and Operating License Extensions.

Section 2: Extended Power Uprate

A. Air Quality Impacts

Pursuant to Minn. R. 7849.7060, subp. 2(A) – (D), the final report should contain a detailed analysis related to the impacts associated with air quality.

B. Fuel Transportation

Pursuant to Minn. R. 7849.7060, subp. 2(E), the final report should fully discuss the potential impacts associated with the availability of the source of fuel and the method of its transportation. (Section 5.9 of the OES’s outline is labeled Transportation, but it is unclear if this section includes a discussion or sub-category on fuel transportation as required by Subp. 2(E).)

C. Water Resources

The Draft Scoping Document addresses Surface Water, Groundwater, and Wetlands in the Water Resources section (Section 5.11), and Wastewater in Section 5.12. We recommend the water resources section also include a discussion on water appropriation, water quality, groundwater protection and water discharge, either within the existing outline categories or explicitly.

Section 3: Additional Dry Cask Storage

D. Water Resources

Minn. Stat. § 116C.83 sets forth specific issues that must be addressed in the EIS with respect to groundwater impacts associated with the proposed additional dry cask storage. We recommend reviewing the statutes to make sure all areas are covered.

E. Plant Closure and Decommissioning

The pending petition for additional dry cask storage relates only to casks necessary to support an additional 20 years of operation via extension of the operating permits. The additional casks necessary for decommissioning will be the subject of a new CON filing at a later time. Thus, the only potential relevance of a discussion of plant closure and decommissioning in this EIS is for purposes of the project description and this EIS should not contain any analysis of the environmental impacts associated with plant closure and decommissioning.

F. Radiation Environmental Impacts

Sections 5.4 and 5.5 of Chapter 2 reference “the Plant” (Section 5.4 “...at the Plant” and Section 5.5 “...near the Plant.”) These references to the Plant should be changed to “the ISFSI.” Incidents and radioactivity at the Plant are independent of those at the ISFSI. Issues involving incremental incidents and radioactivity at the Plant should be addressed in the Extended Power Uprate portion of the EIS and the Additional Dry Cask Storage EIS Chapter should only address incidents and radioactivity at the ISFSI.

G. Mitigation Measures (Minn. R. 4410.2300(I))

A discussion of mitigation measures to minimize any adverse impacts may be beneficial in Sections 4 or 5.

H. Term of Storage

Although it is not required by statute or rule, we believe a discussion concerning impacts associated with long-term storage should be

addressed in the EIS, as was done in the EIS for the Monticello ISFSI.

The Department of Energy (“DOE”) continues to make progress on the development of Yucca Mountain, although more slowly than we would like. In June 2008, the DOE filed a license application for Yucca Mountain with the Nuclear Regulatory Commission, and in September 2008 the Nuclear Regulatory Commission docketed the application for review. The Yucca Mountain Environmental Impact Statement estimates the physical capacity of the site is significantly higher than 77,000 tons and thus it is possible Yucca Mountain could accept additional waste from the continued operation of Prairie Island. However, opposition to the Yucca Mountain project remains. Under the circumstances, we believe it is reasonable to address the potential long-term storage of radioactive waste at Prairie Island. An analysis, consistent with the Monticello ISFSI EIS, which assessed the potential impacts of on-site storage at the plant for 30 years beyond the licensed life of operation and up to 200 years, in 50-year increments, would be appropriate in this case.

Thank you for this opportunity to comment on the Draft Scoping Document. Please call me at (612) 330-5641 with any questions regarding any of the above-noted matters. We look forward to working with you throughout the Site Permit and Certificates of Need approval processes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian R. Zelelak". The signature is fluid and cursive, written in a professional style.

BRIAN R. ZELENAK
MANAGER, REGULATORY ADMINISTRATION